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By email: noise.paper@airports.gsi.gov.uk

Dear Howard Davies,

Aviation Noise discussion paper

After hearing with great interest your comments to the London Assembly Transport Committee, and following the publication of your recent *Discussion Paper 05: Aviation Noise*, I thought it appropriate to write to you on behalf of the London Assembly Environment Committee with a response to the noise paper and some other contributions to your Commission's deliberations, based on the years of work that the Environment Committee has conducted on the noise and other environmental impacts of airports around London.

The committee welcomes your attention to the issue of aircraft noise. Noise from Heathrow and London City airports affects hundreds of thousands of people across wide areas of London, and most severely those close to the airports and flight paths where there are frequent low-level overflights. The committee has taken evidence many times over the years about these effects, and has heard that the greatest impacts are from sleep disturbance from flights at night or early in the morning, and from noise over schools, where learning can be severely disrupted.

The committee's most relevant recent publications include *Flights of Fancy: Can an expanded Heathrow meet its environmental targets?* (2010)¹, *Plane Speaking: air and noise pollution around a growing Heathrow Airport* (2012)², *The London Assembly's consultation response to the Government's draft aviation policy framework* (2012)³ and *London Assembly night flights consultation response* (2013)⁴.

Overleaf are some more detailed points, initially structured around the chapter headings in your paper and responding to the questions at the end of each chapter.

¹ <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/flights-of-fancy-can-an-expanded-heathrow-meet-its-environmental> Hereafter referred to as *Flights of Fancy*

² <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/tackling-air-and-noise-pollution-around-heathrow> Hereafter referred to as *Plane Speaking*

³ <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/aviation-policy-framework-consultation-response> Hereafter referred to as APF response

⁴ <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/response-to-the-government-s-consultation-on-night-flights-at> Hereafter referred to as Night Noise response

Chapter 3: Measuring aviation noise

The committee has previously recommended⁵ the adoption of an Lden measure and the use of lower thresholds for identifying the areas most affected by aircraft noise. This was driven by the greater effects of noise on people in the evening, night and early morning, when there is less other noise and people are trying to sleep. It was also informed by the Lden threshold used by the EU, and recent evidence on the levels of noise causing serious and moderate annoyance. The committee has not taken evidence on metrics such as the number of noise events above a threshold, but would generally support metrics and thresholds that effectively reflect the human impact of aircraft noise and that work with other relevant regulatory frameworks to minimise noise disturbance for Londoners.

The committee would welcome the Airport Commission making a contribution to the debate over noise metrics, informed by current research and the views of those affected by noise. The Committee did not feel that the government's response to the recent consultation on the aviation policy framework adequately reflected the submissions it had received, and wrote to the Department for Transport on the issue.⁶

A further point that the committee has made on noise metrics is that airports should not be considered in isolation. There are parts of London which experience sub-threshold noise from more than one airport (especially noise from Heathrow and City in south-east London) which combines to create greater noise impact that would be expected from either alone. The committee has recommended that Heathrow and City work together to manage their joint noise impacts and that a combined noise map for the two airports be constructed and used to regulate noise from both.⁷

This and the next chapter of the issues paper raise related questions about whether noise metrics should consider absolute noise levels or the change to existing noise levels, and whether there is a difference between affecting a new area with noise versus increasing noise in an already-affected area.

The Committee recommends that the human effects of noise are considered – both the number of people affected and the severity of the effect on those people. London's experience with increasing aircraft numbers and changing flight paths and hours of operation is that the negative impacts of increased noise can be considerable even in an area already experiencing a lesser level of noise from aviation or other sources. The paper shows that noise from Heathrow affects by far the most people of any airport in the UK or Europe, and by far the most people per aircraft and per passenger of any airport in the UK. If more passengers are to fly to and from airports in the south-east it should be at airports with the lowest impacts per extra passenger.

Chapter 4: Quantifying noise effects

In responding to the recent night noise consultation, this committee found that the Civil Aviation Authority's current approach only partly reflected the available evidence on the cost of sleep disturbance from aircraft noise. Responding within the terms of the consultation, the committee did not consider whether monetisation was the right way to quantify the effects of noise, but did

⁵ *Flights of Fancy* pages 16-21, *Plane Speaking* pages 32-34, APF response pages 9-10

⁶ <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/letter-to-transport-secretary-on-the-aviation-policy-framework>

⁷ *Plane Speaking* pages 34 and 36-37, APF response page 10

conclude that if monetisation was used then it should reflect best available estimates of all costs, rather than treating costs of uncertain magnitude as zero. The committee also recommended that further research be undertaken to arrive at better estimates of costs, where current evidence was that there were potentially significant effects.⁸ The committee previously recommended that there should be a full and independent health impact assessment around aviation noise and air pollution, particularly for London.⁹

Chapter 5: Mitigation

As a triggering threshold for its compensation scheme, the committee recommended that Heathrow adopt the 59dB Lden contour, in line with London City airport's 57dB LAeq threshold and with the committee's recommendation for a switch from LAeq to Lden. The committee also looked forward to Heathrow and City both developing tighter thresholds in line with EU Noise Directive requirements and recent research for the UK government and the World Health Organisation.¹⁰

This chapter also seeks views on an independent noise regulator. This committee has drawn attention to the range of models for independent regulation of aviation and its impacts, either proposed within the UK or in practice overseas. The committee has not recommended a specific model but has drawn attention to the need for single point of reference to simplify the regulatory environment and for a trusted third party to reduce antagonism in the relationship between communities and airports.¹¹

Other aviation issues

As this committee has not previously given evidence to the Airports Commission, there are some other points arising from our work that you may be able to consider.

Carbon emissions

This committee has heard from the Committee on Climate Change that accommodating a 'business as usual' projected growth in passenger numbers (200 per cent) would not be consistent with reducing UK carbon emissions by 80 per cent by 2050, as required by the Climate Change Act 2008. Even to accommodate a more restricted (60 per cent) growth in passenger numbers would mean that, despite more efficient aircraft, aviation CO₂ emissions would not decrease and would therefore require greater decarbonisation in other areas of the economy than is indicated by current progress.

Airport strategy should be based around an overall UK quantum of aviation consistent with the 80 per cent reduction and with realistic expectations of decarbonisation in other sectors. Decisions can then be made about where to locate that capacity, in the light of local considerations including noise as discussed above, and air pollution below.¹²

Air pollution

Air pollution is a major public health issue, with 29,000 excess deaths each year estimated to be attributable to particulates exposure nationwide. There are persistent breaches of EU and national NO₂ limit values around Heathrow and its approach roads, far more so than in other areas of outer

⁸ Night Noise response section 9

⁹ *Flights of Fancy* pages 26-28, *Plane Speaking* pages 36-37

¹⁰ *Plane Speaking* pages 34-37, APF response pages 10-11, Night Noise response section 8

¹¹ *Flights of Fancy* page 35, APF response pages 12-13

¹² *Flights of Fancy* pages 29-34 especially page 30, APF response pages 5-7

London. National, London and local government face a great challenge in bringing these levels down even at current Heathrow passenger numbers so any expansion would be a significant negative factor. As a major driver of breaches in the areas around Heathrow is surface access, passenger numbers and modes of surface travel are critical factors, as much as the number and type of aircraft using the airport.¹³

High Speed Two

The committee's response to High Speed Two Ltd's consultation on its draft Environmental Statement¹⁴ noted that decisions on the HS2 scheme are expected to be taken before the Airports Commission is due to make its final report. It could be unfortunate, either if the HS2 route was influenced by false expectations about the future expansion of Heathrow, or if the planned HS2 route contributed to a decision to expand Heathrow in the face of all the negative impacts that would bring. If the Commission is not minded to recommend the expansion of Heathrow, an early indication of this would be helpful to inform other strategic infrastructure decisions.

Conclusion

Noise as well as other environmental factors clearly swing the debate about airport capacity against any expansion of Heathrow. The London Assembly unanimously opposes Heathrow expansion in terms of either runway capacity or passenger numbers, and has called for the final report from the Airports Commission before the next general election.¹⁵

Thank you very much for your consideration of these issues. If you would like to talk through the points in this response I would be very pleased to meet with you.

Yours sincerely



Murad Qureshi AM

Chair of the Environment Committee

¹³ *Flights of Fancy* pages 22-28, *Plane Speaking* pages 17-30

¹⁴ <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/high-speed-2-response-to-draft-environment-statement> - see section 6, especially paragraphs 6.8 – 6.10

¹⁵ <http://www.london.gov.uk/media/assembly-press-releases/2012/07/assembly-says-no-to-revival-of-third-runway-at-heathrow> ;
<http://www.london.gov.uk/media/assembly-press-releases/2012/10/bring-forward-publication-of-airport-capacity-report-assembly> ;
<http://www.london.gov.uk/mayor-assembly/london-assembly/publications/airport-capacity-in-london> ;
<http://www.london.gov.uk/media/assembly-press-releases/2013/05/london-assembly-restates-opposition-to-extra-runways-at-heathrow>