

Matt Gorman  
Sustainability Director  
Heathrow Airport Limited

Aircraft Noise 3 Villages

Lightwater  
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Sent via email

18 July 2016

Dear Matt

Firstly, thank you for including our concerns regarding current noise levels at the last HCNF as requested. It required considerable insistence but finally, HAL stated that in relation to the issue of the increase in noise which is of major concern to the majority of community groups (i.e. increase in numbers of aircraft, concentration of paths and lowering of altitudes), nothing can or will be done by the aviation industry to address the current situation.

Our understanding from the responses provided by HAL is that in terms of altitudes and concentration the industry is simply following Department for Transport guidelines and in terms of numbers – these are capped. That the industry as a whole cites guidelines as justification for the recent and unacceptable increase in noise is a situation we find wholly unacceptable.

At a recent HCNF meeting, I specifically asked the question of what community groups could expect in terms of outcomes given the considerable amount of work being undertaken by many individuals. Whilst I had to yet again press the point, I was assured at that time that industry bodies would act on information. It now transpires this is not the case.

HAL and its aviation partners are effectively asking communities to accept current noise levels and move forward. However, the situation is one of moving goal posts. Our own area is seeing continued changes in aircraft patterns and as you are aware, Rob Beere has recently brought to your attention the issue of Westerly arrivals now being a feature of this area.

Communities have been more than patient to date given that not a single concession to reduce noise has been either made or even proposed. Instead we have been subjected to months of being told nothing had changed. Data analysis contradicted that assertion but even this is insufficient for the industry to now act.

We are now being told the things that had not changed cannot be changed back. Hardly a coherent argument!

There are many actions the industry could take to ameliorate noise issues but it elects instead to use guidelines as justification for inaction. It is time for the aviation industry to reconsider this intransigent position and give serious consideration to where it goes from here in terms of making changes to address current noise levels if it wishes the continued engagement of communities.

We seek tangible evidence that the process will result in change, and more importantly, deliver benefits for communities. If not, this leads us then to ask a fundamental question. Exactly what is the value to community representatives and the many thousands of people each represents in attending the HCNF if not to address current noise?

Given that DfT guidelines are so crucial to the way in which you operate as you state, AN3V considers the level of DfT representation at the HCNF to be inadequate. If the current representative is simply reporting events at the HCNF, this has not resulted in any action being taken to date. HAL might therefore consider a request to the DfT for it to field a higher-ranking representative with direct decision making responsibilities.

The HCNF has continued to operate largely due to the goodwill of community representatives prepared to invest time and money to attend. HAL may find this goodwill evaporates if benefits are only ever in the industry's favour. Indeed, the DfT Aviation Policy Framework (APF) states :

*Collaboration: By working together with industry, regulators, experts, local communities and others at all levels, we believe we will be better able to identify workable solutions to the challenges and **share the benefits of aviation in a fairer way than in the past.***

On Noise and other local environmental impacts, the same document continues to refer to sharing benefits:

*We want to strike a **fair balance** between the negative impacts of noise (on health, amenity (quality of life) and productivity) and the positive economic impacts of flights. As a general principle, the Government therefore expects that future growth in aviation should ensure that **benefits are shared between the aviation industry and local communities.** This means that the industry must continue to reduce and mitigate noise as airport capacity grows. **As noise levels fall with technology improvements the aviation industry should be expected to share the benefits from these improvements.***

AN3V sees no evidence of sharing of benefits to date, despite the fact that at the Bagshot meeting, you advised residents that trials were part of a noise sharing initiative.

We previously mentioned actions the industry could take but elects not to. The APF talks about the ICAO Assembly 'balanced approach' principle to aircraft noise management which consists of identifying the noise problem at an airport and then assessing the cost-effectiveness of the various measures available to reduce noise through the exploration of four principal elements, which are: reduction at source (quieter aircraft); land-use planning and management; noise abatement operational procedures (optimising how aircraft are flown and the routes they follow to limit the noise impacts); operating restrictions (preventing certain (noisier) types of aircraft from flying either at all or at certain times).

The issues of the increase in concentration, lowering altitude and late night/early morning aircraft are well documented and evidenced by independent data. The DfT's document correctly states that the routes used by aircraft and the height at which they fly are two significant factors that affect the noise experienced by people on the ground. This is an area which the industry could address immediately.

**Night flights** : It is not acceptable that commercial interests trump the rights of individuals. For example, sounding a car horn after 11.30 is illegal but the aviation industry can fly a 747 over residential areas as low as 4,200ft at 1am without consequence. Whilst some late departures may be unavoidable due to extreme weather conditions, most are not. HAL could refuse departure of late running flights and instead opt to protect the well-being of thousands of people whose sleep is disturbed, in favour of the relatively small number of travellers inconvenienced. HAL opts for the economic argument.

**Dispersion** : Flight paths could be dispersed as they were in pre-trial days – coincidentally when very few people complained about noise. HAL/NATS opts for the economic argument.

**NPRs** - Flights now depart the NPR often within a few feet of what is legally permissible and in turn this means very large aircraft are now overflying areas at much lower heights. When challenged about early departures from NPRs, HAL advised we must take account of AMSL which allowed a further 83ft – so in fact the height at which a flight can depart is actually 3,917ft. Lightwater, for example, is 200ft above AMSL (source [www.metoffice.gov.uk](http://www.metoffice.gov.uk)) - when is that taken in account?

**Higher altitudes** : Surely the question for the industry, if it is indeed following DfT guidelines, should be what is an acceptable height for large bodied aircraft, particularly late at night, over residential areas?

Once again, the industry appears to be working on the margins of what is permissible without due regard to the noise impact. You stated at the HCNF meeting that heights were governed by the DfT. However, Section 3.26 of the DfT APF states:

*The Government wishes airports to consider using the **powers available to them** to set suitable noise controls such as departure noise limits, **minimum height requirements, noise-preferential routes** and adherence to continuous descent approach, and where appropriate to enforce these with **dissuasive and proportionate penalties**.*

The aviation industry cannot simply cherry pick elements of guidelines and Government policy which best suit its economic objectives.

The HCNF must have more substance than simply a forum to impart information to communities or an engagement tick box exercise for HAL. The Heathrow Noise Forum (HNF) may be making 'strategic' decisions but as you are well aware, AN3V remains unconvinced of the need for two separate bodies dealing with the same issue. This point is also raised in 4.5 of the APF where it states.....

*Airports, in partnership with local communities, should: take the opportunity to review the membership and terms of reference of their committees to ensure that local interests are fully represented and that **there is no duplication of activity of committees**.*

As we have always stated, there is undoubtedly some potential value to the HCNF in terms of determining *future* operations. However, a sustainable Heathrow (and other airports for that matter as this is a nationwide issue), is dependent on establishing a meaningful and effective process of engagement with communities to address current issues and it therefore needs to present a coherent, credible plan to outline which of the benefits currently enjoyed by the aviation industry will be shared with communities newly blighted by its operation.

Unless and until that plan is made clear, HAL will need to provide compelling evidence as to why AN3Vs continued attendance at the HCNF is of benefit to the community members it represents who demand current noise issues be addressed.

I look forward to hearing from you.

Yours sincerely



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cc:

Rt Hon Chris Grayling MP  
Rt Hon Michael Gove, MP  
Martin Rolfe, CEO NATS  
John Holland-Kaye, CEO HAL