

Summary

- Up to **2.2. million people** would suffer from an increase in noise pollution by 2050.¹
- **653,900 people** will fall within the DfT's 'significantly affected' 54 decibel noise contour.
- About half of these, **323,684 people** will fall into this category for the first time (although will not know it yet).
- A further **419,803 people** already significantly affected by noise will receive a doubling of flights overhead (they also won't know this).
- Successive Governments have not set or defined an acceptable level of noise pollution – ignoring a request by the Transport Select Committee in 2018.
- Hundreds of thousands of school children across London and the South East are already exposed to aircraft noise above 54 decibels, the sound level threshold that has a negative effect on their behaviour, memory and cognitive development. Any expansion will only increase the harm caused by aircraft noise pollution.
- The very real negative costs of Heathrow expansion will fall on individuals as well as society as a whole. The physical and mental health of well over a million people is at risk, and this will have major implications for the NHS and social services.

UK noise policy (SoNA) and WHO recommendations

- The guidance in the Survey of Noise Attitudes (2014) showed that community sensitivity to noise has increased. More and more studies over the past decade have demonstrated that noise has negative health impacts at lower levels than previously understood.
- There are significant differences between **WHO** (World Health Organisation) 2018 guidance and the CAA's 2017 **SoNA** (Survey of Noise Attitudes), on which UK noise policy is based.
- WHO strongly recommends noise levels should not exceed 45dB LDEN (equivalent to 43dB LAeq) in the day.
- Current UK policy, which is based on SoNA, recognises 54dB LAeq as the day threshold for 'significance annoyance' and 51dB LAeq for LOAEL ('lowest observable adverse effect level').

¹ This figure was unearthed following an FOI by campaigners in February 2018. See https://www.whatdotheyknow.com/request/aviation_policy_framework_metric_2#incoming-1104762 (Attachment 5)

- The difference between UK SoNA and WHO is equivalent to a **500%** increase in flight numbers (as each 3dB increase is equivalent to a doubling of flights).
- The use of a 'low/no change' UK SoNA position in 2014 is likely to massively underestimate the impact of a new runway at Heathrow by anywhere between 3-6dB LAeq.
- SoNA was produced on the basis of static assumptions. It did not address the impact of high rates of change to the noise environment - the very thing it needed to assess.

Airports National Policy Statement (ANPS)

- The ANPS relied on highly optimistic assumptions concerning the transition to quieter (less noisy) and less polluting aircraft.
- The ANPS assumed a single 'minimise total' flight path scenario, which in fact is not compatible with the DfT's own key environmental policy – to reduce, minimise and mitigate significant adverse health and wellbeing impacts of aviation noise.
- Crucially the ANPS failed to include a robust financial sensitivity analysis relating to noise issues, despite being required to do so by the Treasury 'Green Book'. Thus, MPs were not fully aware of the negative impacts of the proposal ahead of the Parliamentary vote.
- It is vital that the Government set out what constitutes significant adverse impacts of noise, to define an acceptable noise limit and to set out plans for the regulation of any noise envelope including recourse for breaches.
- As part of the review of the ANPS, the Government should undertake an assessment of the impact of noise by modelling the multiple flight paths associated with a third runway at Heathrow to ensure the potential noise and air pollution impacts on local communities are properly understood.

Health impacts in the ANPS

- The Health Impact Analysis accompanying the Airports National Policy Statement (ANPS) demonstrates that there will also be major adverse effects for people living in areas with poor health status, children and young people.

- The analysis also identifies a number of serious adverse impacts of a third runway in relation to reduced life expectancy, the numbers of people exposed to increased nitrogen dioxide concentrations and increased annoyance due to aircraft noise. However, these impacts have not been included in the ANPS document, which is a major omission.
- The ANPS has failed to give sufficient weight to the very serious noise impacts on mental health, particularly children's cognitive development.
- It is estimated that the ANPS under-accounted for the health impacts of expansion in the, potentially amounting to around £10 billion in missed health costs.
- The effect of concentrating flights over nationally and regionally important open spaces, such as Kew Gardens, Richmond and Windsor Great Parks, was not even factored into the health analysis.

Amending the ANPS

- The Transport Select Committee in its inquiry into the ANPS in 2017/18 produced a number of recommendations regarding the impact of the proposed expansion, the majority of which were ignored by the Government at the time.
- We support recommendations in paragraphs 69, 70 and 71 calling on the Government to:
 - set out what constitutes significant adverse impacts of noise,
 - define an acceptable noise limit,
 - set out plans for the regulation of any noise envelope including recourse for breaches and
 - define a minimum level of acceptable noise respite .²
- We would also welcome updated noise modelling to be undertaken to reflect a range of possible flight paths and include the assumptions about the future fleet mix.³
- We believe that a condition should be included in the ANPS ensure noise impacts are measured, during the DCO process, against an updated baseline that incorporates the Government's latest guidance and assumptions. This should include the specific metrics and thresholds against which the noise impacts of any proposal are assessed.⁴

² [6] Ibid, p.34

³ [3] Ibid, para 66, p.32

⁴ [4] Ibid, para 67, p.33-34

Independent Noise Body

- The Airports Commission recommended that an independent noise authority should be operational and making a judgement about expansion proposals.
- Supporting expansion at Heathrow without a robust and comprehensive assessment of the noise impacts risks exposing millions of people to noise pollution that damages their physical and mental health.
- The Independent Commission on Civil Aviation Noise was disbanded by the previous Government in 2022, just two years after it was established. We would welcome the re-establishment of an independent noise advisory body as soon as possible.
- We remain concerned that support for expansion at Heathrow has emerged without knowing who will be impacted, for how long and what level of noise they will be exposed to.