

MAYOR OF LONDON

Lord Ahmad of Wimbledon

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Aza Tariq.

I agree with you that aviation plays an important role in supporting London's status as a global city. However, I have grave concerns about the existing environmental impacts of Heathrow, which look set to worsen if a third runway is built. Night flights and their associated noise are of fundamental concern to Londoners, and I therefore welcome the opportunity to respond to the consultation.

Noise and air pollution affect the health and well-being of hundreds of thousands of Londoners, and pose serious risks which cannot be ignored. There is strong evidence to support the link between long-term noise exposure and serious impacts on public health, including increased risk of high blood pressure, heart attack, stroke and dementia. Studies have also linked aircraft noise to significantly reduced reading comprehension and memory recall in school children. That is why it is a priority for me that steps are undertaken to reduce these impacts in advance of any expansion at Heathrow.

The consultation highlights Heathrow's reduction in noise during the night quota period, and this is welcome. However, to put this into context, 13 times the number of people are exposed to noise during the night from Heathrow as compared to, Gatwick and Stansted combined. All efforts must be made to reduce the unacceptable levels of noise affecting Londoners every night.

The consultation proposes no worsening of noise under the new night noise regime, but it seeks no improvement either and I am deeply disappointed by this approach. The Government needs to be far more ambitious: the impact of night flights on hundreds of thousands of Londoners should not be underestimated. The resultant annoyance and sleep disturbance is directly detrimental to people's health and quality of life, as well as their economic productivity. I strongly urge you to revisit this approach if the night flight regime is to have credibility.

The economic value of night flights is cited as the reason for effectively maintaining the status quo. However, no evidence is offered to support this assertion, or indeed whether some of these flights can be operated at other times of the day. It is also unhelpful that there has been no attempt to incorporate the findings of the 2014 Survey of Noise Attitudes (SoNA), which contains night noise data and would have provided a more up-to-date basis for a night flights policy.

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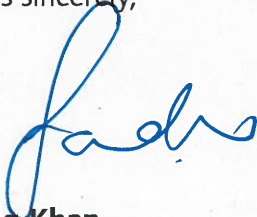
The consultation recognises that the night period lasts from 11pm to 7am - and this in line with World Health Organisation and EU guidance. Studies have found that aircraft noise can increase the time taken to fall asleep and that between 4am and 7am, sleepers keeping conventional hours are both more easily awakened by ambient noise and have more difficulty going back to sleep. In this context, the focus of the regime on the night quota period, 11.30pm-6am, is wholly inadequate. Indeed, the only restrictions that apply to whole night period are for aircraft rated QC/4, QC/8 and QC/16, older aircraft which have largely stopped serving Heathrow. The introduction of the new, lower QC/0.125 category is welcome, as is the inclusion of quieter aircraft in the total movement limit. This is a sensible recognition that new engine technologies are delivering incremental noise improvements which render existing thresholds outdated.

However, the overall approach to the noise quota and movement limits is regrettable. The changes proposed are designed to take account of past incremental noise reductions and rebase the limits down to observed 2015/16 levels. While this prevents any net worsening, it also offers absolutely no incentive for improvement.

Such an approach does nothing to encourage airlines to switch to using quieter aircraft in the night period or seek to take advantage of new engine technologies. This is exacerbated by the five-year duration of the regime, without any intermediate review points; a night noise regime that is unchallenging to comply with in 2017 is likely to be even less challenging in 2022. If the Government policy is to limit and, where possible, reduce the numbers exposed to significant aircraft noise, then this clearly falls short.

I also want to highlight a particular concern at Appendix D of the consultation. It appears that the Rolls Royce-powered Airbus A380 has been classified incorrectly for landings, at a level which understates its actual noise profile. Given that the manufacturer has indicated that this cannot easily be rectified - and that these landings constitute a significant proportion of Heathrow's night movements - this aircraft should be reclassified without delay.

Yours sincerely,



Sadiq Khan
Mayor of London