

AIRPORTS COMMISSION ‘Discussion Paper 05: Aviation Noise’

Paragraph Reference	Statement / Question requiring a response	Suggested RBWM Response
General	Overall approach and Aviation Policy Framework	<p>The Borough would like to express its appreciation for being given the opportunity to respond to the <i>Airports Commission Discussion Paper 05 ‘Aviation Noise’</i>. Generally it is a well presented, comprehensive and fair treatise of the key issues relating to aviation noise. The Borough also welcomes the approach the document takes and the fresh approach adopted re noise metrics to try and seek solutions to a difficult issue.</p> <p>However, the Borough does feel compelled to record its disappointment on a number of general issues that are not only fundamental to building a sound foundation for any future aviation noise strategy but are also of such absolutely significant importance to local communities. The Airports Commission are urged to give careful consideration to the points raised below notwithstanding the government’s APF statements in guiding the framework within which the AC is being requested to formulate its recommendations to government in the final decision making processes.</p> <p>The Borough’s disappointment stems from the belief that some statements contained within the final APF continue to represent a significant distortion and inconsistency with a number of existing and emerging government policies. These relate to:</p> <ul style="list-style-type: none"> - Sustainability / Climate change obligations and agendas. - Noise policy, particularly in relation to references and definitions such as: <i>‘Bearing down on noise’</i>; <i>‘Excessive noise’</i> and <i>‘Striking a balance’</i>. - Seemingly, a complete disregard of the comprehensive body of research, information and evidence presented to the T5 Inquiry and the conditional basis upon which the T5 permission was granted, ignoring the very intention of the conditions attached to that permission together with the statements and ‘promises’ about the future development of Heathrow Airport. That Inquiry, together with other government sponsored agencies conducted exhaustive comparative research into the environmental impacts of a significant number of airports e.g. RUCATSE; the various Runway Enhancement and optimisation of capacity studies et al have all previously drawn a number of conclusions e.g. against any further development at

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		<p>Heathrow; favouring 2 runways at Gatwick post the legal agreements in 2019; further development of London's Third Airport (Stansted). Yet, in 2013/14 the UK continues to review the same information; arguing the same points because the aviation industry does not like the answers the research has revealed and is intent on eroding away previous decisions at every opportunity, lobbying successive governments on the same issues. This in turn has stifled the development of government policy and research, delayed key strategic infrastructure decisions and eroded the communities' trust due to a series of <i>'broken promises'</i>.</p> <ul style="list-style-type: none"> - The on-going and some what bizarre circumstances that led to the dismissal of the ANASE study and the resulting absence, to this day, of a credible, calibrated methodology for assessing community annoyance in the UK. - Avoidance of an unequivocal statement committing the UK to working towards, achieving and complying with a number of EC Directives and Guidelines (e.g. WHO Community Noise) for assessing adverse health and noise –related impacts for a range of situations. - An emerging, perceived industry bias towards further airport development at Heathrow and furtherance of a policy of proliferation and concentration in the South East. <p>The key areas of greatest concern to the Borough relative to this response on aviation noise are:</p> <ul style="list-style-type: none"> - The absence of credible and agreed criteria for assessing aviation noise impacts. - Failure of successive governments to strike an equitable balance between the conflicting interests of the aviation industry's quest to expand and the quality of life, local environment and an already overstressed infrastructure particularly with regard to housing, road and other transport systems within congested built up areas. - Continued and further night flight restrictions at Heathrow; - An early abolition of the Cranford Agreement coupled with the introduction of Easterly Alternation to afford local residents periods of respite (see attached Appendix 1: RBWM's response to LB Hillingdon); - The inadequacy of noise mitigation regimes and schemes that lean more towards favouring passenger convenience and aviation industry interests rather than long suffering local residents. - The ineffectiveness of existing collaborative and consultation arrangements;

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		<ul style="list-style-type: none"> - Constant pressure for never ending developments at Heathrow airport in the wake of a record of <i>'broken promises'</i> by government; the aviation industry and airlines (note previous statements about not wishing to build a 3rd Runway; Glidewell Inquiry, (T4 will be the last); and T5 Inquiry statements); - Uncertainty over future development proposals, which in particular blight the housing market, such as additional runways and the collateral damage upon the local social and economic environment that such overdevelopment proposals inflict, whether or not adopted. <p>In response to these concerns, the Borough's strategy hitherto has been to:</p> <ul style="list-style-type: none"> - Provide strong community leadership and seeking to mitigate adverse impacts upon local communities. - Responding to various Government consultations; - Seek the active engagement with and involvement of local MPs and Peers; and liaising with government agencies in seeking to redress the definition of <i>'equitable balance'</i>; - Establishing a local stakeholder Aviation Forum for local residents to communicate and express their views and knowledge on aviation-related matters; public meetings, press briefings and by raising awareness over key issues; - Empowering local communities and residents to voice their opinions on aviation issues through various channels, including more recently the Borough's recently launched <i>WideNoise</i> initiative (see attached Appendix 2); - Working in partnership and maintaining effective dialogue with other local authorities and community interest groups on areas of mutual interest. <p>A significant amount of funding has been spent on such matters over many years, with little improvement secured.</p> <p>A number of matters now being brought forward reflect upon those very same issues that the local authorities around Heathrow Airport sought to address through successive Night Flight Judicial Reviews, the T5 Inquiry and previous responses by this Council (and others) over a considerable number of years to a raft of government consultations, including the APF.</p> <p>The T5 Inspector in framing his final report and his recommendations to the Secretary of State specifically highlighted the importance of a number of the issues that remained unresolved.</p>

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		<p>Regrettably these issues remain largely unresolved yet are continuing to be avoided by the aviation industry continuing to strive and press for relaxation and/or modification irrespective of previous statements and commitments. We refer, of course to:</p> <ul style="list-style-type: none"> - no third runway; - a cap on the noise contours; - the cap on the number of permitted aircraft movements (480k atms); - a review of noise measurement methodology and assessment criteria; - a review of certain operating procedures. <p>The Airport Commission will be well aware of the Inspector's decision to recommend approval of T5 being based on the premise that T5 would be the last significant development at Heathrow Airport. This be an end to the historical 'creeping incrementalism'.</p> <p>Many of the Borough's communities continue to suffer the significant adverse effects from existing operations at Heathrow Airport such that any further increase in activity at Heathrow Airport will have significant negative impacts for the Borough through the potential over-heating of the regional and local economy in the Thames Valley area and creating development pressures on the Green Belt. It will add to the already extreme pressure on the housing stock and increase demand for land for all purposes especially housing thus further pricing housing out of the reach of the extra employees further development would need. It would place further pressure on the existing congested transport network and other infrastructure, particularly in areas such as the historic town of Windsor that can currently barely cope, despite the recession.</p> <p>RBWM remains concerned there is little objective evidence arising from the development of the APF document that provides firm assurances and comfort that these issues can or will be adequately accommodated in a sustainable way. The APF, in its present form, is failing to provide the necessary re-assurances to local communities.</p>
1.3	<p><i>'...the Government's primary objective is to limit and where possible reduce the number of people significantly affected by aircraft noise'</i> and</p> <p><i>'...as a general principle, any benefits</i></p>	<p><i>'To limit and where possible reduce...'</i> This is a dilution of previous government policy commitments and taken together with the second paragraph could be interpreted as safeguarding flexibility for allowing expansion of aircraft movements against a pre-determined 'noise threshold' with no overall reduction in the noise climate. The key issue here is that both the existing threshold value and noise climate are uncalibrated and unacceptable in the first instance. It follows all else must therefore be flawed.</p>

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	<i>from future improvements in aircraft noise performance should be shared between the aviation industry and local communities'.</i>	The second paragraph is akin to a 'profit share' statement. However, it is perverse to talk of sharing benefits (e.g increases in movements) or 'performance related opportunities' for achieving compliance with minimum standards of acceptability
Para 2.9	<i>'...conceptualise the effects of noise by considering them in three groups: health effects, amenity effects and productivity and learning effects..'</i>	<p>The common determinant of aviation noise is regarded as 'annoyance'. However, the various impacts of noise which are particularly relevant to this response are more embracing and include:</p> <ul style="list-style-type: none"> - Effects on residential behaviour and annoyance i.e. social and behavioural effects - Interference with communication - Sleep disturbance effects - Performance effects - Psychophysiological effects and mental health effects. <p>The key point being the impact of aviation noise is much more far reaching than merely 'annoyance' (defined as: <i>'a feeling of displeasure associated with any agent or condition known or believed by an individual or a group to be adversely affected'</i>). The issue therefore centres on a variety of negative emotions when exposed to community noise (what ever its source). These might include: anger, disappointment, dissatisfaction, withdrawal, helplessness, depression, anxiety, distraction, agitation and exhaustion. Activity interference due to aircraft noise is commonly associated with interference with rest, recreation, watching television or sleeping. Ideally assessment of aviation noise would be better served by a suite (scorecard) of descriptors relating to situations rather than a single all-encompassing averaging metric, used to derive an approximation of community 'annoyance'. Studies have shown that simple noise indices such as LAeq fail to adequately predict the total effect on residential behaviour and annoyance to noise for particular situations.</p> <p>The Borough supports the flexible approach set out in paragraph 2.9</p>
Para 2.13	<i>'A more recent study (ANASE) was completed in 2007, designed to update the 1982 work, which found an indication that people have become relatively more sensitive to aircraft noise since 1982, such that the proportion of people being 'highly</i>	This confirms the basis of the Borough and knowledgeable members of the community contentions that the existing methodology and baselines being used to predict a long-term future aviation strategy are fundamentally flawed. It is suggested that even a temporary acceptance of the peer reviewed EU/WHO Community Noise standards would be better in going forward, pending the outcome of a further study. To retain the existing system i.e. LAeq _{16h} 57 criterion simply for historic, comparative purposes whilst ignoring the significant body of contrary expert evidence is both perverse and highly questionable. The use of a balanced scorecard approach

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	<p><i>annoyed' at a particular exposure has increased. There has been some support for the change identified in this study being corroborated by further research. The ANASE study also suggested that people were becoming more sensitive to numbers of aircraft movements, as opposed to higher noise levels emitted from single movements. There was criticism of the ANASE survey methodology which has meant reliance cannot be placed on its results'.</i></p>	<p>utilising a suite of measures, as is being proposed, would overcome any comparative concerns.</p>
<p>Para 2.14</p>	<p><i>'In addition to these larger studies recent work undertaken by the European Environment Agency has found that 27% of people are 'highly annoyed' at 55dB (L_{den}) due to aircraft noise, whereas only 6% of people are 'highly annoyed' by road noise of the same noise level. This also supports the view that people are more sensitive to aircraft noise than other noises.'</i></p>	<p>The key issues here are:</p> <ul style="list-style-type: none"> - What is/would be an acceptable threshold for the % of people highly annoyed (in terms of community tolerance)? - Against which research study would any threshold value be referenced? - There is an overwhelming case for adoption of recommendations of studies conducted this century rather than one carried out a quarter of a century ago.
<p>Para 2.28</p>	<p>Referring to Mental Health impacts – <i>'Experts in this area have suggested that there is insufficient research, especially surrounding longitudinal studies, to draw firm conclusions around this topic.'</i></p>	<p>The Borough requests the AC recommends to government that further research is conducted and commenced on the basis of the 'precautionary principle'.</p>
<p>Para 2.38</p>	<p>Referring to health impact studies: <i>'The Commission is interested in</i></p>	<p>The issue of cognitive impairment in children was raised by local authorities at the T5 Inquiry following the commissioning of a local study around Heathrow airport given concerns expressed</p>

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	<i>views on these issues. In particular we would like to invite submissions which shed light on any other relevant evidence or research that the Commission should be aware of.'</i>	at that time. A comprehensive Proof of Evidence was submitted by Dr Stephen Stansfeld (formerly of UCL). This and further follow up studies completed since that date are respectfully drawn to the attention of the AC.
Para. 3.55	What is the most appropriate methodology to assess and compare different airport noise footprints? For example:	<p>In response the Borough would offer the following suggestions:</p> <ul style="list-style-type: none"> - Migrate to an internationally/EU accepted metric as the baseline assessment descriptor e.g. 55L_{den} to ensure consistency - Adopt a balanced scorecard approach linked to situational analysis as per World Health Organisation (WHO) recommendations and expressed as SMART objectives. - Conduct a 5-year periodic review of community reaction around individual airports to ensure updated calibration is maintained - Discard methodologies based on averaging over extended periods of time - Ensure the maximum footprint of the noisiest aircraft is included in the scorecard approach when assessing annoyance. - Ensure the <u>number</u> of aircraft movements are given sufficient weighting in any assessment - A short-term ratio to ensure both the intensity and number of movements are assessed. e.g. to cater for interference with speech and sleep

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Para. 3.55	<p>What metrics or assessment methods would an appropriate 'scorecard' be based on?</p> <p>To what extent is it appropriate to use multiple metrics, and would there be any issues of contradiction if this were to occur?</p>	<p>The Borough supports this approach given its inclusiveness and variation. Suggestions include the following:</p> <p>As per 'situational/activity' thresholds set out in the WHO Community Noise Guidelines relating to KPIs such as:</p> <ul style="list-style-type: none"> - Effects on residential behaviour and annoyance i.e. social and behavioural effects - Interference with communication - Sleep disturbance effects - Performance effects - Psychophysiological effects and mental health effects. - Subjective analysis of community complaints on a set menu of categories - Complaints per head of population expressed as ratios e.g. per aircraft movement - Variation thresholds based on particular background noise levels. This is more important to quieter areas with lower levels of background 'activity'. - Scope of mitigation packages/numbers/total cost/
Para. 3.55	<p>Are there additional relevant metrics to those discussed in Chapter 3 which the Commission should be aware of?</p>	<p>The Borough is currently engaged in a community noise mapping project in collaboration with University College London (UCL) called the <i>WideNoise Initiative</i>. WideNoise, currently being run as a pilot community mapping study involving five other European Universities, appears to have enormous future development potential in relation to determining aircraft noise and community dose-response relationships.</p> <p>Based on empowering local communities, it works on the principle of a mobile phone application that converts a Smart phone into a sound level meter; records the sound of the aircraft and allows the subject to include a 'subjective tag' of the noise experience. This is then relayed through the web via a GPS system and centrally logged and mapped. The project was initiated during the Operational Freedoms Trials at Heathrow Airport following changes being made to long standing operational patterns.</p> <p>The next stage of the project will seek to refine the methodology using static monitors to better assess the subject responses to the noise levels per event/over time; including the potential for 'Emotion Mapping' of peoples reaction to aviation noise. Attached to this submission is a short summary that provides further information of the first 6-months of this initiative. The AC is strongly urged to investigate this approach in going forward.</p>
Para. 3.55	<p>What baseline should any noise assessment be based on? Should an</p>	<p>55L_{den} with immediate effect and continue until completion of a wider ranging survey has been conducted and adopted and amended as necessary dependent on the outcome.</p>

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	assessment be based on absolute noise levels, or on changes relative to the existing noise environment?	In contrast the LA _{eq16h} methodology should be discontinued
Para. 3.55	How should we characterise a noise environment currently unaffected by aircraft noise?	<p>The noise environment is the noise environment. What is required is the assessment and evaluation of the <u>variation or differential</u> in noise environment on introducing aviation noise to an area that has not previously/infrequently been exposed to aircraft noise. Changes (degree of) in patterns are a hugely significant driver of community acceptability, 'tolerance' and noise habituation. There is much social research and precedent with assessment methodology (BS 4142) surrounding the likely reaction from various increases in noise. Given that people are more sensitive to aircraft noise than other forms of transport noise, partly because there is no hiding from longer lasting noise events from above as opposed to attenuated noise at ground level, the reaction is likely to be stronger and more robust (<i>N.B. extent and strength of community reaction to Frankfurt's 4th runway is a good example</i>).</p> <p>In addition, caution needs to be exercised as it has been suggested that another likely reason for aircraft noise being more intrusive and annoying than other forms of transport noise is because of the low frequency component of the emitted noise. Given measurement scales are weighted ('A'-weighted) this reduces the low frequency component and potentially <u>under estimates</u> the impact upon auditory reception of most people subjected to this type of noise.</p>
Para. 4.40	How could the assessment methods described in Chapter 4 be improved to better reflect noise impacts and effects?	<ul style="list-style-type: none"> - Balanced scorecard approach using a suite of agreed noise-related Key Performance Indicators (KPIs) – see above. - Immediate cessation of using LA_{eq16h} 57dB(A) as the descriptor of community noise annoyance; - Regular social surveys; - Consideration of subjective responses/anecdotal tags to noise events (see <i>WideNoise</i> initiative)
Para. 4.40	Is monetising noise impacts and effects a sensible approach? If so, which monetisation methods described here hold the most credibility, or are most pertinent to noise and its various effects?	This is fraught with difficulties. It has been established that noise can have adverse health impacts. It also is associated with sleep deprivation, productivity and learning impacts and amenity and quality of life impacts. All require baselines against which to judge the likely impacts within a population. Again, the problem is that the UK has not a universally accepted baseline upon which to measure or predict the likely outcomes from whatever category of impact. It follows therefore that any form of monetisation model will be flawed. Also habituation/adaptation to noise over time will change the sums whether by insulation, relocation or acceptance

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		<p>What is acceptable is to adopt a noise metric e.g. Lden 55 and at least ensure there is adequate compensation for those affected by the noise i.e. noise mitigation packages that can effectively address: sleep deprivation, productivity and learning impacts and amenity and quality of life impacts in an internal environment, in the first instance. Where practical, the cost of this can then be fed into the various Cost Benefit Analysis models and evaluations.</p>
<p>Para. 4.40</p>	<p>Are there any specific thresholds that significantly alter the nature of any noise assessment, e.g. a level or intermittency of noise beyond which the impact or effect significantly changes in nature?</p>	<p>This is a complex area that has been the subject of detailed studies. The Borough, as stated above, favours the WHO approach linked to a balanced scorecard comprising a basket of noise metrics designed to cover a range of specific situations and activities. Inevitably there will be a variation in both noise and associated metrics.</p> <p>As a 'quick fix' pending a more detailed study 55Lden would be a more credible and acceptable threshold than that currently in use for a general overview, notwithstanding this 'averaging' methodology also has limitations. It does however, have some scientific, more universal credence that is based on a number of successive and respected international research programmes.</p>
<p>Para. 4.40</p>	<p>To what extent does introducing noise at a previously unaffected area represent more or less of an impact than increasing noise in already affected areas?</p>	<p>Dispersal or concentration of aircraft noise is an issue of debate, largely depending on whether the resident is a 'winner or loser' in noise terms.</p> <p>The Borough's parallel experience lies with the Cranford Agreement. On the one hand the current arrangements severely impact on thousands of residents during easterly operations without respite periods. Removal of the Cranford Agreement, whilst more equitably sharing the noise burden around the airport and offering respite on easterly operations affording an improvement, also introduces more noise to other areas of the Borough (Old Windsor, Wraysbury areas) who, without additional noise mitigation measures, will be subjected to notable increases in aircraft noise levels of as much as 8 dB. However, honouring the principles of sharing the noise burden amongst communities, the Borough has opted for abandonment of Cranford and hence, a preference for dispersal of noise.</p> <p>A social survey would assist the AC with respect to this matter.</p>
<p>Para. 5.44</p>	<p>To what extent is the use of a noise envelope approach appropriate, and which metrics could be used effectively in this regard?</p>	<p>The Borough does not consider these as either practical or workable.</p> <p>Capping the number of movements and optimising the benefit from the introduction of less noisy aircraft over time, is preferred. The current system of specifying/implying a notional level of acceptability that is measured using a LAeq metric and allows increased aircraft movements if an averaged noise dose is reduced, completely disregards the detrimental impact of increasing the <u>number</u> of flights upon community annoyance. This current approach is seriously flawed.</p>

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Para. 5.44	To what extent should noise concentration and noise dispersal be used in the UK? Where and how could these techniques be deployed most effectively?	<p>See last question – same principle</p> <p>The recent Operational Freedom Trials conducted at Heathrow Airport amply demonstrated the unacceptability of dispersal from set flight paths, resulting in a significant increase in community complaints from those adversely affected and no compliments from those who benefitted. A social survey would assist the AC with respect to this matter.</p>
Para. 5.44	What constitutes best practice for noise compensation schemes abroad and how do these compare to current UK practice?	<p>If the AC does not have the benchmarking information from overseas airports it is recommended this is urgently obtained. The Borough does not currently hold this information. However, the key point (see below) is to ensure the baseline threshold is consistent with EU/WHO standards and implement them. If adoption of these standards is simply a financial constraint to the industry it is one they have to face up to and not persistently avoid. There are strong suspicions that the current eligibility criteria for noise mitigation <u>and</u> even the reluctance to lower the threshold value of annoyance in the UK is more to do with economics than scientific robustness.</p>
Para. 5.44	What noise assessments could be effectively utilised when constructing compensation arrangements?	<p>The Council notes that the APF refers to a revision of the existing scheme of noise mitigation. This is, in any event, a requirement under the EU Noise Directive because of the likely fundamental revisions to operations and the consequential change in environmental impacts upon some local communities.</p> <p>Bearing in mind the increase in sensitivity to aircraft noise, the Council urges the Airport Commission to recommend the urgent introduction of far more realistic and generous schemes in relation to:</p> <ul style="list-style-type: none"> - Daytime Noise Insulation Scheme - Night time Noise Insulation Scheme - Community Buildings Noise Insulation Scheme <p>together with the introduction of a more flexible, systematic and coordinated approach based on zoning linked to WHO-based noise thresholds with differential levels of eligibility for the Residential Noise Insulation and Home Relocation Assistance Schemes.</p> <p>The council is aware the proposed scheme seeks to introduce a more coordinated approach based on zoning linked to the noise contours (L_{den} 63; 66; and 69 dB(A)) with differential levels of eligibility for the Home Relocation Assistance and Residential Schemes. Also, the Night Noise</p>

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		<p>Insulation Scheme is currently under review pending the Government's review of night noise, delayed until late 2013.</p> <p>The World Health Organisation (WHO) recommend a residential night time level of 55dB(A). In this context the threshold values for eligibility would appear not to be sufficiently robust in that they fail to meet an accepted and recommended standard based on sleep deprivation i.e. worst case.</p> <p>The uncertainties around the possible introduction of 'mixed mode' and any revised changes to the Night Noise Insulation Scheme (particularly relevant in this context) would suggest both the 'precautionary principle' and the 'polluter pays' principles must be applied. The Borough has particular concerns over the introduction of 'mixed mode' as it is particularly harmful to residents within a wide area of the airport as this denies them any periods of respite. Periods of respite are especially critical in the case of busier airports such as Heathrow.</p> <p>The Airport Commission is urged to consider these matters as substantive topics as part of its deliberations regarding any short-term proposals.</p>
Other Relevant Matters		
	Abandonment of the Cranford Agreement	<p>The original intention of the Cranford Agreement was to provide a measure of protection to the residents of Cranford given their proximity to the end of the northern runway. This was at a time when takeoff noise was the dominant source of noise and the numbers of over-flights were a mere fraction of what they are present day. The development and technological advancement of aviation has changed the 'character' of the noise around Heathrow such that with the improvements to aviation performance and the increase in the number of movements, landing noise near defined flight paths has become the dominant factor. This is further exacerbated by there being no system of runway alternation on easterly operations as compared with the eastern side of the airport. On such days this results in around 650 aircraft directly over-flying one swathe across the Borough. During anti-cyclonic conditions with sustained periods this unrelenting level of disturbance is both wholly intolerable and inequitable.</p> <p>The Borough is probably unique amongst those local authorities around Heathrow Airport in that it is supportive of the early abandonment of Cranford Agreement given the current lack of respite during intolerable easterly operations and the positive benefits that abandonment of the Cranford</p>

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		<p>Agreement would bring in terms of sharing the 'existing' burden of excessive noise around the airport more equitably.</p> <p>The Council is also mindful of the implications and threats arising from removing the Cranford Agreement in that it could lead to both the introduction of 'mixed mode' operations, as a relatively easy short term capacity 'fix' allowing increased movements (i.e. enhanced runway capacity); and a likely strong public reaction in those communities where the pattern of noise exposure changes. It is a fact that abolition of the Cranford Agreement results in 'winners and losers'.</p> <p>The derived community benefits of 'easterly alternation' through the abandonment of the Cranford Agreement is a subject close to the hearts of both this council and also thousands of local residents currently affected by easterly operations. The abandonment of the Cranford Agreement must bring with it the long awaited respite to the severe and intolerable nuisance caused to these many thousands of local residents in Windsor and nearby villages during easterly operations.</p> <p>Abandoning the Cranford Agreement presents a dilemma for the Royal Borough of Windsor and Maidenhead because:</p> <ul style="list-style-type: none"> - Abolishing the Agreement would 'share' (disperse) the excessive noise burden around the airport more equitably and thereby allow runway alternation to be introduced affording much needed respite to local residents. It would also inevitably 'shift' ~50% of the noise burden to other communities such as Old Windsor, Wraysbury and other parts of Windsor that are more aligned with the southern runway (09R). These types of operational changes always stimulate strong public reactions. - The existence of the Agreement currently constrains the airport from introducing Mixed Mode operations. It is accepted this would be one way of optimising existing runway capacity. However, such a move would be strongly opposed due to the resulting increase in flight numbers over the current capped limit (480k atm) and the associated intensification of operations particularly the denial of alternation and any respite from incessant over flights resulting in consequential adverse environmental and infrastructure impacts. Furthermore, while Mixed Mode is operated on many

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		<p>airports, the huge volume and frequency of landings and departures at Heathrow sets it aside from other airports due to the complexity and potential risks of such an operation.</p> <p>Previous analysis confirmed the following outcomes if the Cranford Agreement was abolished:</p> <ul style="list-style-type: none"> ○ There would be an overall improvement in the noise climate for Windsor at most times of the day of around 2-3 dB ○ But for Old Windsor and Wraysbury, there would be an increase of up to 8dB during easterly operations, with a worsening in the early morning and evening period of around 2dB. ○ The introduction of Mixed Mode operations would have a radically adverse impact upon in particular the communities of Old Windsor, Horton, Wraysbury and Datchet. ○ Mixed Mode operations would result in a disproportionate deterioration in Old Windsor and Wraysbury relative to the improvement in Windsor. This is the major reason for RBWM's policy of being totally opposed to the introduction of Mixed Mode operations at Heathrow Airport. <p>The ideal situation from a local community perspective would be to abandon the Cranford Agreement at the earliest opportunity, retain a movement cap, maintain segregated mode, introduce easterly alternation to provide some respite to all communities around Heathrow Airport and for Heathrow to provide additional noise mitigation and insulation measures meeting the latest recommended standards to those communities like Old Windsor, Horton, Wraysbury and Datchet that will be adversely affected by the abandonment of the Cranford Agreement .</p>

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