

## Response ID ANON-6AJS-RJMY-P

Submitted to **Minimum Requirements for Noise Modelling Consultation**

Submitted on 2020-03-04 09:59:04

### About you

**1 Are you responding in an official capacity on behalf of an organisation?**

Yes

**2 If yes, please tell us its name.**

**If yes, please tell us its name.:**

Richmond Heathrow Campaign

**3 What is your name?**

**Name:**

Peter Willan

**4 What is your email address?**

**Email:**

willan829@btinternet.com

**5 Do you consent to your response being published?**

Yes, with personal identifying information (name, organisation, respondent category, location, additional information - please note your email address will NOT be published if you choose this option)

### Overriding criteria

**6 What are your views on the CAA's proposed no decrement and no radar criteria for noise modelling?**

Agree

**Please explain your answer and provide any other general comments.:**

### When an airport is designated for noise by the Secretary of State

**7 What are your views on the CAA's proposals for noise modelling at airports designated for noise by the Secretary of State?**

Agree

**Please explain your answer and provide any other general comments.:**

### When a sponsor wants to change the design of civil airspace

**8 What are your views on the CAA's proposals for the noise modelling Category required for assessment of options and consultations for Airspace Change Proposals?**

Agree

**Please explain your answer and provide any other general comments.:**

**9 What are your views on the CAA's proposals for the forecast period over which this aspect of the call in criterion is assessed?**

Agree

**Please explain your answer and provide any other general comments.:**

**10 What are your views on the CAA's proposals for the noise modelling Category required for call in assessment?**

Agree

**Please explain your answer and provide any other general comments.:**

**11 What are your views on the CAA's proposals for assessing whether a proposed change has an identified adverse impact on health and quality of life for the purposes of assessing criteria for call in by the Secretary of State?**

Agree

**Please explain your answer and provide any other general comments.:**

**When an ANSP wants to change an ATC operational procedure and the proposal meets the criteria for a 'relevant PPR**

**12 What are your views on the CAA's proposals for noise modelling at airports applying for a planned and permanent redistribution of air traffic?**

Agree

**Please explain your answer and provide any other general comments.:**

**When there are changes to the operational use of the civil airspace around an airport**

**13 What are your views on the CAA's recommendation the noise modelling at airports whose traffic has changed in line Direction 15?**

Agree

**Please explain your answer and provide any other general comments.:**

**When an airport submits a planning application for a development where the CAA is a statutory consultee**

**14 What are your views on the CAA's proposals for noise modelling at airports applying for planning consent for a development where the CAA is a statutory consultee?**

Agree

**Please explain your answer and provide any other general comments.:**

## **Transition arrangements**

**15 What are your views on the CAA's proposals for transition arrangements?**

Agree

**Please explain your answer and provide any other general comments.:**

Richmond Heathrow Campaign (RHC) represents the interest in Heathrow of three amenity groups: The Richmond Society, The Kew Society and the Friends of Richmond Green with in aggregate over 2,000 members.

[www.richmondheathrowcampaign.org](http://www.richmondheathrowcampaign.org)

1. RHC's primary interest is Heathrow, which is a designated airport and therefore requires Category A modelling level, which we would wish.
2. RHC has considerable concern with the modelling approach when there are multiple airports using the same airspace such as over London and its surrounds. There are 14 airports sharing the airspace with Heathrow, including Gatwick, Luton, Stansted and London City. RAF Northolt uses the airspace for military activity and there are smaller airports such as Southend.
3. Some of these 14 airports in addition to Heathrow will be in Category A but others will be in lower Categories in their own right. However, the current re-design of Heathrow's flightpaths for a 3rd runway and also for modernisation (even without a 3rd runway) has highlighted the need to integrate the flight paths and their use for all 15 airports for operational and safety reasons. What is unclear is how the cumulative noise impact from multiple airports is being modelled and it is important because some communities experience noise from flights connected to several airports. The airspace change process and 3rd runway noise contours focus only on Heathrow and it seems the decision process focusses only on Heathrow. This needs to be remedied so as to include multiple airports when appropriate.
4. Consideration needs to be given as to whether Category A modelling should be required for all 15 airports or whether some umbrella modelling using Category A processes would suffice. Probably some compromise on noise monitoring would have to be agreed. Whatever is decided needs to be transparent in its use. We believe CAA proposals with further consultation on this important issue are needed.
5. RHC has concerns with the Ancon model and the webTag tool used to assess the impact of aviation noise but we reserve our comments to future consultations by the CAA, which we understand will be forthcoming. In broad terms our concerns include the choice of metrics and the granularity of the noise contours. RHC's own noise model focusses on four metrics by flight path - single event, hourly (taking account of traffic frequency), daily (taking account of respite), and annual (taking account of easterly/westerly directionality) and we recommend these metrics. The model also combines multiple flight path use to produce cumulative contours overall but also separately for departures and arrivals, and separately for easterly and westerly modes. We are very concerned at the absence of a national or local noise objective that allocates noise across communities and the use of webTag to minimise Total Cost rather than Average Cost Per Person/Household. Total Cost results in concentration whereas Average Cost results in dispersion. RHC would welcome the opportunity to engage with the CAA on these matters.