# **Update on SoNA and PBN**

Heathrow Community Noise Group (CNG) Stephen Clark & David Gilbert

CNG Jan 2020

Update on SoNA and PBN. Stephen Clark and Dave Gilbert (Teddington Action Group). Heathrow Community Noise Forum 22/01/2020.

### **Recap of issues with SoNA previously identified**

SoNA is used to set UK aviation policy and therefore needs to be a robust study and correctly analysed but the following issues have been identified;

- Major sampling issues;
  - did not plan <51dB  $L_{Aeq}$ ,
  - clustering 'choices' did not cover key routes with high annoyance levels such as the Easterly Detling route
  - compared to other SoNA surveys had high levels of social housing and flats
  - was surveyed in less annoying winter period but compared to summer noise modelling
  - surveyed those habituated to noise and avoided those experiencing increased noise from 2014 trials
- Subsequent choice of LOAEL (Lowest Observable Adverse Effect Level) based purely on L<sub>Aeq</sub> with no apparent appreciation of numbers of highly annoyed people impacted below this level which would be ~50% of those highly annoyed
- Approach to identify most appropriate metrics to describe annoyance flawed (and seemingly more influenced to maintain existing policy from comments on draft reports)
- Was a static survey, ignoring potentially 6-9dB L<sub>Aeq</sub> of airspace change impacts

# A response from Heathrow was received on Monday – we will study if any satisfactory answers have been provided or whether substantial differences of data interpretation remain

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### **Further SoNA Data Analysis**

The full SoNA data set was recently identified from FoI requests

This is a 6MB data set with ~2000 lines each with the multiple survey questions responses, noise metrics and area/post code detail

Noise annoyance '% Highly Annoyed (HA)' has been analysed for 'local areas' around Heathrow

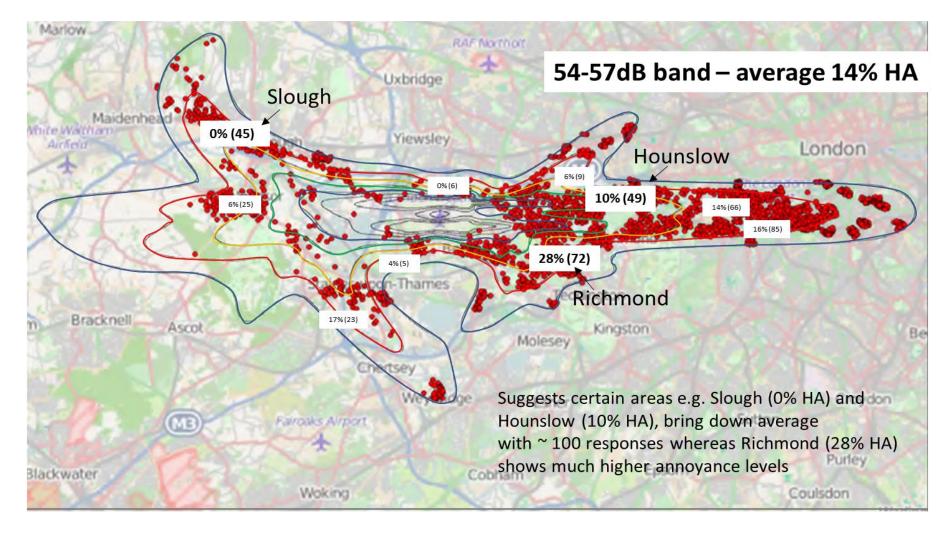
Analysis shows;

- An averaging approach too simplistic there are wide variations between areas
- Annoyance from Departures cannot be described by simple L<sub>Aeq</sub> metrics, at Heathrow people are more annoyed during easterly take offs, single mode metrics are likely to be more representative
- As different communities have different responses to noise annoyance a 'local' approach should consider local area characteristics

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#### New Heathrow local Analysis (1) 54-57dB L<sub>Aea</sub> Noise band

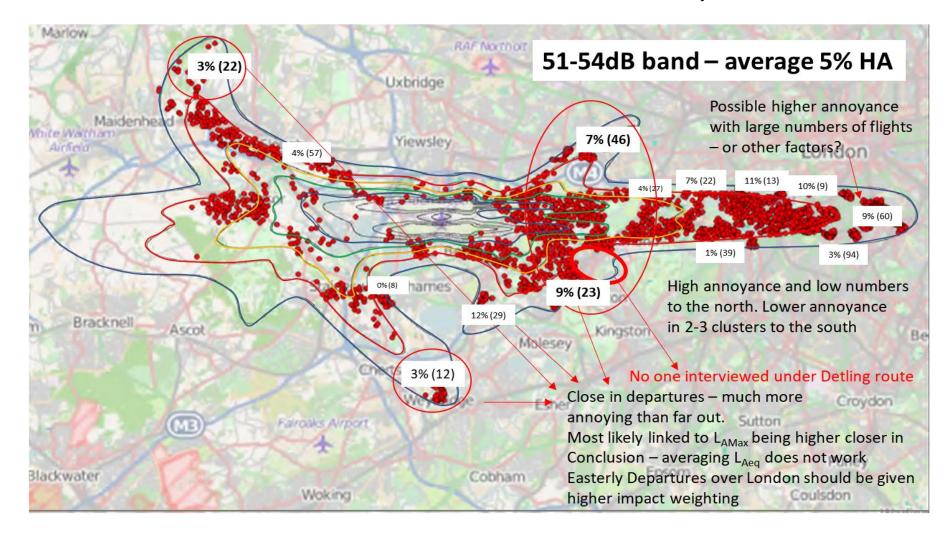


Key: %HA (numbers in borough in 54-57dB noise contour)

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#### New Heathrow local Analysis (2) 51-54dB L<sub>Aea</sub> Noise band

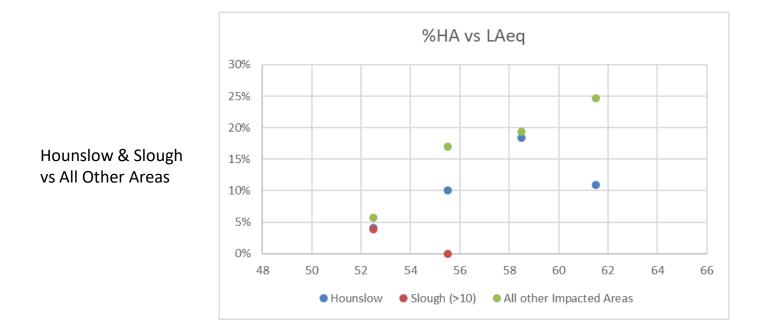


Key: %HA (numbers in borough in 51-54dB noise contour)

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### Impact of different Areas on Heathrow results?

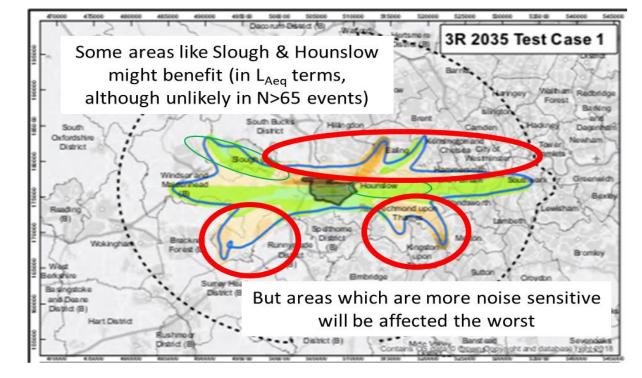


 Is it reasonable that Slough and Hounslow with 400 responses - 25-30% of total SoNA weighted responses - have a potentially disproportionate weight on the UK's aviation metrics?

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#### Different area impacts if Heathrow Expansion were to go ahead?



Key: Blue line 51dB LAea contour (note ~50% of people 'Highly Annoyed' live outside of this contour today and assumes annoyance does not increase with time – our view annoyance area is much bigger) Green lower LAeg Brown more L<sub>Aea</sub> vs base case

- Simplistic averaging approach to noise annoyance is not appropriate around Heathrow and London – areas show high divergence and local characteristics
- SoNA is not a local study it is an average of areas with a bias to those habituated to noise
- Heathrow are proposing to increase Noise in areas where SoNA shows the greatest noise sensitivity

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**Base graphic** 

consultation

Heathrow

materials

assumes

significant

in fleet mix

and unclear

flight path

usage

improvements

from

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### PBN – update, January 2020

#### What Heathrow said in 2016 about PBN;

- The social impact of PBN trials in the UK has been enormous
- No environmental assessment of noise impacts has been undertaken

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comment by: Heathrow Airport Limited

Whilst Heathrow Airport Limited fully supports airspace modernisation, this document does not support current UK CAA guidance and is not in line with current UK airspace projects such as LAMP. The time scale suggested here is unrealistic and could jeopodise these projects. In addition, as subsequent comments highlight, we have the following concerns:

- The Social Impact of PBN trials in the UK has been enormous, therefore this should be considered and not dismissed in one sentance.
- There does not appear to be an environmental assessment of this proposed change in terms of noise.
- The Benefit section takes no account of the cost of airspace consultation which
  results in an incomplete assessment.
- Mixed conventional and PBN operations are not supported by the UK CAA.

Consequently, this NPA is not supported by Heathrow Airport Limited.

Noted.

easa.europa.eu/sites/default/files/dfu/CRD%202015-01\_0.pdf

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## The local evidence applicable to Heathrow

- Heathrow's PBN trails led to mass protest and opposition
- This led to the early abandonment of the trials
- Communities were in uproar well below the DfT's 51 dB L<sub>Aeg</sub> LOAEL level
- Change in the noise environment had a massive effect



#### WESTERLY AND EASTERLY DEPARTURE TRIALS 2014 - NOISE ANALYSIS & COMMUNITY RESPONSE

HEATHROW AIRPORT LTD

JULY 2015

• Average noise metrics were not able to explain the level of reaction

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### There are no successful precedents over densely populated areas such as Heathrow anywhere in the world

#### Phoenix Noise



Navor of Phoenix Greg Stanton and his epresentatives explain FAA's policy of disregard for United States citizens.

Boston Noise



U.S. Rep. Steve Lynch in doafight with FAA over NextGen aircraft noise and collution. Calls FAA most unresponsive agency in government

Santa Cruz Noise



anta Cruz attorney cites destruction of pristine natural habitat by FAA's dirty NextGen transportation system.

#### Washington, D.C.



Arizona Senator John McCain sends letter to FAA Administrator Huerta urging changes to noisy flight tracks.





lawsuit against Federal Aviation Administration for unbearable aircraft

Chicago Noise

Chicago political activist Jac Charlier challenges Mayor anuel to come out from hiding re: O'Hare jet noise.

San Diego Noise



hell over NextGen aircraft noise and pollution. FAA sits stone faced, deaf and mute

Chicago



Chicago political activist John Kane says meeting with Mayor Rahm Emanuel over aircraft noise a waste of time

Chicago



Convenient for Chicago Mayor Rahm Emanuel: Air traffic over his home delayed until 2021.







#### New York Noise



N.Y. Rep. Grace Meng introduces "Quiet Communities Act of 2015" N.Y. Kep. ... "Quiet Communitie to benefit all comm U.S.

New York



New York Congressman Steve Israel calls the FAA the "Federal Arrogance Administration Brooklyn Noise





#### Air France



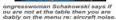
Air France sponsors Paris UN climate conference, but who are they really kidding?





Congresswoman Fles anor Holmes





Maryland



akening from FAA's NextGen aircraft oise and aircraft pollution strategy



onto residents unite to fight for their rspace saying Nav Canada appears y accountable to the airline industry.

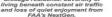


rman protesters flow into the streets

Germany



error in the busy airport terminal. oudly, just like the jets disturb their peace and quiet.





Chicago residents join forces to reduce property tax due to O'Hare aircraft noise and FAA's NextGen.



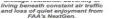




opposition to airport expansion and aircraft noise and pollution.



rmans protest against aircraft noise



#### Chicago



Avella from Queens to Federal Aviation Administration: "This is not acceptable!"

Santa Cruz

Santa Cruz Save Our Skies: "An

incessant assault. . you feel helpless . . . you can't stop it. . . you can't go outside\*

Chicago

Chicago residents break U.S.

Charlotte, N.C.

Charlotte, North Carolin

residents bombarded by FAA NextGen noise and pollution.

record, logging more than 1 Illion O'Hare noise complaints



New York's U.S. Senator Charles Schumer sells out New Yorkers and all of America in his 2012 FAA Reauthorization bill vote.

New York

Washington, D.C.

atBlue

is a bad neighbor for Queens' residents.

New York



Queens, NY jet engine sound monitors reveal residents suffer from levels of jet noise considered unhealthy





NYC Councilman Dromm togethe with Queens environme oups, criticize FAA NextGen aircraft noise and misery.





Auckland, New Zealand far starting to feel the pain and misery of living under NextGen aircraft noise flight tracks.

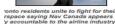
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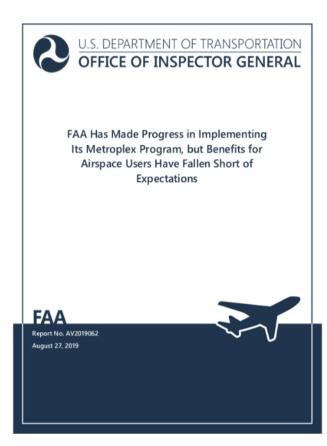
Maryland residents in for rude



Germany



### **Recent developments in US – 27 August 2019**



US Government Office of Inspector General published its report on NextGen (PBN)

Key findings;

- After 10 years only 7 out of the 12 Metroplex area programs have been completed
- Delays are largely due increased community concerns about aircraft noise
- The financial benefits are less than half the FAA estimated

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### Now US Senators and Congressmen are getting involved

Congress of the United States Washington, DC 20510 December 20, 2019

Hon. Stephen M. Dickson Administrator Federal Aviation Administration 800 Independence Avenue SW Washington, DC 20591-0004

Dear Administrator Dickson:

We are writing on behalf of hundreds of thousands of Americans who continue to suffer the effects of the FAA's NextGen program.

As you know, since its introduction of Metroplexes in 2010, the FAA has concentrated flight paths over neighborhoods, schools, and national monuments in order to make the airspace more efficient. This heavy air traffic produces constant noise and particulate matter that has yet to be deemed safe by the FAA or any other government agency. The noise created by the frequency of flights – in some areas beginning before 6:00 a.m. and continuing every few minutes until midnight or later – has had a devastating impact on residents' quality of life. The FAA has yet to make any significant changes to the disruptive flight paths. In fact, communities, cities and states around the country, including in and around the District of Columbia, Phoenix, Boston, San Francisco, Los Angeles, Seattle, Denver, New York, and the State of Maryland, have taken legal action as a result of the FAA's failure to adequately address community concerns. We are concerned that the NextGen program has failed to meet the bare minimum standards for success. Currently, the FAA continues to introduce and implement concentrated flight procedures with Performance Based Navigation throughout the country. The FAA boasts profits for airlines, shipping companies, and other industry stakeholders<sup>[1]</sup>, but the burden of noise, health risks, and declining property values falls on the backs of hard-working Americans. We urge the FAA to fast-track the development of new flight paths in all Metroplexes and at other airports with NextGen procedures that will significantly disperse air traffic and raise aircraft altitudes.

We would appreciate your review of the enclosed report and a detailed timeline of your plan to implement procedures that will mitigate harm to the communities we represent. We look forward to your prompt response.

United States Senator

Benjamin L. Cardin United States Senator

Jamie Raskin Member of Congress

Sincerely

Kanala D. Harris United States Senator

Edward J. Marker United States Senator

Member of Congress

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## This is what they are saying;

- Heavy air traffic produces constant noise and particulate matter that has yet to be deemed safe by the FAA or any other government agency
- Noise created by the frequency of flight beginning before 6.00am and continuing every few minutes until midnight or later - has had a devastating impact on residents' quality of life
- The NextGen program has failed to meet the bare minimum standards for success
- The burden of noise, health risks and declining property values falls on the backs of hard-working Americans
- New flight paths are required to significantly disperse air traffic and raise aircraft altitudes

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### **Key conclusions for Heathrow**

- US (and other) experience proves concentrated PBN is unacceptable over residential areas
- Heathrow is situated in one of the most densely populated areas around an airport in the world
- The airport has insufficient air space to make PBN acceptable through respite - there is complete absence of proof that effective respite can be achieved
- It would be negligent to ignore irrefutable international (and local) experience and introduce concentrated PBN flight paths around an expanded Heathrow
- Hardly any UK politicians are aware of the issues raised in this presentation mainly because they have not been told about them
- Who will be held accountable for imposing unacceptable living conditions on millions DfT, CAA, NATS or Heathrow?

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