

Report of Richard Greer | Appendix 2

1. Introduction and purpose

- 1.1.1 This is Appendix 2 to my proof of evidence (APP/2) and should be read in conjunction with my proof (APP/2/A).
- 1.1.2 At 4.2.2 of its Statement of Case (SoC), HACAN-East asserts “*A Citizen Study beyond the proximity of the runways suggests that the overflight noise of the new generation aircraft is not meaningfully quieter than their predecessors.*”
- 1.1.3 I review the Citizen Study in this Appendix.

2. Review of the Citizen Study (CD3.7.20)

- 2.1.1 The Citizen Study (CD3.7.20) referred to in the HACAN-East SoC was first published in August 2022 and was updated in February 2023. The study reports noise level measurements of aircraft operating from the Airport undertaken by members of the public using a mobile phone app and then seeks to use this data to compare the noise levels of current and new generation aircraft. The Appellant has engaged with HACAN-East about the study.
- 2.1.2 The measurements presented in the study were undertaken at a number of locations under the arrivals flight path when the Airport is operating in an easterly direction, roughly between the Horniman museum, at the western end of the study area, and Mottingham, at the eastern end of the study area.
- 2.1.3 With regard to the appeal, I would note four points.
- 2.1.4 First, I note that the study area is located substantially outside of the LOAEL contours in the ES. These contours are a matter of common ground with the LPA as noted in Section 9 of the SoCG (CD11.2).
- 2.1.5 As I have set out in Section 3 of my evidence, LOAEL values for aviation noise are set by government policy (CD3.7.7) and government guidance (CD3.5.9); the guidance states that the LOAEL thresholds set for aviation should be “*regarded as the point at which adverse effects begin to be seen on a community*”. This is consistent, for example, with the recent decision to grant London Luton Airport Operations Limited’s application to expand London Luton Airport operations to 19 mppa (CD8.6). In the decision, the Secretary of State agreed with the Inspector and concluded that areas overflowed outside the 51dB daytime contour and the 45dB night-time LOAEL contours would not experience harm to amenity.
- 2.1.6 The Citizen Study does not, therefore, materially assist on noise levels within the LOAEL contour area.
- 2.1.7 Secondly, I note that the study area is overflowed by the flight path that is only used by easterly arrivals. This means that communities in these areas are only experience around 15% of the flights at LCY. Easterly operations occur around 30% of the time, the Proposed Amendments would therefore typically only result in aircraft movements on just over one weekend afternoon a month on average. Most people in these areas are more impacted by London Heathrow westerly arrivals, which occur around 80% of the time.

- 2.1.8 Thirdly, I consider the Citizen Study to be of greater potential relevance to the Airport's ongoing Airspace Change Proposal (ACP) in connection with the CAA's airspace modernisation programme.
- 2.1.9 I am of this view because the Citizen Study notes the opportunities to reduce noise in its study area through the implementation of Continuous Decent Approaches (or Operations) and / or the definition of additional flight paths to support flight path alternation and hence provide predictable periods of respite for overflowed communities. Such changes to flight paths and operations are outside the scope of the Appeal and are matters for the separate ACP process overseen by the CAA in line with Air Navigation Guidance (CD3.5.9) and in accordance with CAP1616 (CD3.7.29). LBN share the view that the ACP process falls under a separate determining regime as set out at paragraph 168 of the Committee Report (CD4.3.1). The Airport's ACP passed the CAP1616 stage 2 gateway in June 2022 and so has completed its initial options appraisal (IOA) and is now at stage 3a (consultation preparation). The timing of consultation is coordinated by the Government and CAA across all airports and timelines have yet to be announced. Consultation will be informed by environmental assessment of the proposed airspace change, including noise, in line with CAP1616.
- 2.1.10 ANG (CD3.5.9) (paragraph 3.11) requires that, for communities further away from airports that will not be affected by noise above the LOAELs, it is important that other aspects of noise are also taken into account where the total adverse effects of noise on people between different airspace options are similar. Metrics that must be considered for these purposes include the overall number of overflights and number above metrics: N65 for daytime noise and N60 for night-time noise. This consideration of maximum noise levels for aircraft movements for ACP purposes is more like the approach adopted in the Citizen Study. However, this ANG applies to airspace change proposals and therefore carries minimal weight in determining the Appeal.
- 2.1.11 Fourthly, and finally, I note that the surveys for the Citizen Study were not, so far as I am aware, undertaken:
- by appropriately qualified persons;
 - using certified or calibrated sound level monitoring equipment in line with the relevant British Standards, BS EN 61672-1:2013 - Electroacoustics. Sound level meters; and / or
 - using a survey methodology in accordance with the relevant British Standard, BS 7445-1:2003 'Description and Measurement of Environmental Noise. Guide to quantities and procedures'.
- 2.1.12 I therefore do not consider the Citizen Study to provide reliable information.