

# HACAN response to DfT Night Noise Objective Consultation

9<sup>th</sup> May 2023

Proposed night-time noise abatement objective:

*Whilst supporting sustainable growth and recognising the importance to the UK of maintaining freight connectivity, to limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life.*

## HEATHROW

**7. To what extent do you agree, or disagree, with our night-time noise abatement objective for Heathrow airport?**

Strongly disagree.

**8. Provide a reasoning for your answer.**

The objective appears to downplay the serious negative health impacts caused by aircraft noise at night. This should have been placed as the central tenet of the objective – to reduce the harm caused.

There is no definition of ‘to limit and where possible reduce’. A policy objective should have a clearer commitment with measurable outcomes so that success of interventions by airports and airlines can be determined. For example, the number of flights or number of people exposed to noise at night.

The proposed objective does not set clear targets to reduce aircraft noise at night or establish a basis on which such targets could be set.

It is not clear why there is a need to include the references to ‘sustainable growth’ and ‘maintaining freight connectivity’. These are covered by a multitude of other policies and do not need to be included in a noise abatement objective.

At the very least the perception is that the objective appears to prioritise the demands of the aviation industry at the expense of impacted communities. Surely reducing the harm to health should come first?!

The industry’s own assessments states that at best aircraft engines may become 1dB less noisy over the next 10 years. This is welcome but not a significant reduction. This means that operational restrictions or improved procedures, such as better departure and arrivals and dispersal of flights, will be needed to actually deliver any reduction in noise.

CAA ERCD report 1901 (2018) shows that between 2006 and 2017 the total number of people experiencing >10 or >20 noise events above 60dB during the average 8-hour night period increased by 11% and 61% respectively. The size of area experiencing >20 noise events above 60dB also increased by 17% in the same period. Thus, despite the best efforts of the industry more people across a larger area are being disturbed and annoyed by aircraft noise at night. It should be a key policy priority to reduce this impact and to understand what is causing this increase in annoyance.

HACAN believes that it is unusual for the night flight objective to be based on the overall aviation noise policy statement which has not been consulted on nor any specific detail provided about definitions, targets, and mechanisms of accountability. The noise statement should have been consulted on and agreed first before addressing the night noise objective.

Government should commit to undertaking a comprehensive review of the economic, social, environmental and health impacts of night flights.

**9. Would alternative wording be preferable for the night-time noise abatement objective?**

Yes

**10. Provide a reasoning for your answer.**

The objective should include a clear and robust mandate for night noise to be reduced.

The current objective and proposal in the consultation for 'balance' would benefit from greater clarity and specificity. Noise abatement objectives need clear targets and enforcement rules to ensure that best practice is followed in reality.

A reduction in night noise, using a range of noise metrics for assessments including the number of noise events and perhaps the number of awakenings should be included in the objective.

**11. Provide alternative wording on a night-time noise abatement objective.**

To reduce the harmful effects of aircraft noise at night with a specific focus to reduce the number of people experiencing 10 and 20 movements over 40dB, 50dB and 60dB LAmax.

**12. How should the proposed night-time noise abatement objective for Heathrow airport be assessed to ensure it is successful?**

Total aircraft noise and noise impacts at night should be reduced progressively and materially at all times and against clear targets.

Specific types of aircraft that cause disturbance at key times (2300-0000 and 0430-0700) should be scheduled at different times – for example earlier in the evening to avoid late departures.

A combination of movement limits, quota limits and reductions in flying in the specific night periods that cause the greatest noise disturbance should be used to assess the objective.

This should include measurement of the number of people experiencing >10 or >20 noise events above 60dB during the average 8-hour night period – the objective could mandate specific reductions annually.

It should also include a commitment to reducing the size of the area experiencing >20 noise events above 60dB.