



HACAN response to DfT Night Flights Consultation

7 May 2024

Introduction

HACAN (Heathrow Association for the Control of Aircraft Noise) is a campaigning organisation formed in the 1970s to give a voice to residents under the Heathrow flight paths. We are a regional body covering London and part of the Home Counties.

This document contains our response to Part 2 of the DfT's Night Flights Consultation.

For the avoidance of doubt, HACAN members oppose night flights at Heathrow and want to see the numbers reduced leading to a complete 8-hour ban between 11pm and 7am.

Aircraft Noise Policy

Annex E of consultation document states the policy objective as *"To limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life, whilst supporting sustainable growth and recognising the importance to the UK of commercial passenger and freight services."*

HACAN is unable to support this objective due to the lack of definition of terms for example *"limit"* and *"possible"*.

In this context we believe *"limit"* could mean that it will be permissible for aircraft noise levels to increase around Heathrow and the airport to remain compliant with the policy.

In terms of *"possible"* we need to know who is deciding what is possible, what policy levers are available and the likelihood of their use.

We would welcome further clarity around these definition and additional information about how the success of the objective will be determined and measured to be published as soon as possible.

Movement Limit and Quota Count.

We believe that stricter noise standards should drive technological improvements leading to less noisy aircraft and an overall improvement in Heathrow's noise environment. In the absence of a ban on night flights HACAN would like to see the quota counts reduced progressively to help reduce the impact of noise at night. The QC system should include targets for reductions in noise quotas over the next regime.



Given our concerns regarding the noise policy above and the use of the LAeq noise metric, which we believe underrepresents the effect of the number of noise events, HACAN considers that maintenance of the movement limit is essential.

Noise levels and fines

HACAN have long argued that the level of fines for breaching of noise limits is too low and does not help to drive behavioural changes. The impact on local communities around Heathrow is great at the start and end of the NQP. Flights should be particularly disincentivised in periods of greatest community sensitivity which research continues to show occurs between 2300 and 0000 and 0600-0700.

The decibel limit at which departure noise infringements occur is far too high. This is exemplified by the complete absence of fines in 2023¹. HACAN would like to see these lowered to ensure that airlines are incentivised to operate their least noisy aircraft at night and early in the morning.

Following a review in 2017 the Civil Aviation Authority advised that whilst compliance with the existing noise limits was good there was little scope for reduction of the departure noise limits due to the continuing operation of the Boeing 747-400 series of aircraft². The review suggested that half of the current fleet was expected to be withdrawn by 2021 and the remainder by 2024 and *"A small reduction of 1 to 2 dB in the daytime and shoulder limits might be feasible at Heathrow, without causing the overall number of infringements to increase above historic levels"*.

Given the time passed since the review, HACAN would like this issue to be revisited as a matter of urgency. We believe that British Airways have retired their fleet of B747-400's³ opening the possibility of a tightening of the departure noise limits. HACAN is of the view that if a limited number of B747-400 aircraft still use Heathrow for cargo flights, this should no longer prohibit progress on this matter.

Thousands of people outside the existing LOAEL limits (45dB LAeq contour) are impacted by night flights. We would like to see the Government lower its metric for judging the success of the scheme to 40dB in line with the recognition that adverse health impacts are shown to occur at this level.

We disagree with the proposal to not use a Number Above metric to measure success of the regime. The frequency and intensity of overflight have significant impact on the health of local

¹<https://www.heathrow.com/company/local-community/noise/making-heathrow-quieter/departure-noise-infringement-fines>

² https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/noise/heathrow-community-noise-forum/forum-meeting-notes/2018/18-july/CAA_Departure_Noise_Mitigation_Review_July_2018.pdf

³ <https://mediacentre.britishairways.com/pressrelease/details/12538>



communities and whilst the inclusion of Number Above metrics alongside the noise contours is welcome we believe that they should also be used as metric of success – this could help ensure that the same communities are not continually overflowed by night flights or at the very least would demonstrate attempts by an airport to spread the impact of noise more evenly.

Early Morning Arrivals

HACAN would like to see work progressed towards significantly reducing the number of flights before 6am. It is claimed that these are important for the economy and help ensure connecting flights are commercially viable. However, despite repeated requests there has been no explanation of the evidence supporting these claims. We understand the economics of the airlines and need to fill connecting flights but would welcome a constructive dialogue about whether the purported economic and connectivity benefits could be maintained if some of the early morning arrivals at Heathrow were to be shifted to slightly later in the day.

Late running operations

At Heathrow there is regular late running of aircraft with insufficient evidence provided as to why this was necessary – if indeed it can be justified. Greater transparency on the reasons for late running should be provided with significant financial penalties for regular breaches. Those services that persistently offend should be rescheduled to reduce the risk of encroachment into the night. Ultimately, slots should be removed from offending operators who fail to improve.

Dispensations

We welcome the proposal to make the dispensation process more transparent and the publication of information. We believe that the information should be detailed (potentially in raw format) so that it is meaningful and can be analysed by the communities that are disturbed by aircraft noise at night.

We support calls for tighter definitions of flights qualifying for dispensations, removal of the arrangements by which airports approve their own dispensations and better reporting and monitoring of dispensations.

The consultation concludes that it does not have sufficient evidence to make further changes to the dispensation regime. Consequently, HACAN would welcome a dialogue with the Department as to what evidence it requires to facilitate any changes in the future.

We support the DfT view that further use of pre-emptive dispensations at Heathrow should not continue. We would like to see robust sanctions imposed should the practice continue in breach of the night flight regime.



Night Noise research

We welcome the ANNE study that the Department for Transport has commissioned looking at the health impacts of noise at night which has the potential to help strengthen the evidence base to inform policy.

However, there is a growing range and increasing weight of academic evidence documenting the adverse health impacts of aviation noise, particularly exposure during the night period. HACAN would like to see responsible policy action taken more quickly that corresponds to the gravity of the impact.

HACAN believe that Government must now commit to undertaking a comprehensive assessment of the economic, social, environmental and health impacts of night flights.

If this does not happen then we will continue to have a debate about the impacts with only a small portion of the evidence available which cannot be an acceptable way to make policy decisions. There needs to be transparent information from the commercial side of the equation of local communities are to be able to have trust that an equitable balance between positive and negative impacts of night flights is truly being sought.

We would welcome an opportunity to discuss a clear timetable for current and future research to be considered and potentially integrated into existing Government policy.