

Equalities Impact Assessment Consultation

Response from HACAN

HACAN (Heathrow Association for the Control of Aircraft Noise) is the long-established organisation which represents residents under the Heathrow flight paths.

1. We find this a very disappointing document which gives every appearance of being done in a rush. It is not a full study of the situation and, as such, should not have been put out to consultation at this stage. It is an unfinished document.
2. Because the document confines itself to looking at areas within, and just beyond, the 57 decibel contour, it fails significantly to detail the extent of the problem. The Government's own ANASE Study, published last November, found that people get annoyed by aircraft noise levels at much lower levels. The World Health Organisation (WHO) also argues for lower levels. It argues that people start to get moderately annoyed when noise averages out at 50 decibels and seriously annoyed when it averages out at 55 decibels. If the consultation document had followed the WHO guidelines, it would have included many more areas, such as Brixton, Camberwell and Peckham, where there are a significant number of ethnic minority inhabitants. The fact that this has not been done means that this is a misleading document as it critically underestimates the number of ethnic minority inhabitants who are, or potentially will be, affected by aircraft noise. Many disabled people and children also of course live in these wider areas and so their numbers are also seriously underestimated.
3. The document calculates the numbers of ethnic minority inhabitants, children and disabled people living in the area it has chosen to measure but is very sketchy on how these people will be affected. That surely is the point of this exercise. If it is not clearly spelt out, simply collecting the numbers is rather pointless.
4. We think it was a mistake to (so far) leave older people out of your calculations. There is a body of evidence to show that a lot of older people are badly affected by noise and, in particular, low-frequency noise (as their ability to hear higher frequency sounds tails off). As aircraft noise contains a significant proportion of low-frequency noise, this is a serious omission which we hope will be rectified as a result of the consultation.
5. There is still so much work to be done before this becomes a credible document that we would expect that it would need a fair bit of time to complete following the close of the consultation.
6. We believe it is a serious mistake to have such a short consultation period. If anything, it should have been longer than the usual 3 month period because a number of the key groups – such as disabled people or ethnic minority communities – can be hard to reach. There is little indication from the consultation document just how many people from these groups you are actually attempting to consult.
7. Of course, a lot of these problems would have been overcome if a thorough and comprehensive document had been put together in time for the main consultation last

November. It appears that the Department only started work on this document after that consultation had closed and only because lawyers from Friends of the Earth had written asking why one had not been done.

That is no way for a government department to proceed.

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