



Night Flight Consultation 2017

Response from HACAN

HACAN is the well-established, regional organisation which gives a voice to residents under the Heathrow flight paths. This response has been agreed by our Management Committee.

Q1a. How strongly do you agree or disagree with our proposed environmental objective for the next regime.

Your objective: “*We propose an environmental objective to encourage the use of quieter aircraft to limit or reduce the number of people significantly affected by aircraft noise at night, while maintaining the existing benefits of night flights*”.

We have two general comments which we expand on in Q1b.

- HACAN has been responding to night flight consultations for decades! We are encouraged to see the environmental objective spelt out more clearly than before: *We propose an environmental objective to encourage the use of quieter aircraft to limit or reduce the number of people significantly affected by aircraft noise at night.* However, as we explain in response to Q1b, we believe there is a case for going further (our section A).
- We have concerns that *the existing benefits of night flights* have not been fully costed in advance of the consultation being issued. Again, we spell this out in more detail in Q1b. (our section B)

Q1b. Do you have any additional comments on our proposed environmental objective for the next regime?

A. Comment on: *We propose an environmental objective to encourage the use of quieter aircraft to limit or reduce the number of people significantly affected by aircraft noise at night.*

In summary, we point to the evidence which makes the health and quality of life case for a night flight ban, ideally for 8 hours but certainly for the 7 hour period between 11pm and 6am.

The importance of an 8 hour night

The World Health Organisation argues that an eight hour night is important. It quotes studies such as that undertaken by the Centre for Time Use Research, 2006 www.timeuse.org/access/ which show that the average time adults are in bed is around 7.5 hours, with the average sleeping time somewhat shorter. (It doesn't, though, address the fact that adults tend to allow themselves less time to sleep than good health requires). However, there is considerable variation in sleeping time. Though results vary from one country to another, data shows that an 8-hour night protects around 50% of the population but that it would take a period of 10 hours to

protect 80%. On Sundays, sleeping time is consistently 1 hour longer. Young children also have longer sleeping times. The diagrams below, taken from the World Health Organisation Report, show the sleeping patterns in a northern and southern European country – the Netherlands and Portugal.

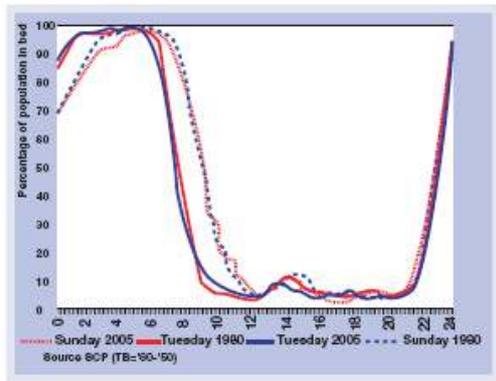


Fig. 1.4
Sleep pattern of Dutch population on weekdays and Sundays, 1980-2005

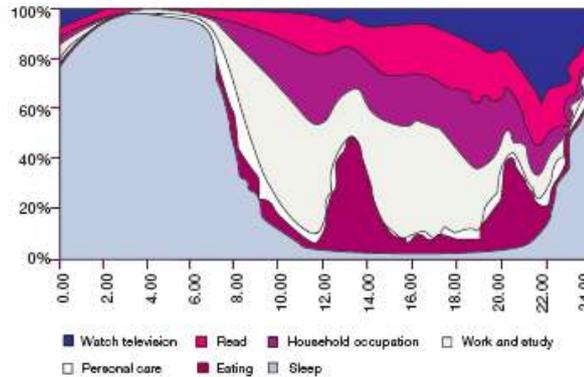


Fig. 1.5
Percentage of time that the Portuguese population spend asleep or in different activities
Source: <http://www.ine.pt/prodserv/destaque/arquivo.asp>, based on a study by the Instituto Nacional de Estatística Portugal, 1999

It is clear that your environmental objective falls far short of this! The WHO evidence indicates the value there would be of an 8 hour ban and that anything less than a 7 hour ban (the length of time the average person is asleep) would be very hard to justify.

The question of annoyance

Annoyance can be difficult to assess in both health and economic terms but it is not disputed that people who get woken up by night flights find it annoying.

The impact on health

There is agreement that all the studies point in the same direction: sleep disturbance can have an impact on a person's health. There is still some uncertainty as to the extent of that impact, particularly over the long term. And insufficient work has been done on the impact on mental health.

The DfT is to be commended for the work it has commissioned or undertaken in recent years on the annoyance and health impacts of night flights. This represents a welcome recognition of the problem; a recognition which wasn't always present. We won't rehearse the arguments here as you are aware of them and have read the relevant literature.

We will, though, refer to *Aircraft Noise and Public Health – the evidence is loud and clear*, work carried out by the Aviation Environment Federation and commissioned by HACAN, since it usefully summarises recent studies. Key findings include:

- There is sufficient evidence from community-based studies to demonstrate that night-time noise exposure leads to sleep disturbance, including changes in heart-rate, arousals, sleep stage changes and awakening.

- The probability of awakening increases with the number of events and with increased sound levels of individual events. To account for this, the World Health Organisation (WHO) recommends using exposure noise metrics that monitor individual events (such as Lmax).

We draw two conclusions from the available studies:

- There is sufficient evidence for a night flight ban to be introduced on health and annoyance grounds. We discuss potential economic impacts of this later in our response.
- The metrics used to assess the impact of night noise should prioritise those which monitor exposure to individual events (such as Lmax). Metrics which average out noise would still have a role to play as they are used by international bodies. They would also be required for comparative purposes. The importance of prioritising individual events is reinforced by the wide geographical range of complaints HACAN receives from people being woken up by night flights. Many of them are from areas some distance outside the official Lden and Lnight contours.

There is an additional important point. The experience of our members is that the insulation of properties is not a panacea. Many, many people with sound insulation still find themselves being woken up by night flights.

B. Comment on: *the existing benefits of night flights.*

There are economic benefits to night flights. But at Heathrow, because of the huge number of people under the flight path, it remains questionable by how much they outweigh the health costs of sleep disturbance and stress caused by night flights.

Moreover, little work has been done on how many of these economic benefits would disappear if the flights currently landing between 4.30 and 6am were transferred to the day.

And, for this particular consultation, we are concerned that detailed cost-benefit analyses do not appear to be carried out for different scenarios at each airport – for example, an eight hour night flight ban; a seven hour night flight ban; your proposal of retaining the current movements limit at Heathrow etc. We recognise that you are asking for respondents to provide further evidence on these points but we believe some more work should have been done on this before the consultation was issued.

Before any decision is taken at Heathrow we would like to see a clear cost-benefit analysis of a seven hour ban from 11pm – 6am which included:

- the economic cost to the airlines, the airport and UK plc if most of aircraft could be accommodated during the day and most of the passengers using them still flew into Heathrow; and if that was not the case
- the monetary savings there would be in terms of reduced annoyance and improved health of a seven hour ban. This should include the savings that would be made if different metrics were used – e.g. Lden, Lnight, N60 etc

Q2a. How strongly do you agree or disagree with our proposal for the length of the next regime?

We would agree that 5 years is about right

Q2b. Do you have any additional comments on our proposal for the length of the regime?

We appreciate that any night flight regime would need to take account of the progress on a third runway. It should be clear by 2022 if the Government has decided to drop the plan for a new runway or whether it has been given the go-ahead.

Related to this is the possibility that a new night flight regime associated with any new runway could be introduced before it is opened. It is sensible for this consultation to allow for this. We will be arguing in response to the forthcoming consultation on the National Policy Statement the case we have made above for a night ban for at least 7 hours.

Q3a. How strongly do you agree or disagree with our proposal to introduce a new QC/0.125 category for aircraft between 81 and 83.9 EPNdB?

We strongly agree with this proposal

Q3b. How strongly do you agree or disagree with our proposal for all aircraft quieter than this to remain QC/0 but count towards the airports movement limit?

We strongly agree with this proposal

Q3c. Do you have any additional comments on proposals for the Quota Count System?

No

Q4a. How strongly do you agree or disagree with the proposal for movement limits to remain unchanged at Heathrow?

We strongly disagree. As we have argued in response to the first question, we believe there is a powerful case to be made out for a seven or even eight hour night.

We have not responded to the questions specifically relating to Gatwick and Stansted.

Q10. Do you have any further views on our proposals, or their potential impact on the Government's ability to fulfil the requirements of the Public Sector Equality Duty?

No comments on this.

John Stewart, Chair HACAN