



# Aviation Green Paper

## Response from HACAN

HACAN is the long-established, regional organisation which gives a voice to residents under the Heathrow flight paths. We welcome the opportunity to respond to this important consultation. Our response has been agreed by our Management Committee.

### **Structure of our response**

We haven't replied to all the questions or, indeed, to all the sections. Noise is the issue which is the main concern for the majority of our members. It is also the area where we have most expertise. Therefore, we have largely confined our response to noise and areas which impact on it.

### **1. Noise**

**There is a lot in the Green Paper on noise which we welcome.**

We welcome the recognition that:

- **Noise can be a real problem for people:** *“the Government recognises that disturbance from aircraft noise has negative impacts on the health and quality of life of people living near airports and under flight paths”.*
- **The number of planes overhead can be a big problem:** *“the Government recognises that statistics showing past and future improvements in noise do not necessarily match the experience of some people living under flight paths, for whom the benefits of quieter aircraft can be cancelled out by greater frequency of movements or the effects of concentrated traffic associated with more accurate navigation technology.”* **For many impacted by flight paths this is perhaps the most important sentence in the Green Paper.**
- **People can become annoyed at lower levels than previously thought:** The use of the 54 and 51 decibel contours rather than the 57 contour is very welcome and a much more accurate reflection of the experience of our members. But there are still people who live outside the 51 contour who are very disturbed by noise. We therefore welcome the DfT commitment to study the recent report from the World Health Organisation (WHO) which found 10% of people became highly annoyed when the noise averaged out at 45 decibels. Our initial view is that WHO could be a particularly important tool in assessing how people react when change happens: when new flights paths are introduced or there is a significant increase of traffic on existing routes.

**We welcome the establishment of ICCAN (Independent Commission on Civil Aviation Noise).** This is something which HACAN has campaigned for over many years. We recognise its full remit has yet to be fully worked out but the Green Paper says it *“will advise the government on best practice on noise mitigation, and how the needs of affected communities can best be served in the airspace modernisation programme”*. We look forward to working with ICCAN.

## 1a. Our assessment of the new measures proposed to tackle noise:

- A new **objective** to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise. This is welcome but it needs fleshing out in the strategy. As it stands, “*to limit, and where possible*” to reduce the impact of noise is too vague. The strategy needs explain how and by whom noise reduction will be enforced.
- A new **national noise indicator** to track the long term performance of the aviation sector in reducing noise. Again this is welcome but the final strategy needs to be more specific. Our view is that any national indicator should incorporate frequency measures as well as average noise measures.
- **Noise caps** to become routine at airports where planning permission is given for growth. These again are welcome. We recognise they could take a number of forms such an annual cap on the number of planes using an airport or flying; a cap on flights over any one community; or an overall or average noise limit which can't be exceeded.

*HACAN has expressed the view that a big concern for most people is the number of planes which fly over their community. Generally, they are much less interested in the total number of aircraft using the airport. While recognizing there are a number of ways to frame a noise cap, we would like to see the idea of a cap on flights overflying individual communities being very much part of the mix. It could be done through guaranteed respite periods.*

- All major airports to draw up a **noise reduction plan** – this is potentially much stronger than the current noise action plans which are required and is welcomed.
- The introduction of **multiple flight paths** to provide **respite** (with the decision down to individual airports). We are confirmed supporters of respite.
- To reduce the current point where **noise insulation** has to be offered from the 63dB LAeq 16hr contour to the 60dB LAeq 16hr contour. This is welcome.
- To require all airports to review the effectiveness of existing **compensation schemes**. This is welcome, as is the requirement that all airports review the effectiveness of existing **insulation schemes**: “*this should include how effective the insulation is and whether other factors (such as ventilation) need to be considered, and also whether levels of contributions are affecting take-up.*” Particularly in lower income communities, the contribution required by the householder could well be a deterrent.
- The Government or the new noise commission to issue new guidance to airports on best practice for **noise insulation schemes**, to improve consistency. It is important that this is done as the picture we have from communities across the country is one of inconsistency.

- For airspace changes which lead to significantly increased flights overhead, a new minimum threshold of an increase of 3dB LAeq is introduced to be eligible for **compensation**. This is important as 3dB LAeq can equal a doubling of flights. There are no proposals, though, about compensating people if their property loses value. We suggest three studies are carried out looking at the impact (if any) of increased flights on property prices in a) London b) the South East beyond London and c) outside the South East.
- Provide more **information** to people moving into an area under a flight path. This would benefit local people, the airport and national government. Our preferred scheme would be that aircraft activity should be a requirement in the search material provided by estate agents.
- **Promote best practice** in operating procedures; give the CAA the duty to require information on the practices used – important and welcome.
- Introduce a new power to direct airports to **publish information**, such as league tables of airline noise performance and including whether airlines are using the best operational practices - such as where they lower their landing gear – available to them. This is welcome. We would add that airports should be required to publish how they measure noise, where they measure it and be encouraged to acquire mobile noise meters which can be installed in areas when communities request them. Heathrow does well on the provision of noise meters but at a number of airports it is a running bone of contention between airports and local communities.

### **1b. Night Flights**

There will be disappointment that there are **no measures to cut night flights** at airports (not just the designated ones). An assessment of the value of night flights to the national and local economies needs to be carried out. There may be economic value in some intercontinental and freight flights but the majority of the night flights at most UK airports are holiday flights which may well be run for the convenience of the operator rather than the good of the economy.

The official NHS advice about sleep is strong: most adults need between 6 and 9 hours of sleep every night (i.e. 7 and a half hours on average); babies need upwards of 15 hours sleep in a 24 hour period; children need an amount reducing from babyhood requirements to 9 hours at the age of 16.

We have produced this booklet for Government to consider: <http://hacan.org.uk/wp-content/uploads/2019/04/Night-Flights-Revisited.pdf>

### **1c. Performance Based Navigation (PBN) Flight Paths**

It is useful that the Green Paper lays out clearly the options for PBN (the new types of flight paths which are being introduced as airports move from a ground-based system to guide planes to a satellite one). The new satellite-based system enables aircraft to be guided along more precise flight paths but it will not allow for the dispersal of flights which some areas currently have.

The only options will be precise, concentrated flights without respite or the creation of a number of these flight paths so respite is possible. In our view, this makes it essential that airports are required to provide clear, cogent reasons for rejecting respite. If an airport opts for all-day flying down concentrated routes, it means that, if the predicted growth takes place, certain communities will be required to bear the entire noise burden. That is a prospect nobody should have to face.

More positively, the new technology potentially allows for the creation of multiple precise flight paths to give residents respite, many of them for the first time. We note that the in-depth NATS study, released alongside the Green Paper, found that the new airspace changes were feasible and that multiple routes to allow respite were broadly possible but that coordination between airports was essential.

#### **1d. CAA Study**

We note the CAA study which was published alongside the Green Paper. It found noise levels would rise by 2030 from their 2016 levels but would fall at most airports by 2050 (despite more people living under many flight paths because of new house building). The fall is mainly due to the introduction of less noisy aircraft. It is an impressive report, packed full of information, but the question needs to be asked if it has fully taken into account the impact of the increased number of flights there may be over some communities as a result of growth and concentrated flight paths.

#### **1e. New Runways**

We note further runways have not been ruled out. The Government believes that, with a third runway at Heathrow in place, there will be enough space available at the UK's airports until 2030 to cater for the projected demand. Beyond that it is uncertain how things will pan out. We note the Green Paper proposes asking the National Infrastructure Commission "*to include airport capacity in future national infrastructure assessments to determine whether there is a needs case for further runways.*" If the Commission feels one or more new runways would be needed, the Green Paper makes clear that the Government would then need to assess locations. There is, however, nothing in the Green Paper to suggest that a fourth runway at Heathrow will not be built. We think this should be ruled out explicitly.

### **2. Demand Management as a potential tool in ensuring growth is sustainable**

Managing demand would make it easier to deal with the downsides of aviation: noise; climate and air pollution. It should, though, be done in such a way so as to ensure that it does not hurt the economy nor return to the era when only richer people could fly. Before the aviation strategy is published we would like to see the Government carry out more work on this. There are number of options which could be assessed.

We outline one of them which we believe has particular merit: **the Frequent Flyer Levy**. The big driver of growth is leisure travel - in particular, leisure trips taken by a small number of people: 70% of flights from the UK are made by 15% of the population; 50% of people don't fly in any one year; and of those that do, most take only one or two flights; business trips account for less than 20% of journeys at most airports. A Frequent Flyer Levy (where everybody would be entitled to one tax-free return flight a year but where the level of tax would increase with each subsequent leisure flight) could curb overall growth without stopping people enjoying a holiday abroad or damaging business: business travel is less price sensitive; and the reduction

in leisure flying by UK residents is unlikely to hurt the economy as the chances are they would spend their money elsewhere in the economy - on holidays in the UK; on rail travel; on buying new household appliances etc. Indeed, given the current tourism deficit, it may result in more money circulating in the UK economy. We believe the Frequently Flyer Levy is a fairer than Air Passenger Duty and, if it can be made to work in practical terms, should replace it.

## **2a. Competitiveness**

There is of course the danger that if tax in the UK far outstrips that in other countries the country would lose out competitively. So far there is little sign of that happening with UK citizens being amongst the top users of aviation and the country having one of the most thriving aviation industries in the world. Worldwide, aviation is under-taxed. We would like to see the UK Government take the lead in pressing for the international community to revisit the whole question of aviation taxation.

## **2b. Hypothecation of taxes raised**

There is a case for the money raised from taxing the aviation industry to be ploughed into research and development of quieter, cleaner aircraft. This could have widespread benefits for the industry, local communities and the wider environment.

## **3. New Technology**

We welcome the Government's desire expressed in Green Paper to promote new technology and to act on the international stage to make the processes more agile: *"The government proposes to work with international partners to: develop a more agile international regulatory framework that is based on performance-based standards. It will not be possible for global standards to keep pace with rapid developments in technology if they are overly prescriptive. The UK recognises the need to pay due regard to existing governance, but the government believes that the UK can provide additional support to ICAO in encouraging more agile processes for standard-setting, particularly in relation to new and emerging technology."* We believe this is important. New technology nearly always surprises and very often comes up with solutions to problems we are all struggling with. ICAO is by reputation a slow-moving body. We back measures to force it out of its lethargy!

## **4. Slots**

We welcome the intention to look again at how slots are operating. We are not experts but over the years have been to conferences in Brussels where only the UK was motivated to do anything about the system of slots. But now could be the time to look at them. Over the coming years a number of European airports may be keen to look at policy on slots as they are expected to reach the capacity Heathrow is at today. And if third runway is built at Heathrow it *"will be the first time a significant number of additional slots have been released at a severely congested airport in the UK...demand is likely to outstrip supply, especially at certain times of the day. Therefore it is crucial that the allocation process is right."* We agree.

**John Stewart, Chair HACAN**

**21<sup>st</sup> May 2019**