HACAN response to Future of Transport regulatory review: future of flight

November 2021

Introduction

HACAN (Heathrow Association for the Control of Aircraft Noise)[1] 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.

According to the European Environment Agency, noise pollution is the second largest environmental threat to health, causing 12,000 premature deaths a year.[2] The harmful effects of noise include heart disease, annoyance and sleep disturbance.

There is a risk that technological solutions to carbon reduction may have adverse effects on levels of noise experienced by communities; for example, large scale electric aircraft may be significantly heavier and thus create even more noise than existing aircraft, particularly on arrival.

Noise

Government should be acting nationally on noise and setting appropriate limits to protect local communities, including from new and novel aircraft. Such aircraft should be subject to both noise standards and local regulation that enforces noise limits.

Disturbance from aircraft noise has negative impacts on the health and quality of life of people living near airports and under flightpaths. The CAA Survey of Noise Attitudes - SoNA (2017)[3] found that the public is becoming more sensitive to aircraft noise, to a greater extent than noise from other transport sources, and that there are health costs associated from exposure to this noise.

The noise impact of new and novel aircraft should be measured before any approval for flight over communities is permitted. The impacts need to be set out clearly and concisely.

Baseline noise measurements should also be included so that communities can compare the current situation to the change being proposed. This should be in an understandable format.

[1] www.hacan.org.uk
[2] EEA (2020) Healthy environment, healthy lives: how the environment influences health and well-being in Europe. https://www.eea.europa.eu/publications/healthy-environment-healthy-lives
[3] https://publicapps.caa.co.uk/docs/33/CAP%201506%20FEB17.pdf

Given the large numbers of people already significantly annoyed by aircraft noise it is vital that regulation for new and novel aircraft clearly specifies the level noise that is unacceptable to the general public.

The cumulative noise impacts of new and novel aircraft should also be set out before any approval is considered. High numbers of even low noise events are likely to create significant disturbance and annoyance for overflown communities.

The impact of new or novel aircraft must be included in a comprehensive review of aviation noise policy and regulation including mitigation measures.

Airspace

Airspace Change Proposals (ACP) have the potential to have a significantly negative impact on the quality of life of millions of people. Yet, the modernisation programme seeks to facilitate growth in airspace capacity with little or no regard to the significant health and environmental impact of airspace changes.

The Government does not possess reliable evidence base on which to assess the impacts on health and the environment arising from the changes envisaged. Consequently, clarification is required of how the assessment of health impacts is factored into ACPs.

Air Navigation Guidance (2017) supports local solutions being arrived at between an airport and local communities. If airports see no operational need for airspace change, or if they consider that it could create unwanted disruption and negative health and environmental impacts on local communities, they should not be forced to deliver it.

The Civil Aviation Authority (CAA) has not set out how it will achieve the balance it is required to strike between environmental and economic impacts. This is especially vital following the abolition of ICCAN, given the role that the CAA's new Environmental Panel is likely to play in advising on ACPs.

UTM and its integration with ATM systems

AAM/ UTM + and other new aircraft should be assessed in relation to their noise emission at the design stage. Assessments should be made available to communities prior to certification.

AAM / UTM + Should be subject to certification / type approval for the purposes of noise in order to reduce the risk of communities being disturbed. The certification process should include an element of tonality to account for specific frequencies that may stand out and cause particular annoyance. World Health Organisation Guidelines should be the basis of noise certification of AAM / UTM +.

In flight AAMs / UTM +should be easily identifiable 24 hours a day so that communities can identify the operators to raise issues of noise, safety, flight frequency etc.

AAM / UTM + should be subject to nuisance legislation pertaining to noise including the Environmental Protection Act 1990. Indeed, Local Authorities should be given the powers to restrict the numbers of AAM / UTM + flying within a particular area to reduce noise.

Regular use of AAM / UTM + should not be introduced into an area without consulting local communities potentially affected by noise beforehand.

Operators of AAM / UTM + must be registered legal entities in the United Kingdom.

Infrastructure

Local transport networks around Heathrow are already congested. The introduction of new or novel aircraft may add to this congestion both in terms of additional journeys to supply infrastructure bases and in terms of new aircraft in the skies overhead.

It is essential that investment continues to be made in public transport networks to support access to airports and that local authorities are empowered with the necessary resources to address local impacts.