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AirportWatch
Aviation Communities Forum
Gatwick Area Conservation Campaign
Heathrow Association for the Control of Air Noise
Luton and District Association for the Control of Aircraft Noise
Stop Stansted Expansion

Kelly Tolhurst MP
Parliamentary Under Secretary of State
Department for Transport
Great Minster House
33 Horseferry Road
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United Kingdom

24 August 2020

Dear Minister

AVIATION NOISE POLICIES

We understand that the government plans to publish an aviation recovery strategy in the autumn and that the strategy may provide further detail on your noise policies for the industry.

Several of our organisations submitted substantial responses to the 2018 Green Paper, Aviation 2050, including the noise proposals made in it. Because that was some time ago, we hope it will be helpful if we summarise the central noise issues that we believe the government should address. Our objective is to help government put in place policies, processes and institutions which can together achieve outcomes that all parties accept are fair and balanced, a goal that the policies of the past two decades have failed to achieve.

Policies

Aviation 2050 acknowledged that a stronger and clearer policy framework is required, "*which addressed the weaknesses in current policy and ensures industry is sufficiently incentivised to reduce noise*". However, it then proposed a core noise objective - "*to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise*" - which is virtually identical to previous policies and neither stronger nor clearer.

Further analysis suggests that the Aviation 2050 proposals are in fact weaker than the extant 2013 Aviation Policy Framework which says “*the industry must continue to **reduce and mitigate** noise as airport capacity grows*” and the Environmental Noise Directive’s clearly stated objective “***to avoid, prevent or reduce** on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise*” (emphasis added).

We support the core noise policy principles set out in Aviation 2050, particularly that there should be a fair balance between the interests of the aviation industry and those its operations adversely impact. However, we do not believe the policy itself is formulated in a way that is likely to achieve that goal. Similar statements in previous policy documents have contributed to an environment in which complaints have increased very substantially, many new aviation community campaign groups have been created and trust between the industry (together with government and the CAA) and impacted communities has largely disappeared.

In our view the Government should move away from this historic formula. The test for any new policy is straightforward: it should provide an objective, readily comprehensible, foundation upon which clear, enforceable, airport-specific noise reduction requirements can be set, measured, reported and enforced. The current and proposed noise policies fail that test.

The policy itself should, in our view, have three components:

- first, the industry should be required to implement, on a timely basis, all safe and reasonably practical measures to reduce its adverse noise effects. This requirement should mirror the “As Low As Reasonably Practical” principle successfully applied to safety regulation across multiple sectors, including aviation, for many years.
- secondly, a condition of any future growth above an agreed baseline should be that it will be equitably and proportionately balanced by reductions in noise and other environmental impacts or, if there are locations where that is not possible, by the provision of equivalent benefits in those areas.
- thirdly, that community exposure to aircraft noise must be reduced to the limits recommended by the World Health Organisation by a specified date to be determined by the government.

These core noise policies should be supported by additional policies that require the industry to pay all external costs that its activities impose on society at large, in line with the “polluter pays” principle, and to ensure potential passengers are properly informed about the industry’s environmental, health and other impacts.

Processes and institutions

Aviation 2050 proposed that aviation noise policy should be delivered principally through noise caps and noise plans.

We believe caps and plans have the potential to be effective tools for managing and reducing aircraft noise. However, current Noise Action Plan arrangements, and most current noise caps, are not fit for purpose and should not be used as a template for future arrangements. Instead:

- noise caps should be determined for all airports whose operations have significant impacts on local communities, not just as an output of planning approvals. They should set out **the level of** noise reduction airports are required to achieve and over what timeframe.
- noise plans should set out **how** airports will achieve the noise reductions required by the noise cap. They should also be set for at all airports whose operations have significant impacts on local communities, not just for airports that do not have noise caps.
- noise caps and plans should be determined and approved respectively by an independent, expert, empowered regulator, endorsed by the Independent Commission on Civil Aviation Noise, not by planning authorities. Planning authorities are not representative of impacted populations, do not have the expertise to regulate noise effectively, lack appropriate powers and may be conflicted.

We have provided your officials with further details on these proposals and would welcome an opportunity to discuss them with you in due course. Our objective is simple: to replace opaque policies and a regulatory vacuum with clear policy that is robustly measured, monitored and enforced.

We appreciate that the aviation industry is facing challenging market conditions. However, we believe this is the right time to put in place more robust noise policies and regulation. Aviation noise issues have vexed government, communities and the industry for many years. Excessive aircraft noise has serious health consequences, inhibits investment, reduces asset values and unnecessarily absorbs policy maker, industry and community resources. All those issues will persist until the government puts in place clear noise policies and robust regulation. These should be foundations of the build back better strategy announced by the Prime Minister.

Yours sincerely,

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cc:

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Rob Light, Chairman ICCAN, Sam Hartley, ICCAN
Huw Merriman, Chair, Transport Committee