

Please find the response to the Noise Action Plan from HACAN, the organisation which represents residents under the Heathrow flight paths. The response has been agreed by the HACAN Management Committee.

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HACAN Response to Noise Action Plan Consultation

The Action Plan needs to be a lot more wide-ranging than it is at present.

What is required:

1. An Action Plan which sets out to reduce annoyance for people disturbed by noise from Heathrow.

That means:

- **An accurate assessment of the true numbers of people affected.** The Lden measurement which the European Directive requires member states to use gives a more accurate measurement than the Leq measurement. The numbers within a 55 Lden contour are over 700,000 compared with less than 300,000 inside the old 57 Leq contour. But it is still an underestimate. **See our video, *Under The Flight Path Crossroad*, shot in Vauxhall outside the 55 Lden contour:** [HeathrowCampaignTV](#) (the views expressed in the video are those of the participants and do not necessarily reflect the policy of HACAN)
- **Retain the cap of 480,000 on the number of flights permitted at Heathrow.** This will mean that, if and when quieter planes come on-stream, residents will get some benefit.
- **Retain runway alternation.**
- **Explore ways of extending runway alternation in some form to areas further from Heathrow** in order to give more people some relief from the noise during the day.
- **Reduce the maximum take-off noise limits**, particularly in view of the fact that the Cranford Agreement is being abolished.
- ***Look at ways of introducing a steeper approach.** A steeper glideslope would have significant benefits for areas further from Heathrow as planes would be higher in the sky for longer.
- ***Avoid any plans to concentrate the number of flights on narrower and narrower corridors thus creating noise ghettos.**
- **Explore ways of actually *reducing* the number of flights using the airport.** It is the sheer volume of aircraft, rather than the noise of each plane, that is the big problem these days. Cutting overall numbers is a big challenge, but not impossible. Investment in fast, affordable rail services, coupled with more use of teleconferencing, has the potential to cut flight numbers without affecting the effectiveness of UK plc.

- **A ban on night flights.** Night flights are incompatible with the WHO recommended noise limits for night-time. A two-stage approach is recommended:
 - a ban on night flights between 11.00pm and 6am when the current agreement with the airlines runs out in 2012. The alleged contribution of these flights to the UK economy has never been backed up by hard evidence.
 - a reduction in the number of night flights between 6am and 7am, leading to an eventual ban.

Our understanding is that a plan to deal with night noise is a requirement of the European Noise Directive.

*** These will be amongst the topics covered in a report on flight paths which we have commissioned and will be publishing before the end of the year.**

2. An Action Plan which takes full account of low-frequency noise in measurements

That needs:

The use of 'C' weighted or 'D' weighted noise measurements as well as 'A' weighted ones. WHO recommends that when the difference between 'A' and 'C' weighted results is around 10 decibels, 'C' weighted measurements should be used as well as 'A' weighted ones. A 2003 HACAN Study (The Quiet Con, 2003) found that 'C' weighted results showed planes to be around 9 decibels noisier than when the conventional 'A' weighting was used – this is because of the high amount of low-frequency contained in the deep roar of an aircraft.

3. An Action Plan which doesn't rely exclusively on average noise

That needs:

Additional noise measurements. The method of averaging out noise is used internationally and would be difficult to ditch unilaterally but additional methods can be used. For example in Sydney, the number of flights going over an area is published as well as the noise average. This needs to be explored for use in the UK as part of this action plan. We would welcome, too, maps which used colour creatively, so it is easier for people to understand noise levels.

4. An Action Plan which protects and enhances quiet areas

That needs:

The retention of runway alternation - because that means important open spaces such as Richmond Green or Windsor Great Park would at least be quiet for some of the day

5. An Action Plan which introduces more realistic and generous insulation schemes

That needs:

- High-quality noise insulation schemes for residential and community buildings, operating over wider areas than now, to include more than just double-glazing (ventilation etc) and to apply to new community buildings as well as existing ones.

- Investment in updating old insulation (in homes and community buildings) after, say, 20 years or when it fails to provide appropriate attenuation
- Ensure Cranford is covered for additional mitigation and/or buy-up if the noise increase is more than 1dB (as in road schemes) - rather than 3dB which BAA would like.

6. An Action Plan which also covers City Airport

That needs:

Given the way that, between them Heathrow and City Airport have made aircraft noise a London-wide problem, the same action plan should cover both airports. At the very least, the two action plans should be complementary. We understand the City Airport action plan has only just been published for consultation.

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