

LADACAN comments on overarching noise policy (IP ref 20040757)

Overarching noise policy statement

“The government’s overall policy on aviation noise is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation’s Balanced Approach to Aircraft Noise Management. This should take into account the local and national context of both passenger and freight operations, and recognise the additional health impacts of night flights.

The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise.”

Comments on the overarching policy

We note that for completeness, the overarching noise policy statement itself should be interpreted in the context of the Preamble, Justification and Balance provided by the DfT.

The **Preamble** preceding the policy on the DfT webpage indicates:

- noise policy will be updated later this year, but the revised overarching statement is published to frame the night noise abatement and noise action plan consultations

The **Justification** following the overarching policy statement on the DfT webpage indicates:

- Aviation 2050, night flights consultation 2020, UK air navigation guidance 2017 fed into this update
- an increase in total adverse effects may be offset by an increase in economic and consumer benefits in the context of sustainable growth
- noise reduction and noise mitigation to the extent practicable and realistic are both required
- clear evidence of the additional health impacts of night flights is explicitly recognised

The ICAO Balanced Approach is key to the required **Balance**. The Balanced Approach itself involves first identifying the noise problem at a specific airport, and then analysing and exploring various measures available to reduce noise using four principal elements:

1. Reduction of Noise at Source (Technology Standards)
2. Land-use Planning and Management
3. Noise Abatement Operational Procedures
4. Operating Restrictions

The ICAO goal is to address noise problems on an individual airport basis and to identify the noise-related measures that achieve maximum environmental benefit most cost-effectively using objective and measurable criteria.

ICAO Guidance on the Balanced Approach refers to various possible measures including:

- Lower noise aircraft technology and certification
- Planning zoning and easement
- Building codes, insulation, transparent disclosure
- Tax incentives and noise charges
- Noise preferential routes
- Navigational procedures
- Reduced power/drag and CDA
- Limited engine ground running
- Movement caps
- Noise quotas
- Curfews

Application of the overarching policy

Application of the overarching policy would involve balancing the economic and consumer benefits against the social and health implications in the context of a particular airport, bearing in mind other principles which underpin noise policy. DfT officials confirmed on 11 July 2023 at its multi-stakeholder Airspace and Noise Engagement Group meeting that those underpinning principles (including the Aviation Policy Framework 2013) remain in effect.

We have therefore summarised application of the overarching policy into five tests:

- 1) Is the benefits/harms balance being applied in the context of sustainable growth?
- 2) Has the specific airport noise problem and been identified and all measures available to mitigate and reduce noise been analysed, explored and put in place?
- 3) Have the noise-related measures that achieve maximum environmental benefit most cost-effectively by objective measurable criteria been identified and put in place?
- 4) Does the analysis take into account the local and national context of both passenger and freight operations, and recognise the additional health impacts of night flights?
- 5) Has the impact of aviation noise been mitigated as much as realistic and practical, to limit and where possible reduce total adverse impacts on health and quality of life?

To comply with the underpinning noise policy, airports seeking expansion must:

- a) share the benefits of growth between the aviation industry and local communities;
- b) demonstrate that noise is continuing to reduce and be mitigated as capacity grows;
- c) have regard to the need for noise levels to fall with technology improvements as a pre-condition of the aviation industry sharing the benefits from these improvements.