

Response ID ANON-13PR-XGHT-1

Submitted to 2024 Consultation on the Future Direction of the UK Aviation Environmental Review
Submitted on 2024-12-10 11:55:59

Introduction

1 What is your name?

Name:
Stephen Mitchell

2 What is your email address?

Email:
Steve@MitchellEnvironmental.co.uk

3 What country are you responding from?

country name:
United Kingdom

4 Are you responding from an organisation or as an individual?

Organisation

Organisation questions

5 If responding from an organisation, which organisation are you representing?

organisation name:
Institute of Acoustics

6 What type of organisation do you represent?

professional membership institute

If other, what type of organisation do you represent?:

Publication of responses

7 Can we publish your response?

Yes

CAA's ambition and aims for the AER

8 Please tell us to what extent you agree with the CAA's ambition and aims for the AER.

Neither agree nor disagree

Please explain your reasoning:

Our response relates to the noise aspects only.

Climate change

9 In addition to reporting greenhouse gas emissions from domestic flights within the UK and international flights departing the UK, are there any other relevant areas we should consider reporting on with respect to climate change in future updates to the AER?

Not Answered

If yes, please identify the additional relevant area(s) we should consider reporting on with respect to climate change in future updates to the AER and explain why this would be useful to you.:

Our response relates to noise aspects only.

If known, please provide examples of any relevant data sources and/or methodologies we could consider to inform your suggestion(s). :

Our response relates to noise aspects only.

10 There are various ways we can present climate change data in future updates of the AER. Please tell us how useful each of the following options would be to you. Note these options are not mutually exclusive and may be used in combination.

Climate change data options - Option 1: National Total:
Useful

Climate change data options - Option 2: Airport Cluster:
Useful

Climate change data options - Option 3: Airport:
Useful

Climate change data options - Option 4: Airline:
Useful

Please explain the reasons for your selections. :

Our response relates to noise aspects only.

11 Are there any other ways we could present climate change data which you think would be useful to include in future updates of the AER, outside of those already suggested?

Not Answered

If yes, please identify the additional option(s) we should consider for presenting climate change data in future updates of the AER and explain why this would be useful to you. :

Our response relates to noise aspects only.

If known, please provide examples of data sources and/or methodologies we could consider to inform the additional option(s) suggested.:

Our response relates to noise aspects only.

Noise

12 In addition to reporting the number of people exposed to aviation noise in the UK, are there any other relevant areas we should consider reporting on with respect to noise in future updates to the AER?

Yes

If yes, please identify the additional relevant area(s) we should consider reporting on with respect to noise in future updates to the AER and explain why this would be useful to you.:

The IOA would like to see metrics reported to cover both the national noise impact, which will be of interest to track progress to achieve DfT aviation noise policy aims and to assist stakeholders affected by noise from individual airports in understanding their noise, how it has changed and how it is being managed.

For noise exposure: Population above LOAEL, and above SOAEL, day and night.

For health effects: Population Highly Annoyed and Population Highly Sleep Disturbed (from TAG). Where appropriate and practicable (noting the additional modelling burden) additional awakenings.

DfT policy emphasises the need for mitigation, so it is important to report this. NAPs, prepared 5 yearly, report noise mitigation measures at airport level for airports with over 50,000 ATMs/yr and city airports, approximately 20 UK airports. The Aviation Environmental Review should be a useful place to summarise this, without being overly burdensome, after each round of action planning. This would facilitate benchmarking that may encourage better practice, and also help track progress.

Aviation policy encourages noise insulation. Although the benefits are not well understood, the number of houses with noise insulation should be reported. Schemes vary, and in later years this reporting could be refined to account for differing degrees of insulation, e.g. with acoustic ventilation, and as the benefit of noise insulation become better understood.

If known, please provide examples of any relevant data sources and/or methodologies we could consider to inform your suggestion(s).:

As referred to above.

13 There are various ways we can present noise data in future updates of the AER. Please tell us how useful each of the following options would be to you. Note these options are not mutually exclusive and may be used in combination.

Noise data options - Option 1: National Total:
Very useful

Noise data options - Option 2: Airport Cluster:
Slightly useful

Noise data options - Option 3: Airport:
Extremely useful

Please explain the reasons for your selections.:

The IOA would like to see the noise performance of as many airports as possible reported. As mentioned above, in addition to the 8 airports for which ERCD has provided data, noise mapping carried out for the remaining airports should provide the majority of the source data albeit on a 5 yearly basis. We feel it is better to include this noting it may be up to five years out of date rather than exclude it.

Noise impacts are a location specific local issue. Those affected by noise want to know about noise from their local airport where they are. Noise is managed at an airport level. For these reasons the information should be reported at airport level.

Summing the individual airport data to report the national situation is clearly valuable to track national performance and the effectiveness of government policy and its implementation. Where communities are overflowed by more than one airport clustering may be useful to ensure the cumulative impact on them is not missed.

We understand clustering airports by the regions served may help in planning services and airspace but see fewer benefits in reporting noise impact in clusters of airports. In any event, this information could be derived from individual airport data and for the most appropriate cluster as determined by each user of the data.

14 Are there any other ways we could present noise data which you think would be useful to include in future updates of the AER, outside of those already suggested?

Yes

If yes, please identify the additional option(s) we should consider for presenting noise data in future updates of the AER and explain why this would be useful to you.:

Noise impact data for each airport should be reported in the context of the throughput each airport delivers, measured as passenger numbers and ATMs. This would facilitate comparison of noise management performance across airports, not in terms of populations affected or overall health effect, but in terms of how noise efficient an airport is at providing flights with minimal impact.

Some airports incentivise quieter fleets. To help evaluate the success of this a fleet noise metric should be reported. This could be, for example, the proportion of Chapter 14 aircraft.

With the prospect of widespread airspace change in the mid-term, the distribution of noise beyond LOAEL contours could change significantly.

Supplementary noise metrics such as population overflowed could be reported. Areas with designated landscape value that are overflowed could also be reported.

Schools and other particularly noise-sensitive receptors can be greatly affected by aircraft noise, and progress to mitigate these e.g. through noise insulation could be reported.

DfT has not taken the lead on land use planning policy and local planning policy is inconsistent, and in often weak. It would assist policy makers if the extent of poor planning that allows new housing in noisy areas without adequate mitigation could be better understood, e.g. numbers of new homes allowed above LOAEL and SOAEL. The IOA appreciates this may be challenging, and it may be a longer-term aspiration if data sources improve.

If known, please provide examples of data sources and/or methodologies we could consider to inform the additional option(s) suggested.:

As referred to above.

Air quality

15 In addition to reporting emissions from civil aviation flights and airport support machinery for the five damaging air pollutants outlined, are there any other relevant areas we should consider reporting on with respect to air quality in future updates to the AER?

Not Answered

If yes, please identify the additional relevant area(s) we should consider reporting on with respect to air quality in future updates to the AER and explain why this would be useful to you.:

Our response relates to noise aspects only.

If known, please provide examples of any relevant data sources and/or methodologies we could consider to inform your suggestion(s).:

Our response relates to noise aspects only.

16 There are various ways we can present air quality data in future updates of the AER. Please tell us how useful each of the following options would be to you. Note these options are not mutually exclusive and may be used in combination.

air quality matrix - Option 1: National Total:
Useful

air quality matrix - Option 2: Airport Cluster:
Useful

air quality matrix - Option 3: Airport:
Useful

Please explain the reasons for your selections. :

Our response relates to noise aspects only.

17 Are there any other ways we could present air quality data which you think would be useful to include in future updates of the AER, outside of those already suggested?

Not Answered

If yes, please identify the additional option(s) we should consider for presenting air quality data in future updates of the AER and explain why this would be useful to you.:

Our response relates to noise aspects only.

If known, please provide examples of data sources and/or methodologies we could consider to inform the additional option(s) suggested.:

Our response relates to noise aspects only.

Additional environmental reporting topics

18 Not including climate change, noise and air quality, would you like to suggest any additional environmental topic(s) that the AER could report on? Please select from the options below.

If other, please specify the environmental topic(s) the AER could report on.:

Our response relates to noise aspects only.

Please explain why the environmental topic(s) selected would be useful to you. :

Our response relates to noise aspects only.

Please provide examples of data sources and/or methodologies we could consider to inform the environmental topic(s) suggested.:

Our response relates to noise aspects only.