

Helicopter Noise Coalition response to The Department for Transport scoping document on “developing a sustainable framework for UK aviation”

October 2011

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We call on the DfT to specifically include helicopters and references to helicopter noise in its “sustainable” framework. If it does not, then we suggest it is impossible for helicopter use to grow in a way that can genuinely be considered “sustainable” by any stakeholder other than the industry itself.

Background

The Helicopter Noise Coalition (HNC) is a group of individuals from across the UK, who are affected by helicopter noise from a variety of sources such as commercial and private operators, emergency services and the military.

We note that the scoping document contains no reference to helicopters, or specifically the problem of helicopter noise in the UK.

The noise produced by helicopters is the main reason for the HNC wanting helicopters to be specifically included within UK aviation policy. The reason that helicopters have been excluded from the scoping document may be because the DfT considers relatively few people are affected by helicopter noise. However there are a large number of people who are seriously affected, and for them it is an important issue.

Two government reports into helicopter noise have been produced in recent years, by DEFRA (1) and The London Assembly (2). The general conclusion is a lack of regulation to protect people from helicopter noise pollution and a lack of satisfactory complaint or consultative procedures. This has not changed in the 5 years since the first report was written. The preparation of a new “sustainable” UK aviation policy is, we believe, the perfect opportunity for the DfT to address this problem and include more specific references to helicopter noise in its “sustainable” framework.

Helicopter Noise Pollution Survey

We have carried out a survey of people who are affected by helicopter noise and the following is a summary of the results which shows the effect helicopter noise is having on people who are exposed to it.

95% of people who responded came from England, suggesting Scotland, Wales and Northern Ireland are less affected by helicopter noise. This could be due to the differences in population density.

89% of respondents say that helicopter noise is more intrusive than other forms of aviation noise pollution, with 60% saying that helicopter noise interrupts conversation outside. 76% reported that the pollution has got worse in the last 5 years, showing that the problem is getting steadily worse and will continue to do so without specific legislation.

36% had considered moving because of helicopter noise with 32% reporting a negative impact on their health and 74% reporting a reduction in quality of life due to helicopter noise. How can this be compatible with a "sustainable" helicopter usage policy?

79% reported experiencing helicopter noise at night, with 29% saying that they are "frequently" woken up and 39% "occasionally". There are no restrictions on night flights for helicopters, with the only restriction being on take-off and landing. But take-off and landing only accounted for 10% of noise disturbance, suggesting that the problem is far wider than just near heliports and that night flights are totally inappropriate for non emergency reasons.

Private and commercial helicopters made up the bulk of complaints at 41% with Police helicopters at 28%, and the military 13%. "Other emergency services" (such as air ambulance and air sea rescue) making up just 4%. The remaining 14% was from an "unknown" source. This suggests that the Private and commercial operators and the Police form the bulk of noise disturbance and should be specifically included in any "sustainable" framework.

Just 7% reported that they had helpful correspondence with the source of the noise after making a complaint, with a massive 65% reporting that they have not had the opportunity for any communication. This shows that the current consultative framework – where one exists at all - is not working in respect of helicopter noise. This can be seen by the recent problems at Wycombe Air Park (WAP), where complainers ostensibly had the opportunity to consult via the Joint Consultative Committee but were largely ignored. This has been escalated to the DfT citing both the Civil Aviation Act and the Convention on Human Rights, and has resulted in the DfT threatening to 'specify' WAP under Section 5 (a potentially more demanding regulatory regime). However progress has been slow and no enforcement action has yet been taken, despite the DfT agreeing that the current situation is unsatisfactory.

Only 23% of those surveyed had contacted the CAA regarding helicopter noise, with just 17% saying they had contacted their MP. This shows that the problem is far bigger than the CAA figures and MP's mail boxes would suggest. Those who do complain or ask for noise to be reduced, generally find their requests fall on deaf ears, and the helicopter industry continues as before. Realising that complaint is futile, and there is no means of getting change, most people cease to complain. The lack of complaints does not mean there is no problem – merely that the complaints procedure is not satisfactory or adequate.

As previously stated, a massive 89% of respondents feel that helicopter noise is more intrusive than other aviation noise. Unlike flight paths for commercial airlines, helicopters generally are permitted to fly almost anywhere at low altitude. Therefore people can find themselves being over-flown by helicopters, though they are not on any documented route. Helicopters fly much lower than commercial airlines for most of their journeys, resulting in a far higher noise impact than that of fixed wing aircraft. Additionally the "quality" and volume of helicopter noise is far more intrusive than fixed wing aircraft, resulting in a higher "annoyance" factor than an equivalent fixed wing flight.

People who are troubled by helicopter noise note that if any terrestrial source of noise – such as a nightclub, race track, factory or a neighbour - was as much of a nuisance, or as intrusive as helicopter noise, there would be controls, and measures by which the producer of the noise could be required to be quieter. It is only aviation noise, including helicopter noise, against which residents of the UK have little or no redress. New roads and railways require extensive consultation and planning permission, helicopter flight paths escape this important dialogue.

Specific responses to questions in section 5

Questions with no relevance to helicopter noise pollution have not been answered. The original questions have been included in ***bold italics*** to aid reading.

5.5 How, and within what constraints, can aviation growth occur as technological developments and improved operating procedures reduce CO2, pollutant emissions and noise impacts?

Aviation growth should only occur within noise constraints considered reasonable by the majority of the affected population. Helicopters are the noisiest aircraft and are considered up to 15dB more annoying than fixed wing aircraft (1). The DfT should specify limits on helicopter noise for all areas of the country including those away from heliports.

5.6 How should decision-makers address trade-offs or competing interests, where these occur both (a) between different aviation objectives, e.g. CO2 emissions versus local noise reduction, and (b) between aviation and other sectors, e.g. airspace use versus renewable energy objectives, or the use of land for maintaining a viable network of smaller airfields versus housing development?

Trade-offs should be made in favour of the majority of people and the environment. For example, if noise from helicopters affects more people than it benefits, then the majority should have primary consideration. Where the benefits are unclear then only the direct benefits should be considered. A commercial or private helicopter on a typical flight will definitely affect more people than it benefits. Police helicopter benefits are more difficult to quantify, which is why we consider their use to be inappropriate for minor crime. Not all crime can be cost effectively targeted, such as when offenders are let off with a caution, or minor fine following expensive Police helicopter involvement.

5.40 What do you consider to be the most significant impacts – positive and negative - of aviation for local communities? Can more be done to enhance and / or mitigate those impacts? If so, what and by whom?

The most significant impact on local communities, by helicopters, is noise. There are limited benefits to communities living around heliports and no benefits to communities living under helicopter flight paths away from heliports.

5.41 Do you think that current arrangements for local engagement on aviation issues, e.g. through airport consultative committees and the development of airport master plans, are effective? Could more be done to improve community engagement on issues such as noise and air quality? If so, what and by whom?

Current arrangements for local engagement on helicopter noise issues do not work.

Communities that are affected by helicopter over-flights have no consultative committee to engage with at all. This can be seen by recent experience with Battersea Heliport who refused to consult with anyone other than “locals”, even though their operations affect communities further afield. The operators have no obligation to consult at all. Very unsatisfactory.

Battersea Heliport is not specified under Section 35 of the Civil Aviation Act meaning that no further action can be taken by people affected by their operations. Heliports that are Section 35 specified are only required to consult with affected local communities, not to **act** on the outcomes of consultation. Very unsatisfactory.

The official complaint route for people affected by over-flights is the CAA which has no consultative element, and all replies are of a standard format, pointing out that no laws are being broken by the helicopters being complained about and nothing can be done. Very unsatisfactory.

A few years ago the CAA and DfT lowered the flight ceiling for helicopters in uncontrolled air space over congested areas – i.e. people's houses. This resulted in extra noise, per flight, being inflicted on over-flown communities at a time when flight numbers were increasing. This was carried out with no consultation with the communities affected. Very unsatisfactory.

Current arrangements are clearly ineffective.

5.43 What are your views on the idea of setting a 'noise envelope' within which aviation growth would be possible, as technology and operations reduce noise impacts per plane? What do you consider to be the advantages and disadvantages of such an approach?

We would welcome any noise restrictions for helicopter over-flights as there are currently none. Noise envelopes around heliports would only be considered acceptable if they reduced the overall noise impacts of helicopter activity and were agreed with affected communities in advance. The current method of measuring aviation noise (Lden) is inappropriate as suggested in DEFRA report "The Lden is not an informative parameter for the depiction of helicopter noise, since helicopter noise arises from individual flights as opposed to the average of a large number of flights" (1). Since the UK reduced the minimum altitude for helicopter flights over built up areas from 1,500 to 1000 feet, the noise is significantly greater, at a time when helicopter use has increased.

5.44 Is it better to minimise the total number of people affected by aircraft noise (e.g. through noise preferential routes) or to share the burden more evenly (e.g. through wider flight path dispersion) so that a greater number of people are affected by noise less frequently?

It depends on who you ask. People will answer in a way that minimises their own exposure to helicopter noise. The fair answer to this question is to minimise the use of helicopters and ensure that they "always avoid populated areas" (3) as suggested by the British Helicopter Association Pilots' code of conduct. Concentration of helicopter flight paths is unfair on those living beneath them, as their routes are generally not published and there is no way for the public to be aware of such routes. Someone moving to a new area might not know they had inadvertently chosen a house under a busy flight path for helicopters, as is the case for many of our members.

5.46 What are the economic benefits of night flights? How should the economic benefits be assessed against social and environmental costs?

As far as helicopter night flights are concerned there is little or no economic benefit. Helicopters are generally far noisier than fixed wing aircraft and their use at night should be heavily restricted to matters of national security, serious crime and medical emergencies.

5.49 If you have comments on any strategic issues not covered in this scoping document, which you consider to be relevant to the development of the aviation policy framework, please include them in your response.

In planning terms, helicopters are treated very much in the same way as cars, so the owner of a private helicopter may build a helipad, and fly a helicopter in and out many times per year. But a helicopter causes significantly more noise and annoyance to neighbours, wildlife and farm animals, than a car. The HNC believes that restrictions on helicopters needs to be looked at again, and tighter controls introduced. In many areas of their operations, helicopters are currently under-regulated, with inadequate safeguards or consultation for members of the public affected by their operations.

References

1. **DEFRA.** *NANR 235 – Research into the Improvement of the Management of Helicopter Noise.* 2008.
2. **London Assembly.** *London in a spin - a review of helicopter noise.* 2006.
3. **British Helicopter Association.** *Pilots' Code of Conduct.*