

NIGHT FLYING RESTRICTIONS AT HEATHROW, GATWICK AND STANSTED

STAGE 1 CONSULTATION

GUIDE TO THE PUBLIC'S RESPONSE ON HEATHROW

Prepared by Richmond Heathrow Campaign (RHC) April 2013

RESPONSE DEADLINE MONDAY 22 APRIL

INTRODUCTION

The Government is consulting in two stages into replacing the night flight regime which expires in October 2014. This first stage focuses on evidence to form proposals for a second consultation in the autumn 2013.

The night period is divided into a central night quota period 2330-0600 and two shoulders 2300-2330 and 0600-0700. There are restrictions that limit the number of movements and the average noise energy (quota) in the central period and noisiest aircraft across all three periods. Each night there are approximately 16 scheduled arrivals in the central period starting at 4:30am and 60 arrivals/departures in the morning shoulder period.

RHC says the next 5 Year Night Flight Regime should commit to a phased extension of a no flight period resulting over time in a total ban on night flights:

- Year 2 No flights 2300 to 0530
- Year 3 No flights 2300 to 0600
- Year 5 No flights 2300 to 0600 & reduced flights 0600 to 0630
- Subsequent Regime Phased extension to a complete ban 2300-0700

We have prepared the following Guide to 23 key questions. There are another 47 questions mostly of a more technical nature. RHC is submitting a comprehensive response on the next 5 year Regime covering all 70 questions. The RHC Full Response and a link to the consultation and a digital response form can be viewed on www.richmondheathrowcampaign.org

The consultation document asks for evidence, particularly in support of any opinions. Answers to Question 2 could therefore include a statement of the experience of Richmond residents to exposure to aircraft noise (e.g. period of residence in Richmond, how frequently disturbed by night flights, whether worse on some days or times than others; whether worse in summer or winter) as the reason why you wish to see a ban on night flights to be included in the stage 2 consultation. There is no need to answer any other questions if you feel that you cannot give any evidence in support. Others may wish to respond to some or all of the questions.

If respondents conclude from their experience there should be a ban on Night Flights 2300-0700 then Question 2 is the question to say so. There will be a stage 2 consultation and if you think that this should include a straight forward question as to whether respondents want night flights, you can say this under Question 1.

How to respond:

- a. Response Form on the website of the Department for Transport using a link on the RHC website, or
- b. email: night.noise@dft.gsi.gov.uk , or
- c. Post to Department for Transport, Great Minster House (1/26), 33 Horseferry Road, London SW1P 4DR

If the DfT Digital response form is used it is necessary to cycle through all the questions to get to the submit button but this can be done quickly. Others may wish to respond to some or all of the 23 questions.

In order to keep the Guide short we have not always allocated the more comprehensive responses in the RHC Full Response to exactly the same questions in this Guide where there are several questions on the same topic. The views expressed here are those of RHC and are published as a guide for anyone considering making personal responses.

GUIDE to RESPONSES

The Responses relate to Heathrow and do not address Gatwick or Stansted.

Objectives

Question 1: Are there any other matters that you think we should cover in the second stage consultation?

A ban on Night Flights 2300-0700.

Question 2: Do you have any comments on our assessment of the extent to which the current objectives have been met?

The existing noise levels at night are too high and are decreasing too slowly and are set in the context of population growth in the southeast with an increasing number of people affected. The night time is a valuable resource for residents in that it provides peace and quiet which facilitates relaxation and sleep. WHO guidelines say the sleep period should be at least 8 hours for most people. The WHO guideline limits are not being met. Night Flights damage health and particularly that of the vulnerable - children, the chronically ill and the elderly.

Additionally, this question provides the opportunity to provide evidence and observations of a personal nature in regard to Night Flight noise impact.

Question 3: Do you have any views on how these objectives should change in the next night noise regime?

The objectives for the next regime should include a commitment that operations at Heathrow will move within a prescribed timetable towards reducing the number of people affected and compliance with WHO guideline limits on noise in the night period (2300-0700).

Structure of noise quota and movement restrictions

Question 4: Do you have any views on whether noise quotas and movement limits should apply only to the existing night quota period or to a different time period?

The new noise quota points and movement limits at Heathrow should ensure that within one year of the new restrictions coming into force there are no scheduled movements between 2300-0530; that within two years there are no scheduled movements between 2300-0600; and that within five years there is a reduction in the number of scheduled movements between 0600-0630. Further reductions between 0600-0700 would be a matter for the subsequent restrictions regime. It should be feasible to provide additional flights in the daytime to equal the number lost through a night flight ban.

Potential Operational benefits

Question 15: Please provide any information on the feasibility of increasing the angle of descent into Heathrow Gatwick or Stansted particularly within the next seven years.

No comment on operational feasibility of angle of descent, but as residents we would not want any consequential increase in total noise. Our approach generally is to secure an overall reduction in night noise. Also, we do not favour a simple redistribution of noise between communities even when more people would benefit than would lose out. We therefore support noise reduction benefits being allocated in proportion to the level of noise in any particular community. So if a package of benefits were achieved from other initiatives and mixed with losses from redistribution such as angle of descent, so that no community experienced a net loss, we would support these operational changes. It is not clear whether the benefits would also apply to the daytime and for all movements. If the benefit were uncertain and/or not likely to start for some time then we would be concerned at taking account of it at this stage.

Question 16: What are your views on the analysis and conclusions in annex H? Would you favour changing the current pattern of alternation in favour of an easterly preference during the night quota period?

Same response as in Question 15 but applied to easterly preference.

Question 18: Please provide any information about the feasibility of using displaced landing thresholds in the next seven years for arrivals from the east at Heathrow and from the north east at Stansted.

Same response as in Question 15 but applied to displaced landing thresholds.

Movement limits

Question 20: Do you have any comments to make on the figures relating to movement limits and usage?

The movement numbers indicate the frequency with which noise disturbance occurs. But this metric does not take account of the benefit from a period of un-interrupted silence at night. Moreover, the movement that first disturbs has a disproportionate impact. We seek a period of un-interrupted silence extending between 2300 and 0700. Were there to be some lesser extension of the period of silence we would not favour concentrating the re-scheduled flights into the later hours of the night. Night runway slots should all be re-scheduled in the daytime.

Noise Quota Limits

Question 22: Do you have any comments to make on the figures relating to noise quota limits and usage?

The headroom between quota and use historically has been too wide and therefore little restraint has been applied. We support the continued use of quota points were our proposed ban on night flights not to become policy but in that event the ceiling should more realistically reflect quieter aircraft and be sufficiently low and decreasing so as to drive down night noise towards WHO noise guidance limits. The decreasing noise quota should be derived from a published noise road map aimed at achieving the WHO goal.

Question 23: Do you agree with our initial assessment of the scope for reducing the noise quota in the next regime without imposing additional costs?

See Response to Question 22.

Noisiest Aircraft Restrictions

Question 24: Do you have any views on the relative disturbance caused by the noise of an individual aircraft movement against the overall number of movements in the night quota period?

People hear a succession of individual noise events between quiet intervals, not a uniform average noise level between 0450-0600. The aircraft movement that first disturbs has a disproportionate impact. We propose a ban between 2300-0700 on all scheduled and operational flights by QC/16, QC/8, QC/4 and QC/2 classified aircraft except for QC/2 operational aircraft in the shoulder periods 2300-2330 and 0600-0700.

Question 25: What are your views on the feasibility of a QC/8 and QC/16 operational ban in the night period? Please set out the likely implications of such a ban and the associated costs and benefits.

See Response to Question 24.

Question 27: What are your views on the feasibility of a QC/4 operational ban in the night quota period at any or all of the three airports? Please set out the likely implications of such a ban and the associated costs and benefits.

See Response to Question 24.

Question 28: Are there more cost-effective alternative measures (such as penalties) to reduce the number of unscheduled QC/4 operations during the night quota period?

See Response to Question 24.

Question 29: What are your views on the feasibility of an operational ban of QC/4 aircraft at any or all of the three airports during the shoulder periods? Please set out the likely implications of such a ban and the associated costs and benefits.

See Response to Question 24.

Do we need night flights

Question 30: What is the rationale for operating services at precise times during the night quota period (as they do now)?

There appears to be nothing unique, essential or market driven about the 16 arrivals at Heathrow in the noise quota period compared to other routes - they originate in a variety of time zones - the Far East, Africa, America and the Near East and they all have arrivals at other times of the day as well. We have already said in our response to Question 4 that it should be feasible to provide additional flights in the daytime to equal the number lost through a night flight ban.

Respite

Question 33: If you favour a guaranteed respite period, what would be the minimum period which you would consider to be worthwhile?

Respite from scheduled movements is necessary across the full night period (2300-0700) in order to meet World Health Organisation guideline limits on community noise at night.

Trade-offs

Question 34: What are your views on the principle of trading off a complete restriction on movements in one part of the current night quota period against an increase in flights in another part of the night quota period?

We would favour this trade-off only as an interim measure towards compliance in stages with the World Health Organisation's guideline limits for community noise at night.

Question 35: What are your views on the possibility of fewer unscheduled night flights arising from an increase in daytime arrivals "out of alternation" or vice versa?

Were daytime de-alternation to reduce the number of unscheduled night flights it is essential that noise impact be considered as well and as far as residents are concerned the trade-off would be high risk and very unlikely to benefit them and as a result the trade-off would be opposed.

Question 36: What value do you place on day time respite compared with relief from noise in the night quota period?

Our proposal for a night flight ban recognises that the flights would be replaced by daytime flights along with a transfer of the associated noise but we place great value on there being a period of un-interrupted silence at night.

Noise Mitigation - Insulation

Question 38: Please provide comments and evidence on the extent to which the noise insulation scheme criteria have been met. Where possible please include figures for numbers of properties insulated under the scheme and numbers which are still potentially eligible.

A problem of the system is that planning authorities oppose its use for Listed buildings of which there are many in Richmond and the scheme is confined to a single supplier whose product is not generally suitable for listed buildings.

Value of Night Flights

Question 41: Is there any other evidence we should consider in assessing the response of airlines and air transport users to changes in the night flights regime?

We are told by the Department for Transport Long Term Passenger Forecasts that there are more passengers who would like to use Heathrow than the airport can handle. So these passengers are available to take up any spare capacity transferred to the daytime by night flight passengers choosing not to fly were there to be a ban. Rescheduling the night flights to the daytime should result in no net loss of value to the UK or the aviation sector. A ban would mean the value is generated in the day rather than the night.

Night Flight Noise Impact

Question 54: Do you agree that the approach proposed by the Civil Aviation Authority (CAA) for estimating the cost of sleep disturbance from aircraft noise reflects the available evidence? If not how do you think it should be changed?

We make no response to the technical detail of noise measurement and costing but in the Response to Question 2 there is scope for providing personal evidence and observations on night flight noise impact.

P J W

10/4/13