

LAANC

Local Authorities' Aircraft Noise Council
Director. Colin Stanbury
Tel 01737 373868
President Mr Michael Elliot
Chairman Councillor Malcolm Beer
Website: <http://www.laanc.org.uk/>

2 Rivermount
Sunbury on Thames
Middlesex.
TW16 5PH

Night noise consultation
Department for Transport Great Minster House (1/26)
33 Horseferry Road
London SW1P 4DRt

31 January 2014

Dear Consultation Team

SECOND STAGE NIGHT FLYING RESTRICTIONS CONSULTATION

LAANC welcomes the opportunity to comment on the proposals set out in the consultation document. LAANC is an umbrella local authority organisation that represents the views of around 16 local authorities affected by noise from Heathrow Airport. Our response, set out below, is necessarily therefore focused on Heathrow but in terms of the key points of UK night noise policy the council believes they have relevance across all three of the airports concerned.

This response has been prepared following a thorough discussion of the consultation document by the council's Executive Committee on 24 January 2014. It represents the unanimous views of the Committee.

Policy Issues

- (1) Options List - LAANC believes the Stage 2 consultation is fundamentally flawed as the "options list" does not contain one which would envisage the phasing out of the number of permitted movements in the Night Quota Period (NQP). This is the very point that LAANC urged the department to consider under the stage 1 consultation – which appears to have been ignored. LAANC urges the department to undertake another round of consultation that would include the option of phasing out the number of permitted movements, or at least of reducing significantly the permitted number of noise quota

points. If these changes are accepted, LAANC sees no reason why the next set of restrictions should not be for five or six years (i.e. to 2019 or 2020).

- (2) Progress Towards Tightening of the Existing Restrictions - all previous regimes have been structured towards a progressive tightening of the night restrictions at Heathrow in acknowledgement that the noise impact since 1993 has been unacceptable but nevertheless permitted. Progress in reducing noise exposure has been very modest over the last twenty years. If the UK's commitment to achieve WHO noise guideline levels is to be achieved at Heathrow by 2030, the rate of reducing night noise exposure from air traffic needs to be increased significantly. The current consultation envisages a halt for the next three years of the very modest rate of progress since 1993, without even seeking views on the achievability of a faster rate of noise reduction in the next set of restrictions. LAANC believes that residents have a legitimate expectation that, in the absence of a phase out of movements in the night quota period, at least the number of noise quota points will continue to be reduced. There is no challenge to the industry to improve its performance in the NQP and the propels for resilience trials will make noise worse. LAAC urges the department to reconsider this point in a further round of consultation as set out above.

- (3) Commitment to Achieving WHO Night Noise Standards - In July 2004, the Department for Transport gave a commitment to achieve the WHO guideline values for night flights by 2030¹. No reference is to this commitment in either in the Stage 1 or Stage 2 consultation. If the government has abandoned this commitment consultees should be informed transparently and openly about this. LAANC asks the question: has the Department abandoned the commitment?

- (4) 3 Year Time Frame for the Next Regime (2014 – 2017) - LAANC does not agree with this proposal. The Airport Commission's final report (May 2015) will be about long term options for additional runway capacity. Even if Heathrow is included in those options, the timing is likely to be well beyond the next set of night restrictions over the next five or six years. So whatever is in the final report is not a reason for not introducing a new set of

¹ *The guideline values are very low. It would be very difficult, if not impossible, to achieve them in the short to medium term without draconian measures - but that is not what the WHO proposed. The recommendation was that the Guidelines for Community Noise should be adopted as long term targets for improving human health. This is also consistent with the advice above. The UK Government is committed to take account of this. In respect of aircraft noise at night, the 30 year time horizon of the White Paper, provides a suitable parameter for 'longer term'.*

Night Flying Restrictions at Heathrow, Gatwick and Stansted: Stage 1 of Consultation on Restrictions to apply from 30 October 2005 (July 2004), paragraph 3.12). The 30 year time horizon of the White Paper ran to 2030.

restrictions through to 2019 or 2020 following a further round of consultation on tighter restrictions over that period. Thus there is ample opportunity to issue a further round of consultation now in response to a number of unsatisfactory components in Stage 2 consultation

- (5) Airports Commission interim report (Dec 2013) A further round of consultation on tighter restrictions should invite views on the principle of the recommendation from the Commission to increase the number of permitted movements in the noise quota period. There has never been any public consultation about the Department's plans for operational freedoms to be extended into the night quota period.
- (6) Noise and congestion between 06:00-07:00: The Heathrow Terminal Five Planning Inspector recommended that a limit should be placed on the number of movements 06:00-07:00 as one of the noise abatement conditions for approval of Terminal Five. This condition was recommended to prevent any increase in the then number of movements and the consequent worsening of the noise situation in that hour. The Government did not act on that recommendation, so the resulting congestion and noise levels in that hour are, in LAANC's view, entirely the fault of the Government. Attempting to deal with the congestion by permitting additional movements into the more noise-sensitive period before 06:00 is not acceptable. Other solutions must be considered for the problem of noise and congestion between 06:00-07:00.

Stage 2 Consultation Questions and Responses –

Q1: Do you agree with our preliminary view as to the new studies on health effects?

- We do not agree with the Department's analysis of published scientific evidence in relation to noise exposure and the adverse effect on human health. The consultation document cites three new studies which add further evidence to health risks associated with aircraft noise exposure. The Department will be aware that in these sorts of studies it is often many years before it is possible to prove cause and effect. The studies collectively show that there is a statistical relationship between morbidity and chronic exposure to transport related noise. The Department does not dispute that night noise is the most problematic component of air noise affecting hundreds of thousands of citizens around Heathrow it should therefore adopt a precautionary principle and adopt a firmer commitment towards minimising health risks associated with aircraft noise exposure. A first step in protecting public health in this regard would be to introduce a phase out of all scheduled arrivals at Heathrow before 6am as well as for all departures after midnight.

Q2: Do you have any further views on the costs and benefits, including health impacts, which we should take into account in our decision?

- Yes. It is our view that the impact assessment is incomplete to a material degree in so far as there is no assessment of a policy option which would see the removal of all scheduled night flights between 23:30 and 6:00 hrs.

Q3: Do you agree with the proposed environmental objectives?

- No we are disappointed with and do not agree with the proposed environmental objectives. The proposed objectives fail to challenge the aviation industry to reduce night noise exposure to affected communities. We would like to see as a minimum a reinstatement of the 2005 (current) objective for Heathrow which is to avoid the overall noise from aircraft during the night quota period from increasing above what was permitted in 2002 (and by implication) what is currently permitted.
- In our view there is nothing in the ICAO balanced approach which prevents the competent authority from setting challenging targets based upon a “noise dose” contour such as the 48dB 6.5hr contour for summer and winter combined. Again as a minimum for the next regime only we would like to see an objective to ensure that the 2012 level of 42.5km² is not exceeded and that by 2017 there should be at least a 20% reduction in this figure. In addition the new objectives should focus on achieving continuous improvements towards meeting WHO guideline levels which is a government policy commitment.
- Also, whilst agreeing in principle to include noise abatement objectives under the environmental objectives, the current proposals do not have any references to measures aimed at mitigating the effects of noise. There is a need to update the current noise insulation / compensation schemes offered by each of the designated London airports. The objectives should also ensure that the quality of insulation is of a high standard, as there is some anecdotal evidence that the current quality of the insulation is of a low standard and residents near Heathrow are only offered a single choice of supplier.

Q4: Do you agree that the next regime should last until October 2017?

- No – The next regime should be for 5 years - please see policy considerations above.

Q5: Do you have any views on the revised dispensations guidance?

- The revised guidance on flights puts the right emphasis on exceptional circumstances, however, the guidance should also acknowledge that any foreseeable operational difficulties arising from forecasted severe weather conditions should count against the quotas and not simply disregarded.
- Government guidance on dispensation should be revised with the aim of bringing more transparency to the process of disregards. For example it should be possible to see how and by whom a decision to grant a dispensation is made, whether it is automatically

granted to specific airlines or flights that regularly depart later than timetabled into the night period. In the interest of openness these data should be made publicly available and should be subject to scrutiny by the Airport Consultative Committee. Recurring offenders should be penalised either financially or by withdrawal of slot.

Q6: Do you agree that we should maintain the existing movement and noise quota limits until October 2017? If not, please set out your preferred options and reasons – this could include the noise and economic impact of any alternatives.

- No the existing noise quota limits should be reduced so they reflect current use. At Heathrow for example the noise quotas are so generous and the headroom so great that they have no practical effect on limiting night noise exposure. We would like to see for the next regime a more ambitious noise quota cap which would mean that by the end of the regime no QC 4 aircraft could be scheduled in the night quota period. This could be a practical first step towards introducing a phased reduction of all flights before 06:00 at Heathrow.
- We are disappointed and do not agree with the department's view that it is not possible to account for the in service noise performance of some sub types of the Airbus A380, which according to the CAA's own noise measurements show little improvement (on landing) on the Boeing 747-400 types that they are replacing. We commented on this in our response to the stage 1 consultation.
- We believe the economic analysis used in support of the continuation of night flights at Heathrow is doubtful. The work of CE Delft on the economics of Night Flights arrives at a very different conclusion. ("A quick scan Social Cost Benefit Analysis") and Nov 2012 ("A Review of Economic Value of Night Flights at Heathrow").

Q7: Do you have any comments on our forecasts to October 2017?

In our view the forecasts of up to 12 extra movements (section 3.1.2) in the NQP without the current night flying restrictions is likely to represent very much a low end forecast at Heathrow.

Q8: Do you have any views on how the benefits of quieter aircraft can be shared in future between communities living close to the airport and the aviation industry?

- LAANC fundamentally rejects the notion that there should be any sharing of any benefit that future technology may bring. We believe that there should be an impact assessment for the option of a phased ban on night flights both in the night quota period (11:30pm to 6am) as well as the whole night period (11pm to 7am). Further we believe the claimed economic benefits for continuing with night flights are overstated.
- Night Noise exposure around Heathrow has been unacceptable for years and communities living close to the airports should be the main beneficiaries of quieter aircraft. At Heathrow where the overwhelming demand for night flights is for arrivals

before 06:00 the “benefits” of next generation aircraft are likely to be theoretical rather than real. For example some variants of the Airbus A380 are, according to the CAA, not materially quieter on landing than the current Boeing 747-400 fleet which they are replacing.

Q9(a): Do you agree with extending the operational ban of QC/8 and QC/16 aircraft to the entire night period (23:00 – 07:00)?

- Whilst this extension of the operational ban on the noisiest aircrafts can be regarded as an improvement, we believe this is not enough. As stated in our response to the stage 1 consultation, we would like to see an operational ban on the noisiest aircraft (QC/8 and QC 16) at Heathrow. There are no QC 16 aircraft left on the Heathrow fleet and an operational ban on these aircrafts types could therefore be formalised without detriment to any existing operator. Night flights are the most unacceptable aspect of Heathrow operations and we would like to see a robust regulatory framework which would see a full operational ban of QC 8 aircraft from whole night time operations.

Q9(b): Do you agree with our assessment of the costs and benefits in the draft IA?

- No we believe there should be an assessment for the option of a phased ban on night flights in both the night quota period and the night period at Heathrow.

Q10: Are there any other changes to the regime which we should consider?

- The carry over arrangements at Heathrow have now become a mechanism for increasing the numbers of early morning arrivals on a seasonal basis for the winter seasons at Heathrow, on some winter mornings 18 arrivals are scheduled. We believe the carry over arrangement is being abused at Heathrow and should be phased out as part of a move to progressively ban night flights after midnight and before 06:00.

Q11: Do you have any further comments on the scope for trialling new operational procedures which have potential noise reduction benefits in the period up to 2017?

- LAANC rejects the suggestion that increasing the numbers of flights arriving at Heathrow before 05:00 even if resulting in less use of TEAM between 06:00 and 07:00 can be classified as having any benefit in noise terms. Whilst we support any procedure that offers a potential for reducing aircraft noise we believe the reductions are at best “at the margins” and unlikely to result in any perceptible reductions in noise impact for communities overflown.

Q12: Are there any other matters you think this consultation should cover?

- For the next regime we would support a scheme in which landing charges are progressively raised to a level that drives fleet replacement at Heathrow. The revenues generated by the continued use of QC 2 and non complaint QC 1 and QC 0.5 aircraft

could be channelled into a community fund to provide for sound insulation for residential and public buildings within the 55dB Lden contour.

Q13(a): Do you agree with the locations of the proposed new noise monitors at Heathrow? If not, are there alternative locations you would favour and why?

- Yes

Q13(b): Do you agree with the proposal to apply runway-specific limit adjustments for easterly departures at Heathrow? If not, please give reasons.

- We agree

Impact Assessment questions:

Question 1: Do you agree with our assessment of how movements and quota usage are likely to change over the period to the end of the summer season 2017 at Heathrow, Gatwick and Stansted?

- Yes – at Heathrow the night quota movements are full and we share the Department's view that there is pressure from the airlines to increase the numbers of scheduled early morning arrivals before 6am.

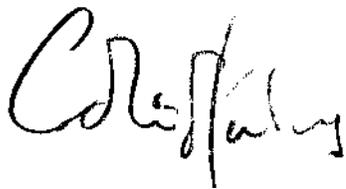
Question 2: Do you agree with our assessment of the costs and benefits of option 1 at Heathrow, Gatwick and Stansted? Would you expect there to be any additional costs and benefits?

- The option has not been monetised and we do not agree that the stated policy objective “to limit and where possible reduce the impact that night noise has on local residents” will be achieved by option 1. The option simply provides for “business as usual”, it does not challenge the airlines in three years to either reduce the numbers of pre 6am arrivals at Heathrow or to commit to fleet replacement of the noisiest aircraft types currently flying by the end of 2017. There is also no challenge to ensure that new generation aircraft such as the Airbus A380 (all variants) actually fly at Heathrow in accordance with (or better than) their allocated theoretical QC category. This is important as otherwise there will be a continuing lack of trust in the system. The sustainable roadmap for aviation is relying on new generation aircraft being perceptibly quieter than those currently flying to deliver its objective of more flights for less noise. The roadmap aims to secure growth in air traffic movements (nearly doubling in the next 40years) with no increase in noise due to the development and operation of quieter aircraft.

- Recent published work by CE Delft² suggests that a night flight ban at Heathrow before 6am could result in a net economic benefit to the UK economy. We are disappointed that no attempt appears to have been made to properly balance the savings that could be made in monetary costs associated with sleep deprivation against the claimed benefits that accrue to the airlines. Because of the huge number of people living under the Heathrow night flight path, these savings can be expected to outweigh any loss of income to the individual airlines concerned. CE Delft maintains that the national economy would only be harmed if none of the passengers who currently arrive on the flights before 6am failed to transfer to flights arriving at other times. If that were to take place, the national economy could lose up to £35 million over a 10 year period, but the report states that the chances of that happening are “highly unlikely”.

Question 3: Do you agree with our assessment of the costs and benefits of option 2 at Heathrow, Gatwick and Stansted? Would you expect there to be any additional costs and benefits?

Whilst we support policy option 2 in so far as it will prevent the noisiest categories of aircraft flying at Heathrow from taking off after 23:30 there is no detailed analysis of the costs and benefits that will accrue so it is not possible to agree with the statements concerning the non monetised benefits that the ban will provide for those currently exposed to QC take offs after 23:00.



Director

Local Authorities' Aircraft Noise Council

² CE Delft 2011 – A quick scan Social Cost Benefit Analysis