

**NIGHT FLYING RESTRICTIONS CONSULTATION
RESPONSE OF LOCAL AUTHORITIES' AIRCRAFT NOISE COUNCIL (LAANC)**

QUESTION	RESPONSE
<p>Policy and legal landscape Q1: Are there any other matters that you think we should cover in the second stage consultation?</p>	<ul style="list-style-type: none"> • In the event that it is still proposed to permit night flights to continue at Heathrow there should be a re-appraisal of the criteria against which these flights will be permitted. Much has changed since the introduction of the Quota Count Scheme in 1993. At that time the numbers of flights in the Night Quota Period (NQP) were fixed quite simply from what the airlines had wanted to fly in the previous summer and winter seasons. No assessment was undertaken as the environmental impact that these 16 or so flights would cause other than by reference to the Ollerhead Sleep Disturbance Study (FS92 - Report of a Field Study of Aircraft Noise and Sleep Disturbance). The findings of this study were criticised at the time and it would appear that the Department no longer seeks to rely on it for policy formulation. • Heathrow now has five terminals. During the T5 planning inquiry British Airways (BA) claimed that once a fifth terminal was operational it could eliminate all but one of its flights in the NQP. . <i>“The additional capacity provided by Terminal 5 together with the use of larger aircraft could double the capacity on South East Asian Services so British Airways current projections showed they would operate either fewer flights in the night quota period if Terminal 5 were built</i> (See paragraph 34 4 48 page 603 <i>“The Heathrow Terminal Five and Associated Public Inquiries - Report by Roy Vandermeer QC Main Report November 2000</i>). Terminal 5 opened in 2008 and this is the first revision of the Night Flights scheme since that time. LAANC believes it is incumbent on BA to deliver or to justify why it is now unwilling to honour this pledge. • The second stage consultation should therefore include a more wide ranging noise assessment. Our own assessment in Annex 1 to this response confirms that more people are exposed to high levels of air noise at night at Heathrow than at any other European Union airport, despite the fact that night flying restrictions may have applied longer at Heathrow than at many other EU airports. • Average QC / movement levels for the night quota period at Heathrow are double those at Gatwick and Stansted and affect many more people. Much of this is due to the numbers of B744 aircraft that operate in the NQP. To make any significant improvement in the NQP air noise environment around Heathrow it will be necessary to reduce and / or prohibit these aircraft types from operating at this time. LAANC would hope that this will be considered as part of the Stage 2 consultation particularly as long haul fleet replacement options exist.

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<p>Factual Information</p> <p>Q2: Do you have any comments on our assessment of the extent to which the current objectives have been met?</p>	<p>The current objectives have been met but they need to be set within the context of being “ad hoc.” Therefore whilst LAANC welcomes any reduction in the contour areas this does not mean the current position is satisfactory. The next London Night Flight restrictions not only covers the period 2019/20, it will also inform the work of the Independent Airports Commission and therefore ultimately future UK Aviation Policy. The next London Night flight restrictions therefore need to be founded on a solid basis. For example the evidence in the ERCD report 1208 (Figure 9) shows that the number of events (movements) is important in relation to numbers of awakenings, it is clearly not just the numerical value of the 8 hour average (leq) value or Lnight. In other words the trade off between noise and number inherent in Lnight is not valid for awakenings. It could also follow that the QC system itself is not an adequate mechanism for controlling awakenings. LAANC considers it important that these uncertainties are reported in Stage 2 of the consultation.</p>
<p>Q3: Do you have any views on how these objectives should change in the next night noise regime?</p>	<ul style="list-style-type: none"> • In the event night flying continues, specific targets should be set for phasing out QC4 rated aircraft from any night time movements. With the introduction of new technology and aircraft fleets, priority should be given to fleet replacement. • Any aircraft with a noise rating above (i.e. worse than) QC2 should not be operated at night. • Phased annual reduction targets over the term should be stipulated. LAANC reaffirms its objection to night flights and urges the Secretary of State (DfT) to reconsider the Government’s policy with a view to a gradual phasing out of night flights within the period covered by the forthcoming night noise regime.
<p>Q4: 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?</p>	<p>There needs to be greater consistency and clarity on the widely accepted definition of night (2300-0700h), as opposed to the night flying restrictions definition that relates to an ‘operational night time period’ (2330-0600h).</p> <p>LAANC supports the principle of retaining the common definition of ‘night’ i.e. 2300-0700h. A regime made up of night quota points <u>and</u> aircraft movements should operate within the common definition. It would be possible to segregate the hourly periods for the purposes of limiting ‘movements’ and specific QC rated aircraft types during such periods. For example it would then be possible to introduce a curfew between 2300-05:30 hrs. In practice this single move would mean moving just 5 arrivals per day at Heathrow/ It would also provide a mechanism for dealing with B744 arrivals before 06:00.</p> <p>Such a system also lends itself to progressive reduction in night flights for specific periods of the 8-hour period</p>

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	within a single regime.
<p>Q5: Do you have any new evidence to suggest we should amend or move away from the current QC classification system?</p>	<p>The Quota Count Scheme for London’s airport has been in place now for 20 years and it is claimed that it has been an effective driver for reducing night noise . In 1993 the average QC per movement at Heathrow in the NQP was 1.975. Reference to Fig 6 of the consultation document shows for Summer 2012 the average QC / movement was just under 1.4 - an improvement in around 0.5 quota count points / movement. LAANC considers this to hardly be a ringing endorsement of the effectiveness of the QC scheme in reducing noise particularly when air noise in the full night period (2300-0700) has worsened at Heathrow over the last twenty years due to the increase in the number of movements (i.e. individual noise events), particularly in the early morning shoulder period (0600-0700).</p> <p>Differences in Operational v Certificated noise levels. ERCD report 1106 (Table 6) shows that A380 (Rolls Royce engined) aircraft on arrival significantly exceed their certificated QC 0.5 value. According to this report the A380 (RR) is operating close to QC 2 on arrival at Heathrow. (Although it is noted that discussions are taking place with the manufacturers to understand why, the important point is that these aircraft types at Heathrow are operationally not perceptibly quieter than the B744s that they will be replacing). For reasons of fairness and accurate reporting of noise dose these exceedances need to be accounted for if the QC scheme is to continue.</p>
<p>Q6: Do you have any views on the optimum length of the next regime and how this should align with the work of the Airports Commission?</p>	<p>This question appears to pre-suppose the existing regime in some form or another is likely to stay and night flights will continue.</p> <p>Any new regime should be reviewed every 5-years as originally intended. Such a period appears to be sufficient for investment planning purposes i.e. aircraft and/or infra-structure development and ideally contiguous with Noise Action Plans and objectives for the airports.</p> <p>LAANC does not support aligning the end of the next regime with the review of Heathrow’s Noise Action Plan. Reviewing the night restrictions regime and introducing a new regime is a process that in the past has taken at least two years to complete, which would delay finalisation of the new Noise Action Plan.</p>
<p>Q7: Do you have any views on how dispensations have been used?</p>	<p>There is widespread criticism of the use of dispensations at Heathrow. Every movement impacts on communities overflowed at night. The classification of a passenger (e.g. VIP) is irrelevant in noise terms. All movements should be counted as part of any restriction limit. Each and every dispensation used should incur financial penalties that are set at an amount which acts as a deterrent to unscheduled operations in the NQP</p>

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	<p>Late departures are mentioned in passing several times in Chapter 3 of the consultation document (3.7, in Chapter 5, at 5.49 and 5.57). Late departures of QC4 aircraft are stated to be the noisiest aircraft, and also the most frequent, operating at night. LAANC believes that QC 8 aircraft still fly from Heathrow and are occasionally granted dispensations. In LAANC's view paragraph 5.64, is misleading by averaging such movements and making no reference to the nights when there are very many departures. The late departures show the ineffectiveness and misleading picture presented by the operation of the voluntary curfew between 23:30 and 04:30. The period of non-operation runs only from the last delayed departure in a night, which may be as late as 2 am, and is more usually between midnight and 1 am, until the first scheduled arrival.</p>
<p>Q8: Do the dispensation guidelines still adequately reflect current operational issues?</p>	<p>Some dispensations may well be inevitable, but should be subject to financial penalty as above.</p>
<p>Q9: Would you favour adding greater contingency to the seasonal movement limits (within any overall movement cap for the airport) in order to avoid large numbers of dispensations?</p>	<p>No. The headroom designed into the system to cater for dispensations would allow for greater concentration of movements and disturbance than the current system. In any event LAANC believes this can be accommodated into the existing quota arrangements. The effect of such an arrangement would be to drive a reduction in useable quota.</p>
<p>Q10: Do you consider there is still a need to retain the principles of carry-over and overrun? If so, please give reasons why.</p>	<p>Not at Heathrow. There are alternative options, such as increasing load factors of the aircraft and rescheduling times for specific routes so that the system does not run so close to capacity</p>
<p>Q11: If we retain the principles do you think we should change the percentage of movements and noise quota which can be carried over or overrun?</p>	<p>If the principles are retained, focus should be upon capping the limit and a phased reduction in the QC. This would improve the noise climate at night and its effectiveness can be evaluated at the next review period.</p>
<p>Exploration of Options for the Next Night Noise</p>	<p>LAANC welcomes the predicted introduction of less noisy aircraft types at Heathrow. However it is the case that even with planned fleet replacements air noise at night will continue to impact upon many thousands of</p>

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Regime Q12: Do you have any comments on our analysis of fleet and operational trends?	people unless there are reductions in the numbers of permitted numbers in the NQP.

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<p>Q13: In the absence of any new restrictions, what changes in operations and fleet mix do you expect in the period between now and 2020 (and beyond 2020 if possible)?</p>	<p>In terms of the Heathrow fleet LAANC believes there will be move towards bigger aircraft flying longer haul routes. However unless new restrictions are placed on night operation of QC4 aircraft, it seems clear from the consultation that these aircraft types will continue to operate to and from Heathrow at night well beyond 2020...</p>
<p>Q14: Please set out how you expect local land use planning policies to impact upon the numbers of people exposed to night noise in the next regime. Please give details of any housing developments planned to take place within the current night noise contours (see Annex B).</p>	<p>No comment</p>
<p>Q15: Please provide any information on the feasibility of increasing the angle of descent into Heathrow, Gatwick or Stansted, particularly within the next seven years.</p>	<p>LAANC believes this is a matter for the aviation industry, CAA and NATS. However, subject to safety considerations, the Council is supportive in principle of any measures that reduce the noise impact to local communities residing under the flight paths. However our information is that while for example Airbus industries have indicated that their current fleet could land on a 4 degree angle of descent the real benefits are to be found in increased arrival rates rather than noise reduction. LAANC supports further research on this option but would only support the introduction of a steeper angle of descent if it was found to be capable of delivering real benefits in noise terms rather than facilitating more flights.</p>
<p>Q16: 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?</p>	<p>LAANC has some difficulty with this issue. Whilst the council supports the principle of a fairer distribution of the noise burden around the airport to offer periods of respite for everyone, it believes that such measures cannot be delivered (and should not be contemplated) until the abolition of the Cranford Agreement (CA) has been secured. The abolition of the CA would allow easterly alternation and much needed and long overdue relief to Windsor and its environs. Such is the acuteness of the impact of the existing regime, it is critical that this is resolved prior to any consideration to introduce Easterly Preference at night. Not to do so would add even further noise burden on communities living to the west of the airport.</p>
<p>Q17: Do you have any views on the costs and benefits of a night-time runway direction preference</p>	<p>LAANC has is no expertise to offer comments on Gatwick and Stansted airport operating regimes</p>

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scheme at Gatwick or Stansted?	
Q18: 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.	LAANC is not able to offer any comment on feasibility but the council supports displacement if it reduces the noise impact overall and does not simply shift the noise from one inhabited area to another. It is not clear whether a displaced landing would apply to all flights . In respect of Heathrow, the Council fails to understand why this should only refer to westerly landings i.e. from the east. It questions why there is an inconsistent approach between westerly and easterly operations.
Q19: Please provide any information about airspace changes or other operational procedures which could mitigate the impact of night noise in the next regime period	The council would look to the CAA and NATS to bring forward improvements in airspace management. For example it was claimed recently by the airlines in response to the proposed Operational Freedom Trial to reschedule some of the pre 05:00 flights that “lack airspace permission over Afghanistan” prevented the later arrival of some of the pre 05:30 arrivals at Heathrow. LAANC would like an explanation of these difficulties as part of the Stage 2 consultation and in particular why this obstacle cannot be surmounted in terms of airspace management.
Q20: Do you have any comments to make on the figures relating to movement limits and usage?	In respect of Heathrow please see our response to Q5. In addition to the concerns expressed therein further evidence as to the lack of effectiveness of the QC scheme is that although the numbers of movements <i>permitted</i> per season has decreased since 1993, the number of actual movements per season has increased.
Q21. In the absence of any new restrictions, how do you expect demand for movements in the night quota period over the course of the next regime to change?	LAANC would not expect the aviation industry to abandon its historical objective to press for freedom on movements while agreeing to the imposition of a noise contour cap. LAANC was disappointed at the reaction from the airlines over the recent “Operational Freedoms” trials in not being willing to support an initiative simply to re time aircraft arrivals on a trial basis from one part of the night to another. This may have offered some limited relief to local communities. This council would object to and robustly resist any proposals for future night operations at Heathrow which did not contain a clear restriction on the numbers of movements.
Q22: Do you have any comments to make on the figures relating to noise quota limits and usage?	Whilst LAANC acknowledges and welcomes the downward trend in the average noise quota limits and usage. the claims made in Para 5.38 of the consultation document are misleading. As pointed out in our answer to Question 5 very little has been achieved by way of noise reduction at Heathrow in 20 years of night restrictions - an average reduction of around 0.5 QC points per movement. LAANC is of the view that at Heathrow an average quota count / movement of just under 1.4 is still too high

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	and the rate of voluntary decrease too slow, hence the need for a partial NQP flight ban on B 744 aircraft. The council does not agree that the under-usage of quota points at Heathrow is due to fewer movements.
<p>Q23: Do you agree with our initial assessment of the scope for reducing the noise quota in the next regime without imposing additional costs?</p>	<p>It is important that the movement limits (if night flights are allowed to continue) are capped to present levels, together with a phased reduction target for Quota limits. The justification is as expressed in the answer to Q.22 above.</p> <p>The trend towards less noisy aircraft in both the day and night periods should mean that fewer noise quota points are needed to enable the existing number of permitted movements to take place in the noise quota period. There should therefore be scope for reducing the permitted number of quota points without reducing the permitted number of movements. But the noise levels are still likely to exceed the World Health Organisation limits for noise at night even with a reduced noise quota. For that reason LAANC proposes a single definition of night in which it is possible to control both numbers and aircraft types.</p>
<p>Q24: 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?</p>	<p>There have been a number of studies relating to sleep ‘prevention’; sleep ‘disturbance’ and sleep ‘deprivation’.. The impact of the ‘number’ of flights over a certain threshold appears to have a greater psycho-acoustical effect than actual noise level within certain noise ranges. This is why LAANC believes it is essential to retain a cap on the number of movements at night.</p> <p>The accompanying ERCD 1208 report section 3 appears to cast doubt on Leq as a mechanism for controlling awakenings, which in turn casts doubt on the QC system itself being an adequate mechanism for controlling awakenings.</p>
<p>Q25: 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.</p>	<p>In respect of Heathrow, such a ban would only have traction if it were applied with no exceptions - ie no dispensations at all. If this were the case LAANC would support this proposal. LAANC believes that such a ban could and should be extended to QC 4 aircraft by the end of the next regime.</p>
<p>Q26: How many QC/4 aircraft do you expect to be in operation over the next seven years during the night quota period? Is the downward trend at Heathrow expected to continue?</p>	<p>Whilst this is predominantly for industry to answer, as stated in the previous answer this Council believes there should be a mandatory phased /targeted reduction over the next period of all QC4 aircraft operating at night. In respect of the following quote from the consultation document</p> <p><i>‘The restrictions have generally taken effect at a time when the number of such aircraft has diminished to a point where the economic cost of such a ban is small and where quieter alternative aircraft are available’ (Para 5.48).</i></p>

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	<p>LAANC believes the above criteria have been met. It is also noted the SoS was sufficiently concerned in 2006 to give assurances that it would be reviewed at the end of the regime in 2012. This is now an opportunity to do just that given the new aircraft coming on stream.</p>
<p>Q27: 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.</p>	<p>LAANC believes a ban on QC is entirely feasible at Heathrow. It is for industry to set out and justify any opposition to this proposal. Scheduled movements by QC/4 aircraft are currently banned 2300-0600 but operational movements are permitted. We propose that all movements by QC/4 aircraft should be banned again under our proposed single definition of night 2300-0700</p>
<p>Q28: Are there more cost-effective alternative measures (such as penalties) to reduce the number of unscheduled QC/4 operations during the night quota period?</p>	<p>LAANC does not believe that economic instruments such as penalties would have any effect. The number of movements in the night quota period accounts for approximately one per cent of all movements per year at Heathrow. The fleet composition is therefore unlikely to be influenced by the relatively few movements at night. Regardless of economic incentives, a partial ban operating ban say between midnight and 06:00 is likely to be more effective</p>
<p>Q29: 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.</p>	<p>Previous comments relating to operation of QC4 aircraft at night, might equally apply to the noise sensitive 'shoulder periods'.</p>
<p>Q30: What is the rationale for operating services at precise times during the night quota period (as they do now)?</p>	<p>LAANC does not believe at Heathrow there is any rationale for operating night flights other than that the airlines have slots at these times which they find profitable to use. It would appear the operator for the operational convenience of the industry. LAANC does not believe the airlines operating in the night time at Heathrow have any real commitment to working towards a mutually agreeable solution.</p>
<p>Q31: What is the scope for introducing a respite period at Gatwick or Stansted? Please set out the associated</p>	<p>LAANC is not able to comment on the position at Gatwick and / or Stansted</p>

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costs and benefits.	
Q32: What is the feasibility of making Heathrow's voluntary curfew mandatory?	It is entirely feasible if the commitment is present. It avoids ambiguity and promotes confidence.
Q33: If you favour a guaranteed respite period, what would be the minimum period which you would consider to be worthwhile?	<p>As stated previously, the Council's position is that there should be a phased reduction in the number of 'night' flights between 23:30h and 06:00h. This could be achieved initially by rescheduling the 5 pre 05:30 movements.</p> <p>Respite from scheduled movements is necessary across the full night period (23:00-07:00) in order to meet World Health Organisation limits on community noise at night.</p>
Q34: 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?	LAANC would support this as an interim measure towards compliance in stages with the WHO Night Noise guidance limits
Q35: 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?	LAANC is not aware that there is any evidence to support the hypothesis that more "out of alternation" daytime arrivals would prevent any unscheduled night flights; or that the absence of "out of alternation" is responsible for all unscheduled night flights? The Council eagerly awaits the results from the recent Operational Freedoms Trials as early indications suggest that any benefit (from fewer late flights) is at best marginal
Q36: What value do you place on day time respite compared with relief from noise in the night quota period?	<p>This question is irrational as 'respite' comes in various forms and there are differing acceptability criteria and causation factors between day and night. Day and night time cannot and should not be traded off. Local communities place a high value on respite from incessant aviation noise during the day..</p> <p>Noise levels around Heathrow exceed the WHO limits for community noise in the day and night periods. Noise reduction should therefore continue for the future in both periods. It is accepted at Heathrow that a night flight ban would mean replacement of existing night flights to the daytime by a transfer of the associated noise but we place great value on there being a period of silence at night.</p>
Q37: Do you have any views on the extent to which	In principle LAANC support incentives, but it is our understanding that landing fees must be based on the cost-

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<p>landing fees can be used to incentivise the use of quieter aircraft during the night period?</p>	<p>recovery of the airport operator. It is not clear how changes in the noise level can add to or detract from the airport operator’s costs. For the reasons set out in response to Questions 28 and 40, we doubt whether economic incentives can influence the fleet composition at Heathrow in the night period.</p>
<p>Q38: 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.</p>	<p>Although this is for respective airports to supply it would be helpful if this information could be made available/transparent for local authorities and local communities affected by such schemes, for example in Stage 2 of the next consultation.</p> <p>A problem with the current system is that planning authorities oppose the installation of double glazing in many types of “Listed” buildings. Additionally the Heathrow scheme is confined to a single supplier whose product is not generally suitable for listed buildings.</p>
<p>39. Do you have any suggestions for changes to current compensation schemes or for new compensation schemes that might be introduced to help offset the impact of night noise on those exposed to it? For new schemes, please explain the parameters that you would suggest for the scheme and the rationale for choosing those parameters</p>	<p>The current compensation schemes are derisory and outdated. A complete review and more generous packages need to be devised and implemented.</p> <p>Criteria need to be based on calibrated community noise values and arguably in going forward be referenced to the baseline criteria and recommendations stated in the WHO Community noise guidelines e.g. the 50dB Lnight contour shown in Figure 4 in Appendix B.</p> <p>To finance the scheme taking a nominal £1 levy per passenger flight, would accumulate a fund of £80m p.a. at Heathrow Airport alone. There does not need to be a cost burden on industry as the passengers pay (similar to a carbon tax in principle)</p> <p>An example of just how unsatisfactory the current Heathrow scheme is in relation to the London Borough of Ealing. Ealing residents are not eligible for award under any of the current Heathrow noise insulation or mitigation schemes, despite the great amount of disturbance suffered often over long period of continuous easterly flying, such as that from 10 February to 10 April 2013.</p> <p>LAANC believes the use of average mode contours is wrong for basing entitlement to noise mitigation and that an worst mode SEL based 90dB contour should trigger grant entitlement for all habitable rooms (secondary glazing as well as mechanical ventilation).</p>

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	<p>Paragraph 6.31 of the consultation document should include a reference to the benefits to residents of a night flight ban at Heathrow. Neither this nor the following paragraphs, nor the annexes make any reference to the effect on the ground of the current regime of delayed departures after 23:30.</p>
<p>Q40. Do you have any proposals for new or improved economic incentives that could be deployed to incentivise the use of quieter aircraft during the night period?</p>	<p>The number of movements at Heathrow in the NQP accounts for approximately one per cent of all movements per year (nearly 480 000 movements). The composition of the fleet is therefore likely to be determined predominantly by the needs of the daytime movements, with little scope for varying the fleet to cater specifically for night movements. For example, the noise-dominant aircraft in the day and night at Heathrow at present is the Boeing 747-400. Over the last couple of years the number of 747-400s has decreased at Heathrow, with the resultant shrinkage of the Lnight contours. However it is unlikely that this reduction in the 744 fleet would have been due to concern for the levels of noise at night.</p>
<p>Night flights Evidence Review Q41: 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?</p>	<p>A significant determinant in any cost appraisal will be the extent of noise mitigation and impacts of noise upon local communities. For this assessment to be able to reflect and properly account for the cost, it must be based on a scientifically and sound measurement base. LAANC does not believe that the existing assessment criteria for are reliable. (Reference: WHO-ECEH Night Noise Guidelines; ANASE). It follows therefore that the true costs are likely to be under-stated while the economic benefits will be inflated due to “double counting” of benefits and confusion between value of night flights in the whole night as opposes to the NQP.</p>
<p>Q42: Is there any reason why we should not seek to ensure consistency with the Aviation Appraisal Guidance approach to assessing air passenger impacts?</p>	<p>Use of HMT Green Book LAANC is of the view that the DfT should follow the procedure set down in the HMT “Green Book”, which applies to appraisal and evaluation across all government departments, and clearly states that proposals should <u>not</u> proceed if, despite a net benefit to UK and foreign residents, there is a net cost to the UK</p> <p>Absent data For better understanding by the public we think it necessary to set out some key passenger statistics - for example, the number of scheduled flights divided into four periods: the night quota period, each of the two shoulder periods, and combined day and evening periods. To this we recommend adding the number of passengers, analysed by purpose of travel (business/leisure), residency (UK/foreign) and destination (domestic/short haul/long haul) and transfers (domestic/international and international/international). Also, the air transport movements should be divided between foreign and UK airlines. Aircraft fleet mix details need to be provided. Ticket prices and resulting revenue in these categories also should be provided. Very little of this</p>

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	night-time information is provided in the consultation or the annexes thereto or by the CAA and other potential sources in a way the data can be comprehensively modelled or understood by the public.
Q43: What are your views on how we should assess the impacts on air passengers associated with a change in night flights regime, if we are unable to use the Department's aviation models?	LAANC believes that the DfT should commission a passenger opinion survey research in order to obtain evidence-based answers to these questions, rather than asking consultees to guess passengers' preferences. Many destinations are duplicate with daytime slots at Heathrow
Q44: Do you think there is merit in applying the approach employed by CE Delft? If so, do you agree that it is reasonable to assume that business passengers and transfer passengers prefer to arrive on a night flight, if they would choose to do so if one were available? What are your views on what we should assume about terminating passengers' preferred arrival times and about passengers' preferred departure times?	No comments offered.
Q45: Do you agree that the impacts on passengers who decide not to travel (or become able to travel) as a result of the change in night flights regime could be critical to the balance of costs and benefits?	No. LAANC would only place limited relevance on this point on the grounds that passengers have alternative choices unlike many residents who have no choice of where to live.
Q46: Are you aware of any evidence that we could use to value the impacts on passengers who decide not to travel or (become able to travel) as a result of the change in night flights regime?	No, we believe that there is suppressed daytime demand at Heathrow that can substitute for any "lost" night flights
Q47: Do you think that the method used by Oxford	No comments offered

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Economics (2011) to assess the impacts on productivity of changes in business usage of aviation (the approach is described in paragraphs J22-23 of Annex J) would adequately take account of the impact on air freight service users of changes in the current night flights regime?	.
Q48: Do you think that, were we to employ the method used by Oxford Economics (2011) to assess the impacts of changes in business usage of aviation on UK productivity (the approach is described in paragraphs J22-23 of Annex J), we would need to isolate the impact on business air passengers in our assessment of air passenger impacts in order to avoid double-counting of business air passenger impacts?	No comments offered
Q49: Is there any other evidence or information that we should consider in assessing the impact on air freight service users of a change in the night flights regime?	No comments offered.
Q50: Is there any reason why we should not seek to ensure consistency with the Aviation Appraisal Guidance approach to assessing airline and airport impacts?	No comments offered.
Q51: What are your views on how we should assess the impacts on profits, if we are unable to use the	As in our reply to Q 42, we would expect the DfT to follow the procedure set down in the HMT Green Book and only count the benefits to UK companies and UK shareholders. Profits to the owners of Heathrow who are

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Department's aviation models?	located outside the UK should be excluded.

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QUESTION	RESPONSE
<p>Q52: Do you agree that there is merit in our applying a similar approach to that employed by Oxford Economics to estimate the economic value of night flights at Heathrow? If so, are you able to provide any evidence of how much freight is carried on night flights at the designated airports? What factors should we consider in assessing the applicability of the available profits data to night flights at the designated airports?</p>	<p>No comment offered</p>
<p>Q53: Is there any other evidence we should consider in assessing the impacts of a change in the night flights regime on airlines and airports?</p>	<p>No comment offered.</p>
<p>Q54: 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?</p>	<p>We have examined DfT Tags 3.18 and 3.3.2 on Noise, ERCD Report 1208 dated 2013 (“Aircraft noise, sleep disturbance and health effects: A Review”), ERCD Report 1209 dated 2013 (“Proposed methodology for estimating the cost of sleep disturbance from aircraft noise”), WHO Report dated 2009 (Night Noise Guidance for Europe) and WHO Report dated 2012 (Methodological guidance for estimating the burden of disease from environmental noise). Broadly we note the approach for estimating the cost of noise impact.</p>
<p>Q55: Is there any other evidence, not considered by the CAA in their literature review, which we should consider in assessing the noise impacts of a change in the night flights regime?</p>	<p>LAANC Is of the view that the government should adopt WHO Guidelines for Community Noise as targets to be achieved by 2030, and that the new night flight regime should contain milestones for reaching that target. .</p>
<p>Q56: Do you agree that we should ensure that the method used to assess air quality impacts should be proportionate to the proposals under consideration?</p>	<p>Yes,</p>

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QUESTION	RESPONSE
Q57: Is there any other evidence we should consider in assessing the air quality impacts of changes in the night flights regime?	No comments offered
Q58: Do you agree with our proposed approach? Is there any evidence on nonCO2 climate change impacts we should consider?	No comments offered
Q59: Is there any reason why we should not seek to ensure consistency with the Aviation Appraisal Guidance approach to assessing public accounts impacts?	No comments offered
Q60: What are your views on how we should assess the impacts on the public accounts, if we are unable to use the Department's aviation models?	No comments offered
Q61: Do you agree that there is merit in our applying a similar approach to that employed by Oxford Economics to estimate the impact on APD revenues?	No comments offered
Q62: Do you agree that the impact of any change in the night flights regime is unlikely to have a significant impact on employment, and therefore any impact on employment taxes will be minimal?	Yes.
Q63: Is there any further evidence we should consider in attempting to assess the indirect impact of a change in the night flights regime on indirect taxation revenue	No comments offered

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QUESTION	RESPONSE
across the rest of the economy?	
Q64: What are your views on our employing a similar approach to that employed by Oxford Economics and Optimal Economics in assessing the impact of a change in the regime on UK productivity? Do you agree that if we were to employ this approach there would need to make adjustments to avoid double counting the benefits to business passengers and freight service users?	No comments offered
Q65: Is there any further evidence we should consider in attempting to assess the impact of a change in the night flights regime on UK productivity?	Data from Health Impact studies

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Q66: Do you agree with our proposal to assess the impact of a change in the night flights regime qualitatively? If not, why not, and what would you suggest as an alternative?	LAANC is sceptical about attempting to put a monetary value on night flights and to balance this against the health impacts as “cause and effect” has yet to be established (although it may be in time). It would be better we believe to pursue a “precautionary principle” approach by making progressive reductions noise quotas and at Heathrow introducing a mandatory curfew.
Q67: Is there any further evidence we should consider in attempting to assess the impact of a change in the night flights regime on UK productivity?	LAANC is currently waiting for the launch of the revised CE Delft report and to consider the findings.
Q68: Do you agree with our proposed approach to considering the potential impact of a change in the night flights regime on UK employment? If not, why not, and what would you suggest as an alternative?	No comments offered
Q69: Is there any further evidence we should consider in attempting to assess the impact of a change in the night flights regime on UK employment?	No comments offered
Q70: Are there any other impacts, not considered above, that we should consider in assessing the impacts of a change in the night flights regime (e.g. impacts related to the way people travel to and from the airport)? If so, what evidence should we consider in assessing these impacts?	The Council recommends that a refreshed resident’s opinion survey is conducted into the impacts of night flights.
Other Matters	No suggestions offered