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**Sent by email only to:** [night.noise@dft.gsi.gov.uk](mailto:night.noise@dft.gsi.gov.uk)

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Dear Sirs

**NIGHT FLYING RESTRICTIONS AT HEATHROW, GATWICK AND STANSTED  
STAGE 1 CONSULTATION**

The Association of Noise Consultants (ANC) is the professional body representing acoustics consultants in the UK with 115 member companies including the country's largest acoustics consultancies. ANC support the intention to retain the UK unique system of night flying restrictions based on QC rating for each aircraft movement, and acknowledge the UK Government's world leadership on defining the design standard for aircraft at night at national hub airports such as Heathrow; QC 2. This has been adopted by the key manufacturers of large intercontinental aircraft. ANC members would stress that the night issue is of great concern to the public, be it from entertainment venues, neighbouring factories, delivery yards, railways and airports etc. and hope DfT can assist in setting the appropriate framework for night noise assessment.

In particular, there is perceived a need for clarity over measurement and subsequent impact assessment, essential to convince the public that the appropriate balance is set between the policy objectives given in the settled Aviation Policy Framework. To assist we offer our brief responses to a few of the questions raised in Section 7 of your Consultation.

[Q. 3]

Although a vexed matter, in order to simplify and clarify objectives, consideration should be given to adopting the 8 hour night period, rather than continuing to use 6.5 hour night metrics unsupported by impact assessment studies.

[Q. 6]

For manufacturers to produce the quiet planes needed at night, and for airlines to perceive their benefits, whilst agreeing with a five year timescale (in line with EU Noise Action Plans), the objections should include a longer horizon target.

[Q. 19]

The consultation notes several measures to reduce landing noise, ANC stress that it would not be appropriate to forget departure noise, and seek that the framework presses for a Code of Practice for departing aircraft, mainly concentrating on the need, if locally possible, to allow modern aircraft to climb

quickly such that noise on the ground is minimised. Long stretches of level flight still occur for both arriving and departing aircraft.

[Q. 24]

ANC hope that the excellent advice given in CAP725 over the assessment of actual sleep disturbance using the individual SEL levels of aircraft will not be overlooked. The importance of number of movements depends on the amplitude of the individual noise events.

[Q. 25]

To persuade the public that the Government is serious over noise at night there should be a complete ban on QC 4, 8 and 16 now.

[Departure noise limits and fines]

The long delayed work by ANMAC should be concluded with challenging targets set for the aircraft types that wish to operate at night, not a single target relevant only to the noisiest aircraft and therefore not challenging for the quieter but still noisy for some members of the public, aircraft.

[Q. 39]

Compensation and insulation schemes.

The current schemes are considered by the 58% consultees to the Aviation Policy Framework as unreasonable and not proportionate, Question 19. With the DfT's policy in support of growth of roads, railways, and airports it would be desirable to bring together a UK framework for compensation and insulation schemes for at least national transportation schemes.

[Q. 54 / Q. 55]

ANC appreciate the lack of clear relationship between cost and noise, e.g. over house prices and aircraft noise, self reported disturbance and actual sleep disturbance, and suggest CAA are asked to prepare evidence readily available to the public that their proposed method has validity. Without such validity no consensus view can be established over night restrictions. ANC do suggest again that the excellent work of DfT on sleep disturbance as reviewed in CAP725 is not overlooked. On the basis of it, it would be possible to assess the actual cost of treating houses exposed to high levels of night noise from individual aircraft. This might be better than using a method related to self reported sleep disturbance not validated in the UK.

Yours faithfully

Philip Dunbavin  
Chairman