

Night Noise Consultation
Department for Transport,
Great Minster House (1/26),
33 Horseferry Road,
London,
SW1P 4DR

Sent by email only to: night.noise@dft.gsi.gov.uk

31 January 2014

Dear Sirs

**NIGHT FLYING RESTRICTIONS AT HEATHROW, GATWICK AND STANSTED
STAGE 2 CONSULTATION**

The Association of Noise Consultants (ANC) is a large professional body representing acoustics consultants in the UK with 116 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 and such concern can impede sustainable development and achieving the employment aims of the NPPF, Para 19.

The ANC is disappointed that the U.K. Government has deferred decision making on this critical issue, to the next administration. To assist we offer our brief responses to the questions raised in Section 7 of your Stage 2 Consultation.

CONSULTATION DOCUMENT QUESTIONS

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

R.1. YES. Although the Government should make it clear what degree of rigour and robustness they regard as appropriate when considering research on health effects e.g. is a precautionary approach to be taken, or the balance of probabilities or a high degree of confidence in the studies required in order for policy to be reviewed.

Q.2. Do you have any further views on the costs and benefits, including health impacts, which we should take into account in our decision?

R.2. The text before Q.2. only addresses the benefits, it is hoped that in the balanced approach, the costs for those exposed to high levels of night noise and the cost on airport environmental credentials of night flying are also taken into account. Airports with night curfews can have less conflict with their neighbours.

- Q.3. Do you agree with the proposed environmental objectives?
R.3. The first objective is appropriate, but should apply to the eight hour period i.e. 2300 to 0700 hrs, not just to part of the night as proposed.
The fourth objective should apply to the entire night period.
- Q.4. Do you agree that the next regime should last until October 2017?
R.4. NO. An earlier date should be sought to complete the review after ASAP after publication by the Airport Commission.
- Q.5. Do you have any views on revised dispensations guidance?
R.5. None.
- Q.6. Do you agree that we should maintain the existing movement and noise quota limits until October 2017?
R.6. YES
- Q.7. Do you have any comments on our forecasts to October 2017?
R.7. NO
- Q.8. Do you have any views on how benefits of quieter aircraft can be shared in the future between communities living close to the airport and the aviation industry?
R.8. The benefits of quieter aircraft are for the community less noise from individual events at night (i.e. those events that cause sleep disturbance), for the industry no benefit arises due to the inclusion of a movement limit as well as a QC budget limit. Consideration should be given to incentivise the industry by allowing more activity, balanced with the overall noise impact, if new quieter planes are acquired and used at the London Area Airports. A related issue would be to penalise those operating the noisier aircraft, and distributing the penalty funds raised to community projects.
- Q.9a. Do you agree with extending the operational ban of QC/8 and QC/16 aircraft to the entire night period?
R.9a. YES
- Q.10. Are there any other changes to the regime which we should consider?
R.10. It would be helpful to bring into the regime the results of the very extensive noise monitoring at the Airport's fixed monitors. This would allow the public to understand better the noise contributions made by individual aircraft types and individual operators. The information is already collected and so minimal cost would be involved. This could relate to demonstrating the benefits of operational changes in landing and departure procedures.
- Q.11. 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?
R.11. ANC welcome proposed practical work to develop operations such that it can be stated that aircraft are operating as quietly as possible, not the current situation.
- Q.12. Are there any other matters you think this consultation should cover?
R.12. YES, the actual noise impact of the future noise in terms of sleep disturbance for those with properties within the Airports sound insulation scheme and those not eligible, i.e. number of awakenings /night-time annoyance etc.

Q.13a. Do you agree with the locations of the proposed new noise monitors at Heathrow?

R.13a. NO. The proposal to locate to locate one of the new monitors adjoining the M4 motorway is unsuitable; a location slightly further from the Airport and more distant from the M4 should be adopted to minimise the influence of road traffic noise on the measurements.

Q.13b. Do you agree with the proposal to apply runway-specific limit adjustments for easterly departures at Heathrow?

R.13b. YES.

Yours faithfully

Philip Dunbavin
ANC Chairman