



| | |
|---|------------------------|
| Agenda Item: | Reference: HACC.435 |
| Date: September 5 2005 | |
| Night Flying Restrictions at BAA London Airports | |

Report by the Technical Adviser

1. The Committee debated the consultation initiated by the Department for Transport about the future of night flights at the London airports and, in particular, the next regime which it is proposed to extend from the present five year period to one of six years, which will take effect from 29 October 2006 until the end of the Summer season in 2012.
2. Although there was a stimulating debate regarding the Department's proposals, and the questions raised in the document, there has been virtually no response to the Chairman's request to Members to notify the Secretariat of the views they, or the organisation they represent, have about the consultation by the end of August 2005.
3. As a result, the draft response which this report conveys should be regarded only as a cock shy which Members can debate and suggest any amendments they believe to be necessary. The draft response has taken into account, where relevant, views which have been clearly expressed by Members but they will be aware of the divergence of views held within the Committee and the difficulty of proposing answers which the majority can agree.
4. The Committee will recall that the closing date for responses to the consultation is September 16 but that the Department has agreed to extend this so as to allow of a debate at the HACC meeting to be held on September 28.

QC COUNT AND MOVEMENT LIMIT

5. In view of the questions which were raised in the earlier Committee debate, it should be helpful to Members to have details of the Quota Count and Movement Limit data for the Summer and Winter seasons and the use which has been made of them over the five seasons since Summer 2003. The data illustrating this is at Appendix A to this report.

THE ECONOMIC BENEFITS OF NIGHT FLIGHTS

6. Following the earlier Committee discussion of these proposals, there was criticism of the lack of data about the economic benefits claimed to result from the operation of night flights and the IATA representative was tasked with providing that. His submission has been received and is attached to this report at Appendix B.
7. Against a general background of economic data about air travel, the section on night flights provides some specific information relating to Heathrow Airport:
 - In Summer 2004, 40% of all BA's longhaul flights arrived before 07.00 hours with similar proportions for other carriers
 - * BA accounts for 35-40% of scheduled movements in the night period generating 6 million passenger journeys, including those on the return sectors and those who transfer to/from other flights
 - Assuming that BA's operations are typical, this implies that the night flights of all carriers generate a total of some 16 million passengers
 - Night flights support directly more than 12,000 jobs in aviation and a further 20,000 jobs in the supply chain and induced employment
 - The loss of night flights by the express cargo industry would reduce UK Gross Domestic Product by more than £5 billion a year by 2021
 - Most air cargo is carried in the bellyhold of passenger aircraft and Heathrow accounts for 55% of the UK market
8. It is proposed to submit this Appendix to the Department as a part of the Committee's response to its request for economic data relating to the proposals.
9. Under the Freedom of Information Act, on 4 July the Department released some information about progress with an on-going study of "Attitudes to Noise from Aviation Sources in England". The study is being undertaken by consultants with Phase 1 having been due for completion in early 2003 with Phase 2 and the study as a whole, due for completion at the end of 2004. A decision to proceed with Phase 2 was not taken until April 2005 with completion expected in 2006. The study should be helpful in determining attitudes towards night flights and Government should be urged to secure the early completion of the study.

Department for Transport,
Aviation Environmental Division 4,
Zone 1/34
Great Minster House,
76 Marsham Street,
London, SW1P 4DR

September 2005

Dear Sir,

Night Flying Restrictions at the BAA London Airports

This is the response of the Heathrow Airport Consultative Committee to the Stage 2 consultation on this subject.

The Committee has noted the Freedom of Information release of 4 July regarding the very considerable delay in completion of the consultant's study "Attitudes to Aircraft Noise from Aviation Sources in England" and urges Government to ensure that this is completed and published early in 2006 for the benefit it will bring to understanding of this problem.

The Government's decision to extend the present system for a further year is noted.

As you will appreciate, there are some quite varied opinions about this subject amongst the Members of the Committee and there are varying degrees of unanimity or opposition which they subscribe to which have had to be reflected in this response.

The response is compiled to follow generally the Summary of Questions posed on page 47 of the consultation document. In doing that, it should be recognised that a significant number of Members of the Committee advocate the imposition of a total ban on aircraft movements during the night period but the remarks following apply if there is a continuation of that activity.

Question 1. Do you have any comments on the proposals for environmental and noise abatements objectives set out in Section 4?

The Committee supports the policy of encouraging the use of quieter aircraft by day and by night and of avoiding an increase in the overall noise from aircraft during the night quota period above what was permitted in 2002-03. It would wish to see that policy extended to include all flights in the night period (para.4.7)

The noise abatement objectives for Heathrow (para.s 4.12 and 4.17) are also supported but in the references to the extent of the 48 dBA Leq contour, it is noted that in 2002-03, the actual contour covered 53.9 km sq. and the Committee believes that the new regime should seek to maintain that area rather than to allow it to increase.

The possibility that the contour area might contract by some 10% if the existing movements limit is retained is to be welcomed. (para.4.19)

Compilation of the noise contours should continue to use data derived from the noise monitors, rather than ICAO certification levels, and the Committee welcomes the proposal to install two additional noise monitors around Heathrow Airport which will improve the quality of that material.

Extension of the night quota period (para.4.22) would result in an objective of reducing the 50dBA Leq contour by 2012 by only 0.3km sq. compared to 2003 which seems a very small reduction given the promises of quieter aircraft coming into service over that period.

Question 2. Should the QC/4 scheduling ban continue to apply only between 23.30 and 06.00 (para.s 5.32 – 5.37)

The intention to prevent QC/8 or noisier aircraft from flying at night is to be welcomed.

There is already a voluntary ban on the scheduling of QC/4 aircraft period at Heathrow and the Committee would supports making this a formal ban; it believes that such a ban should apply throughout the whole of the Night Quota period, whatever that may be.

The Government's intention to introduce a QC/0.25 category is noted; the Committee will be concerned if this change is used to result in an increase in the number of aircraft movements able to be operated and/or any worsening of the contour objectives proposed.

The decision to retain the 9EPNdB adjustment if noted but there are still serious concerns amongst some Members about the justification for doing this.

Question 3. Do you have any views on the definition of the night period and night quota period?

The Committee was unable to agree on a single view about this. The airline and other interests concerned about economic matters believe that to extend the present night quota period of 23.30 to 06.00 would be detrimental to the interests they represent. Those with environmental concerns would support extension to cover the entire night period from 23.00 to 07.00; this would clarify some aspects of the current controls which confuse the general public.

Question 4. Are you in favour of extending the night quota period (to 23.00 to 07.00) if the movements limit and noise quotas were set precisely to accommodate current levels of night flying described in paragraph 6.11 ?

If night flying controls are set precisely for current levels of this activity as suggested, it should ensure that there is no increase in current levels of noise disturbance and this would be supported generally by the majority of the Committee although those concerned with the economic consequences would wish to ensure activities between 06.00 and 07.00 continue as now.

However, the Committee has noted with some apprehension that the Government is proposing in the Civil Aviation Bill to take powers which could enable it at designated airports such as Heathrow, to allow quota limits or noise contour limits as primary control of noise instead of movement limits. Generally, it is felt that it is primarily the number of aircraft movements which people experience rather than just the noise of them which is significant in measuring disturbance. The Committee believes it is important to maintain the principle of establishing aircraft movement limits.

Question 5. Are you content to continue with the arrangements for disregarding movements?

The Committee notes the Government's intention to continue with these arrangements but urges that a more frequent and transparent record of the granting of "disregards" and the reasons for them be publicised than is currently the case – e.g monthly rather than quarterly.

Question 6. Do you agree with proposals to remove the rule on movements scheduled after 06.30 but arriving before 06.00 (para.s 6.14-6.15)

The Committee supports the proposal to remove this rule from October 2006 so that all movements during the night quota period will count against both the movement and noise quotas unless exempted for another reason.

Question 7. Are you content with the carry and overrun arrangements proposed?

It is accepted that the proposed change would make the system less complicated and would not result in any overall increase in the actual number of movements permitted in the night quota period each year. For this reason, the proposed changes are supported.

Question 8. Do you have any comments on the proposed movements and noise quotas (para.s 7.19 – 7.52)

It is noted that Government preference is to retain the current night quota period from 23.30 to 06.00 when it is also proposing a policy of permitting some increases in the movements limit at Heathrow, from 2,500 to 2,820 in the winter season and from 3,250 to 3,600 in the summer season over the period to 2012.

This is inconsistent with Government's intention of "bearing down on aircraft noise" and the proposal is opposed by a majority of members of this Committee.

Government has recorded the movements limits and noise quotas which would be proposed if the night quota period were to be extended to 23.00 to 07.00 (para.7.48) which would show very considerable increases in those limits and quotas to reflect the numbers of aircraft movements which already take place in the shoulder periods between 23.00 and 23.30 and, more particularly, between 06.00 and 07.00, although the number of these is not recorded so as to permit a comparison with the overall numbers which Government is proposing to cap (para.7.49) The majority of our members would be opposed to any increase in aircraft movements at night.

Introduction of a maximum noise contour for the 8 hour night period would assist in controlling aircraft movements during the shoulder periods.

Question 9. In relation to a noise insulation scheme, do you have any comments on:

9 (a) whether or not policy should be implemented through statutory regulation?

The Committee favours the implementation of a regulatory scheme for the provision of noise insulation to standards and in locations which are clearly defined in Statutory Instruments as was a number of schemes in past years. There would be a need for such schemes to be administered centrally and the HACC believes that this should be the community-led body which BAA Heathrow is proposing to establish to deal with the insulation of public buildings.

9 (b) whether to use a noise footprint or other criterion?

The Committee favours the use of a noise footprint

9 (c) if a noise footprint criterion is used, how to define it for each airport?

A noise insulation scheme should be based upon a noise footprint of the noisiest aircraft using Heathrow and reviewed from time to time. Whilst the use of a 90dBA SEL footprint is proposed, this is higher than the noise footprint level which the World Health Organisation defines as causing noise disturbance. To meet that criterion, a 70dBASEL footprint should be adopted.

9 (d) whether the scheme should relate to the whole night or the current night quota period ?

The scheme should relate to the whole of the night quota period in use .

Yours faithfully,

Sam Jones
Chairman