

SHORT (& MEDIUM) TERM MEASURES - EXECUTIVE SUMMARY

MEASURE SET	Night Flights.	
MEASURE TITLE	Tighten current restrictions.	
MEASURE SUMMARY	This measure is aimed at tightening the current regime of night flight restrictions, moving towards a complete night ban (23:00 to 07:00), reducing community night noise exposure.	
MEASURE INVOLVES	<div><div><input type="checkbox"/> Behavioural Change</div><div><input checked="" type="checkbox"/> Operational Change</div><div><input type="checkbox"/> Technical Change</div></div> <div><div><input type="checkbox"/> Infrastructure Change</div><div><input checked="" type="checkbox"/> Regulatory Change</div><div><input checked="" type="checkbox"/> Policy Change</div></div>	
WHAT DOES THIS ADDRESS?		
<p>Night flight noise has been a significant environmental and community issue for some years. The issue has gained further attention in recent years following the publication in 2009 of the WHO Night Noise Guidelines for Europe. These are now referenced as the guiding principles behind a number of proposals to restrict or even ban night flights. The CAA review of environmental noise and health recognises the issues, but concludes that agreement upon threshold noise levels, which assure effective protection of the health of the population from aircraft noise, remains controversial; this is particularly true for protection of rest and sleep at night.</p> <p>There is a case to be made that restricting or banning night flights would improve the quality of life for those people living under the flight paths, especially at LHR. Representations to the night flight regime consultation from a number of MPs argue for restrictions on night flights due to sleep disturbance.</p>		
WHAT WOULD BE DONE?		
<p>Change to the current Night Flight Regime at Heathrow, Gatwick and Stansted for the next regime that reduces the QC available, and imposes further restrictions on hours of operation, initially reducing flights pre 06:00 and ultimately pre 07:00 and post 23:00.</p> <p>The next Night Flight regime would need to be articulated differently from the present regime.</p> <p>At LHR significant slot reallocation would be required to use daytime availability, although this is fully dependent on availability of other slots, and would not coordinate with the required arrival times from current destinations and flights.</p>		
WHAT IS THE IMPACT?		
<p>The impact is expected to be:</p> <ul style="list-style-type: none">• Reduction in noise disturbance of local communities, with possible improvements to quality of life and reduced health effects where present.• Reduced capacity – although one proposal suggests that capacity can be delivered at other times of day• Reduced resilience – any delay would result in late night flights being unable to leave; early morning arrivals would be compressed into an even tighter peak• Reduced connectivity – current early morning arrivals from Australasia and the far East would mostly be lost, as departure times from origin airports could not be adjusted to accommodate the required UK arrival time• Significant knock on effects, especially to BA at LHR, as effects on home airport operator likely to impact other operations.		

MEASURE SET:	Night Flights	Short Term	<input checked="" type="checkbox"/>
MEASURE TITLE:	Tighten Restrictions	Medium Term	<input type="checkbox"/>

PROPOSAL SUMMARY

Proposed by:	HACAN (021), Individuals (038), London Councils (046), Richmond Heathrow Campaign (060), Transport for London (068)		
Proposal: NFI-TRES-1 NFI-TRES-2	<p>This measure is aimed at establishing the principle, and delivering in actuality, a reduction in night flights through tightening night flight restrictions. This is from two different conceptual positions:</p> <ul style="list-style-type: none"> • Opposition to night flights in principle, but a pragmatic view of current restrictions • Clear opposition to night flights proposing immediate and future restrictions, including ban between 23:00 and 07:00 		
Approach	<p>The approach for each of the proposals is as follows:</p> <ul style="list-style-type: none"> • Some submissions indicate a position opposed to night flights in principle, and therefore a restriction to night flights 23:00 to 07:00 is a corollary even if not explicitly stated. • Other submissions were explicit in suggesting tighter restrictions, starting with a reduction in LHR flights pre 06:00, and moving to a 'ban' on flights between 23:00 and 07:00 • Although not explicitly stated within the, tightening restrictions could include enhanced use of quiet aircraft rules. This option is addressed under 'minor changes' measure. 	<p>Stated Capital Cost: Not stated</p> <p>Capacity (mppa): Not stated</p> <p>Capacity (atm): Not stated</p>	
Benefits	<p>The main benefits available are a reduction in noise disturbance of those residents nearest the airports concerned. It may be argued that night noise is perhaps the most significant noise effect of airport operations. Evidence is presented to suggest that night flight movements could be absorbed within slot reallocation of existing daytime capacity, although this does not address genuine slot availability of origin-destination time pairings. The actual impact of restricting early morning arrivals or a complete ban on night flights is currently not qualified or quantified in terms of population or L_{den} or L_{night} dB contours.</p> <p>There is no capacity benefit from this proposal, and unless flights displaced from night hours can be accommodated during the daytime, there could be a capacity reduction.</p>		
Issues & Risks	<p>The position and proposal to restrict night flights pre 06:00 and implement a full ban on night flights is most likely to reduce capacity, and no evidence is presented to indicate that the social and environmental gains from the reduction in noise are significant. The response is a deviation from current night flight regime, and in contradiction of the ICAO 'balanced approach' to noise management. There is a risk that tightening night flight restrictions impacts the ability to serve far eastern and south American markets. There is a risk where QC limits are currently not utilised to the full that future growth to markets requiring shoulder period arrivals or departures is constrained. To retain capacity without night quota period use will result in a requirement to fit existing flights within the 07:00 to 23:00 operating window. At current capacity usage this is likely to have significant impact on congestion, reducing resilience, and very probably result in further capacity pressures. Tightening current restrictions will limit flexibility for late departures following delays (which could be inevitable from previous risk) thus severely impacting operations. Such impacts would affect the 'home base' airline more than any other, are thus punitive to the based airline, and could be seen as anti-competitive.</p>		
Mitigations	Not stated. Environmental mitigation not appropriate. Mitigation of impacts on airlines and the UK economy is not identified beyond the concept of slot reallocation.		
Dependencies	<p>There key dependencies are:</p> <ul style="list-style-type: none"> • Alignment with DfT Night Flying Restrictions consultation • Operational procedures regarding late departures and early arrivals • Commercial decisions regarding route origins and destinations drive demand for night flights 		

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ASSESSMENT SUMMARY

Strategic Fit	Not stated. Does not align easily with the UK Government's Aviation Policy Framework, where although the key aim is to "limit and where possible reduce the number of people in the UK significantly affected by aircraft noise", the knock on effects on operational viability and commercial operability are likely to be in conflict with the benefit. No capacity benefit gained; capacity and resilience is reduced.
Economy	Not stated. The London Chamber of Commerce and Industry report on the Economic Benefits of Night flights in July 2004, quoted a British Airways estimate that night flights contributed some £2.2bn to the UK economy. Bringing this analysis closer to the present day, the Optimal Economics submission to the DfT Night Flights Consultation includes more detail on the economic impact of restrictions on night flights at Gatwick, and there is a series of Oxford Economics studies submitted to the consultation addressing the impact of restricting freight and courier flights.
Surface Transport	Not stated. Current public transport provision late at night and early morning may see reduced use.
Environment	Not stated. Not quantified at this stage - but there would be reductions in night noise exposure to local communities. However if capacity and connectivity is to be retained, there is an issue that noise nuisance is merely being exported to origin airport communities.
People	Not stated. Vulnerable groups who are more susceptible to noise would benefit from reduced noise exposure. Effects on employment from changes to airline schedules are unknown. In the UK, typically, the current (saved) noise related planning policy around airports (e.g. LB Hillingdon Supplementary Planning Document on Noise) is informed by the now defunct Planning Policy Guidance 24. This identifies no further planning restrictions at Noise Exposure Category (NEC) A (equivalent to 57 dbA Leq exposure 07:00 to 23:00 and 48 dB 23:00 to 07:00), with increasing restrictions for NEC B, C and D. Since the cancellation of the PPG in the new National Planning Policy Framework, reference may be made to the Noise Policy Statement for England (NPSE). Further guidance may be required to ensure the application of the ICAO balanced approach without undue limitation on aircraft movements.
Cost	Not stated. There would be costs associated with regulatory change. There are cost-benefits from reduction in night noise. There are broader costs from loss of opportunity within the economy.
Operational Viability	There are some significant impacts on operations at LHR that result as a ban on night flights, although minor restrictions would be possible. Restricts operational freedom and flexibility. The main impact would be to increase pressure on the early morning peak arrivals, and if flights pre 07:00 were banned; a number of destinations from the far east (and Africa) could not be served in the same way.
Delivery	Not stated. Implementation at Frankfurt indicates that it is possible with policy and regulatory environment. Restrictions on night flights have knock on effects at destination airports. India has raised an issue with ICAO about the night noise impact on communities around departure airports from flights required to maintain connectivity and arrive during the day in Europe. The issue of exporting noise should be considered.