

Night Flying Restrictions

Richmond Society Summary Response

1. The Richmond Society would like to see a complete ban on scheduling flights between 11:30 pm and 6:00 a.m. Clear evidence of economic benefits of such flights was not provided in the Stage One consultation. The Society believes that any economic benefit is easily outweighed by the impact on our members' lives, and indeed on the overall productivity of all workers living under the Heathrow flight paths. Elimination of all scheduled night movements and all movements which have a significant risk of ending up in the night period should be a key principle of the revised night flying restrictions.

2. The Richmond Society would like to see a reduction in the number of flights in the Night Shoulder Periods, 11:00 pm to 11:30 pm and 6:00 am to 7:00 am. The Richmond Society believes that sleep disturbance – particularly in the early morning – is a significant problem for our members. This is a consequence of both the number of movements and the overall noise of landings. We therefore urge a phased reduction of all night flights, particularly those between 6:00 am and 7:00 am.

3. The Richmond Society is against the proposal to increase the number of night flights from an average of 16 per night to 18 per night. The Society welcomes the proposal that overall noise from aircraft during the night quota period will not be allowed to increase above what was permitted in 2002-03. However, the overall number of aircraft movements contributes to sleep disturbance as well as the noise. The Society believes that the noise benefits from quieter aircraft should go entirely to the residents affected by night noise. It should be therefore be possible to decrease the overall noise during the night quota period progressively. The Richmond Society urges that if night flights are not to be abolished altogether, the existing quota should be retained or reduced.

4. The Society welcomes the proposal to prevent the noisiest aircraft from being operated at night, and prevention of noisier aircraft from being scheduled for the night quota period. However, **the Richmond Society sees no reason why QC/4 aircraft (e.g. older Boeing 747s) should be allowed to continue to be scheduled in the shoulder periods** – particularly 6:00 am to 7:00 am – since quieter aircraft with equivalent capacity and range are already in widespread use.

5. The Society welcomes the proposal to consider contracting the Heathrow noise contour by around 10% corresponding to the phasing in of quieter aircraft. The Richmond Society urges that this 10% reduction be included in the 2006-12 Night Flight Restrictions.

6. The Richmond Society would like to see actual rather than theoretical aircraft noise being used to enforce night flying restrictions. The existing and proposed noise monitors should be used to assess noise and appropriate targets should be set and measured at each point.

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About The Richmond Society

The Richmond Society is a registered charity and was founded by local people in 1957. All our work is done by volunteers in committees and working groups. We are totally independent, being financed only by members' subscriptions and donations.

Our aims are:

- To campaign to preserve and enhance Richmond's historic character, unique features and amenities.
- To promote high standards in planning, building and landscaping in or affecting Richmond.
- To protect the quality of life, balancing the interests of residents, business and visitors
- To encourage an active interest in Richmond and its community and provide a focus for members to meet and socialise.

As of June 2005, The Richmond Society had 918 members.

We monitor planning applications and plans affecting the landscaping of the town and submit representations to the local Council and other relevant bodies, seeking positively and constructively to discourage adverse change but to encourage projects which will enhance the local amenities. We are also active in responding to local and national consultations, e.g. on development plans and legislation.

We identify, raise funds and with Council support manage environmental improvements. Projects have included restoration of the River God statue in the Terrace Gardens and the RSPCA fountain on Richmond Hill. We have also provided Visitor Information Boards on The Terrace, the Riverside and The Green and a plaque to commemorate the centenary of the Act of Parliament protecting the view from Richmond Hill.

We maintain an interest and involvement in issues relating to traffic, highways, car parking & public transport and also campaign against aircraft noise, night flights and the expansion of Heathrow Airport.

Our tree planting and landscaping, implemented in co-operation with the Council, is financed by donations from members, receipts from our Summer Evening Heritage Walks and sales of our Heritage Walk Guides from the Tourist Information Centre.

Anti-social aspects of the evening economy are a particular concern and licensing applications are closely monitored and, where necessary, opposed.

We work actively to encourage the removal of Graffiti tags as soon as they appear. Working with the Council we have contributed ideas for public policy changes to fight the problems of graffiti and litter.

The Richmond Society Awards were introduced in 1977 for development projects which are considered to make a positive contribution to amenity, and the annual review and awards presentation has become a key event in the Society's calendar

Night Flying Restrictions

Richmond Society Detailed Response

Q1. Do you have any comments on the proposals for environmental and noise abatement objectives set out in section 4?

4.7 Heathrow Environmental Proposals

Progressively to encourage the use of quieter aircraft by day and by night.

To avoid allowing the overall noise from aircraft during the night quota period to increase above what was permitted in 2002-03.

To support the principal daytime noise objective as set out in the White Paper, namely that if a third runway is built, the 57dBA daytime noise contour should not exceed its area in 2002 (127 km²),

To meet noise-abatement objectives as adopted from time to time,

Richmond Society Response

The Society is in favour of this proposal. However, the overall number of aircraft movements contributes to sleep disturbance as well as the noise, and the use of quieter aircraft must not be used as a justification for increased movements.

The Society welcomes this proposal, but believes that with quieter aircraft, it should be possible progressively to decrease the overall noise during the night quota period, and that this should be proposed.

The Society is strongly against the building of a third runway. Regardless of any prior agreements, in practice over time it is likely to drive up aircraft movements and hence noise.

If the third runway were built, then the Society would support this proposal.

In addition to future noise-abatement objectives, measurements from the existing and proposed noise monitors should be used to assess aircraft noise in practice (rather than by aircraft type) and appropriate targets should be set and measured at each point.

General Noise Abatement Objectives

4.11 Elimination of all disturbance at night would not be compatible with a fair balance with economic costs to airport users.

4.12 Minimise sleep disturbance resulting from overflight of the noisiest types of aircraft.

Richmond Society Response

Elimination of all scheduled night movements and all movements which have a significant risk of ending up in the night period should be a key principle of the revised night flying restrictions.

The Society agrees with this proposal. However as noted above, the overall number of aircraft movements contributes to sleep disturbance as well as the noise, and the use of quieter aircraft must not be used as a justification for increased movements.

General Noise Abatement Objectives (ctd)

4.12 Encourage airports to offer and pay for sound insulation for affected residents.

4.13 Prevent QC/8 aircraft (DC8, B707 and older, heavy B747s) operating at night other than in exceptional circumstances.

4.14 Prevent QC/4 aircraft (Nearly all older B747s, heavy B737-100 and 200s, most DC10s, most Lockheed Tristars) being scheduled at night.

4.15 Continue to allow QC/4 aircraft to be scheduled in the “shoulder” periods (11:00 pm – 11:30 pm and 6:00 am to 7:00 am) for economic reasons.

Heathrow Noise Abatement Objectives

4.17 By 2011-12 limit the 6.5 hour 48 dBA L_{eq} contour to 55 km². (2002-03 limit 55.7km², actual limit 53.9km²).

4.19 Consider contracting the Heathrow noise contour by around 10% corresponding to the phasing in of quieter planes.

Note: the Phase 1 consultation did not provide sufficient evidence of economic disadvantages resulting by freezing the movements limit.

4.24 If the night quota period is extended, to limit the 8 hour 50 dBA L_{eq} contour to 92 km² by 2012 compared with 92.3 km² in 2003.

Richmond Society Response (ctd)

Given the number, variety and age of buildings in Richmond, the Richmond Society believes that it would be impractical to implement a sound insulation scheme. We would see this as an appropriate option for areas nearer Heathrow where noise levels are higher and buildings are more modern and hence easier to adapt.

Overall, however, the Richmond Society believes that resources should be directed towards reducing the level of aircraft noise rather than alleviating its effects.

The Society is strongly in favour of this proposal.

The Society is strongly in favour of this proposal.

The Society sees no reason why QC/4 aircraft should be allowed to continue to be scheduled in the shoulder periods – particularly 6:00 am to 7:00 am – since quieter aircraft with equivalent capacity and range are already in widespread use.

Richmond Society Response

The Society welcomes this proposal, particularly if it is strengthened by the next proposal to reduce the noise contour.

The Society welcomes this proposal and would recommend that it be incorporated in the final Night Flying Restrictions.

Again, with quieter aircraft, it should be possible progressively to decrease the overall noise during the night quota period, and this should be proposed.

Q2. Do you agree that the QC/4 scheduling ban should continue to apply only between 2330 and 0600 as set out in paragraphs 5.32-5.37

A2. No - The Society sees no reason why QC/4 aircraft should be allowed to continue to be scheduled in the shoulder periods – particularly 6:00 am to 7:00 am – since quieter aircraft with equivalent capacity and range are already in widespread use.

Q3. Do you have any views on the definition of the night period and night quota period? (paragraphs 6.1-6.7)

A3. The Richmond Society is against any proposal which might result in there being more aircraft movements in the current Night Quota Period. The Society would like to see a reduction in the number of flights in the Night Shoulder Periods, 11:00 pm to 11:30 pm and 6:00 am to 7:00 am and abolition of all scheduled flights in the current Night Quota Period.

Q4. Are you in favour of extending the night quota period if the movements limits and noise quotas were set precisely to accommodate current levels of night flying described in paragraph 6.11?

A4. No. Extending the Night Quota Period while accommodating current movement levels may result in some of the noise from the 6:00 am to 7:00 am Night Shoulder Period moving to earlier times, so increasing sleep disturbance to our members.

Q5. Are you content to continue with the arrangements for disregarding movements? (paragraph 6.12)

A5. The Richmond Society accepts that there may be a case for disregarding movements under exceptional circumstances. However, the effect of this in practice should continue to be monitored to ensure that such movements are entirely unavoidable.

Q6. Do you agree with proposals to remove the rule on movements scheduled after 0630 but arriving before 0600? (paragraph 6.14-6.15)

A6. The Richmond Society is in favour of this proposal, as it will encourage operators to reduce the risk of arrivals significantly earlier than scheduled. In addition, the Society notes that the number of operations affected is small (and hence the impact on residents living under London's holding stacks is small). The Society also welcomes this as a simplification of the rules.

Q7. Are you content with the carry and overrun arrangements proposed? (paragraphs 7.8-7.18)

A7. The Richmond Society recognises that overruns and underruns will be necessary in practice. The Society is content with the process in effect today and also with the proposed minor revisions. The Society also welcomes simplification of the rules.

Q8. Do you have any comments on the proposed movements limits and noise quotas for Heathrow, Gatwick and Stansted? (paragraphs 7.19-7.52)

Proposed Movements Limits

7.19 As mentioned earlier in 4.18: by 2011-12 limit the 6.5 hour 48 dBA L_{eq} contour to 55 km². (2002-03 limit 55.7km², actual limit 53.9km²).

7.22 With quieter planes and a total (day and night) limit on flights as a condition for Terminal 5, it is proposed to increase annual night movements from 5800 to 6420, a change of 620 or around 2 movements per nights.

7.24 The quota is proposed to be the same for the entire six years of the scheme, to take account of quieter planes and the desirability of improved noise abatement.

Richmond Society Response

The Society welcomes this proposal, but would like also to see implementation of the proposal in 4.19 to contract the Heathrow noise contour by around 10% corresponding to the phasing in of quieter planes.

The Richmond Society believes that the overall number of aircraft movements contributes to sleep disturbance as well as the noise, and the use of quieter aircraft should not be used as a justification for increased movements.

The Society is therefore against this proposal, believing that the “dividend” from quieter aircraft should go entirely to the residents affected by night noise.

The Society supports the principle of a constant quota, but as stated above is against the proposed increase in the current quota.

Q9. In relation to a noise insulation scheme, do you have any comments on:

Whether or not policy should be implemented through statutory regulations?

Whether to use a noise footprint or other criterion?

If a noise footprint criterion is used, how to define it for each airport?

Whether the scheme should relate to the whole night or the current night quota period? (paragraphs 8.8-8.21)

A9: Given the number, variety and age of buildings in Richmond, the Richmond Society believes that it would be impractical to implement a sound insulation scheme. We would see this as a potentially appropriate option for areas nearer Heathrow where noise levels are higher and buildings are more modern and hence easier to adapt.

Overall, however, the Richmond Society believes that resources should be directed towards reducing the level of aircraft noise rather than alleviating its effects.