

Response of the London Borough of Richmond upon Thames

to the Consultation on:-

'Night Flying Restrictions at Heathrow, Gatwick and Stansted Airports'

Stage 2, 2005.

This response is made by the London Borough of Richmond upon Thames, mindful of its responsibilities as the planning authority and its duty to promote and protect the health and environmental well-being of the borough and its residents. It takes account of well over 1000 responses made by residents to a recent on-line and paper based survey, and also the responses received in a public consultation meeting held on 5 September 2005.

The comments made relate principally to Heathrow Airport, which is the main airport affecting this authority's area.

As a general comment, the Council is concerned about any aviation activity that appears likely to worsen noise within the Borough, and especially with night noise. These concepts are contained within Council Policy, in particular the Planning policies STG 12, BLT 29 and TRN 28 as set out in the Council's agreed Unitary Development Plan (see extracts in Appendix 1).

We note, from the Terminal 5 final Summary Report, regarding the T5 Inquiry, that the Inspector expressed his view that ***"a progressive improvement in the night noise climate could be achieved through the existing system while working towards the long term objective of removing the need for night flights"*** (Report para 89). He also expressed his view, in assessing the balance of acceptability of Terminal 5, that there should be ***"the introduction of stricter controls on movements at night particularly early morning arrivals"*** (para 97). We agree with his concerns and look to the Government to be active and effective in ensuring the improvement of the night noise climate, and to work ***"towards the long term objective of removing the need for night flights"***.

Our response relates to the decisions, proposals and questions posed by the Stage 2 Consultation Paper, with additional responses to points and questions raised in the main text. The relevant consultation paper references are given in brackets.

However we find that many parts of the consultation either lack clarity or provide insufficient information, so that it is exceptionally difficult for us to respond in as comprehensive way as we would wish. Given the information we have, our response on the issues raised by the consultation paper, in addition to those on the questions set, is as follows:-

The Decisions.

We note the decisions made following Stage 1 of the consultation, summarised as follows, and with our comments:-

1. Decision - **To have no ban on night flights** (4.11). In our view there very clearly should be an immediate ban on the relatively few flights in the Night Quota Period, and steps taken to actively reduce and in due course eliminate flights in the remainder of the Night Period. We do not accept the reasons given for opposing a

ban, certainly in respect of the Night Quota Period, which are in our view unreasonable.

2. Decision - **To retain the QC system**, (5.4) –The decision is wholly misleading to consultees, as the QC scheme includes both noise and movement limits. However in parallel with this consultation paper we are led to believe from other sources that the current Civil Aviation Bill appears to be clearing the way for the movement limit to be abolished, which the consultation paper does not refer to. We have other concerns with the system. We believe that disturbance will increase with increased movements, even when the aircraft have lower QC ratings. For this reason we do not accept that maintaining the status quo in a ‘noise budget’ will result in no extra disturbance, which is the whole basis which underpins the QC scheme.
3. Decision - **To retain sole use of ICAO noise certification data for fixing QC ratings, rather than using real noise measurements** (3.11-3.13, 5.5). Following the 2004 Judicial Review on this issue, we find it quite extraordinary that the paper proposes no steps whatever to take account of the actual noise produced by planes for which the ICAO rating does not accurately reflect their noise output. This inaccurate rating of the noise output of planes is a most serious issue, which as you know from that action, is in itself responsible for the great majority of aircraft landing noise at Heathrow during the Night Period.
4. Decision - **To introduce a new QC/0.25 noise category** (5.8). We accept that quieter aircraft should have an appropriate rating, but we retain our overall concerns about additional movements within the QC scheme and use of ICAO certification data alone (as above).
5. Decision - **To abandon the weight based QC/0.5 classification** (5.8). We note that this decision has the potential to increase night flight movements and have concerns about this because of the inadequate extent of research on sleep disturbance and our view that numbers of movements contribute significantly to disturbance.
6. Decision - **To retain the 9 EPNdB reduction off arrivals noise assessments** (5.22). The 9 EPNdB reduction remains questionable, with the consultation paper accepting that separate arrival and departure limits would represent a more stringent control (5.19). These should be set. It appears to us to be quite unreasonable to propose making this adjustment to the effect of the ICAO ratings while refusing to make any adjustment for the inaccurate ratings referred to above.
7. Decision - **To have no ban on operating QC4 aircraft in the Night Quota Period** (5.31, 5.42). In our view it is clear that QC4 aircraft should not operate in any part of the Night Period.
8. Decision - **Not to reduce the departure noise limits** (5.42). We disagree with this decision: the departure noise limits should be reduced, with appropriate fines, in order to give a strong message that noisy aircraft should avoid flying at night.

The Proposals.

Most of the proposals are covered in the responses to the questions below. Proposals not covered include:-

1. Proposal – **that the environmental objectives should evolve over thirty years or so** (4.6). Whilst we believe it is right to take the medium to longer term view for

aviation generally, this is far too long a time frame in which to deal with an issue as serious, as rapidly changing, and as urgent as aviation demand and regulation, especially at night at one of the world's busiest airports. We seek a night flight ban much sooner than 30 years, and find it quite inappropriate that the Secretary of State should seek to make such important decisions now in the absence of clear environmental objectives

2. Proposal – **that the night flight regime should next be reviewed in six years** (4.10). The previous review period was every 5 years. We accept that it would make sense to have the next review in six years, on this occasion only, as the review would then to line up with the 5 yearly mapping requirements of the Environmental Noise Directive (2002/49/EC). Thereafter the review should be every 5 years, which would line up with the timetable requirements for the mapping and action plans in the Directive. In principle, a gap of five years is better, as a period of six years also reduces the opportunities for the community to comment on future proposals.
3. Proposal – **to install two additional noise monitors near Heathrow** (5.53) – We welcome any new monitors that will help to improve the efficiency of enforcing the noise limits. However we do have a view that far more emphasis needs to be placed on the accurate measurement and monitoring of aircraft landing noise further from Heathrow, for example at Putney/ Barnes/ Kew, as of course the noise from aircraft landing is the principal problem in respect of night flights.
4. Proposal – **to trial differential or tiered limits for all types of aircraft, not just the noisiest ones** (5.40 (iv)). We welcome this proposal.
5. Proposal – **to allow the movement limit to increase** (7.22). The number of movements permitted at night is already unacceptable and any increase, however small, is a change in the wrong direction. It is also quite inconsistent with the announced policy of “bearing down on noise”. An increase in movements is also contrary to our policy, and we believe that it would worsen the noise climate (see Policy in Appendix 1) and the resulting disturbance.

The Questions.

We now want to respond to the Questions posed in the Paper. We repeat the questions here, as they appear in the Chapter 9 summary version, followed by the fuller version, where different, taken from the body of the document.

QUESTION 1. Do you have any comments on the proposals for environmental and noise abatement objectives set out in section 4?

RESPONSE 1

1. We agree that quieter aircraft should be encouraged (4.7). A 30 year time frame is too long a period to contemplate suffering from aircraft noise, as there is no indication that they will be quiet enough to fly at night by then. Consequently, there should be a move to phase in a night ban over a much shorter period, such as ten years.
2. We agree there should be no increase of the noise above the levels in 2002-03. However it would quite obviously be far more appropriate if the limit were based on the noise that actually occurred (and not that which should have occurred) (4.7).

Nor do we accept that 2002-03 was an acceptable base year. In 1997, during the T5 Inquiry, we proposed a 10 year phase out of night flights, as night noise was then at an unacceptable level. Even now, over seven years later, it is still unacceptable. The fundamental issue is that there should be a continuous improvement year by year until night flights are ended.

3. We agree that the area for the daytime 57dBA contour should not exceed 127km², but in our view a much smaller area should be specified (for example, it was only 110 km² in 2003 and 117km² in 2004 and it should be no larger than 110 km²). 127km² would permit a significant growth in real noise, as 2002 noise was inflated with Concorde noise (4.7).
4. As part of the policy of bearing down on noise there should be a firm policy commitment to contain the noise in each and every year, rather than accept some exceptions (4.8). If year on year variability is inevitable, a margin should be built in to the quota to accommodate this.
5. We take para 4.11 as being a less than direct way of saying that you have no plans for a night flight ban. This puts your policy in direct opposition to the agreed Unitary Development Plan Policy STG 12 for this borough. We believe that phasing out of night flights is necessary, and that in respect of flights in the Night Quota Period, it should happen now. (Appendix 1)
6. Regarding the economic versus environmental issues, we note that you are asking for more information, especially from airlines and airport users, as you still do not have a comprehensive picture on the economic impact of night flights and of night restrictions (6.8). Your stated objective is to 'strike a fair balance between the protection of local communities from excessive aircraft noise levels at night and the provision of air services at night where they are of benefit to the national, regional or local economy' (4.1). We are concerned that the consultation document has been produced without being based on the necessary economic evidence that should have provided the other half of the 'fair balance' equation. We also note that you give no definition of what is 'excessive', and in correspondence you have suggested that the word is self-evident. Clearly we believe that the current balance is wrong and that the noise is already excessive. The dictionary definition of the word is indeed clear. Excessive means "**more than is necessary, normal or desirable**", and in our view that stage was reached with night flights a long time ago, and certainly well before the revised night flight regime started in 1993. We see no evidence of any economic and social benefits of night flights that are anywhere near sufficient to justify the environmental burden that such flights create. This is even more clear-cut when looking at the limited number of flights in the Night Quota Period. Have you assessed the economic benefits of **not** having night flights, including say to the National Health Service? You appear only to have considered the cost of moving down from the current level of activity. You do not appear to have considered the economic and social benefits of having the activity in the first place against which the environmental disbenefit can be balanced. So in our view you have not justified the need for any night flights. One example that does not appear to have been assessed, which has been put to us by residents in our recent survey, is that there is a heavy cost to individuals and to the economy from their reduced ability at work because they are suffering from the repercussions of sleep loss (4.11). Put the other way, there is an economic benefit to individuals and the economy, from a decent night's sleep. We know that the Strategic Aviation Special Interest Group (SASIG) will be submitting a detailed

response on the economic issues, and we will therefore not elaborate the point here, as the Borough is a member of SASIG.

7. The proposals should deal with noise from all aircraft, not just the noisiest ones (para 4.12). The objective of minimizing sleep disturbance is good but whether a person is woken by a 'noisy' or 'quiet' aircraft is irrelevant, if their sleep is still being broken.
8. Regarding sound insulation, without prejudice to our policy that night flights should be banned, we support the proposal that noise insulation should be offered, provided it does not permit any worsening of the night noise climate for those who, for many reasons (including health and comfort), need to have their windows open. 'Sleep disturbance' is mentioned without any definition, so we assume that the term must include premature awakenings, the difficulty of getting to sleep, and the difficulty in getting back to sleep, once awoken (4.12). In view of this, it is clear that the proposed figure of 90dB(A) SEL is too high. The World Health Organisation, in its 'Guidelines for Community Noise' states that "*it is important to limit the number of noise events with a L_{Amax} exceeding 45 dB*". This guideline value of 45dB L_{Amax} in bedrooms, would equate roughly with a 70dB(A) SEL outdoor footprint. A mapping check on the locations of complainants, who suffer sleep loss, would establish whether a 70dB(A) SEL footprint would include them. From maps supplied to us by BAA, as well as information supplied to us from residents, we know that residents suffer sleep loss in all parts of the Borough, and way beyond the Borough boundary. Whilst we acknowledge that this footprint would be large, it adopts the precautionary principal, in the absence of better studies on sleep disturbance. We propose that properties within both the landing and take-off SEL footprints would need to be included in any offer of sound insulation, together with appropriate mechanical ventilation for when the windows are shut. 70dB(A) SEL would be the threshold for ventilation with single glazing. Double-glazing gives greater insulation but this only applies if the window is closed and so does not affect the window closing threshold. All properties used for sleeping at night should be included. We are highly sceptical that effective noise insulation can be achieved for the average cost of £3000 suggested (8.20).
9. We agree that QC8 aircraft should be prevented from flying at night as they cause very considerable sleep disturbance. We are not aware of any circumstances when an exception to this should be made (4.13) but accept that it may be unavoidable under some most exceptional emergency circumstances.
10. Providing for QC4 aircraft with a scheduling ban in the Night Quota Period just maintains the status quo, and does not go far enough. It is again inconsistent with the expressed policy of bearing down on noise. An operating ban could be achieved if there was more care with the scheduling of QC4 aircraft to prevent the risk of them encroaching on the Night Period. (4.14).
11. A scheduling ban against QC4 aircraft flying in the full Night Period would herald a significant improvement over the current situation, and reduce sleep disturbance. It would show that the policy of bearing down on noise will have some actual effect. It would of course still fall short of an operating ban, for which we press, and any aircraft operating would continue to produce unacceptable disturbance. As above, greater care in scheduling could prevent QC4 aircraft from flying in the Night Period (4.15).

12. A means should be found to control and limit aircraft noise in the full Night Period of 2300-0700 and not just 2330-0600(4.16). Residents of this borough are especially badly affected by the heavy and excessive use of aircraft landing over their beds during the so-called 'shoulder period' after 0600 in the morning, which causes great disturbance.
13. The noise abatement contour area objective for Heathrow of 55 km² merely maintains the status quo and once more is in our view inconsistent with the White Paper objective of 'bearing down' on night flights. Furthermore, the containment of noise should apply immediately rather than wait until 2011-12 (4.17).
14. The Government's underlying policy, as set out in the Future of Air Transport White Paper 2003 is the concept of 'bearing down on night noise'. Again in correspondence you have suggested that this is a phrase whose meaning is obvious. The dictionary definition of to 'bear down' is **"to approach in a purposeful or intimidating manner"**. This policy does not appear to be followed through in the consultation paper in any unified or common understanding of the term whatever. 4.18 indicates the greater scope to 'bear down' at Gatwick, which effectively admits that little is being offered for Heathrow. 'Bearing down' clearly implies considerable improvement, and pressure on polluters, and therefore should mean a significant reduction in noise, whilst the consultation presents various other meanings including the avoidance of an increase (4.7) or maintaining the status quo for Heathrow (4.17, 4.24). This seems to us to be also well short of the stated aim of the Government's conclusions in the document 'Guidance To The Civil Aviation Authority On Environmental Objectives Relating To The Exercise Of Its Air Navigation Functions' which states that the Government's objective included **"reducing the environmental impacts of aviation, in particular ofnoise"** (Section C, para 23 from the Guidance Document, dated January 2002, but not placed on the DfT web-site till March 2005).
15. We would welcome the freezing of the movement limit and reducing the contour area by 10% (4.19) We certainly oppose any increase in movement limits, as proposed elsewhere in this consultation paper. Furthermore we would also oppose the prospect of not having any movement limit, as will be permitted if the Civil Aviation Bill is enacted. It certainly appears wholly inappropriate that consultees were not informed of the possibility of any abolition of the movement limit via primary legislation, and by a process independent of this current consultation process.
16. The discussion of possible 8 hour contours again demonstrates that only the status quo is proposed and that there is to be no true 'bearing down' or reduction of night noise (4.24).

QUESTION 2 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

Para 5.37 wording - *To summarize, the question is thus: do you agree that, even if we do decide to extend the night quota period to cover the whole night from 2300 to 0700, the proposed QC/4 scheduling ban should continue to apply only between 2330 and 0600 for the duration of the 2006-2012 regime and be subject to review when we come to consider the regime from 2012 onwards?*

RESPONSE 2

We disagree that the public should have to wait until 2012 before any phasing out of night flights can be reconsidered. It makes sense to remove QC/4 aircraft from the Night Quota

Period urgently and they should also be removed from the whole Night Period. Any scheduling ban should therefore apply to QC/4 flights in the whole Night Period as a minimum, progressing rapidly to a complete operating ban on flights in the Night Quota Period, and then to the whole Night Period within ten years.

QUESTION 3 Do you have any views on the definition of the night period and night quota period? (paragraphs 6.1-6.7)

RESPONSE 3

1. It is our view that a complete ban should apply for the full 2300-0700 Night Period, extended to 0800 on Sundays. It therefore follows (if, despite our view, there is no ban), that more controls should immediately apply in the 2300-0700 period, and these should be made increasingly stringent each year in order to bear down effectively on night noise and eliminate it within ten years.
2. The creation of the current 'shoulder periods' in 1993 was absolutely disastrous for the local communities. The 0600-0700 period has especially badly affected residents, with the redefinition of the shrinking night. The dawn period is now so busy (as we predicted at the time) that both runways are used to clear the stacks (Tactically Enhanced Arrivals Mode). Yet this is a highly noise sensitive period which should also be subjected to the most stringent noise controls (and indeed the whole of the Night Period is a highly sensitive period and should be subjected to stringent noise controls).
3. The control of night noise needs to be in the full 2300-0700 period. However, if this period were adopted as the new quota period, we would strongly resist any extra movements moving into the existing core 2330-0600 night, and there must be a robust mechanism to prevent this (6.4). It is essential that the core night movement and quota controls, together with the proposed contour objective, should be protected and improved and that the shoulders should also be controlled and improved, as indicated by the T5 Inspector. The shoulders would need to be controlled by quota and movement limits, together with a contour control for the 2300-0700 period, as required by the Environmental Noise Directive. In addition there would need to be a progressive reduction of ten percent per year over ten years, of movements, quota and contour areas, in both the 2300-0700 night and the core night periods, leading to a complete ban at the end of the period.

QUESTION 4. 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? *Para 6.11 wording: **Supposing, hypothetically, that the movement and noise quotas would be set precisely to accommodate current levels of night flying in either case, are you in favour of extending the night quota period to 2300-0700, or would you prefer to retain the current definition?***

RESPONSE 4 This continues the theme of Question 3. Setting the current level of movements and quota in the 2300-0700 Night Period would be necessary in order to monitor their gradual reduction and would prevent extra flights in the night but would still not protect any drift of movements into the core night. It is imperative that a way is found to obtain control of the full night without worsening the core night. What is wholly misleading is that consultees have not been told that the Government have plans, in the

Civil Aviation Bill, to allow the removal of the limit on numbers, which would then increase, and that would then realise our worst possible fears on increased disturbance at night. So it is of extreme concern that any agreement on numbers now may soon be history, and that any comments given in responses to this consultation may become irrelevant. What is needed is a ban on movements, not an increase (even if the increase is by aircraft with a smaller QC rating).

You will be well aware from the evidence submitted in connection with the claim for judicial review in 2004 that the extent of noise attributable to aircraft with ICAO noise ratings under-represents the actual noise produced. Therefore, quota and movement limit controls need to be adjusted downwards by the same proportion as the ECRD reports indicate an excessive burden of noise.

QUESTION 5. Are you content to continue with the arrangements for disregarding movements? (paragraph 6.12). *6.13 We propose to continue these disregards. Are you content?*

RESPONSE 5 Our view is that every effort should be made to end night flights and sensible scheduling would prevent the uncontrolled use of additional "disregards" as they would not be flying at night. All aircraft flying at night should count against both movement and noise quotas, and be included within the night contours, to reflect the disruption caused. No one would wish for serious hardship or suffering for passengers and careful scheduling should be used to prevent the risk of any flights, including "disregarded" flights, from occurring at night. In any event all flights should count against the quota, movement and contour restrictions.

QUESTION 6. Do you agree with proposals to remove the rule on movements scheduled after 0630 but arriving before 0600? (paragraph 6.14-6.15).

6.15 We therefore propose to remove this rule from 29 October 2006, so that all movements during the night quota period will count against both the movement and noise quotas unless it is exempted for another reason. Do you agree?

RESPONSE 6 Without prejudice to our view that there should be a ban on night flights, we agree that this rule should be removed. It would be better still if the change were to apply from October 2005.

QUESTION 7. Are you content with the carry and overrun arrangements proposed? (paragraphs 7.8-7.18)

7.16 After consideration, we are therefore proposing in principle:

- *to continue the present carryover/overrun rules; except*
- *allowing the same flexibility in all years, irrespective of the relative length of the seasons or the incidence of Easter but intended to allow for these factors as well as for the general practicalities of scheduling; and*
- *to set the flexibility at 10%.*

7.17 We regard these provisions as sufficient to provide both for the practical difficulties of managing the limits efficiently, including the avoidance of any need for a moratorium late in the season, and for the variability of season length from one year to the next. **Are you content with each part of the above proposal?**

RESPONSE 7 Without prejudice to our view that there should be a ban on night flights, we agree to the arguments for greater flexibility, assuming that there continue to be night flights.

QUESTION 8. Do you have any comments on the proposed movements limits and noise quotas for Heathrow, Gatwick and Stansted? (paragraphs 7.19-7.52)

7.51 *We shall welcome your comments on these proposals, or suggestions for alternatives.*

RESPONSE 8 We find the proposals for any increase of night flights at Heathrow entirely unreasonable and unacceptable, as we see no evidence of any 'bearing down' or improvement of night noise at Heathrow. In our view there should be a complete ban now on night flights at Heathrow. In any event, if this is not put in place, any improvements gained, by reduced noise from individual aircraft, should be retained and not lost again to increased movements (c.f. 7.22, 7.25). The proposed contour control, based on the 6.5 hours by permitted movements, should instead be based on the actual noise of 2002/03 (7.19), or preferably for a less noisy year, and should be progressively reduced each year over ten years, followed by a total ban.

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

(a) whether or not policy should be implemented through statutory regulations? *Para 8.8*

(b) whether to use a noise footprint or other criterion? *Para 8.8*

(c) if a noise footprint criterion is used, how to define it for each airport? *Para 8.8*

(d) whether the scheme should relate to the whole night or the current night quota period? **Para 8.16** (paragraphs 8.8-8.21)

RESPONSE 9

A sound insulation scheme for bedrooms does not actually improve the noise climate at night. We would prefer there to be no night flights and therefore no need for a sound insulation scheme and the following comments are therefore made on the assumption that there is no outright ban and that a suitably designed sound insulation scheme would be of benefit.

(a) the noise insulations scheme could be implemented initially by voluntary arrangement, but in the medium term it should be through statutory regulations, so long as the arrangement were flexible enough to update readily (8.9)

(b) Footprints of the noisiest aircraft flying should be used, for both landings and takeoffs, and not just the 95th percentile (8.11-8.13, 8.16, 8.17). Account should be taken of the curving routes of departures, rather than the straight line arrivals only, as presented at present.

(c) If the aim is to tackle the broader definition of sleep disturbance (see above, Question 1, response 8), we think the criterion of 90 dB(A) SEL is set too high and should be near to 70dB(A) SEL (8.8, 8.10).

(d) Aircraft disturb sleep in the whole of the Night Period so the scheme should be based on the noisiest aircraft permitted to fly in the full Night Period (8.16).

The insulation scheme should extend to all premises where people sleep (8.18). All rooms that might be used as a room for sleeping should be treated, together with adjacent rooms, the roof, and provision made for mechanical ventilation (8.18). Premises that are already insulated will at some point need repairs/replacement, which should be provided for. The insulation and ventilation scheme should be ongoing, for as long as there are disruptive night flights that require the provision of the protection.

As noise disturbance does not only happen at night, there remains the issue of the need for sound insulation for other habitable rooms, for daytime use.

Conclusion

As indicated in our responses above, the Council feels strongly about the continuation of night flights, and clearly wishes to see them phased out as soon as possible, which in our view should be commenced with immediate effect in 2006. We agreed with the T5 Inspector's Report of July 2001, that there should be a ***“long term objective of removing the need for night flights”*** and that there should be ***“the introduction of stricter controls on movements at night particularly early morning arrivals”***. We point out forcefully however, it is now some 12 years since that Inquiry commenced and this is now necessary in the **short** term. We call on the Government to take note of his view, and of our views, and the views of our residents, and to take steps to ensure the continuous improvement (not the status quo) of the noise climate at night, followed by a total ban after ten years.

Our policies, set out in Appendix 1, again indicate our stance on these issues. The Council wishes to see the air transport strategy (including night flights) as part of an integrated and sustainable national transport strategy, as 'Predict and Provide' is unsustainable.

The above responses are submitted in the name of Richmond Council. They have been compiled from the views of Council Members, Officers, Overview and Scrutiny Co-opted Members and members of the public, both at a public meeting on 5th September and from responses received via the Council's Aircraft Noise Survey and in other ways.

The Aircraft Noise Survey was conducted during August and September 2005. It was conducted both on-line, on the Council's web site, and also paper copies were completed and posted in. We are submitting the summary statistics from the survey, together with the comments we received in the comments box, as part of the Council's response. Whilst not all of the survey questions nor all of the comments are solely about night flights, we include them all, for completeness. This is partly to avoid the risk of leaving out some relevant comments. However, it is also valid to send in all of the comments, as the stress of night flights fits within the context of the more general stress of noise from flights, both day and night. We invite you to consider those comments as part of this response, as they make many powerful and pertinent points in relation to the harm caused by the effect of noise and disturbance from night flights.

Appendix 1

London Borough of Richmond upon Thames Extracts from the agreed Unitary Development Plan, Planning Policies STG 12, TRN 28 and BLT 29

Relevant extracts from the Council's agreed Unitary Development Plan are set out below. The full text is available on the Council web site. Overall, the Council will press for a reduction in aircraft and helicopter noise and oppose changes in aviation activity which would worsen the problem in the area.

STG 12 AIR TRANSPORT

3.31 The Council will oppose further developments likely to lead to an expansion in services or an increase in flights to and from Heathrow Airport, or any increase in commercial or private helicopter activity over the Borough. It will seek a ban on night flights.

3.32 The Council is concerned that any increase in flights over the Borough will lead to increased noise

TRN 28 AIR TRANSPORT

7.125 The Council will seek benefits where possible, but oppose further developments or changes in aviation activity which will be likely to:.....

(c) worsen noise or other pollution in the Borough;

(d) pose increased risk to public safety.

7.126 The Council will continue to press for a reduction in aircraft noise.

7.127 Aircraft noise is a major source of disturbance in the Borough. The Council,will continue to press for a reduction of aircraft noise through the introduction of quieter engines minimising the use of noisier aircraft and reduction of night flights. The Council will also oppose changes in operations at Heathrow and other airports and heliports which appear likely to worsen noise or other pollution in the Borough

BLT 29 EXISTING INJURIOUS USES

6.117 The Council will use all its powers to restrict and control existing injurious uses such as activities generating unacceptable noise levels or various forms of air and water pollution.

6.118 Aircraft noise is a major source of disturbance in the Borough and the Council will oppose changes in aviation activity which appear likely to worsen the situation.

Appendices 2 & 3

(Statistics and comments from the Aircraft Noise Survey to be added here.)