

Response Guide to DfT Night Flights Consultation Part 2

You can send your responses by email to night.flights@dft.gov.uk or complete the online form here: <https://www.smartsurvey.co.uk/s/4AJWXY/>

You do not have to answer all the questions. You can simply write a short email setting out your key concerns and objections. We have provided a draft email on which you can base an email response. (Option 1 below)

Should you be interested in the detail and wish to provide responses to individual questions, please use the suggested responses we have provided below in Option 2. We have provided responses only to the questions we suggest you answer. This section also provides some brief context for each section of the consultation (*highlighted in blue*).

Option 1 – email response

DfT Night Flights Consultation Part 2
Response from: xxxxxxx

Please take account of my views on this consultation as set out below:

There is ample evidence to show that depriving people of sleep can cause very serious health deterioration. A ban on aircraft operations at Heathrow for an 8-hour period as recommended by the WHO would be beneficial and would help protect the right of those affected to a decent night's sleep.

Therefore, the key principles on which future night flight arrangements at UK airports, including Heathrow, should be based are:

- Night flights, other than emergencies and humanitarian flights, should be banned at all UK airports as soon as possible.
- The existing level of night flights should be reduced to protect the right of residents to a decent night's sleep and to reduce the related health risks to local communities

In particular:

- Flights should be particularly disincentivised in periods of greatest community sensitivity, late and night and around 4.30-6.00am.
- The night flight regime should be reviewed every five years to ensure that the regime can be amended to reflect changes in academic evidence and operational best practice.
- It is essential that airports ensure that airlines use the recommended ICAO procedure for departures.
- There should be an immediate ban on operating QC4 rated aircraft for a full eight-hour period each night.
- Noise allowances should be based on the genuine noise level at the ground to ensure it reflects the experience of local communities.
- Heathrow should provide funding for noise monitors across several communities including those 10, 20 and 30 miles from the airport to ensure that all communities impacted by night operations are able to evidence the disturbance they endure.
- Aircraft movement limits should be retained.
- The "carry-over" process should be abolished.

The COVID-19 pandemic further weakens the case for any night flights as traffic volumes will remain below pre-pandemic levels for many years, thus increasing the operational resilience of airports to accommodate all flights during the day.

The impact on local communities of the de-designation of Heathrow would potentially be very negative as no arrangements for the regulation of aircraft noise currently exist. De-designation would allow the airport to increase night flights as it saw fit, with little regard for the community impact.

Government should produce clear guidelines on best operational practice, sound insulation, night flights, general noise reduction and community engagement.

Option 2 – detailed responses to specific questions

Night flight dispensation review - context

Following the 2017 Night Flights Consultation, Government committed to a review of the dispensations granted at the designated airports (Heathrow, Gatwick and Stansted).

This review found that adverse weather was the main factor resulting in unscheduled night flights. Strikes by Air Traffic Control (ATC), IT problems and medical emergencies were the next leading causes.

Heathrow apply pre-emptive dispensations to help reduce the risk of delays during the early morning hours. The dispensation guidance does not explicitly permit or prohibit this, and there is not currently sufficient evidence to conclude whether the benefits of this approach outweigh its negative effects.

The review found that some movement dispensations may not strictly meet the criteria and proposed that the government refines the guidance to provide better clarity.

25. What length should the night flight regime beyond 2024 be? Provide evidence to support your position.

Night flights, other than emergencies and humanitarian flights, should be banned at all UK airports as soon as possible. There is ample evidence to show that depriving people of sleep can cause very serious health deterioration. The night flight regime should be reviewed every five years.

26. How do you think the length of regime will affect you? Provide evidence to support your view.

Many residents are affected by night flights at Heathrow, which have a very serious impact upon their lives. It is essential that airports ensure that airlines are using the recommended ICAO procedure for departures.

A length of around five years ensures that the regime can be amended to reflect changes in academic evidence and operational best practice.

36. Would you be impacted if the NQP was extended to 23:00 to 07:00?

Yes, many Chiswick residents would benefit from a ban on aircraft operations at Heathrow for an 8-hour period as recommended by the WHO. This would help protect their right to a decent night's sleep.

37. Provide evidence to support your position.

As above.

38. Do you think night flights in certain hours of the NQP have a greater impact on local communities than other times of the NQP?

Yes. The impact on local communities around Heathrow is great at the start and end of the NQP. Many residents struggle to get to sleep when they are disturbed by later arrivals and departures.

Similarly, there is significant disturbance caused to residents by flights in the 0430 – 0600am period. Once you have been woken up by aircraft noise it is very difficult for many to get back to sleep.

There has also been an issue at Heathrow of noise during the middle of the night caused by the testing of engines.

39. Provide evidence to support your view.

The increase in the number of people impacted by noise at night as evidenced in CAA, ERCD Report 1901 – Heathrow Airport 2018 Summer Noise Contours and Noise Action Plan Contours.

https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/noise/reports-and-statistics/reports/noise-action-plan-contours/Heathrow_Airport_2018_Summer_Noise_Contours_and_Noise_Action_Plan_Contours.pdf

40. Would a mechanism that disincentivises aircraft movements in periods of the night that are more sensitive for communities impact you?

Local residents would benefit from an 8-hour night flight ban. Flights should be particularly

disincentivised in periods of greatest community sensitivity.

41. Provide evidence to support your view.

The SoNA Night study was expected to include some analysis of the times when local communities are particularly disturbed. However, despite being undertaken in 2014 the study remains unpublished.

Banning the noisiest aircraft – context

Currently, the government imposes a strict operational ban on the loudest aircraft movements (QC8 and QC16 rated) between 23:00 and 07:00, although these aircraft are no longer in regular service.

DfT are proposing to place an operational ban on QC4 rated aircraft movements between 23:30 and 06:00 (see above section). They are open to extending this proposed operational ban, if taken forward, to 23:00 and 07:00 beyond 2024.

There are relatively few QC2 rated aircraft currently operating at night at the designated airports. DfT are also interested in exploring whether there is potential to introduce a scheduling ban on QC2 rated aircraft movements between 23:30 and 06:00 and eventually 23:00 to 07:00.

42. What would be the impact on you if QC4 rated aircraft movements were banned between 23:00 and 07:00 after October 2024?

There should be an immediate ban on operating QC4 rated aircraft for a full eight-hour period each night.

43. What would be the impact on you if a scheduling ban was placed on QC2 rated aircraft movements between 23:30 and 06:00 after October 2024?

Government regulation and action should lead the industry and incentivise it to improve its performance. Consequently, there should be a ban on operating QC2 rated aircraft for a full eight-hour period each night from 2022, especially as approximately only 3% of night quota period flights in summer 2019 were operated by QC2 rated aircraft.

44. What would be the impact on you if a scheduling ban was placed on QC2 rated aircraft movements between 23:00 and 07:00 after October 2024?

See Q49.

45. If bans are introduced, in your opinion, should the implementation be staged?

No, the ban should be brought in immediately.

46. Provide evidence to support your position.

The SoNA Night study, despite being undertaken in 2014, remains unpublished. This leaves a significant gap in the available evidence that limits the responses that community groups can provide.

Future Movement and Noise Quotas - context

Future regimes could include an increase or decrease in an airport's movement limit and QC limit or alternatively maintain the existing limits.

47. In a future regime how should we manage the number of aircraft movements (detailing the airport or airports relevant to your view)?

All night flights, other than emergencies and humanitarian flights, should be banned at all UK airports from 2022. If night flights continue to be permitted, they should be limited to those that are genuinely essential and their impacts should be tightly regulated. Targets should be set to drive down the number of aircraft movements.

At Heathrow there is regular late running of aircraft with insufficient evidence provided as to why this was necessary – if indeed it can be justified. Greater transparency on the reasons for late running should be provided with significant financial penalties for regular breaches of the night-time peace.

48. In a future regime, how should we manage an airport's noise allowances (detailing the airport or airports relevant to your view)?

Noise allowances should be based on the genuine noise level at the ground to ensure it reflects the experience of local communities.

Heathrow should provide funding for noise monitors across several communities including those 10, 20 and 30 miles from the airport to ensure that all communities impacted by night operations are able to evidence the disturbance they endure.

49. Should we remove the movement limit and manage night flights through a QC limit only?

No.

50. Provide evidence to support your view.

This would undermine the restrictions entirely and increase the number of communities exposed to the harmful impacts of aircraft noise.

54. If the government decided that unused allowances should be returned to the airports' pool, what would be the impacts on:

- **communities**
- **airports**
- **airport users**
- **airlines**
- **business in and around airports**

Communities may have become accustomed to lower levels of traffic, thus to allow an airport to increase traffic from unused allowances will cause unnecessary negative noise impacts, affecting health and mental health.

55. Do you agree or disagree that the current carry-over process benefits you?

Disagree.

56. Provide evidence to support your view.

As the carry over process disadvantages local communities around airports, particularly those who shift their winter quota to increase their summer limit.

57. What changes, if any, would you like to see to the carry-over process and how would this impact you?

All night flights, other than emergencies and humanitarian flights, should be banned at all UK airports from 2022.

The carry-over process should be abolished as they currently leave the quota limits in winter irrelevant.

61. What are your views on changes to aircraft noise at night as result of the COVID-19 pandemic? Provide evidence to support your view

Chiswick residents have enjoyed the reduction in air traffic at night during the pandemic and many are anxious about return to pre-pandemic levels.

The COVID-19 pandemic further weakens the case for any night flights as traffic volumes will remain below pre-pandemic levels for many years, thus increasing the operational resilience of airports to accommodate all flights during the day.

Airport designation - context

Heathrow, Gatwick, and Stansted airports have been designated for the purpose of avoiding, limiting or mitigating the effect of noise from aircraft since 1971. The Secretary of State has powers to designate airports in England and Wales and to set noise controls, which include the current night flight restrictions, are contained with the Civil Aviation Act 1982

DfT are not proposing to designate or de-designate any airports as part of this two-stage consultation process. However, it is open to considering criteria for designation, that could in future be used as the framework for the designation of an airport in England and Wales

69. What impact, if any, do you think the de-designation of an already designated

airport (Heathrow, Gatwick, Stansted) would have on:

- ***communities***
- ***airports***
- ***airport users***
- ***airlines***
- ***business in and around airports***

The impact on local communities of the de-designation of Heathrow would potentially be very negative as no arrangements for the regulation of aircraft noise currently exist. De-designation would allow the airport to increase night flights as it saw fit, with little regard for the community impact.

Government should produce clear guidelines on best operational practice, sound insulation, night flights, general noise reduction and community engagement.