



## Response Guide to DfT Night Flights Consultation Part 2

[Part 2](#) looks at national night flights policy and restrictions beyond 2024, including dispensations and airport designation arrangements.

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

Deadline for submissions is **31st May 2021**.

**Note for Members:** This guide constitutes our response to Part 2 of the consultation.

Please do consider submitting a response and use this guide to inform your own submission.

You do not have to answer all of the questions. You can simply write a short email setting out your key concerns and objections.

### Night flight dispensation review

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 refine the guidance to provide better clarity.

#### **13. What are your views on the:**

- *findings of the night flight dispensation review?*
- *proposals for the night flight dispensation review?*

The experience of many communities around Heathrow is that late flights are permitted for reasons that have nothing to do with the listed dispensations. All too often the congestion at the airport caused by the desire to squeeze in as many planes as possible, with the result that later running becomes inevitable.



The proposals do not go far enough. The definitions of flights qualifying for dispensations should be strengthened to avoid events that should be included within normal planning being claimed as dispensations, to the cost of local communities. It is disappointing that the proposals do not contain any penalties on the designated airports for granting dispensations that do not meet the agreed criteria.

It remains inappropriate that Heathrow get to approve their own dispensations. The lack of independent oversight results in a system open to abuse and one that is not fit for purpose. The review suggests there is insufficient evidence to assess Heathrow's practice of preemptive dispensations. HACAN would be keen to work with the DfT to investigate whether this evidence can be found.

We welcome the proposal to make the dispensation process more transparent but question why the publication of this information is not already available to scrutiny by overflowed communities.

## Revising our night flight dispensation guidance

This section looks at the areas where guidance could be refined on the granting of dispensations.

**Weather** - disruptions caused by strong winds, snow and ice, and fog resulting in low visibility procedures. That is not specifically covered in the guidance is whether weather events abroad that have prolonged impact at a foreign airport, or en-route weather disruption, should qualify for dispensations

***14. Should disruption due to local weather qualify for dispensations? Provide evidence to support your view.***

No. The local weather at Heathrow is well known, is not exceptional and should be included in routine operational planning.

***15. Should disruption due to en-route weather qualify for dispensations? Provide evidence to support your view.***

No, this should be accommodated in routine planning. An exception should only be made in the case of limited and specific safety issues.

***16. Should disruption due to foreign airport weather qualify for dispensations? Provide evidence to support your view.***

No.



**Industrial Action** - There is evidence to suggest industrial action in the aviation industry can be expected to occur at least on an annual basis. Therefore, there is an argument that this should be taken into consideration by airport operators during operational planning. We

**17. Should disruption caused by ATC industrial action qualify for dispensations? Provide evidence to support your view.**

No. Disruption caused by an industrial dispute is a consequence of a breakdown in worker relations that should not be borne by local communities.

**18. Should disruption caused by industrial action by airport staff qualify for dispensations? Provide evidence to support your view.**

No. As above for Q17.

**19. Should disruption caused by industrial action by airline staff qualify for dispensations? Provide evidence to support your view.**

No. As above for Q17.

**Network Capacity Delays** - DfT are currently of the view that delays resulting from network capacity issues do not qualify for dispensations.

**20. Should network capacity delays qualify for dispensations? Provide evidence to support your view.**

No. This is an issue for the industry and the capacity constraints are well known. The failure to adequately plan should not result in unacceptable impacts on local communities.

**Criminal Activity** - Such as the drone incident that occurred at Gatwick in December 2018, can cause widespread and prolonged disruption.

**21. Should delays caused by serious criminal or terrorist activity that affect multiple flights qualify for dispensations? Provide evidence to support your view.**

Possibly – depending on the nature of criteria used to determine the severity of the incident. This consultation proposal raises several questions:

- How many such incidents have occurred over the past decade?
- Is this enough to warrant qualification for dispensation?



- Why does the proposal remove the need for the airport operator to consult with central Government?

**Cumulative Delays** - Delays caused during the first or subsequent flights of an aircraft during the day for reasons that would meet the dispensation criteria (for example fog), or for multiple delay reasons incurred throughout a day, can often cause knock-on effects that lead to the last flight rotation landing in the Night Quota Period (NQP).

**22. Should cumulative delays qualify for dispensations? Provide evidence to support your view.**

No. Rather than seeking to pack more flights than their capacity can support, airports should plan robust levels of resilience to cope with delays.

**Emergencies** - The emergencies criterion states “flights involving emergencies where there is an immediate danger to life or health, whether human or animal”.

**23. Should, in your opinion, dispensations be permitted for flights delayed to the NQP due to a medical emergency that has passed? Provide evidence to support your view.**

No. Airports like Heathrow should be able to accommodate such delays within their overall night flight allowances. The consultation documents state that there is evidence of medical emergencies or disruptive passengers on the ground result in delays but does not provide links to that evidence or further details about the number of instances that would potentially require dispensation.

**24. Should, in your opinion, dispensations be permitted for flights delayed to the NQP due to a police emergency (for example a disruptive passenger) that has passed? Provide evidence to support your view.**

No. If sufficient operational resilience is built into airports standard procedures than this would be able to accommodate such occasional delays. How many such delays have occurred at Heathrow in the past decade?

**25. Should, in your opinion, dispensations be permitted for the repositioning of emergency service (including medical transplant) aircraft? Provide evidence to support your view.**

No. The number of these flights is likely to be very small compared to the total number of night flights and should be accommodated within existing allowances.



**Reducing Carbon Emissions** - If an aircraft arrives in UK airspace earlier than expected, the aircraft is held in a stack until it can land after the NQP. This causes unnecessary fuel-burn and increased carbon emissions. However, allowing these aircraft to land early, would lead to noise for those living underneath the airport's final approach routes.

**26. Should dispensations on the basis of reducing carbon emission be permitted? Provide evidence to support your view.**

No. There appears to be no evidence that additional dispensations for night flights would help to reduce emissions. Conversely, a report by ACI Europe entitled "A Route to Net Zero European Aviation"<sup>1</sup> highlighted that, "improved ATM and other operations" would only generate a nominal improvement in decarbonisation, a 6% maximum in 2030 and 2050 across the aviation system.

**Pre-Emptive Dispensations** – Heathrow adopts this practice to reduce the risk of delays during the airport's early morning busy hours, which could then have knock-on effects throughout the day, and possibly into the night period.

**27. Should pre-emptive dispensations be permitted? Provide evidence to support your view.**

No. See response to Q13 above.

**Other Airport Operator granted dispensations** - Whilst it is not possible for guidance to cover every eventuality, DfT seek views and evidence on what other issues, if any, should be grounds for airport operators to grant dispensations.

**28. Should dispensations be granted for information technology failures? Provide evidence to support your view.**

No. The failure to manage its IT properly should be borne by the industry not by communities near airports.

**29. If you have further views or evidence on the guidance allowing airport operators to grant dispensations, provide it here?**

Airports appear to have sought ever more creative reasons for granting dispensations as they have made fuller use of their night flight movement limits. The effect of this has been to expose local communities to more flights and greater night noise.

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<sup>1</sup> [https://www.destination2050.eu/wp-content/uploads/2021/02/Destination2050\\_Report.pdf](https://www.destination2050.eu/wp-content/uploads/2021/02/Destination2050_Report.pdf)



There should be process established where each dispensation can be reviewed thoroughly and independently which should also provide an opportunity for stakeholders to dispute dispensations, and consequences for granting dispensations incorrectly.

**Government Dispensations** - On the rare occasion the government does grant night flight dispensations, they are usually granted in advance for flights of V.I.P.s travelling on official government business

**30. What are your views on government dispensations overall? Provide evidence to support your view.**

They should continue to be granted rarely, in truly exceptional circumstances.

### **The structure of the night flight restrictions at the designated airports beyond 2024**

Historically, night flight regimes have been for periods of 5 years or shorter. DfT are aware that some stakeholders have indicated that this does not allow for long-term planning.

**31. 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.

**32. 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.

**The QC system** - Has been in place since 1993, and the principles of the system are used at other UK airports to restrict night noise. DfT are of the view that it continues to be the best system for limiting noise at the designated airports. However, we welcome views and evidence on how it works in practice,



**33. Do you think that QC is the best system for limiting noise at the designated airports?**

The best way to limit noise at Heathrow would be to introduce a night flight ban of 8 hours.

If night flights continue then airports should utilise a combination of movement limits, quota limits and reductions in flying in the periods that cause the greatest noise disturbance.

The data (CAA, ERCD 1901) shows that between 2006 and 2018 there has been a significant rise in the number of disturbing night-time noise events at Heathrow. In 2006, the N60 figure of 10 or more affected 837,000 people, but by 2018 this had risen to 974,000 (a 16% increase).<sup>2</sup>

This suggests that the QC system alone is insufficient to reduce the impact of noise on local communities. Consequently, the QC system should include targets for reductions in noise quotas over the next regulatory period. It is also important that airlines are incentivised to operate the quietest aircraft with significant fines imposed on those who fail to comply.

**34. What do you think are the:**

- *advantages of changing to a new system?*
- *disadvantages of changing to a new system?*

A new system that utilised monitors to ensure that airlines are incentivised to reduce the noise on the ground could help to deliver improvements for local communities.

**35. Do you have evidence of other noise management regimes being used elsewhere and how they compare with the current system? Provide evidence to support your view.**

The SoNA Night study was expected to include analysis of the best mechanisms for reducing noise and the most appropriate metrics to use in analysing airline performance. However, despite being undertaken in 2014 the study remains unpublished. This leaves a significant gap in the available evidence that limits the responses that community groups can provide.

**36. Should we introduce an additional QC category for quieter aircraft in the longer-term. Provide evidence to support your view.**

No. Such a category should only be introduced if accompanied by appropriate operational regulations, incentives and fines to ensure that aircraft are flown in a manner that causes the least disturbance.

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<sup>2</sup> [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](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)



**37. Should the government reintroduce an exempt category?**

No. An exempt category would undermine the purpose of operational restrictions at night. This would increase the harmful impacts of noise on local communities.

**38. Provide evidence to support your position.**

WHO (2018) Environmental Noise Guidelines for the European Region  
[https://www.euro.who.int/\\_data/assets/pdf\\_file/0008/383921/noise-guidelines-eng.pdf](https://www.euro.who.int/_data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf)

**39. Do you think we should re-baseline the night quota system in the longer-term? Provide evidence to support your view.**

We have no strong view as long as any re-baselining does not increase the number of aircraft permitted to operate at night.

**40. What factors should we consider when anticipating how to best future proof a re-baselined QC system?**

As above to Q39.

**41. What costs, if any, would you anticipate in re-baselining the QC system?**

As Q39.

**Night Quota Period** - Currently, the government's movement and QC limits cover the period 23:30 to 06:00, with this being referred to as the Night Quota Period (NQP). However, as the night period is 23:00 to 07:00, DfT are open to broadening NQP to cover this period. Movement and QC type limits would need to reflect movements that already exist in the shoulder periods (23:00 to 23:30, 06:00 to 07:00).

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

Yes, many of members 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.

**43. Provide evidence to support your position.**





As above.

**44. 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 of our members struggle to get to sleep when they are disturbed by later arrivals and departures.

Similarly, there is significant disturbance caused to members 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.

**45. 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](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)

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

Our members would benefit from an 8-hour night flight ban. Flights should be particularly disincentivised in periods of greatest community sensitivity.

**47. 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** - 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.

***48. 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.

***49. 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.

***50. 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.

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

No, the ban should be brought in immediately.

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



***53. 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.

***54. In a future regime, how should we manage an airports' 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.

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

No. This would undermine the restrictions entirely and increase the number of communities exposed to the harmful impacts of aircraft noise.

***56. Provide evidence to support your view.***

See Q55.

***57. Should we introduce a ring-fencing mechanism to ensure night slots are available for:***

- ***commercial passengers***
- ***dedicated freight***
- ***business general aviation***

It appears that there is insufficient evidence on which to make a judgement on this issue.



**58. Provide evidence to support your view.**

As Q57.

**59. Should an airline be able to use unused allowances later in the season?**

No.

**60. If the government decided that unused allowances should be returned to the airport's 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.

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

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

**62. Provide evidence to support your view.**

See Q 61.

**63. 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.



## Our national night flight policy

Government's approach to managing aircraft noise is based on the principles of [International Civil Aviation Organisation's \(ICAO\) Balanced Approach to aircraft noise management](#). The Balanced Approach ensures that decisions in relation to an airport's operations consider both health and economic factors. It also means that where there is a noise problem at an airport, it should be addressed in accordance with the Balanced Approach and be managed in a cost-efficient manner. Operating restrictions should only be introduced at airports if there are no other ways of achieving the desired benefits.

The government recognises that noise from aircraft at night is often regarded by communities as the most disturbing form of airport operations and that there is evidence of adverse health impacts from these operations.

### **64. How fair a balance between health and economic objectives do you think our current night flight approach is? Provide evidence to support your view.**

The current approach to night flights does not provide an appropriate balance between the health on overflown communities and wider national economic objectives.

There has been no meaningful attempt in the past 15 years to carry out a proper evaluation of the health costs and purported economic benefits of night flights. This is despite the growing evidence that exposure to aviation noise at night has adverse effects on health.

Indeed, the WHO European Noise Guidelines (2018) strongly recommended reducing noise levels below 40dB Lnight during the night time, compared to 45dB in the day. Yet, this consultation contains no proposals to deliver that reduction.

The government should urgently carry out such an assessment. The failure to do so before this consultation demonstrates the lack of balance between health and economy.

Further, the delay in publication of SoNA Night is problematic to community groups seeking to respond to this consultation. This was seen as potentially providing crucial evidence for the management of night time noise. The original intention was to publish SoNA Night in order to help provide informed responses to the 2017 Night Flights consultation. The length of delay means that there is a risk that the findings may now be less relevant as it was based on a 2014 survey. This reflects a recurring issue with the length of time it takes for evidence and research to translate into meaningful policy.

### **65. What are your views on the health impacts of aviation noise at night (including potential impacts on different groups in society)? Provide evidence to support your view.**

Numerous studies have found a link between night flight noise, annoyance, stress and ill-health. HACAN has previously summarised a number of studies on the impacts of night flights here: <https://hacan.org.uk/wp-content/uploads/2019/04/Night-Flights-Revisited.pdf>



Some more recent academic evidence can be found here:

- Baumert et al (2021) <https://academic.oup.com/eurheartj/advance-article/doi/10.1093/eurheartj/ehab151/6239256>
- Munzel et al (2020) <https://academic.oup.com/eurheartj/article/42/8/844/6046141>
- Saucy et al (2020) <https://www.mdpi.com/1660-4601/17/9/3011>
- Jongseok et al (2017) <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6301087/>
- Brown and Van Kamp (2017) <https://www.mdpi.com/1660-4601/14/8/873>

**66. What are your views on the economic value of night flights (including the potential value on different businesses and aviation sectors)? Provide evidence to support your view**

The economic value of night flights at Heathrow are minimal, benefitting the airlines and the airport but delivering little or no economic value to local communities or the wider economy.

If the loss of productivity caused by sleep disturbance and the climate costs of the flights was factored into the cost benefit analysis then it seems likely that night flights would actually have a negative economic value to the country.

It is clear that insufficient data exists to support claims of the economic benefits of night flights. Government should commit to undertaking a comprehensive review of the economic, social, environmental and health impacts of night flights.

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

Our members 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.

**Future technology** - DfT are keen to explore how future technology will benefit communities, consumers and the industry.

**68. In your opinion, what are the advantages or disadvantages that the emergence of new technology will have in relation to night noise from aircraft within the next 10 years? Provide evidence to support your view.**



2019 analysis on noise forecasts from the CAA (CAP 1731) anticipates that by 2050 the geographical area exposed to noise around all UK airports may shrink but that the total number of people exposed to aircraft noise will increase.<sup>3</sup>

Flights at Heathrow have also tended to become more concentrated over the last decade or so both on landing and departure. These days it tends to be the sheer volume of aircraft passing overhead which most disturbs people – not something that can be solved by a slightly quieter aircraft.

The Sustainable Aviation Noise roadmap reveals that any further improvement delivered by UK aerospace manufacturing will be incremental. The report estimates (based on historical trends) that the rate of noise reduction will be around 0.1 decibels per annum.<sup>4</sup>

Thus, technological improvements will only produce a 1dB decrease in noise over the next 10 years, which is insufficient to reduce the harm imposed upon local communities. This means that operational restrictions or improved procedures, such as better departure and arrivals and dispersal of flights, will be needed to actually deliver any reduction in noise.

Further, the focus of both Government and industry is on emissions reductions with noise appearing to be less of a priority. There is also an engineering balance to be obtained between emissions and noise reduction; it is not possible to significantly reduce both without a radical alteration in the body design of aircraft. This is something that is not yet being fully explored and certainly won't be delivered in the next 10 years, if ever.

**Night Noise Reference in Noise Objective** - Night noise is a significant element of aviation noise and DfT welcome views and evidence on whether there should be specific reference to the balance between the impacts of night noise and the economic benefits of both passenger and freight operations.

***69. Should we include a reference to night noise when we publish a revised aviation noise objective?***

Any revised aviation noise objective should absolutely include a reference to night noise. The objective should include a clear and robust mandate for night noise to be reduced.

The current objective and proposal in the consultation for 'balance' would benefit from greater clarity and specificity. Noise abatement objectives need clear targets and enforcement rules to ensure that best practice is followed in reality.

***70. What factors relating to night noise should we include if we do introduce a noise reference in our revised aviation noise objective?***

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<sup>3</sup> [https://publicapps.caa.co.uk/docs/33/CAP1731AviationStrategyNoiseForecastandAnalyses\\_v2.pdf](https://publicapps.caa.co.uk/docs/33/CAP1731AviationStrategyNoiseForecastandAnalyses_v2.pdf)

<sup>4</sup> <https://www.sustainableaviation.co.uk/wp-content/uploads/2018/06/SA-Noise-Road-Map-Report.pdf>



A reduction in night noise, using a range of noise metrics for assessments including the number of noise events. It is also crucial that the health impact of night noise is included.

## Airport designation

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

### ***71. Should the government set criteria for airport designation?***

Yes, however we believe that the regulation of night flights at Heathrow is inconsistent with the ICAO balanced approach and that strengthened regulation is required to rectify this.

### ***72. What do you think are the:***

- ***advantages to the government setting criteria for airport designation?***
- ***disadvantages to the government setting criteria for airport designation?***

Current regulation of aircraft noise is ineffective with multiple bodies involved but little accountability. Designation offers a solution, if it is accompanied by the development of robust, effective arrangements for the regulation of aircraft noise. It is vital that Government commit to a sustained reduction in aircraft noise and its associated health impacts.

### ***73. What factors, if any, do you think we should consider when setting criteria for designation?***

Factors should include:

- the size of the airport in ATM and passenger number terms,
- the population affected, and
- the level of greenhouse gas emissions produced by of aircraft using the airport.

### ***74. How should any criteria for designation be agreed?***

The Department should develop a draft set of criteria for designation and discuss them informally with stakeholders through its normal engagement channels, before consulting formally on them.



**75. What impact, if any, do you think the designation of an airport would have on:**

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

Designation offers a solution, if it is accompanied by the development of robust, effective arrangements for the regulation of aircraft noise.

**76. 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.

**77. Any other comments?**

The noise contours in Appendix G of the consultation do not adequately represent the numbers of people affected by night flights. Thousands of people outside the 48dB LAeq contour are impacted by these flights. It should measure night noise down to WHO guideline levels and take account of these impacts in a full cost benefit analysis.