

Response to DfT consultation on Night Flights Restrictions

March 2021



Introduction

AEF campaigns on aviation’s impacts, for people and the environment. The comments set out in this response relate only to the questions in the consultation covering the night noise regime at Heathrow, Gatwick and Stansted from October 2022 to October 2024. We are undertaking a wider consultation with our members to inform a response to the questions addressing national night noise policy, and these will be submitted separately.

Night noise regime at the designated airports from October 2022 to October 2024

In its opening paragraph on the Night Flight restrictions consultation, the Department for Transport states that it recognises that there is evidence – including that provided by the World Health Organisation – that sleep disturbance caused by night-time aircraft noise can have a negative impact on health. AEF agrees that an evidence-based approach to the issue of aviation noise at night is crucial. However, your proposals for restricting night noise at the three designated airports appear to be based on assumptions, rather than evidence.

The stated objective for the October 2022 – 2024 night noise regime at the designated airports covers both noise and economic issues. It proposes to:

[[]imit or reduce the number of people significantly affected by aircraft noise at night, including through encouraging the use of quieter aircraft, while maintaining the existing benefits of night flights.

The evidence on health impacts is referenced to the WHO and others, but the “existing benefits of night flights” are not explained or quantified anywhere in your consultation document. It is unclear whether these relate solely to commercial benefits for the industry, for example by allowing aircraft to perform more daily rotations or to take advantage of lower landing charges, or benefits to consumers, or the national economy. Without this evidence it is difficult to reach any informed conclusion about the justification for night flights beyond the fact that it protects an operational practice that the industry has become accustomed to. Making unsubstantiated claims about the benefits of night flights does not lead to a balanced approach to night noise as claimed.

With regard to achieving the objective to limit or reduce aviation night noise, you do not set out what “encouraging” quieter aircraft usage would mean in practice, especially in light of possible long-term structural changes to the industry caused by the Covid-19 pandemic. COVID-19 has led to many new aircraft orders being cancelled or delayed, and this could impact on the speed of transition to a less noisy fleet. While it is also true that the pandemic has accelerated the phase out of older, less efficient - and comparatively noisier – aircraft from commercial passenger service, the reduction in available ‘bellyhold’ freight capacity has seen many of these aircraft picked up by logistic companies whose business has grown considerably since the onset of the pandemic. Heathrow reported that its dedicated freight operations had increased four-fold. It is unclear how long this trend will continue, and whether some changes will become permanent, so the potential for cargo operators to re-purpose older and noisier aircraft is a glaring omission in the consultation given that operations are mostly carried out at night.

In view of the above, AEF does not agree with the night noise objective (Question 6). We ask you to carry out a study to validate or refute the assumption that the claimed benefits of night flights to the UK economy to justify the negative impacts on communities exposed to noise. We also call for an immediate post-COVID-19 study to update forecasts on the introduction of quieter aircraft operating, especially at night.

Referring to your proposal to maintain the existing restrictions at the designated airports for two years from October 2022 to October 2024, we do not agree with this (Question 8). The proposal to extend the existing regime is underpinned by the same unsubstantiated assumptions about the benefits night-time aircraft operations to the UK economy. These assumptions do not justify the ‘wait and see’ approach that you propose to adopt. AEF supports a ban on night flights at the designated airports and beyond (in recognition that night-time aviation noise is an issue at non-designated airports, we back the national call for a night flight ban). AEF’s members living near to or under the flight paths of designated airports have reported better sleep since lockdown, and increased wellbeing as a result. At the very least, then, night flights should not increase from current levels in operation for more than a year during the pandemic, in order to lock in the benefits to communities.

While banning QC4 aircraft at night is a step in the right direction (Question 11), its impact is likely to be small given that QC4s cannot be scheduled between 11:30pm and 6:00am, and are operated only where there is a delay. As the DfT states, the impact of a ban on the industry would be “minimal” and the primary intent appears to be prevent any ‘backsliding’. But to give overflowed communities more certainty about future noise improvements, we consider that the scope of the proposed ban should be extended. In addition to the operating ban on QC4 between the hours of 2330 and 0600, we would like to see a scheduling ban on QC4 between 2300 and 2330, and 0600 and 0700 to provide protection for the full 8-hour night period. There should also be a scheduling ban on QC2 aircraft between the hours of 2330 and 0600, to apply continuous pressure on the industry to reduce noise.

AEF feels that this is the time for the DfT to take bold action on reducing aircraft noise, acting on the growing body of evidence around the negative effects of night-time aviation

noise on health – especially as individuals and communities recover from the deep impacts of Covid. The Government’s pledge to build back better requires quality of life and health issues to be at the forefront of an economic recovery. Without evidence to support the claimed economic benefits to the national economy, the consultation should not be seeking to protect the status quo, but should instead look to put the industry on a trajectory that will reduce noise.

Deborah Lovatt
Outreach Manager
Aviation Environment Federation