

## **Night Flights Consultation**

The Government's consultation on night flights is been split into two parts.

Part 1 focuses on two key areas:

- extending the existing night flights regime beyond its current expiry date of October 2022 until October 2024
- stopping the use of the noisiest Quota Count 4 (QC4) -rated aircraft at night

Deadline for submissions is **3rd March 2021**.

You can send your responses by email to [night.flights@dft.gov.uk](mailto:night.flights@dft.gov.uk)

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

This part of the consultation will close on **31st May 2021**.

### **Introduction**

The Coalition is the largest organisation campaigning against the expansion of Heathrow. Our membership includes local communities, parliamentarians, local authorities, trade unions and environmental NGOs. This submission constitutes our response to Part 1 of the DfT's consultation on Night Flights.

### **Noise abatement objective for the period October 2022 to October 2024**

#### **6. Do you agree with our October 2022 to 2024 night noise objective for the designated airports? Provide evidence to support your view.**

No. It is difficult to see how the extension of the existing regime will help to deliver the stated objective. We believe that night flights should be reduced at the very earliest opportunity. They cause significant disturbance to the sleep patterns of many communities across London and the South East.

The proposed approach appears to undermine Government claims about the seriousness with which they take aircraft noise at night. In particular, it does not include any proposal to actually reduce the number of aircraft operating at night or reduce the quota limit at designated airports.

Further, insufficient progress has been made on local community concerns relating to the impact of night flights, many of which were raised by many community groups in previous consultations. These are not reflected in the objective.

**7. Do you agree with how our October 2022 to 2024 draft noise objective for the designated airports will be measured? Provide evidence to support your view.**

No. The World Health Organisation (WHO) latest noise guidelines, published in 2018 recommended that the safe level for aircraft noise at night was 40dB Lnight.<sup>1</sup> The use of the 48dB Lnight contour thus underestimates the total number of people disturbed by aircraft noise at night. This would have a significant impact on any costs benefit analysis.

To reduce the size of the population within this lower level contour would require more severe restrictions on night flight operations.

Many other studies have been done which point to the link between night flights and poor health, for example, the study carried out by the European Society of Cardiology into cardiovascular deaths.<sup>2</sup>

**Specifics of the regime from October 2022 to October 2024**

**8. Do you agree that we should maintain the existing restrictions for two years from October 2022 to October 2024? Provide evidence to support your view.**

No. We believe that there should be no extension of the current night flight regime as it fails to take account of the evidence on the health economic costs of night flights.

There has been no of the costs and benefits of night flights presented as part of the consultation for consideration. Extension of the current approach would delay such a comprehensive evaluation from taking place.

The government should consider commissioning a robust investigation into the impacts of night flights including a comparison of any economic benefits and the costs of sleep disturbance, lost productivity and the mental and physical health toll.

The consultation does not present a range of options that involve significant change to the current regime, which gives the impression that a decision to roll over has already been taken.

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<sup>1</sup> [http://www.euro.who.int/\\_\\_data/assets/pdf\\_file/0008/383921/noise-guidelines-eng.pdf?ua=1](http://www.euro.who.int/__data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1)

<sup>2</sup> <https://academic.oup.com/eurheartj/advance-article/doi/10.1093/eurheartj/ehaa957/6007462>

Consequently, a phased reduction in night flights should take place during the period 2022 to 2024 culminating in a ban on flights at all UK airports for a full 8-hour period, between 2300 and 0700.

Stricter limits on the number of night flights permitted should restrict operations to services which are genuinely essential for economic reasons or emergencies.

We believe that tougher regulation is required to ensure that:

- all night flights are operated by the quietest aircraft, including larger fines for airlines in breach of regulation.
- dispensations are only granted in genuinely exceptional circumstances.

Further, given the current reduction in traffic caused by the pandemic, airports have greater operational flexibility than usual, they could easily shift flights from the night and into the day period.

### **The impacts of maintaining the existing restriction from October 2022 to October 2024**

**9. What would be the impacts to you should the government maintain the existing restrictions for 2 years, from October 2022 to October 2024? Provide evidence to support your view.**

The number of people impacted by aircraft noise at night would remain too high resulting in adverse health and economic impacts, in direct contradiction to the stated objective.

**10. What would be the impacts to you should the government allow the night flight restriction in place at the designated airports to lapse. Provide evidence to support your view.**

The impact on local communities would be devastating and would completely be at odds with existing policy. It would have a significant adverse impact on mental health and exacerbate the negative impacts to physical health.

### **Operational ban on QC4 aircraft movements during the night quota period (23:30 to 06:00)**

**11. Do you agree we should ban QC4 rated aircraft movements from operating at the designated airports between 23:30 and 06:00 from October 2022?**

Yes, we assert that government should ban all night flights from October 2022. in fact, there is no reason why all QC4 movements for the full 8-hour night period are not banned immediately.

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

QC4 only constituted 0.05% of night flights in summer 2019 thus any ban on their operation would have minimal impact on the industry. Many of these aircraft are being removed from fleets as a result of the pandemic.

Consequently, a similar ban on QC2 aircraft should also be considered as this would better assist the objective to limit or reduce the number of people exposed to aircraft noise at night.