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Date: 2 September 2021

Night Flights Consultation  
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Dear Sir or Madam

## **Night flights Restrictions Consultation - 2021**

### **Preamble**

0.1 This response is made by the Heathrow Strategic Planning Group (HSPG); a constituted grouping of 'willing' local authorities and local enterprise partnerships<sup>1</sup> committed to jointly leading a collaborative multi-agency approach on the future planning of the functional economic area surrounding Heathrow Airport. This text has been finalised by officers. The Group was formed in late 2015. It is independent of, but constructively engaged with, Heathrow Airport Ltd (HAL). The Group collaborates on a range of matters in addition to town planning, and acts as a conduit between the members and Heathrow Airport, Government, neighbouring area interests (including the West London Alliance of London Boroughs) and other key stakeholders.

### **1.0 Strategic level responses**

HSPG previously responded to the Part One consultation, outlining general positions, explaining our membership and making comment on improvement to the noise objective and metrics. In particular, the need to also publish noise contour information for 'dispensed' flights and for an evidenced WebTAG type assessment of health

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<sup>1</sup> Full Members of the HSPG (and signatories of an 'Accord') are: Elmbridge Borough Council, Enterprise M3 Local Enterprise Partnership, London Borough of Ealing, London Borough of Hounslow, Runnymede Borough Council, Slough Borough Council, Spelthorne Borough Council, Surrey County Council, Thames Valley Berkshire Local Enterprise Partnership

Other organisations have 'Observer' status and participate in some activities, including: Government, Highways England and West London Alliance (of London Boroughs), Royal Borough of Windsor and Maidenhead. The Group works closely with Heathrow and airport stakeholder groups such as Heathrow Community Engagement Board and Heathrow Area Transport Forum.

impacts of night flights on local communities. HSPG is committed to collaboration and supporting a successful and sustainable future for Heathrow Airport as an important economic driver and support for recovery and renewal following the Covid-19 pandemic. However, we do believe there are tremendous opportunities for aviation to 'Build Back Better' in many regards, including in terms of night flying, and so all reasonable opportunities should be taken to reduce the harmful impact of night flying on local communities and their environment in future. These impacts can have significant impacts on health, quality of life and productivity in a relatively densely-populated area like ours.

- 1.2 HSPG is concerned that the way in which the Night Flight Restrictions consultation on has been pursued and which has not addressed the fundamental need for a proper assessment of the full costs and benefits of night flying. The evidence that is presented is far from comprehensive and does not take on the fundamental issue that the costs of night flying are borne locally whilst the benefits are spread very much wider. This is particularly significant for areas around larger airports like Heathrow. The policy responses need to be considered in the context of such an assessment rather than being picked off a menu and considered in isolation as the current consultation encourages. Unfortunately, the way in which the consultation itself has been managed has also tended to obscure rather than enlighten in terms of this broader strategic assessment. We return to all of these issues in the detailed comments that follow.
- 1.3 UK wide and airport level policies for night flying restrictions should be consistent with the Aviation Policy Framework, delivering *sustainable development goals* and the ICAO Balanced Approach. Sustainable development principles (and the Noise Policy for England) require balancing of interests, including UK wide, regional and local economic benefits, and protecting the health and wellbeing of local communities. The impacted local communities need confidence that a genuinely Balanced Approach is being achieved at airports, and that any additional disturbances caused by dispensation flights are only for truly exceptional and emergency circumstances.
- 1.4 There has been no fundamental review of the current regime since 2006, and limited progress in addressing the good intentions declared by the Government for an evidenced and balanced approach to night noise as set out in the Aviation Policy Framework 2013 and noise objectives. The availability of objective and attitudinal research on impact and value of night flying is limited and dated and further work is urgently needed.
- 1.5 It is disappointing that Government have now determined that the existing night flight restrictions regime will be rolled forward for three years<sup>2</sup> (rather than two) for the period October 2022 to October 2025, and use of QC4 aircraft banned *only* for the Night Quota Period (23.30-06.00). For local communities around designated airports the

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<sup>2</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1004311/night-flight-restrictions-at-heathrow-gatwick-and-stansted-decision-document.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004311/night-flight-restrictions-at-heathrow-gatwick-and-stansted-decision-document.pdf)

opportunity to seek environmental improvements to mitigate the impact of night flights has again been missed. This roll-forward of regime should not preclude locally agreed voluntary improvements, nor lead to delays in much needed research nor delay in the Government's commitment to update guidance for airport dispensations for Winter 2022.

- 1.6 With the significantly reduced levels of traffic at Heathrow as a result of the COVID-19 pandemic and with traffic levels not expected to recover until mid- decade, HSPG believes there is justification and scope to urgently introduce interim and voluntary measures which ensure the movement limits and noise quotas reflect the actual levels of daily activity and network capacity that is available, rather than maintaining historic limits levels in order to 'keep a foot in the door' for future growth. The overall aim should be to Build Back Better, including in night flying only where strictly justified.
- 1.7 Despite recent publications in July from CAA (reviewing the 2014 SONA) and Airport Operators (describing the economic role of night flying), there is inadequate evidence that the Government is providing evidenced sustainable development balance of benefits and impacts in night flying restrictions. HSPG urge Government and the industry to urgently endeavour to provide:
  - Further objective and attitudinal evidence of the impacts of the annoyance and health impacts of night flying through further surveys and additional metrics as outlined in the SONA proposals.
  - More detailed, impartial and robust evidence of the local, regional and UK wide economic benefits of different types of night flying: cargo including freighters, express and long-haul belly hold cargo, and passengers including business passengers and holiday flight (domestic, local and long-haul) and hub transit only movements, at airport level. (We do not regard documents published by those pursuing particular sectional interests, such as that recently published by Airlines UK, are a substitute for this.)
  - Furthermore, such work and the current overarching consultation exercise cannot replace the contribution of specific consultations on key issues nor modelled WebTAG type evaluation of health impact costs of alternative options for future regime change.
  - At airport level, interim aircraft movement limits and noise quotas should maintain rigorous approaches to night flying as activity recovers. To maintain proper control as levels of aviation activity recover, at the very least the past practice of carrying-forward unused Winter and Summer night flight quotas from one period to the next should cease. Airport management must ensure limited nighttime noise quotas and aircraft movements facilitate the highest priority flights only.
  - More resilient network capacity planning through recovery including and the Airspace Modernisation Strategy and ACPs. Resilience capacity should be built into network planning and not rely on airport dispensations.
  - Improved Government night flight dispensation guidance, and improved local monitoring of all night flights (with and without dispensation), and use of airport dispensations. In particular, it should be made clear that the dispensation

system is not a backstop for delays in Airspace Modernisation, poor service planning, inadequate infrastructure and/or maintenance or failure to maintain good industrial relations.

- Limits and whole night ban of the noisiest aircraft (QC2 and QC4 as soon as possible) to incentivise use of quieter aircraft.

- 1.8 Finally, HSPG wish to comment on the consultation process adopted. This has been disappointing; these are complex matters for those outside the aviation industry to engage with and such interests have been further disadvantaged by: the complicated presentation of material adopted by DfT / CAA (for example both with and without question numbers for example); the very numerous and loaded questions; and the (unnecessarily to any clear purpose) 'stages' of consultation which were then in turn delayed. Consequently, this very protracted consultation process has worked to disadvantage potential respondents, with a lack of promised and necessary evidence, and then the late publication of material at the end of July (Government's response to Stage One and long-awaited information on the SONA review). This has left less than 12 weeks for consultation contrary to usual practice, and during the summer period.
- 1.9 To address these short coming, it is vital that further engagement and consultation on key issues (identified below) is conducted. HSPG remain very willing to participate in such with both Government and Heathrow Airport.
- 1.10 HSPG's responses to the (originally numbered) consultation questions are set out below.

### ***Responses to the consultation questions***

## **2.0 Dispensations (formerly Questions 13 to 30)**

- 2.1 Night flights at designated airports such as Heathrow Airport are governed by both a limit on the number of air traffic movements (ATMs) and a noise quota [QC allowance] – whereby specific aircraft types and operations are assigned a noise rating score during the night-time, and the airport's total score for the summer or winter season must be below the overall quota. The dispensation framework allows airport operators, or the Secretary of State (SofS) to disregard these ATMs from the movement and noise quota if they meet specified criteria. Government dispensations relate to national emergencies, nationally determined priorities or truly exceptional circumstances; and airport granted dispensations to the application of guidance criteria (Annex F): Emergencies, Widespread and prolonged air traffic disruption. Serious hardship to passengers. Inconvenience and delays to passengers do not qualify as 'serious hardship' nor do delays to any cargo flights.
- 2.2 HSPG support the consultation commitment to introduce new guidelines for Winter 2022 with improved clarity, consistency and scrutiny and transparency in the dispensation process. Other delays should not be used to justify delay in new guidance.

- 2.3 Disruptions are to be expected in the aviation sector and we believe that the system should actively incentivise more efficient practices enabling adequate provision to be made within the modernisation and good management of the airspace network and airport's capacity planning night and operations. Dispensations should not be used to 'squeeze additional capacity' out of the system, but only to deal with only truly exceptional or emergency circumstances. If it is not, the system will perversely incentivise inefficiency and poor practice. The current dispensation guidance is brief and leaves far too much open to interpretation with little clarity about key terms like what constitutes 'serious hardship or suffering' or 'unacceptable' congestion. These are left to the airport managers' retrospective judgement after the movement has occurred. It is therefore foreseeable that dispensations could be granted on the basis of wide interpretations and without detailed evidence and little guidance for airlines, airport operators or communities about what might be deemed acceptable.
- 2.4 We agree that more transparency is needed to enable meaningful scrutiny by airport stakeholders and local communities. We support the proposal for independent review of night flight dispensations by Independent Commission on Civil Aviation Noise (ICCAN) or the Civil Aviation Authority (CAA). However, it is not clear how such reviews would differ in timing or scope from the reviews by DfT at the end of each night flight regime period. To be an improvement such periodic reviews would need to provide for interim scrutiny and not merely replace the current DfT role. In any event there needs to be clear mechanisms for redress if dispensations granted by airport operators do not meet the dispensation criteria and accountability for government dispensations.

***Questions 14 to 16: Should adverse weather qualify for dispensation?***

- 2.5 The DfT dispensation guidance outlines that the likelihood of adverse weather such as snow conditions should be taken into account in operations planning, whereas "widespread and prolonged" high winds may justify exceptional circumstances. Given the effects of climate change on weather patterns at departure, destination or enroute, and the evidence in the consultation of inconsistency of approach between airports, HSPG agree there is need for further clarification in guidance to airports managers on this aspect of dispensations.
- 2.6 This will require targets consultation on specific proposals. However, this should reflect weather forecasting and other technological advances enabling better informed aircraft departures, and the fact that weather has always been a key factor in aviation, and the need to incentivise effective planning for issues it may cause. Dispensations should only be granted for truly exceptional circumstances.

***Questions 18 & 19: Should dispensations apply to airport or airline staff?***

- 2.7 No, the Consultation outlines that there is evidence to suggest industrial action in the aviation industry can be expected to occur at least on an annual basis. Allowance for dispensation on the basis of airport and airline industrial action could be seen to be

accepting this habit, rewarding bad management practices and poor industrial relations. The dispensations should be restricted strictly to widespread and prolonged air traffic disruption (beyond the airport's control) such as strikes by Air Traffic Controllers, political instabilities overseas or ATC computer failures. This dispensation should not cover airline staff or baggage handler strikes - the solution to these problems largely lay in the hands of the airport and airlines. For these reasons we agree with the consultation that dispensations should not be used for these reasons.

***Question 20: Should network capacity issues qualify for dispensation?***

- 2.8 No. Dispensation is intended to deal with exceptional and unforeseeable circumstances and it should not be administered simply to increase capacity at the margins. Prior to COVID-19 Heathrow operated on the margins of its night flight movement limits, with an average of 104% of its winter allowance using carry over from the summer season with an average of 89% of its summer movement limit [between 2008/09 to Summer 2019]. At Heathrow in 2019, 39% of late running departure movements and equivalent of 50% of late running arrivals (outside of the scheduled arrival period of 04:30 – 06:00) were subject to dispensations. In 2020, in spite of the significant reduction of movements over the year due to the pandemic, over the equivalent of 50% of late running arrivals (outside of the scheduled arrival period of 04:30 – 06:00) and 13% of late running departure movements were subject to dispensation. The night flight restrictions at Heathrow equate to approximately 16 flights per night on average, and therefore dispensation of even just 1 or 2 flights a night is significant. The data indicates that the dispensation regime could be seen to be being used to squeeze additional capacity out of the airport to the detriment of local communities. Indeed it is acknowledged in the consultation that the general trend of increased night flight dispensations is likely to be due to airport growth with less resilience in operational procedures to absorb delays that do occur. Airspace Modernisation Strategy and Airports ACPs should plan for network resilience for the available capacity and not seek to use dispensations to overcome constraints.

***Questions 17, 21, 23, 24, 25 and 28: Should ATC industrial action, serious criminal or terrorist activity, medical or police emergencies, re-positioning medical transport, or information technology failures qualify for dispensation?***

- 2.9 Disruptions of any kind should only qualify for dispensation in truly exceptional and emergency circumstances to protect the safety of the airfield, its users and local communities.
- 2.10 It is not clear from the consultation why medical transport repositioning flights cannot be accommodated within existing night flight movement and QC limits. There is insufficient evidence presented to enable us to form an opinion as to whether it should be granted a dispensation category or whether it would necessarily meet the emergencies criterion of immediate danger to life or health.

- 2.11 Similarly with regard to medical or police emergencies that have passed, no information is presented on the length of time elapsed since the emergency that is being considered, and therefore it is not possible to form a view.
- 2.12 Information technology failures should not qualify for dispensation other than in the most exceptional circumstances (such as a national-scale cyber attack). The system must incentivise airports and airlines to ensure they have adequate, well-maintained, resilient and secure IT systems and dispensation should not be a cushion for inefficiency.

***Question 26: Should reducing carbon emissions qualify for dispensation?***

- 2.13 HSPG members recognise the importance of reducing carbon emissions. Many members have declared climate emergencies and put in place action plans to reduce and mitigate impacts, HSPG members are also embarked on joint work to further these aims. It is essential the aviation industry plays its part to reducing carbon emissions from the whole network system, including the aircraft in the sky, the airport infrastructure and supply chain, and surface access to airport related activities.
- 2.14 That said, reducing carbon emissions is a broader issue needing a system-wide, strategic response including through the Airspace Modernisation Strategy, and must not be addressed through a dispensation system designed for another purpose and which will encourage an ad hoc approach. Pending such a thoroughgoing policy, the system must incentivise best practice.
- 2.15 Therefore, HSPG members strongly urge that reducing carbon emissions should *not* qualify for dispensation. Such a dispensation could be so broad as to allow an almost unlimited number of night flights to be ‘dispensated’ without evidence of individual or cumulative benefit and but devastating disruption and health impacts from night noise to local communities. It would also encourage poor practice, providing a ‘greenwash’ for inefficiency and mismanagement.

***Question 27: Should pre-emptive dispensations be permitted?***

- 2.16 With existing guidance and dispensations given at Heathrow, we remain concerned that dispensations continue to be being applied for airspace network capacity related delays, including pre-emptively, with 26.7% of Heathrow’s dispensations over the review period being for flights which arrived between 05:30 and 05:59. Heathrow Airport has granted dispensations for additional flights to land between 05:30 and 06:00 on poor weather days on the basis of reducing the risk of delay later during the airport’s busiest morning hours. Dispensation is granted on the basis that due to capacity issues morning delays could create knock-on effects through the day, and possibly into the night period some 15-18 hours later. Currently the dispensation guidance is not detailed, and does not explicitly permit or prohibit this. The consultation finds that there is insufficient evidence to conclude whether the benefits of this approach outweigh its

negative effects and whether the cause is lack of resilience in capacity planning or exceptional weather. We agree that the dispensation guidance should be revised to tighten and clarify the circumstances under which dispensations are permitted.

- 2.15 To specifically allow pre-emptive dispensations would be a fundamental change in the nature of the system and should not be considered as part of a generic and partial review of this kind. Any change for pre-emptive dispensations would need to be supported by clear proposals for use in specific circumstances and robust evidence of health and other impacts on local communities and full public consultation.

### **3.0 Length of the Night Flight Regime beyond 2024 (2025) (Questions 31 & 32)**

- 3.1 It is recognised and accepted that there is a minimum regime length of 3 years due to consultation and notification requirements.
- 3.2 Extension of the regime beyond 5 year reviews is clearly inappropriate given the uncertainty over the next few years as the industry recovers from the COVID-19 pandemic and adjusts to changes to international trade rules, uncertainty about future growth, and the airspace modernisation programme.
- 3.3 A thorough review of the regime is long overdue, and the Government's decision to roll forward the existing regime for three years (rather than two) is disappointing. The review should continue at pace, including gathering of up-to-date, robust and comprehensive evidence on health and wider impacts of night flights, the extent of their economic benefits and health costs. The review of dispensations guidance for Winter 2022 should not be further delayed and local airport level improvements should be encouraged in the meantime rigour and ensure that only necessary priority flights take place at night

### **4.0 Retention of the QC System (Questions 33 to 41) and Quota Carry-Over (Questions 53 to 63)**

#### ***Questions 36 to 38: Re-introduction of an exempt category and additional category for quieter aircraft?***

- 4.1 We do not believe that an exempt category of aircraft should be re-introduced. It was removed to provide increased transparency around the number of flights operating during the night period. To re-introduce it would therefore be a retrograde step. Counting all aircraft in an airport's movement limit is viewed as the correct approach, not least to provide transparency for, and accountability to, local communities. Even a relatively 'quiet' aircraft generates a noise level which has an adverse impact on the resting population under, and adjacent to, flightpaths. The WHO environmental noise guidelines state that 10+ events exceeding 45dB L<sub>Amax</sub> internally are likely to cause an adverse health impact. Therefore any aircraft capable of disturbing a resident should be included in the QC system to ensure it remains fit for purpose.

- 4.2 Government should introduce new / additional QC category for quieter aircraft so to ensure the benefits of such aircraft are captured in the QC system and airport limits, and operators are incentivised to adopt such aircraft.

***Questions 39 to 41: Re-baselining the night quota system***

- 4.3 We agree that decimalisation of the QC system with QC0.125, QC0.25 and QC0.5 and possibly a new category of 0.0625 makes the system appear more complicated and so detrimental to transparency, and we can understand proposals to re-baseline to whole numbers. We support the call for evidence from airports, airlines and other stakeholders or regulators as to what practical operational impacts this could have, and the costs involved to ensure the case for re-baselining is understood in the round.
- 4.4 If the system is to be re-baselined, it makes sense to anticipate future noise improvements to aircraft and create categories, or a numbering system with allowances, to incentivise production of quieter aircraft (including new forms of propulsion and design) and to forestall the need for further re-baselining.
- 4.5 For transparency a re-baselined system should show a direct translation of the existing system so that old QC categories are at least equally penalised in the new system, and to allow the reviewing of long-term trends in noise reduction in order to minimise misunderstanding and maximise clarity.

***Carry over of underused movement and noise quota limits (Questions 53 to 63)***

- 4.6 We do not support the removal of the aircraft movement limits and management of night flights through a QC limit only through a limited consultation such as this. If such proposals are to be brought forward (and this may offer benefits) an evidenced and targeted consultation process will be required.
- 4.7 The actual frequency of aircraft overflight events (of even 'quiet aircraft') is a factor in noise disturbance. Public understanding of sleep disturbance is personal subjective and anecdotal, of single events that disturbed personal sleep – so SEL and N above measures to supplement period averaged noise energy figures are relevant. Background noise levels are also pertinent.
- 4.8 Pre COVID-19, Heathrow Airport achieved unused capacity in terms of the night quota count as airlines operate ever quieter fleets. Government has determined to roll forward the existing noise objective and measures for three years – a period during which aviation will hopefully continuously recover activity. As part of this roll forward HSPG believe that airports voluntarily - and if necessary Government - should curtail any carryovers of night aircraft movement and noise quota limits from previous periods of reduced demand, so that an effective management of day time and night time regimes are maintained during this period of recovery.
- 4.9 Movement limits and noise quota should ensure that communities have assurance of a maximum level of disturbance and noise to which they will be subjected over a given time period.

- 4.10 The consultation outlines that each designated airport's scheduling committee should separate the airport's movement and QC limits into pools for scheduled services, ad-hoc movements, and contingency, weighting towards scheduled services can leave the airport's resilience lacking. This in turn is likely to increase propensity towards dispensations which should have been managed through an airport's standard operational procedures. The HSPG advocates the total ban on scheduled services during the NQP and continuing reductions across the Night; Other Night flights (23.00-23.30 and 06.00 and 06.59) should be prioritised for services that need to operate at night rather than those being pushed to the night period for other reasons. Proposals to ring-fence slots or limit pools should only be considered following a wholesale review of the case for night flights.
- 4.11 Making changes of this kind risks bringing the whole system into disrepute and any proposal along this line should only be brought forward as part of the comprehensive review we have urged above.

## **5.0 Policy, metrics, Night Quota Period, (Questions 42 to 47)**

- 5.1 In July Government published the 2<sup>nd</sup> edition of the CAP1506 Aircraft Noise and Annoyance (addressing errors in the 1<sup>st</sup> edition), and CAP2161 Aircraft Noise and Sleep Disturbance. These are based on self-reported evidence and conclude that further research is needed to understand the nature of impact of night aircraft noise on annoyance and health and wellbeing, conducted in summer, with sufficient samples for full of the impact of a range of exposure levels and mode direction and explore non-acoustic factors. (The report notes latest objective measures in UK date from 1990 whereas WHO drawing in the DLR from 2006.) HSPG strongly support the case for further research and use of metrics to include: LAeq8h (summer average), and single events to offer N60 and loudest event LAeq(outside) to provide meaningful figures to the public and relationship with WHO metrics.
- 5.2 Governments' Airports National Policy Statement, recommended a 6.5 hour ban over the Night Quota Period (NQP) but many argue for a full 8hour ban over the defined Night (23.00-07.00). Established noise metrics (e.g. L<sub>night</sub>, LA<sub>eq8hr</sub> and L<sub>den</sub>) and health based evidence on the impacts of night noise from the World Health Organisation and the Government's own Noise Policy Statement for England with Lowest Observable Adverse Effect Level, for example, are all based on an 8 hour night period. Therefore, noise policies should be continuously reduced and monitor across the whole nighttime period as well as ban in the NQP.
- 5.2 In addition, Heathrow operates a voluntary NQP ban on scheduled flights with night quota and aircraft movement limits – all of which are important additional safeguards to local community wellbeing.
- 5.3 On the basis of current evidence, the correct approach should encompass a combination of national standards, airport aircraft movements limits and noise quotas and economic incentives (to operate the quietest aircraft types) in the ON period.

## **6.0 Ban of QC4 and QC2 aircraft movements (Questions 48 to 52)**

- 6.1 We support the agreed ban of QC4 rated aircraft in the NQP and strongly support operational bans on QC4 and QC2 aircraft movements across the whole Night, to align with those imposed on QC8 and QC16 aircraft movements and provide noise improvements across the whole of the nighttime period. The number of older QC4 aircraft is very small (e.g. 0.4% of night flights in summer 2019 at Heathrow) and decreasing rapidly. We note that Gatwick Airport Limited has already committed to a voluntary ban on QC4 aircraft in the night quota period by the end of 2022, and Heathrow's Noise Action Plan 2019-2023 highlights that it was already implementing a voluntary ban on scheduling cargo flights in the night quota period. Therefore, we urge the Government to consider introducing the ban across the full 8 hour period from October 2022 and not to wait until 2025. The Government is urged to start to explore with the industry the timing and process of such a phase-out as new airline fleets are introduced.

## **7.0 Health impacts and economic value of night flights and proposed night noise objective (Questions 64 to 70)**

- 7.1 The consultation documents published in March (Annex A) do not provide any meaningful insight into the actual benefits and costs (economic, social, environmental and health) of night flights currently or of how these may have changed since the framework of the current regime was introduced in 2006. Documents published by bodies with a clear interest in the matter (like Airlines UK) are not a substitute for robust, disinterested research commissioned by Government and with the confidence of all parties concerned.
- 7.2 As referred above, CAP2161 has been produced in July using sampled evidence from the 2014 SONA. While this is welcome it does not constitute up to date evidence on the impact of night flying on health and wellbeing of those impacted by night aircraft noise, nor does it put a *cost benefit valuation* on this using the widely-used WebTAG methodology. WebTAG provides an accepted approach to identifying and analysing costs and benefits.
- 7.3 We do welcome Airlines UK's "The Economic Impact of Night Flying in the UK" as a contribution to the debate about the nature of night flying in the UK. This does not (and to be fair does not purport to) attempt to relate the benefits it asserts arise from night flights to the cost to local communities – see further comments below.
- 7.4 It is well understood that airports are important economic infrastructure at regional scale. HSPG believe it would be extremely helpful for the industry to take their work further to explore the economic impacts at *regional* as well as national and local levels to, to provide more meaningful and useful information about 'wider benefits' beyond Direct, Indirect and Induced impacts. This is particularly important for an area like ours which straddles the Greater London and other administrative boundaries.

- 7.5 With the further extension of the current night flights regime to 2025, Government is urged to commission broadly supported, methodologically robust and clearly disinterested further research into costs and benefits of night flying so that a sustainably balanced approach can both be achieved, consistent with the ICAO Balance Approach for night restrictions, and be seen to have been achieved by all those with a stake in the process.
- 7.6 The consultation 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 annoyance and adverse health and wellbeing impacts from these operations. The government's Aviation Policy Framework (2013) also recognises that the costs on local communities are higher from aircraft noise during the night, particularly the health costs associated with annoyance and sleep disturbance. As night noise is such a significant element of aviation noise it is appropriate that there should be specific reference to night noise in the Government's aviation noise objective.
- 7.7 The proposed night noise addition to the Noise Objective is welcome, however:
- The proposed addition to the statement<sup>3</sup> needs to be evidenced as a urgent priority.
  - The wording (and evidence) needs to address the local, **regional**, and national economic benefits.
- 7.8 The Airlines UK publication 'The Economic Impact of Night Flying in the UK' (York Aviation July 2021) provides a useful description from the industry's perspective of how it currently (2019 levels) *currently* operates, why flying is done at night, when, the relationship of the Heathrow hubs with regional and international transits etc. The impact of four scenarios (2019 levels based) for *doing different* - reducing night flying to varying degrees are assessed: 1. Full Night Ban, 2. NQP Ban and 50% reduction in Other Night 3. NQP Ban. 4. 50% Night Ban. Each assessed using a DDI economic model - Direct/Indirect/Induced and 'Wider impacts'. This does give some useful insights but it is NOT as an assessment of the actual benefits and costs (economic, social, environmental and health) of night flights and, as we have pointed out earlier, is not (and does not claim to be) disinterested.
- 7.9 If despite our reservations<sup>4</sup> we accept the findings in general terms for the sake of argument at this stage, this does clearly demonstrate that under all scenarios, that:
- the benefits in night flying in terms of GVA and employment are very much UK wide rather than local to the airports (broadly to related activities within 20mins of airports). However, HSPG believe these 'wider' benefits will be both of regional

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<sup>3</sup> The consultation proposes that following additional statement could be included in the Government's noise objective: *"There should be a balance between the local and national economic and consumer benefits of night flights, both in terms of passenger and freight operations, against their social and health implications, in line with ICAO's Balanced Approach."*

<sup>4</sup> The HSPG has a number of questions about the methodology and approach taken and is following these up with Airline UK and Heathrow, the HSPG will comment further in future dialogue as the night flights regime is reviewed.

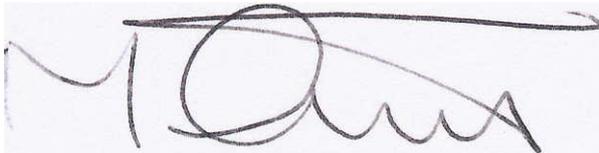
interlinkages and scale, and more broadly national economic impact. This needs far more exploration, and

- Brexit and the detail of subsequent trade deals will have considerable impact on the future demand for passenger and cargo movements compared to previous forecasts and this requires research too.

## **8.0 Designation of Airports (Questions 71 to 76)**

8.1 We do not support de-designation of already designated airports. We support a national framework for night flight controls – de-designation could exacerbate differences in night noise environments around airports and leave their communities more exposed.

Yours faithfully,



Michael Thornton  
Lead Advisor to HSPG

**For Heathrow Strategic Planning Group**