

ANNEX C: Summary of consultation responses – longer term policy reform

Regime length

We asked the following question:

What length should the night flight regime beyond 2024 be? How do you think the length of regime will affect you?

Many individuals or community group responses preferred a shorter regime, allowing for more frequent review and greater transparency and accountability. They said this would also allow new evidence to be taken into account and give communities the opportunity to put forward their views on a more regular basis. One campaign group suggested a 3 year regime, another supported 5 years to ensure the regime could be amended to reflect changes in academic evidence and operational best practice. One campaign group said that communities would not welcome a regime that is longer than 5 years without an opportunity for review.

Industry responses tended to support a longer regime, with some suggesting at least 5 years, but up to around 10 years as being appropriate to provide necessary certainty for planning and investment decisions. Industry responses suggested there are strong arguments for a longer regime to account for fleet investment cycles (typically 15-20 years), the time and resource required to assess progress against desired outcomes, and to review the effectiveness of interventions. Some suggested a 10-year regime would provide greater certainty for all stakeholders, while a 5-year regime is the minimum period necessary to give confidence to community stakeholders and to allow industry a degree of certainty when making decisions over future investments.

One airline added that as industry recovers from the COVID-19 pandemic and the UK adjusts to leaving the EU, it will be critical to avoid any immediate or premature regime changes that reduce night flight capacity. Another airline argued for a 3 year regime – given the COVID-19 crisis and the anticipated recovery forecasted at 2024/25 and beyond, a 3 year period from that point of recovery would allow for sufficient data to be collected, analysed and for next steps to be determined. Freight carriers tended to support longer regimes too, saying that short-term regimes do not give sufficient time to plan operations and make commercial decisions.

Some local authorities took the opportunity to call for a night flight ban, or at least a phased removal of night flights, citing their communities being significantly affected. A Parish council whose stance remains that all night flights should be banned apart from genuine emergencies, said that if night flights are to continue the regime should be for short periods to provide more focussed monitoring and to ensure that reviews take place at an appropriate frequency. The council felt that the longer the length of the regime the greater will be the burdens impacting on the local community.

One local authority suggested a regime of no longer than 5 years, as a reasonable period to be able to fully assess the effectiveness of a regime and to be able to properly consult on up-to-date evidence with proposals in adequate time before the start of the next regime. They pointed out that Noise Action Plans are reviewed every five years. With shorter regimes (say under 5 years), there would be little time to analyse their effect once implemented before consultation starts on the next regime.

Quota Count (QC) SYSTEM

We asked the following question:

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

Some individual and community responses did not agree that the QC system is enough and called for a more robust system that favours community rather than industry. One group stated that managing night flights through a QC limit alone has the potential to lead to more movements per night and thus increase the individuals disturbed by night noise. Other groups stated that the best way to limit noise at night would be to introduce a night flight ban of 8 hours. There was a strong response from community groups saying it is critical that movement limits continue to be a part of the controls on night flights. One group pointed out that it is the noise event that disturbs sleep, not average noise levels or the QC rating. They stated that all aircraft are noisy, some to a higher degree, and were of the view that the QC system was made by the aviation industry to justify more flights and did not reflect the actual disturbance on the ground.

Other campaign groups were willing to accept that the current QC system is reasonable, but suggested more weight should be given to the frequency of movements. Another believed the QC approach, if applied correctly while maintaining limits on the total number of movements, could incentivise airlines to operate quieter aircraft, but argued that the quota count at each airport needs to be progressively tightened in each period.

Industry responses were generally of the view that the QC system remains the best system for managing night noise at the designated airports. One industry body argued that with further advances in technology and the introduction of the next generation of quieter aircraft, there should be an opportunity for a further upward increase in movements, whilst maintaining or reducing the noise quota parameter, allowing for further flexibility in scheduling and providing additional economic value in a controlled manner.

Airlines welcomed that the QC scheme offers a stable and predictable regulatory framework for planning and provides the best available means of assessing and taking account of noise impacts. One airline suggested such a scheme is preferable to less tailored solutions, such as movement limits or hard curfews and bans. They added that a long-term stable policy is also essential to provide a clear basis for airline planning.

Another industry body believed that to be effective QC schemes must be appropriately configured to incentivise the use of quieter aircraft through the potential reward of increased movements during restricted periods. They encouraged the government to maintain the existing system during the current period of unprecedented uncertainty and subsequent periods that will likely continue to be impacted by the lingering effects of the COVID-19 pandemic.

This industry body also encouraged all authorities to strengthen their approach to land-use management and planning. They expressed the view that significant investments in newer and quieter aircraft required to improve the noise performance of fleet operating at any airport, can be completely offset by ineffective local land-use practices that fail to prevent encroachment or adequately plan for the longer-term airport and community development.

Another industry response supported the use of QC as a management tool, arguing that an aircraft movement limit is a blunt instrument and offers no incentive to invest in new technology. They believed the government could better communicate the benefits of the QC system by linking it to shrinking noise contours. This industry response did recognise the challenges removal of a movement limit would pose and how there could then be a perception of a lack of control. Other industry responses said their preferred option would be the removal of existing movement limits for summer and winter seasons and the use of QC limits only – believing this would incentivise utilisation of quieter aircraft.

Another industry response said that to achieve its full potential the QC system should operate in isolation. Whilst the QC system is noise based and relates to the government's noise objective, the movement limit is (by definition) activity related. They argued that movement limits do not relate to the government's stated noise objective and have not been demonstrated to comply with obligations under the Balanced Approach.

Freight carriers responded by stating that the next regime must not act as a barrier to trade. They would like to see the government take a broader, strategic approach when considering night restrictions to ensure the UK remains open to international trade and is an attractive place to invest and do business. Others saw the QC system as an effective method when compared with other operating restrictions and noted that changing the QC system would be a significant operational reform.

Other industry responses suggested that the QC system is well embedded into many airports' noise management policies and is understood by both airlines and local stakeholders.

Local authority responses tended to note that the QC system is important, but also suggested that movements should also be controlled, as the number of movements, even of the quietest aircraft, all account for disturbance. There were calls for a future regulatory system to ensure that airlines are financially incentivised not to operate in periods that have the greatest community impact and that charges for those periods both fully reflect the costs imposed and vary in a way that helps ensure that such flights are operated by the least noisy categories of aircraft on all occasions.

We asked the following questions:

What do you think are the:

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

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

Do you have evidence of other noise management regimes being used elsewhere and how they compare with the current system?

Communities expressed a hope that a new system would hold airports more accountable for noise levels and lead to a reduction in noise, but few set out the advantages / disadvantages of changing system, with some suggesting that there is not another readily available system that can be compared to the QC system. Some individuals called for a programme that would reduce noise and aircraft movements progressively each year.

One council said that the main disadvantage of a new system might be the inability to compare historically if different metrics were used.

One industry group stated that members were not aware of a system that is better than QC for managing aircraft noise. They noted that the communities and other relevant stakeholders also understand the QC system after many years of experience of working with it, and that advantage should not be given up. One response stated that further analysis would be required of any potential new system to fully understand what advantage it offered. If an overly strict regime were to be applied, it would possibly lead to mass cancellations of flights and customers being affected. It could also lead to a risk of changing objectives and as a result, a loss of progress from the current approach.

Hong Kong was given as an example which has shown a balanced approach can be taken where additional movements are possible within an overall reducing noise envelope. The Hong Kong QC system takes QC usage in 2011 as its baseline. All improvements in noise performance since then go towards creating a growth pool, and so airlines are incentivised to continue investing for further growth opportunities in the Hong Kong night period. This was presented as one such sharing scheme that works as an incentive for all parties to drive continuous improvement for affected communities.

We asked the following question:

Should we introduce an additional QC category for quieter aircraft in the longer-term?

Individual and community responses were mixed, with one group not wanting a new lower QC category unless there were also incentives that ensure less disturbance. Others supported having a new category for quieter aircraft, with the hope this would lead to quieter aircraft being used more regularly.

One industry body argued that there has been no step-change in aircraft technology since the most recent QC category was introduced and forecasting the noise-performance of future aircraft is challenging. They added that new regulatory proposals should carefully consider the implications of moving the performance benchmarks for what are considered quiet aircraft without significant advances in associated technology, as this may actually serve to disincentivise required investments.

Another pointed out that a new QC category (QC 0.125) for aircraft between 81 and 83.9 EPNdB was introduced only as recently as October 2018. This respondent stated that a QC 0.0625 category would just cause confusion and right now it is difficult to imagine any

aircraft of meaningful passenger or freight carrying capability ever qualifying as noise exempt anyway.

Other industry responses supported this, saying the future regime should be flexible enough to allow for the introduction of a new QC category if needed for any future technology and next generation aircraft with lower noise profile.

There was some support from local authorities for introducing a new QC0.0625 category, with a local authority saying it would be a logical progression of technological advance. Others pointed out that a new QC category would not help to cut the actual aircraft movements and that movements in any new category could still have a significant potential noise impact on resident's health and thus needed to count against the noise quota value.

We asked the following question:

Should the government reintroduce an exempt category?

There was strong community feeling against this, with opinion expressed that this would make night flight controls weaker instead of stronger. It was argued that this would create a lack of transparency by making communities unaware of expected night-time movements. Many individuals said that they do not want an exempt category or anything that could lead to more flights at night. They stated that all movements should be counted towards the airport allowance. It was pointed out that an exempt category was removed to provide increased transparency around the number of flights operating during the night period and to re-introduce it would be a retrograde step.

An individual suggested the government do something that reflects the different airports, i.e. given the numbers, re-introduce exempts at Stansted but not for Heathrow or Gatwick.

An industry body said that on balance it would currently be premature to 'move the goalposts' again now, when we are yet to see the next generation of technology capable of falling below the current thresholds.

Another believed the reintroduction of an exempt category would be one of the best means of encouraging advances in aircraft technology and demand for such aircraft by airlines. However, this only holds true if the exempt category and the performance benchmarks which determine inclusion in such a category remain in place and are applied consistently in the longer term. If aircraft are considered to be so quiet that they do not affect the quota count available to airlines there is a strong likelihood that their share of the fleet operating at designated airports will increase at a faster rate than their share in the global fleet.

An Airport Consultative Committee called on government to ensure that a QC rating for any aircraft that has a noise footprint that exceeds 60dB LAmax over any residential dwellings near an airport is captured by the regime. They suggested that even a relatively 'quiet' aircraft generates a noise level which has an adverse impact on the peace and tranquillity of the resting population beneath and to both sides of its flightpath. In their view, counting all aircraft in an airport's movement limit is the correct approach and any reintroduction of an exempt category should only be considered if it can be proved there would be no adverse impact on residents.

Local authorities tended not to be supportive, arguing that a reintroduction of an exempt category would only make things less transparent and create more uncertainty for

communities. One response stated that the only situation in which it is considered that there should be an exempt category, whether for movements or noise, is where the 60 dB LAmax footprint of that aircraft encompasses no residential premises at the airport concerned. They added, if an aircraft has a noise footprint that has the potential to cause sleep disturbance to local residents, then it should count to the movement and noise quota limits for the period.

We asked the following questions:

Do you think we should re-baseline the night quota system in the longer-term?

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

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

Individual and community responses tended to question the need to re-baseline the noise quota system, suggesting instead the government should be working on reducing night flight movements and noise. One campaign group stated that targets should be set for reductions in noise over the next regulatory period and incentives should be set for airlines to operate the quietest aircraft. Another group felt that QC categories should be revised to reflect more accurately the type of aircraft that are in operation, and said that to maintain simplicity, no category should be assigned a QC value of less than one.

The opinion expressed by industry was quite mixed. One industry group said that in the longer term, there might be merit in re-baselining the night quota system, but that it would be premature to do so at this point, when we are yet to see the next generation of technology capable of falling below current thresholds. It was noted that consideration needs to be given to the fact that many airports across the UK use the QC system and their limits are part of local planning agreements and/or conditions.

Another industry group argued differently, believing there should be a re-baselining of the QC system to whole numbers, to provide a clearer, easily understood system for all to use. They added that it should, however, be easily relatable to the previous system so that assessments of improvement can be clear and unambiguous. They said this would also negate the need for the introduction of a QC0.0625 category.

Other responses said that to avoid confusion in re-baselining the system, all communications concerning such a move would have to be handled with care, and that it is difficult to quantify the exact cost implications of re-baselining, but there would be some costs for airlines and airports to reconfigure existing systems used to monitor and manage the night regime.

It was suggested that any re-baselined QC system needs to have sufficient room to allow for the creation of new categories, without going back into a decimalised system for as long as practicable.

Local authorities were generally supportive, believing re-baselining of the noise quota system would make it more simpler and user friendly. One local authority response noted that any “rounding up” or “rounding down” that is necessary should have an overall neutral effect. They added that a main issue to consider would be future fleet mixes. They saw no specific direct costs for local authorities, other than familiarisation time for both officers and

members. A Parish council stated that as aircraft become quieter it seems absurd that QC ratings keep going into even more numbers of decimal places. They supported a new system that leaves room for manoeuvre if and when quieter categories of aircraft become available.

EXTENDING THE NIGHT QUOTA PERIOD (NQP)

We asked the following question:

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

Individuals and communities expressed strong support for the extension of the NQP, describing the current shoulder periods as disturbing, and times when aircraft noise can prevent getting to sleep or can cause awakenings earlier than intended. They expressed their view that allowing residents a longer period to sleep would positively impact their health and said that their health should come before the financial benefit to commercial organisations.

However, some community groups also reiterated that they want all night flights banned apart from emergencies. And concern was also expressed by one campaign group, who whilst welcoming an extension of controls into the current two shoulder periods (i.e. for a total of 8 hours), suggested this should be done as three separate controls plus an overall night period control. This approach would be to avoid noise being shifted from one period to another without proper control that recognises the harm in each period of the night.

Industry responses stressed that flights within and just outside the night period are crucial for UK connectivity, operational flexibility and the UK's overall competitiveness, and the periods concerned include some of the busiest times at airports. Industry responses expressed concern that an extension of the NQP would impact a substantial quantity of flying, ultimately affecting fares and the viability of certain areas of UK air connectivity. They added that the shoulder periods support a competitive and workable schedule of rotations by short-haul carriers, as well as provide resilience necessary to address operational issues. The use of these periods enables airlines to maximise aircraft utilisation and operate efficiently, which is at the heart of providing connectivity at a price that is acceptable to consumers. They argued that having to retime services due to an extension of the NQP would have significant consequences for airlines, passengers and the wider economy. Industry responses spoke of damage to key export industries, and a weakening of opportunities to link all UK regions to fast-growing economies in Asia and elsewhere. It was argued that given the scale of traffic in the shoulder periods, any restrictive changes here would have very significant negative consequences for the service that aviation provides to the UK's economy and society.

In the context of the Balanced Approach, some industry responses questioned what noise problem or noise objective would extending the NQP be trying to address? Industry responses suggested that alternative potential measures be considered and exhausted before implementing such restrictions. It was suggested that if the government is considering this approach there must be more detailed impact analysis carried out before policy measures are developed in detail.

Some industry responses pointed out that re-timing of flights would require the securing of corresponding slot timing at the down-route airport, and were that to be achievable this

could nevertheless still impact the commercial viability of the flight. It was mentioned that in the case of overseas based airlines, they may be faced with a capacity reduction that would conflict with their rights under an Air Service Agreement (ASA). It was said that it is possible therefore, that airlines, states or even consumers, would challenge forced re-times and the effective expropriation of slots and noise quota, through the UK or international courts, arbitration, or by imposing trade sanctions and restrictions against UK airlines under the relevant bilateral ASA.

Industry responses also suggested that an extension of the NQP would not only impact the ability of airlines to meet expected increases in demand on several high-traffic and economically important routes, but also the competitiveness of the designated airports when compared with other European Hubs. They said the competitive disadvantage is magnified when the UK's hour time difference to mainland western Europe is considered, effectively giving European hubs such as Amsterdam, Paris, Frankfurt and Madrid an hour's head-start.

Industry responses noted that extending the NQP to begin at 23:00 would markedly increase the number of returning aircraft subject to regulation at designated airports, and similarly, extending the NQP to end at 07:00 would also significantly increase the number of departing aircraft subject to regulation. It was feared that this would very significantly increase the management burden associated with the system.

From an airline perspective, responses argued that if the NQP were to be broadened to cover the night period, this would result in lower aircraft utilisation, thus impacting the frequency and choice of destinations airlines could offer. They said a high aircraft utilisation model enables low-cost carriers to provide customers with a vast choice of destinations, multiple frequencies on popular routes and competitive fares.

Freight carriers strongly opposed an extension to the Night Quota Period to 23:00-07:00. In particular, they argued that this would have severe implications on express operations, already operating to tight deadlines to meet customer needs and provide next day deliveries of time critical goods such as pharmaceuticals, legal documents or critical manufacturing components needed to fulfil just-in-time methodologies. They argued that operations in the night period are out of necessity rather than choice, due to customer demand for late afternoon collections and early morning deliveries. They stated that ensuring that goods can continue to be flown at night to support UK businesses will be imperative in a post-Brexit and post-COVID economy.

It was suggested that particularly in the hour 0600-0700, significant changes to the airspace capacity profile could result from an extended NQP, and that this requires modelling to understand the full implications from an air traffic control perspective. It was said that constrained capacity early in the morning, combined with the loss of half an hour at night, would be likely to compromise the ability of short haul airlines to complete three rotations.

One Parish council believed an extension of the NQP to 8 hours to be undesirable because it would enable airlines to reschedule aircraft at present timed to take-off between 23:00-23:30 to anytime in the night, adding to the disruption to residents' sleep patterns. They feared the same could happen in the morning period with flights timed to take-off between 06:00-07:00 being moved to earlier slots. Another Borough Council stated that if the government were minded to extend the NQP then the current restrictions on the core night period should be maintained as a minimum. The council added that with a simple

night period quota there is a real risk that residents would see an increase in flights in the hour or so after 23:30, and also in the period from 05:00-06:00, and potentially throughout the night, which they argued would be severely detrimental to health, given sleeping patterns in the UK.

We asked the following questions:

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

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

Some community groups stated that all hours of the NQP impact communities negatively, however, the shoulder periods were regarded as particularly disturbing as noise at this time can prevent residents from falling asleep or cause them to wake earlier than intended.

Industry responses tended to stress that early morning departures are essential to the business models of many airlines with aircraft based at UK airports. They argued that if the ability to fly early in the day is curtailed, the rationale for basing aircraft at an airport is severely undermined. Industry responses opposed the introduction of a complete restriction or curfew on movements in specific periods of the NQP and questioned what problem or objective this would be trying to address. It was argued that anything that reduced airline flexibility would only lead to lost opportunities and/or cause a drag on profits that slows down the rate of re-investment in new aircraft.

One industry response said that instinctively it is reasonable to assume that flights in certain hours of the day and night (or even day of the week) will have different impacts on local communities, and that some objective sleep studies have indicated that people react differently depending on what phase of sleep they are in. However, it was suggested that this is an important area which requires more in depth research.

A response from a Parish council believed the periods at the beginning and the end of the night, when people are going to sleep or are half-waking, are the most important. They argued that any noise that wakes a person at a time when they cannot rapidly return to sleep will also have a major impact on that person. They called for the periods of greatest impact to be determined through research and surveys at each airport. The Parish council also added that following the COVID-19 pandemic, the medical recommendation now is that bedroom windows should be open in the winter as well as summer to ensure the free flow of air. But with open windows come additional noise impacts. They went on to say that disturbed sleep results in mental health impacts and has a negative impact on children's education.

QC4 movement ban – extended across the night period.

We asked the following question:

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

Although communities approved of this ban, some felt that the benefits would be limited given there are now relatively few QC4 rated aircraft still in operation at the designated

airports. Some responses argued for QC2 rated aircraft to now be banned at night, whilst some campaign groups again called for all aircraft at night to be banned on the basis that all aircraft at night cause a disturbance.

However, many individuals affected by noise from East Midlands Airport thought this would have a positive impact for them as they suggested that East Midlands Airport has a lot of freight flights which tend to use old and noisy passenger planes that have been refurbished into cargo planes.

Industry responses included the argument that the decision of airlines to retire their Boeing 747-400 aircraft, had resulted in newer and quieter aircraft being introduced to replace them, such as the Airbus A380 and A350 or Boeing 777 or 787, with significant reductions in the noise footprint of these replacement aircraft.

An industry response made the point that the Boeing 747-400F is still one of the most used freighters in the world and is a vital aircraft for the global freight networks. They argued that hard night curfew bans for QC4 rated aircraft would be detrimental for UK cargo airlines to compete with EU and Asian operators in particular. In their view there is no need to expedite changes whilst the existing movement and noise quota allowances are in place at the designated airports.

It was suggested that a national approach in banning QC4 rated aircrafts should not be taken, and the government should make clear to local authorities that this policy (if used) at the designated airports should not be applied to other airports without full consultation, as the impacts may be different.

Another industry response felt that the extension of aircraft-specific operating restrictions in the night period may prevent airlines from operating their most appropriate aircraft for their schedule. For freight operators, such a restriction would hamper flexibility, which is critical to support UK global trade. As a result, an operating restriction may result in a suboptimal use of airport capacity, higher operating costs, and potentially additional emissions if the replacement aircraft is less fuel efficient than a more appropriate aircraft for the market and associated flight distance.

Some responses from freight carriers argued that for long-haul cargo operations, QC4 rated aircraft remain a core part of the network, whilst others argued that banning QC4 rated movements during the night period would be a disproportionate action compared to their current use, and added that these aircraft can provide a useful fallback option if capacity is constrained.

QC2 scheduling ban – NQP / Night Period

We asked the following question:

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?

Individual and community responses approved of this scheduling ban, but some also took the opportunity to call for the government to go further and ban all night flights. Although it was felt that a scheduling ban on QC2 rated aircraft would help towards reducing noise, it was suggested that this is still only a small portion of night flights and communities are

seeking change with a greater impact. Communities also argued that the ban should start from earlier than waiting for the next night flight regime.

One campaign group was of the view that a ban on QC2 rated aircraft movements for the NQP would not go far enough, and suggested they would like to see such a ban extended to cover 23:00-07:00.

Industry responses strongly opposed any scheduling or operating ban for QC2 rated aircraft movements in the NQP any time before the year 2045. They argued that any QC2 operating ban before then would certainly curtail the economic life of aircraft types that airlines are still in the process of purchasing. This strong opposition was also voiced by freight carriers, who fear a threat to their operational flexibility and argued that such a ban would have a significant impact on UK air cargo logistics.

It was said that such restrictions would impact several modern long-range aircraft types which are still being delivered and will operate in significant numbers for the foreseeable future, e.g. B777-300ER. It was argued that these aircraft types would effectively become permanently redundant before repayment of capital costs, and before the end of their useful economic lives if banned from operating in the night.

Airline responses said that they need assurance that investments in aircraft, certified in accordance with all applicable standards, can be flexibly operated wherever and whenever during their entire useful economic life, and without undue restrictions.

However, some industry responses did acknowledge that they would not be immediately or directly impacted by a scheduling ban on QC2 rated aircraft in the NQP, although these same responders would not support such a ban for the entire night period (23:00-07:00).

It was argued that many cargo operators will have a long-term reliance on fleets for which movements are predominantly rated as QC2, especially on departure. This is due to the superior belly-hold capacity and range of such aircraft, allowing these operators to maximise the economic value of each flight operating. It was said that a ban on QC2 rated aircraft could require cargo operators to fly multiple, smaller aircraft to reach the same payload, driving up costs. If smaller aircraft were required, some large volume shipments may have to be excluded from express air transport. It would also require additional slots and would be less desirable from an environmental perspective. Another response suggested that for cargo operators, there are currently no alternatives to wide body long-haul aircraft such as a Boeing 777, and these aircraft represent the best available technology and are the quietest of their type. It was said that if operating restrictions were applied, operators could be forced to relocate hub operations to other countries, reducing UK connectivity.

One industry body response said that further limiting the deployment of QC2 rated aircraft on routes to/from the designated airports would severely impede connectivity with vital markets in Asia, North America and other regions. The point was made that some airlines serving the designated airports only have QC2 rated aircraft and a scheduling ban may prevent these airlines from operating to the UK entirely. It was added that shifting operations to later in the day may not be a viable alternative due to the time differences at many foreign airports and the potential overlap of operating restrictions at foreign airports with those in the UK.

Some industry responses also suggested that they were not satisfied that enough evidence had been presented to suggest all other noise management options had been exhausted prior to introducing a ban on QC2 rated aircraft. They urged the government to explore other options such as better land-use planning and reduction of noise at source, before implementing further operational restrictions as per the Balanced Approach.

Industry responses also noted that new aircraft technology has brought significant advances in reducing noise at source and that this remains a top priority, reflected in the continued modernisation of fleets as well as new innovative operational procedures that have been implemented, such as Continuous Descent Approach (CDA).

We asked the following questions:

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

If bans are introduced should the implementation be staged?

As above, there was general support from individual and community responses, although some community groups again argued for the ban to be introduced earlier than the next regime.

Industry again expressed their strong view that a scheduling ban should not be introduced. Responses said that all the reservations expressed on the prospect of a QC2 scheduling ban in the NQP would be intensified for a ban between 23:00-07:00, to the point this would become overly restrictive. In the context of the Balanced Approach, it was again asked what noise problem or noise objective is being addressed by suggesting bans for specific aircraft types?

However, if a scheduling ban were to be introduced, the industry viewpoint was that there should be a staged approach to implementation, with phasing to minimize disruption to airline schedules, and the ability of airlines to accommodate passengers or deliver goods that are essential to the UK economy.

Industry responses also suggested that post COVID-19 pandemic, airlines will have significant debt burdens and will not have access to endless capital to accelerate fleet renewal.

Another response expressed concern that a scheduling ban on QC2 rated aircraft between 23:00 and 07:00 at the designated airports would be likely to lead to airlines shifting the operation of these aircraft to airports that do not have the same restriction. Therefore, any changes could have wider consequences across the UK.

QC SYSTEM – movement limit / allowances

We asked the following questions:

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

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

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

Individuals and community groups did not agree with removing movement limits and argued that this would be taking a step in the wrong direction. Individual and community responses suggested a desire for stricter controls and were of the view that removing movement limits could potentially lead to more night flights, which they are strictly against.

Community responses tended to focus on the noise event itself being the thing which causes disturbance, rather than the quota count or average noise levels. In their view, each noise event can disturb sleep. It was argued that the removal of a movement limit would undermine community confidence entirely and has the potential to increase the level and incidence of noise exposure at night. It was argued that communities need the certainty of an overall movement limit. It was also felt that removal of a movement limit could mean that over time the actual numbers of flights could increase dramatically as QC values come down. Without the control mechanism of a movement count, it was suggested that this would be unfair on communities.

One campaign group described the QC system as being of minimal effectiveness but argued that it is the number of flights that is a major determinant in the harm caused and, in their view, this must be controlled independently.

Another campaign group believed that reaction to aircraft noise is influenced, to a significant extent, by the number of noise events experienced. Therefore, maintaining a movement limit is critical to communities' confidence in any night flight regime. They added that the concept of managing noise at night, as distinct from banning operations, is strongly disliked and distrusted by many communities. They argued that communities are calling for a full 8 hour period of protection at night and called for night flights to be phased out over 5 years.

Industry responses often made the point that the current system has delivered on the objective of reducing the overall impact of night movements at the designated airports. However, given the significant advances made in aircraft technology and the introduction of quieter aircraft types, they felt it appropriate to look at re-balancing the ratio between physical movements and noise quota count to allow an increase in movements, whilst maintaining an acceptable overall level of noise. They argued that as we come out of the COVID-19 crisis, airlines need to recover and will have to manage their aircraft assets harder, and therefore maximum flexibility is required to ensure high utilisation of these aircraft within a managed noise profile.

Industry responses also tended to be of the view that blunt movement limit-based regimes offer no incentive to accelerate the introduction of new technology. Support was expressed for managing flights through a QC limit alone and allowing for additional movements within an overall reducing noise envelope. It was argued that this would in principle be the most effective way of incentivising quieter aircraft and driving down the number of people sleep disturbed.

Some industry responses were of the view that they would oppose any move to reduce the existing movement limits in the NQP or wider night period at the designated airports, especially as they believe it is possible to achieve growth in night flights within an overall reducing noise envelope to support existing unfulfilled demand. It was argued that if it can

be shown that the overall noise footprint can be decreased whilst the number of night flight movements increases, then there is no justification for preventing an increase in night flight movements.

Some industry responses did acknowledge, however, that movement restrictions in the most sensitive times of night might be needed for the foreseeable future. They recognised that the complete removal of movement limits would cause concern for local communities, who would perceive such a move as a lack of control. Another point made was that moving to a QC only limit would give neither the airport nor neighbouring communities any certainty about the total number of movements over any given night flying year.

Another industry response called for the QC system to be constructed in a way that incentivised the industry to invest in new, noise efficient aircraft. This response said this can be achieved by managing noise budgets in a way that shares the benefits of new technology between industry and community stakeholders, i.e. where some of the improvements in noise performance go towards reducing the number of people sleep disturbed and some go towards creating a growth pool as part of an '*environmentally managed growth scheme*'. They added that to implement more stringent restrictions by reducing QC limits to the latest recorded usage levels and removing all headroom would not be a constructive or balanced way of rewarding the aviation sector for its efforts to invest in noise performance improvements.

One industry response said that if a QC limit-only approach is to be seriously considered, then the government must consider support for research and development for quieter aircraft and new technology. The government should also consider the specific nature of express cargo operations to ensure they are not disproportionately impacted by the need to fly larger aircraft to carry the volume of cargo.

One Airport Consultative Committee was of the view that a night-time take off can be just as annoying to the community when it is a quiet aircraft as when it is a noisy higher quota count aircraft, this is just a question of degree of annoyance. Other ACC responses believed that a continued reduction in QC limits whilst maintaining the level of movements would encourage operators to utilise quieter and more efficient aircraft.

Another ACC expressed support for a combination of aircraft movement limits, noise quota and economic incentives to operate the quietest aircraft types, in order to control the number and types of aircraft flying at night, particularly in the NQP.

Responses from local authorities supported the continuation of movement limits, including an argument that in the absence of a movement limit, it would theoretically be possible for an airport operator to double the number of movements (say by operating QC0.25 instead of QC0.5 aircraft) and stay within a QC limit. It was said that this would certainly be noticeable to local communities. It was felt that movement limits have been the control mechanism that has actively kept noise levels down. It was argued that the movement limit should remain, as the health impact of noise comes not just from how noisy an aircraft is, but the number of times that a person is disturbed by that noise. One viewpoint presented was that given that the 'quietest' aircraft have a significant 60dB LAmax footprint, and so will disturb sleep, therefore a cap on movements is still required.

A Parish council argued that the economic case for continuing with night flights has not been proven and that health impacts should be weighed against any economic

advantages that night flights bring. A Borough Council called for significant reductions in QC limits to act as an incentive for the use of quieter aircraft at night.

Other local authority responses were supportive of a future regime that significantly reduced the number of aircraft movements at night through a phased approach, which would lead to significant health and well-being benefits for local communities and residents. It was acknowledged that any future regime would need to consider route viability, cargo requirements, connectivity and operational resilience, but this should not be prioritised over the health of residents.

Ring-fencing mechanism

We asked the following question:

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

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

Those community groups who support a complete ban on night flights were of the view that a ring fencing mechanism should not be necessary. However, if a night flight ban is not implemented then they believed a ring fencing mechanism should only be introduced if it reduced the detrimental impact on local communities.

Individual responses were also not supportive, with some suggesting that passengers should travel during the day instead. In terms of business general aviation, individual/community group responses suggested that more meetings are likely to be conducted online post the COVID-19 pandemic and suggested that in cases where travel is required for business this could be done during the day.

An industry group response argued that the current system works, where the independent slot coordinator is tasked to maximise the efficient utilisation of each airport's available capacity. This responder could see no reason to introduce fixed limits on an arbitrary basis. Support was given for the need to retain a contingency pool of slots at designated airports for the purpose of airport resilience. However, opposition was expressed to introducing a ring-fencing mechanism dedicated to balancing the needs of business/general aviation and scheduled flying. It was argued that such intervention would be likely to have negative unintended consequences.

Another industry response said that ring-fencing night slots at congested airports for business/general aviation would lead to a significant opportunity cost of not operating services with higher value to other users of aviation and the broader economy. It was said that ring-fencing would cause an artificial distortion in the market and lead to a less efficient use of capacity, as less capacity is allocated to routes where demand can be best served, with an overall impact of less connectivity and choice for most consumers across the designated airports. It was argued that business aviation gaining historic rights to slots at hubs where seasonal demand exceeds supply, would not be a positive step. It was argued that this would not be conducive to the most economically efficient use for these slots, especially where business aviation chooses to use a congested hub when there are alternative smaller airfields nearby.

It was noted that a number of local guidelines have been developed in accordance with Article 8 (5) of the Slot Regulation and agreed by the Coordination Committees to deal with specific scheduling issues at the designated airports. It was argued that this should be the first port of call to address any perceived issues, rather than introducing a dedicated and legal ring-fencing mechanism as part of the government's night regime. It was also argued that ring-fencing is inconsistent with the commercial freedoms that bilateral Air Transport Agreements confer on airlines.

Other industry responses said that it is important that airports manage their own business priorities/assets. It was argued that each airport should have the ability to determine the right mix for its operation and business model, and that it is for airline operators to make their economic case that taking a night flight slot would be of best economic value to the airport business and the local/national economy. Another response was of the view that current slot allocation rules are already in place, and these are designed to make the best economic use of available slots by any operator at any airport to ensure the maintenance of competitive market conditions.

Freight carriers did respond positively in support of a ring-fencing mechanism to ensure night slots are available. They made the argument that in the event of severe road traffic incidents or short notice closure of Eurotunnel the current night flight regime acts as a blocker for access to trade as it hinders uplift by air. Responses suggested the identification of a contingency airport in the South-East that could be made available to cargo operators at short notice without noise restrictions. It was argued that ring-fenced slots could be used to provide contingency and ensure the South-East of the UK remains accessible.

Another argument made was that it is important there is a ring-fencing mechanism in place to protect express and cargo operators. This is because airport operators might prioritise passenger flights (which potentially use less QC and are more valuable to individual airports due to passenger footfall), rather than express and cargo operators which play a more significant role to the wider UK economy and infrastructure. In the view of these respondents, this would ensure the QC system is a more holistic noise management system.

A business and general aviation trade association argued that business aviation adds over £7bn in output to the UK economy and expressed strong support for a proportion of pool night slots to be ring-fenced for use by ad-hoc services. In their view this would prevent slots being systematically and routinely used-up by over-running airline day schedules, owing to what could be regarded as an unrealistically planned high number of aircraft rotations per day.

Unused allowances

We asked the following questions:

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

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?

Individual and community group responses did not support unused allowances being carried over by airlines. They argued that there are already high levels of aircraft noise, particularly in summer months when more people sleep with windows open and would suffer more aircraft noise. They did not want to see anything adding to this with corresponding negative impacts for local communities. They argued that the approach to unused allowances does not benefit communities at all and is a demonstration of how the night flight regime favours the airports/airlines.

Some responses argued that the advice of health professionals is to reduce night noise and allowing unused allowances to be carried over would be going against this advice. Others noted that with the impacts of the COVID-19 pandemic, flight levels have been much lower and therefore suggested it would be unlikely that airlines should need these extra movements.

The industry viewpoint was that an airline should be able to use unused allowances later in the season, as there are inevitably times when scheduled night flights end up operating in the day (with quota allowances for planned operations going unused) and other times when scheduled daytime flights end up operating in the night (where access to surplus quota allowance is required for unplanned operations).

It was argued that airline planning is a complex procedure that is subject to a broad variability of external factors, and that operational resilience benefits from the flexibility afforded by the ability to use unused allowances later in the season. It was argued that the consequences of insufficient flexibility would be borne by airlines, freight delivery and the passenger. The point was made that important events and religious festivals such as Chinese New Year, Easter or Ramadan are not at constant times each year. Responses also suggested that passenger and cargo operators also experience peak periods in different seasons and the ability to plan effectively to manage these peaks is supported by the utilization of unused allowances later in the season, or into the next. It was said that the return of unused allowances to the airport's pool would mean all stakeholder groups would suffer from reduced resilience in the form of less reliable schedules.

One suggestion for change from industry, would be to consider the creation of flexible options for tapping into unused quota in circumstances where an unusual run of flight cancellations causes an excessive build-up of surplus quota, i.e. cancellations caused by prolonged strike action, forced airspace closures, political unrest, wars and terrorist activity closing airports and airspace, or sudden and severe downturns caused by global recessions and not to mention pandemics.

One local authority expressed the view that so long as the "banked" allocation was used during that same season, either by that airline or another one and not as carry-over, then there should be a neutral effect. A District Council felt differently, and believed an airline should not be able to use unused allowances later in the season stating that this might increase the number of night flights either in total or at specific times of the year.

A County Council considered that the purpose of future policy should be to minimise, where possible, flights within the NQP. With this aim in mind, they suggested that it

seemed more logical that if an airline had a service that was scheduled for the NQP but departed in the day, the 'banked' movement should then be returned to the airport and only utilised if necessary. The airport operators should be seeking where possible to minimise NQP flights, and banked flights should be reported annually. It was added that this would likely be viewed favourably by the local communities and local authorities.

Carry-over process

We asked the following questions:

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

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

Individuals and community group responses argued that the carry-over process benefits industry only and ignores recent research showing the harmful health impacts of disturbed sleep. They argued that this process impacts them negatively as it caused uncertainty and can lead to further noise disturbances particularly during the summer period.

Industry responses agreed that the current system of carry-over has benefits by providing a mechanism for flexibility. As aviation traffic trends change over time, there was support expressed for annual movement limits being preferable to rigid seasonal splits. It was felt that sufficient safeguards could be included to ensure there are no adverse consequences of moving to an annualised total. Some responses suggested an annualised limit, could run from Winter to Summer or perhaps November to October, with claims this would be much easier to administer than the current Winter/Summer split that is then carried over (and has a limit to carry over). It was said that having an annualised limit would allow airlines to manage their night movements/QC over a longer period, with more flexibility and a great ability to recover any overuse as an individual airline, potentially protecting the pool for other purposes.

Other industry responses were of the view that the current structure and percentage carry-over / overrun levels are proportionate and effective and are an important measure to ensure the smooth operation of the night flight regime, across seasonal boundaries, especially in managing changes in daylight saving time. Industry responses suggested that the carry-over process is seen as an essential feature that provides the flexibility required to plan and operate around variabilities in calendars, events, and demand from season to season. Daylight saving time changes occur at different times globally resulting in varying usage of allowances in a season according to the development of schedules to other jurisdictions. Religious festivals and events like the Easter holidays fluctuate across seasons meaning the associated impact on demand for flights also fluctuates across seasons. Industry responses also suggested there is benefit in carry-over flexibility to meet changing demand more generally and, in particular, in the establishment of new routes, or recovery from industry shocks, where frequencies of operation would typically build across seasons. It was said that if the carry-over process were to be restricted, a less flexible planning process would ensue with less certainty of operation.

An Airport Consultative Committee made the point that the carry-over allowance taken together with the number of night-flight dispensations that can sometimes be granted, can potentially add a significant number of extra night flights in a season.

One District Council said that they would like to see the carry-over and overrun arrangements phased out, believing that prolonged use of these both disguises and perpetuates higher summer limits which are not transparent, and which are not evident from the movement and quota limits set under the restrictions. They argued that certainty and transparency for local residents can only be achieved by absolute limits, which airport operators will be able to plan for in setting their schedules. It was said that if the new regime were to be longer than 5 years in duration, this would assist airport operators in their longer-term planning. This response also made the point that as Easter dates are known for many years ahead, they should be able to be planned for within existing and proposed QC and movement limits. A Parish council suggested that when setting the new regime, rather than all years having the same numbers, individual years could have their movement and QC limits adjusted to take Easter into account.

Another local authority described a disbenefit from the carry-over process being that it permits more than 100% use of the movement quota in some seasons, which translates directly into noise that otherwise would not occur. It was felt that the current carry-over process does not benefit local communities, who it was said want certainty and trust in the system.

GENERAL QUESTIONS

We asked the following question:

How fair a balance between health and economic objectives do you think our current night flight approach is?

Individuals and community groups tended not to believe the current night flight regime gives sufficient weight to the disbenefits night flights have on public health. Responses suggested this is a significant failure of government and that the balance is in favour of airports. Some suggested that the health of residents around airports/under flight paths appears to be of little concern to those regulating night-time aircraft movements. Some argued that recent research showing the health risks of disturbed sleep, for example, is not taken seriously and that no significant changes have been made to the night flight regime.

It was said that although there is a ban on QC4 rated aircraft movements, this only accounts for a very small percentage of flights and much more needs to be done to show that the night flight regime is fair.

One campaign group suggested that the polluter should pay, believing that communities should not have to experience noise so that aircraft can fly to generate income to then invest in reducing that noise. Another campaign group stated that they have seen no convincing evidence of the value of night flights and believe that industry claims on the wider benefits of night flights have been dramatically overstated.

Industry responses were of the view that policy around night flights should continue to follow the Balanced Approach to aviation noise and should recognise the important economic role that night flights play within the UK economy. They argued that, primarily, changes must follow the Balanced Approach, and past tendencies for population encroachment to negate improvements made by industry must be avoided.

Other responses were of the view that the existing framework of restrictions, and their evolution over time, has arguably struck a fair balance between maintaining the benefits of night flights within a sustainable transport network, and the reduction of environmental and health impacts. Support was again expressed by industry for environmentally managed growth where the benefits of new technology are shared between community and industry stakeholders.

It was stated that any future night flight regime should recognise that noise management cannot be considered in isolation. For example, flying noise abatement procedures can have the benefit of reducing noise in the immediate vicinity of an airport but can be far more polluting, generating greater emissions and increasing engineering costs by accelerating wear and tear on engines.

Responses suggested that the record of UK aviation in reducing noise impacts has been consistent and strong, and that the starting point should remain that operational restrictions should continue to function as a recourse of last resort. It was suggested that future night-time noise objectives or criteria for designating airports must explicitly reflect the ongoing investment in new technology and the strategic importance, operational function and the economic, social and health benefits of a flexible night flight regime.

It was said that night flights are essential to the UK economy and therefore must continue, albeit in a controlled way. Potentially significant societal costs from night flying, particularly from noise were acknowledged, but the benefits and costs of night flying need to be carefully considered in the context of the Balanced Approach.

Other industry responses suggested that future planning legislation and policy should seek to set out more clearly the importance of ensuring that the location of proposed non-airport related development, such as housing, does not adversely impact future occupiers or existing / future airport operations. Responses suggested that airports currently have no control over developments on their periphery, and called for planning guidance to be more robust and offer greater consistency on land-use. It was said this would also make an important difference in managing the number of people affected by noise both now and in the future.

One local authority response suggested that the current government approach seems skewed towards economic objectives rather than health objectives. A weighting towards health would imply an 8-hour NQP, rather than the current 6.5 hours. Others felt that the balance is currently very unfair, with what they regard as economics being prioritised over the health and well-being of local residents.

A Borough Council argued that the government's economic assessments of night noise are systematically underestimating the health impacts, and thus overestimating any net economic benefits. Whilst some District Councils acknowledged that night flights have economic benefits and that aviation will contribute to the UK's economic recovery, some did not agree with the preservation of existing night movement limits or noise quota limits and urged for these to be reduced to allow affected communities respite through the night period.

We asked the following question:

What are your views on the health impacts of aviation noise at night, including potential impacts on different groups in society?

Individuals and community groups tended to refer to different health studies and the World Health Organisation (WHO) Environmental Noise Guidelines for the European Region (2018) were frequently mentioned in responses. Responses noted that these guidelines strongly recommended reducing noise levels, and were put forward as a demonstration that large numbers of people are affected by lower levels of noise at night. Negative health impacts from aviation noise were referred to, including cardiovascular disease, high blood pressure, cognitive impairment, hearing impairments and mental well-being. Impacts on children's learning and school performance were also referred to.

An individual response stated that the growing acknowledgement of the damage caused by aviation to health needs to be reflected in any UK decision making in relation to night flights and called for a fully independent review (led by impartial health and environment experts) which would need to assess whether there are any valid reasons why there should be any deviation from WHO guidance in the UK situation. Another campaign group called for government to urgently conduct a thorough survey on sleep disturbance among residents subjected to aircraft noise at night, and to use the results when setting the next night flight regime.

Industry responses stated that they fully recognise that there are societal costs from night flying, particularly from noise, and that these are vital considerations in the Balanced Approach. It was felt that with the investment in quieter aircraft, health impacts would continue to be reduced.

Some industry responses were of the view that there is a lack of research into the current effectiveness of any interventions already in place and the effectiveness of any interventions proposed by this consultation, for example, the sensitivity of different hours within the night period. It was noted that there is a need for additional research into aircraft noise disturbance on health, particularly since sensitivity to the same noise is both highly subjective and deeply personal, i.e. reactions to the same level of noise by different individuals are highly variable, influenced by factors such as individual adaptation and habituation and the stage in the sleep cycle at which the aircraft noise event occurs.

Other industry responses believed it is also important to recognise and assess the positive health benefits of things like employment, travel opportunities and family/business connectivity afforded by the aviation industry and how this contributes to overall health impacts. Until such time as health impacts and health benefits can be adequately assessed, the view was expressed that the QC system remains the best available means of evaluating and taking account of aviation noise and night flying impacts.

Local authority responses were of the view that the health impacts of aviation noise at night are serious, with night noise being a major disruption to overflowed residents who live beyond noise preferential routes. It was argued that numerous studies have found a link between night flight noise, annoyance, stress and ill-health. It was felt that significant impact on the local communities in close proximity to airports is reflected in the quantum of complaints received at airports and local authorities.

It was suggested that productivity losses (from poor performance and tiredness) due to disrupted sleep are a direct and immediate economic loss. However, it was claimed that the most significant impacts could be the effects on children who live under flight paths, which could result in reduced learning, lower skills and qualifications, and therefore lower

productivity and income over their future working life, compared to what they could have achieved if they had been able to go to school well-rested.

An Airport Consultative Committee noted that sleep specialists recommend that people should sleep for 7-8 hrs per night on average. Therefore, to assess the impact of night flights, it was suggested that the whole night period needs to be assessed as well as the Night Quota Period. This response noted that the 48dB LAeq6.5hr contour for the NQP is a useful tool but said that it does not properly assess the impact of individual noise events (i.e. overflights), which at night cause the sleep awakenings/arousals. It was suggested that these events are best measured using the N60 (Number above) contours. Therefore, it was suggested that to assess the full impact of night flights on the NQP and also the whole night period (23:00-07:00), both the LAeq contour and the N60 contours (starting at the 10+ N60 contour) are required for both the Night Quota Period and the whole night period.

We asked the following question:

What are your views on the economic value of night flights, including the potential value on different businesses and aviation sectors?

One community group responded by saying that the crucial question should be examining how many night flights are important and then prioritising these to occur during the daytime.

An individual questioned how night flights impact the NHS in the longer term, suggesting it is likely that more people will have stress/mental health issues arising from night-time aviation noise disturbance. They also questioned how businesses are impacted through a loss of efficiency in their workers who suffer from disturbed sleep as a result of aircraft noise. These were described as unknown financial costs caused by night flights.

One campaign group questioned the economic value of night flights and argued that if the loss of productivity caused by sleep disturbance and the climate cost of the flights were factored into a cost benefit analysis then it seemed likely that night flights would actually have a negative economic value to the country.

An individual pondered how *essential* are night flights to the economy? They explained that there is an argument that if night flights are not essential to the economy they should not be allowed, given their downsides in terms of annoyance and health. They recognised this would be a radical departure from current policy but one they felt worth exploring. In terms of budget holiday flights, they acknowledged that these benefit the passengers who use them, and the operators, with probably some more limited benefit to the airports. However, this responder went on to add that it would be difficult to argue that there would be any significant economic loss locally, regionally or nationally if these flights were switched to the daytime. For freight flights it was suggested that the government should commission a study into how much of the freight needs to be carried overnight. This response did recognise that inter-continental night flights are valued by airlines and suggested an assessment be carried out about how essential these flights are to the wider economy.

Industry responses argued differently, setting out that night flights are particularly crucial and play an important role in connecting the UK economy with high growth markets around the world, maintaining the range and frequency of viable destinations served. They said

that early morning arrivals and late evening departures permit a full day's business in the UK and maximise the opportunities for those making flight connections. Furthermore, it was suggested that half of air freight value is flown during the night period (23:00-07:00), where the speed of delivery that air freight can offer is vital for a plethora of UK industries.

An industry response claimed that customer feedback showed strong demand and a preference for overnight flights from fast-growing Asian economies, departing before midnight and then arriving early into the UK for a full day of business or to connect to other flights. It was argued that the demand for night flights already exceeds existing available night flight capacity, and it was suggested that the government has a vital role to protect national strategic and economic interests and provide flexible aviation capacity to allow the UK industry to adapt to economic challenges.

Industry responses frequently referred to research conducted by York Aviation on the economic impact of night flying in the UK¹ which stated that the direct impact of night flying in 2019 was estimated to be around £1.4 billion in GVA and 24,200 jobs. It was stated these direct impacts, in turn, generate around £2.0 billion in GVA through indirect and induced effects and 38,700 jobs. If wider impacts are included, night flying in the UK in 2019 was estimated to generate a total of £16.5 billion of GVA and approximately 213,200 jobs across the UK.

Some industry responses suggested that UK night flight policy should support the development of a noise envelope which seeks to encourage and incentivise new technology and procedures while reducing impacts, rather than placing limits on flight movements. This would have the benefit of achieving the objective by limiting the impact rather than the activity.

Another industry response added that overnight delivery has become an increasingly important element in the global supply chain. Just-in-time manufacturing processes, lack of consumer patience to wait for goods, and time-and-temperature sensitive shipments such as pharmaceuticals and fresh produce, mean that air cargo is a crucial link in the transport chain. It was said that operating services at precise times during the night quota period allows for the timely delivery of business-essential goods and documents to customers across the UK. Responses added that in order to transport packages in time for next day deliveries, night flights are essential not an operational preference, and it was felt that to lose a cargo operation overnight would have detrimental effects both locally and nationally.

It was also highlighted that international trade does not operate in a single time zone, and that trade must operate 24/7 within an interlinked global transport network. Responses argued that night flights are a necessity for express carriers to support the continued growth of the 24-hour global economy, and that if Global Britain is to be successful then carriers have to operate not just by day but also by night.

The view of one District Council was that the economic benefits of night flights are always presumed but are not set out on a type-by-type basis. They suggested there needs to be a balanced assessment of the economic value of night flights against environmental effects and the establishment of a new post-pandemic baseline ought to be a good opportunity for this. From the Council's perspective, the starting point should be that any benefits which

¹ [The-Economic-Impact-of-Night-Flying-in-the-UK.pdf \(airlinesuk.org\)](#). Published in July 2021.

have accrued to local communities from reduced night flying over the COVID-19 pandemic period should be captured into a new regime.

Other local authorities were also not convinced of the economic benefits of night flights and called for substantial evidence to be produced by government to support the case for night flights and then weighed against the significant impact on the health of residents living closest to airports.

It was suggested that documents published by industry, who had a clear interest in the matter, are not a substitute for robust, disinterested research commissioned by government, and with the confidence of all parties concerned.

GENERAL QUESTIONS

We asked the following question:

What are your views on changes to aircraft noise at night as result of the COVID-19 pandemic?

One campaign group stated that due to the COVID-19 pandemic many businesses have seen the benefits of conducting meetings online instead of travelling abroad for in person meetings. Thus, they believed levels of business travel will remain low post-pandemic and so demand for night flights could reduce dramatically. It was also felt that there would be a lower level of travel generally. Communities argued that this should result in all flights taking place during the day to reduce the negative health impacts on local communities.

Another campaign group stated that with no certainties about the pace of recovery, it is likely that there could be significant delays to airlines placing new orders for aircraft or exercising options for additional deliveries. Given these uncertainties, it is difficult to predict future technological advances and therefore it was suggested that the government must take a cautious approach.

Industry responses recognised that communities have become more used to less flights (both during the day and night) owing to the COVID-19 pandemic, and therefore when flights resumed said there is likely to be a large community impact which will require additional engagement from the sector and government support for aviation.

Industry responses mentioned both COVID-19 and Brexit as both extraordinary circumstances that underline the importance of maintaining strategic flexibility to protect national interests and provide flexible aviation capacity as the UK economy adapts to any economic challenges. It was argued that aviation's recovery from the pandemic and response to a post-Brexit economy will be volatile and is likely to take several years. It was said that it is not yet possible to fully comprehend how this will adapt the way people live, work and travel in the short or long term, as the industry enters the initial phases of meaningful recovery. It was suggested that the timing, speed and degree of any policy changes will need to reflect this economic reality.

Responses noted that the air freight industry has provided a vital lifeline during the COVID-19 pandemic, with timely PPE and pharmaceutical deliveries, alongside the transportation of vaccines, and general cargo during an unprecedented period of disruption to global logistics. In addition, it was noted that the pandemic has led to an increase in e-commerce, with more people buying online and expecting next-day delivery. It was also said that air

cargo plays a vital role in the long-haul aviation market, with many routes made economically viable through a combination of cargo and passenger markets. Some responses anticipated that the aviation sector will not fully recover until 2024 at the earliest, and therefore needed government support and flexibility to support recovery and changes in consumer behaviour.

Industry responses also said it is crucial for government to be mindful that increasing regulatory burden on the aviation sector will hinder the UK's economic recovery and share of global trade, as well as progress in delivering a cleaner and quieter aviation sector. They added that without night flights the government will not be able to deliver its Global Britain ambitions, and further restrictions would place the UK, and UK businesses, at a competitive disadvantage.

One Airport Consultative Committee noted that the COVID-19 pandemic had resulted in a rise in online shopping with the public expecting a next day delivery. If goods are to be supplied the following day, a 24/7 service appears to have become the norm and fulfilling a public expectation. As such this would be a major barrier to introducing a total night flight ban.

Other Airport Consultative Committee responses noted the significantly reduced airport operations as a result of the COVID-19 pandemic, which had seen a large reduction of night movements resulting in a much improved night noise climate. It was noted that residents have become accustomed to the quieter skies, and as night flights return it is likely that people will be more sensitised to the noise of overflight leading to a disproportionate increase in the stress of those under the flight paths due to an increase in those negative feelings.

The catastrophic impact the COVID-19 pandemic has had on the aviation sector with many airports facing extremely challenging times given the significant downturn in operations, the various lockdowns and ban on international travel, with the ripple effect of the downturn being felt across wider regional economies was also noted. Responses said that the desire to rebuild aviation swiftly and efficiently must not however be at any cost and the opportunity should be taken to review sustainable growth measures.

A Parish council answered that the pandemic has provided a silver-lining in the form of the advantageous effects it has had in terms of residents enjoying enhanced sleep and an increase in air quality. They added that wildlife has also benefitted, mentioning that bird life had become more noticeable. With many businesses discovering alternatives to air travel, such as video conferencing, the council believed it is inconceivable that traffic volumes would return to pre-COVID levels, which they claimed destroys the case for night flights in the future. They called for the government to act to ensure the benefits felt by residents during the pandemic in respect of night noise are retained in the future.

GENERAL QUESTIONS

We asked the following question:

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?

One campaign group stated that a 10 year time frame is not enough to develop the technology needed to make a meaningful difference in reducing night noise, e.g., electrification and hydrogen-based technologies will not have an impact on noise levels until the mid-2030's at least.

However, some community responses recognised that there may be some benefits as aircraft develop and older noisier aircraft will be retired from passenger service. These responses added this will only have a beneficial impact if these older aircraft are not then re-used for freight traffic instead.

One campaign group suggested that the focus of government and industry is currently on emissions reduction with noise appearing to be less of a priority.

Industry responses referred to significant progress made by the aviation sector in reducing the noise impact of aircraft and spoke of projected ongoing reduction in aircraft noise towards 2050. It was said that where the number of people affected by noise has increased, this has been due largely to the growth in population within the (shrinking) noise contours. Whilst technology has and will continue to drive down aircraft noise, industry believe that to date there has been insufficient controls on local planning which has meant efforts to reduce the impact of noise on communities has been undermined.

It was felt that evolution in aircraft design and technology and smarter solutions through collaboration will continue to drive down aircraft noise. It was said the newest aircraft on the market have on average, a noise footprint that is 30-50% that of the aircraft they are replacing thanks to engine and airframe noise research, technology, and design. It was stated that the latest generation aircraft such as A320 NEOs, B737 MAXs, A350's and B787's, will become increasingly prevalent over the next 10 years and will continue to lead to an improvement in noise around airports both during the night and during the daytime.

The modernisation of airspace was also referred to in industry responses, and it was said this will unlock further innovation in operating procedures to reduce noise, including routes designed to enable aircraft to avoid noise sensitive areas and offering new opportunities for respite.

An industry response suggested that ultimately, the most effective thing that government can do to incentivise the use of quieter aircraft is to put in place the conditions to facilitate growth.

An Airport Consultative Committee response expressed hope that the modernisation of airspace coupled with the development of quieter aircraft will bring noise benefits for local residents. They added that it remains vital that the number of night flights is confined to the absolute minimum and not allowed to increase.

A District Council said that it is difficult to say with any certainty, but in their opinion there seemed to be no emerging technology that will make any real difference to aircraft noise signatures other than minor developments on flaps and undercarriages. They believed new propulsion technologies are likely to take longer than 10 years to become operational to any degree, so what will be locked in will be benefits from new generation aircraft coming onstream within that period. They added that emerging navigation techniques such as PBN could change noise signatures depending upon the solutions that they enable, such as "concentration versus dispersal" of flightpaths.

Another Council recommended that emerging policy seeks to promote improved noise and energy efficient aircraft for freight and cargo operations, given that these operations are more frequently used at night, often with older and noisier aircraft.

DESIGNATION CRITERIA

We asked the following questions:

Should the government set criteria for airport designation?

What do you think are the:

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

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

How should any criteria for designation be agreed?

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

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

What impact, if any, do you think the de-designation of an already designated airport (Heathrow, Gatwick, Stansted) will have on:

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

Community groups responded favourably in seeing advantages to government setting criteria for airport designation, tending to regard this as a way of bringing stricter controls on airports. One campaign group argued that designation should be based on the number of people impacted by aircraft noise, and this should also cover noise from ground operations. Community groups were of the view that designation should be accompanied by robust effective arrangements for the regulation of aircraft noise.

One individual suggested the factors to be considered when setting criteria for designation should be aircraft movements / aircraft movements at night / population. Other individuals stated that the government should set targets for noise reductions at airports, and airports who fail to reach these targets should then be designated and have reductions enforced by government.

Another individual suggested the following criteria:

- The number of night flights using the airport
- The type of flights using the airport (their QC value)
- The number of people impacted

- The ownership of the airport – any airport which is owned or part-owned by the local authority and which has more than 50,000 movements (day and night combined) a year, should be designated to avoid a potential conflict of interest

One campaign group remarked that opportunities for local authorities to impose a regime or controls to limit night noise arise infrequently, usually when airports submit planning applications. The campaign group believed designation criteria should be flexible, take into account the views of communities, and should only be set where local planning authorities, users and communities cannot agree on noise abatement procedures.

De-designation was generally not favoured in these responses. It was suggested that de-designation of an airport would receive such widespread and prolonged media criticism that it could not be sustained. One campaign group suggested that were de-designation of an airport to be considered, this should be on a temporary basis initially, with an opportunity for the decision to be reviewed after a pre-determined period of time.

Industry responses were of the view that in general, decisions are best made at a local level – and that no two airports are the same. In following the Balanced Approach, a one-size-fits-all approach would not be an appropriate response to addressing a specific noise problem when assessing the individual characteristics of the airport concerned. Some responses also recognised that airports are nationally important infrastructure, and suggested it is right that the government should continue as the competent authority setting noise objectives and measures, and for the Secretary of State (Transport) to continue to have oversight and accountability for decisions that determine night flight policy, and in particular operating restrictions in line with the Balanced Approach.

Industry responses were of the opinion that any criteria for designation must be developed in consultation with the airport and operators concerned, together with local industry, planning authorities, communities and airport consultative committees. Should there be criteria for future designation of airports, these would also need to fully reflect the strategic importance, function and economic value of night flights.

Another industry response was of the view that airport designation guarantees certainty and transparency with the local community on the night flight regime and supports long term planning. The response suggested there should also be flexibility to those airports that wish to become designated and for this to be considered on a case-by-case basis. This response said it is important that any criteria for designation are clear and objective – and that the airport's own view is one of the criteria. Other criteria may include issues such as the number of people affected by noise or possibly the strategic/economic importance of that airport's movements to the UK. However, the response added that those who have agreements with their local authorities, and good working relationships with them, should be able to continue to work with them to have a locally tailored night flight regime. It was felt that local solutions present the best way to tackle noise issues, and that designation / a national approach should be a fallback position.

It was suggested that there should be flexibility and a clear process for those airports that wish to become designated to follow and apply for. It was said that there are circumstances where designation of an airport could help with what a local community may regard as a conflict of interest where an airport is owned by a local authority which also sets the local planning conditions for the airport.

Another response supported clear and defined rules and criteria to be implemented and published to demonstrate how designation had been determined and therefore which airports fall under the designated category. The following factors for consideration when setting criteria for designation were suggested:

- size of the airport - in order not to add unnecessary regimes and policies that require heavy administration, consideration should only be given to airports of a substantial size.
- local area/likelihood of impact on community - consideration should be given as to the location and situation of an airport and whether night noise is a cause for concern or needs pro-active management and administration.
- current levels of flying / type of flying - if the current profile of flying is fairly limited in terms of the movements at night, or perhaps this is mostly regional/commuter traffic on smaller/quieter aircraft then the airport will not benefit from any added complexity.

One response made the point that a national night flights policy which could mandate a QC system at regional airports could greatly hinder investments that have already been made in airport facilities and could cause a loss in confidence in the UK for further investment. Another response said that a single national policy that treats airports the same makes no sense and in order to abide by the Balanced Approach, noise regulation and policy should be bespoke and based on the individual needs of each airport.

Another response felt it important that non-designated airports maintain the flexibility to set limits which suit their local circumstances. There could be potential benefits and disbenefits from airport designation. Potential benefits from designation included a unified approach to noise regulations. Potential disbenefits from designation included noise regulations struggling to fully address changing local circumstances, and the inability to vary policy to best respond to those local circumstances.

One response argued that were a regional airport to be designated then much of the flexibility that currently benefits both the airport and local communities would be lost and instead the airport would be forced into a “one-size fits all” approach.

Noise Action Plans were referred to as generally the best way for night noise controls to be determined where it is possible to do so, with additional engagement, if required, through elected Airport Consultative Committee representatives. It was said that government should retain power of approval in all cases and the backstop of designation and direct central control in exceptional (defined) circumstances, recognising that airports are nationally important infrastructure.

Regarding the impacts of the designation of an airport, we did not receive much in the way of a response to this question. However, there was an opinion given that designation would demonstrate to a local community that night noise was being effectively administered and controlled.

On impact to airports, it was suggested this would depend on the size and scale of the airport, especially in terms of how slot co-ordination would be fulfilled. It was said that if smaller, currently, non-designated airports were to become subject to a night regime, co-ordinators would need to be instructed to co-ordinate the airport, potentially reducing flexibility at the airport and adding unnecessary bureaucracy in the allocation of slots at that airport. For airport users and airlines, it was felt this may create instability in schedules

if current schedules cannot be fulfilled, many of which will be linked to historic slots at outstations / down-route airports. It would also make schedule changes, updates and evolution of programmes challenging versus the scenario today. From a consumer perspective this would limit the number of options and routes available, which could potentially affect access in and out of regional parts of the country.

For businesses in and around airports, it was suggested that if the designation brought restrictions, then businesses that rely on and benefit from the airport could see a negative impact, with potential reductions in the number of flights and aircraft based at that airport. It was stated that regional airports are very sensitive to fluctuations in demand and often compete against bigger hub style airports for business, however, they offer regional connectivity, local economic benefits and employment.

Responses from Airport Consultative Committees tended to advocate finding local solutions to local problems. It was felt that the existing designation arrangements for Heathrow, Gatwick and Stansted have generally worked well by setting controls. As such these have provided some reassurance to local residents and these controls have been set independently of the airport. It was said that should the government decide that further designation for noise purposes is needed at other airports, it would be important that proposals be considered on a case by case basis where local solutions have not proven successful in effectively managing the noise climate and where the planning system does not effectively capture noise control, abatement and mitigation. It was felt that it would not, however, be appropriate to have “a one size fits all” approach to designation.

Responses were clear that it is important that there are robust criteria in place against which cases for designation can be assessed, and which take account of local variations. It was noted that there is a need to ensure that any proposed restrictions on night flights do not displace such flights from one particular airport to another, or from a designated airport to an undesignated airport. It is also important to note that in many cases the local planning authority for an airport may not necessarily cover those areas and residents most affected by the impact of aircraft overflight and noise. This may result in conflicting opinions on the benefits and dis-benefits of night flights in the wider area around airports.

One response from an ACC noted that in practice a number of airports use the night flight restrictions set by the government for the designated airports, as the background for setting their own local night restrictions and evidence suggests that these arrangements function well. Night flights at UK airports vary considerably and it would seem best that control should continue to be managed locally. This response added that if significant problems arose at a particular airport, consideration might be given as to whether designation would solve the issue. This apart, it would seem best to confine designation to the existing three airports and not seek to designate other airports.

Another ACC also said that they would prefer to see the delivery of noise controls being made locally, rather than through a more national approach which could involve a levelling down of the details.

Regarding de-designation of an already designated airport, one ACC was concerned that in the absence of government control the question would arise as to who would then be responsible for setting noise restrictions. If these were to be set by the airport, this could cause suspicion amongst local residents that any restrictions were set to suit the airport's economic and operational interests. If responsibility were given to the local planning authority, there would be a question as to whether that local authority would have sufficient

resource and expertise to set and manage restrictions, especially as it is understood that many local authorities are facing significant financial challenge.

Local authority responses were somewhat mixed. One local authority said that any proposals for the designation of other airports would need clear grounds and a degree of pragmatism. It was noted that at many smaller airports, noise is already locally managed via discussions with communities.

A Parish council expressed support for the government setting criteria for airport designation, which they said needed to be clear and consistent so that a set standard is applied across the board. They claimed the current regulation is unsatisfactory. Factors to consider when setting criteria for designation should include the size of the airport – both in terms of flight numbers and passenger numbers – and the strategic importance of the airport and the emissions and other climate impacts of aircraft using that airport.

One council believed that given airport designation is based around protecting the local population's health from night noise, in their view any airport with more than 1,000 people within the N60 >10 noise contour for the night quota period (23:30-06:00) should be considered for designation.

Another council said that they would welcome set criteria for airport designation, as it provides an appreciation of why an airport may/may not be designated. This would be helpful to local authorities that have airports within their administrative boundaries that are not designated at present, as the criteria would provide an understanding to the local population of why their airport is undesignated. The ambient noise of the locality was also suggested for consideration as part of future criteria, along with the strategic importance of the airport to the UK economy, the number of night flights and the size of population / number of properties affected by night flights.

Regarding the de-designation of an already designated airport, one local authority feared that in the absence of a suitable replacement scheme, de-designation could have a potentially disastrous effect on communities. A Parish council used the word "catastrophic" to describe the effect that de-designation of their local airport would have on their community. Without designation, it was feared that all regulation would disappear allowing aircraft to fly anywhere at any time. They argued that the government should not be considering de-designation but rather should be working towards a future of no night flights.

Another District Council believed de-designation should only be considered if the government first put in place effective arrangements for the regulation of aircraft noise. They expressed a concern that de-regulation could lead to a significant increase in night flights, noise, and the consequential health impacts felt by local communities. They added that it is also important to highlight that the impacts of night noise are not always felt by communities and residents in the same authority boundary as the airport itself, and therefore de-designation may lead to conflicting opinions between authorities on the benefits and impacts of night flights.