

# ANNEX D: Summary of consultation responses – night-time noise abatement objectives

This consultation launched on Monday 27 March 2023 and closed on Tuesday 9 May 2023.

The consultation asked questions about the same night-time noise abatement objective for each of the three noise-designated airports (Heathrow, Gatwick and Stansted), receiving a total of 113 responses via the online smart survey.

A further 306 responses were received by email, along with 5 responses via the post, making 424 responses in total.

## **Heathrow**

**We asked: To what extent do you agree, or disagree, with our night-time noise abatement objective for Heathrow Airport?**

**“Whilst supporting sustainable growth and recognising the importance to the UK of maintaining freight connectivity, to limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life.”**

Of individual respondents who completed the online smart survey and expressed the view that they strongly disagreed with the proposed objective, the common theme was disappointment that the current wording fails to put first the health and well-being of the local communities around the airport.

Individual respondents argued that the primary focus should be the impact on families living under flight paths, with some calls for a complete phasing out of night flights between 11pm and 7am, or from 10pm to 8am, in order to prioritise health and well-being from a good night's sleep. The point was made that noise is deeply distressing at any time, but especially at night and that aircraft can often be delayed and that there are repeat offenders for this.

A fear expressed was that the proposed objective would substantially reduce community protection from aircraft noise at night by facilitating an increase in the number of flights permitted to operate in the night period. Others expressed disappointment that the

proposed objective did not set clear targets to reduce aircraft noise at night or establish a basis on which such targets could be set.

One campaign group said that the objective ignored the wider environmental, economic, health and community impacts of night flights, such as the emissions generated and local transport congestion and noise. They argued these should be factors in any consideration of future night flight limits. Another campaign group argued that the balance between the aviation industry and community is biased in favour of the former and that the polluter pays principle has been ignored. They argued that there is strong evidence that sleep deprivation is harmful and that the objective ignores this and fails to justify an incremental economic benefit from night flights, when in the case of Heathrow, the passenger traffic could be deferred until the day.

Of those individuals who disagreed with the proposed objective, it was said that the objective should be primarily focused on providing quality of life and well-being to those who are affected by airport noise and limiting the number of night flights rather than just looking to reduce their impact. Others said that economic and business considerations should not be prioritised above the health and well-being of local communities. The view expressed was that the proposed objective implied that growth and freight connectivity are more important than health and quality of life considerations. There was also a call for sustainable growth to be defined, with the point made that sustainable growth is certainly not growth that negatively impacts on the well-being of health and quality of life in a local community.

One local authority response expressed disappointment that there were no details on how a growth in night-time operations will be balanced against negative health and social impacts and the costs and benefits assessed. They added that this may well be dependent on the findings of the various research projects currently underway, in particular on how travel preferences may have changed as a result of the COVID-19 pandemic, the Aviation Night Noise Effects (ANNE) study and review of existing evidence underpinning the WHO guidelines on noise and new evidence and how these will be incorporated into Transport Analysis Guidance (TAG) appraisals. Given that these studies have yet to conclude, this respondent felt it would be premature to finalise any new night-time noise abatement objective(s) and metrics before they have reported, and the full nature of adverse effects on health and quality of life and the most meaningful forms of abatement are better understood.

They added that the proposed wording for the night-time noise abatement objective highlights the importance of freight connectivity, but it is not clear if this applies just to freight-only flights at night. They noted that Heathrow is an important national freight port, but the airport has relatively few dedicated freight-only flights and operates a voluntary ban on scheduling cargo flights between 23:30 and 06:00. The local authority stated that they would not wish to see Heathrow backtrack on this operating restriction.

There were some responses in favour of the objective, with one respondent noting that a balance has to be struck between the economic benefits of night flights and the wider community that is impacted by them.

Email responses on this question, included one from industry which, whilst welcoming progress on the objective, made a number of recommendations, including that the objective needs to include “passenger air services and freight connectivity” to ensure that

the economic value of critical business and corporate travellers from night flights is incorporated. This response also encouraged the government to set out their desired outcome or ambition statement, expected outcomes and to ensure various 'control' datasets are in place to make tracking night flights' impacts and opportunity a fair test. The response added that further restrictions on night flights risked putting the UK at a competitive disadvantage, and said that in the long term, it is critical that the government commit to a regular in-depth assessment on the economic value of night flights to measure their value to the UK economy.

This industry response was of the view that the proposed objective places a negative connotation on quality of life suggesting that all the effects of aviation noise will be 'adverse', and that this does not allow for quality of life benefits to be recognised and measured as part of the target and therefore misses an entire cohort of data, for example, jobs for local residents due to night flights. It was suggested that "to limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life" be changed to "enhance the quality of life effects and reduce health impacts of aviation noise at night".

The response also called for a short explanatory note to accompany the objective, setting out what the government sees various terms such as sustainable growth and quality of life to mean. There was also a call for the government to plan to make allowance for changes in population due to housing development under the flightpath, with any increase in health or quality of life impacts resulting from what was described as "inappropriate development" needing to be discounted in some form in any assessment.

On metrics, this industry respondent noted their complexity and suggested that they not be selected on the basis of this consultation alone, but recommended that further discussion with all stakeholders should take place. It was suggested that government could explore several metrics annually, including connectivity, destinations served, and freight and cargo tonnage to measure sustainable growth; and explore potential indicators of quality of life, sleep disturbance and mean annoyance to measure health.

Other email responses on this question included one from an individual who referred to late departures from Heathrow impacting on sleep regularly, and who called for a mandatory ban on night flights at all south-east airports from 11pm to 7am.

Another individual response noted that it is well documented that sleep disturbance can have a negative impact on physical health. They stated that the new night flight regime must set legally binding targets to reduce the impacts of aviation noise on the greatest possible number of people and improve the monitoring and enforcement of these targets relating to Heathrow. They described the proposed objective as "substantially diluted", saying it is not enough to "limit" the impact of aviation noise. In their view, any increase in activity from Heathrow must be met with commensurate, legally binding targets to reduce the adverse effects of noise. They added that following the conclusion of the ANNE study, DfT must establish the likely health impacts of night flights and set statutory targets to reduce these impacts.

A response from a campaign group felt that the objective appeared to downplay the serious negative health impacts caused by aircraft noise at night. In their view, this should have been placed as the central tenet of the objective – to reduce the harm caused. They argued that a policy objective should have a clearer commitment with measurable

outcomes so that success of interventions by airports and airlines can be determined. They added that it is not clear why there is a need to include references to “sustainable growth” and “maintaining freight connectivity”, as it was suggested that these are covered by a multitude of other policies and do not need to be included in a noise abatement objective.

Another campaign group argued that the proposed objective did not give sufficient weight to the disbenefits of night noise to public health and felt that the proposed objective continued to place the balance very much in favour of the airport and airline operators. They expressed the view that research demonstrating the negative impacts of noise and disturbed sleep is well-known and must be the leading factor in the objective which is set. They feared that the proposed objective could allow unconstrained growth in night flights that would have significant community impacts. This response described the economic benefits of night flights as extremely questionable and argued for the objective to be balanced in favour of health impacts to those who are impacted by aircraft noise at night.

A response from a local authority said their position on night flights at Heathrow is that there should be a compulsory scheduled night flight ban for a minimum period between 2230 – 0600. In their view, the primary basis for setting the objective should be evidence and fact-based, and they did not support the objective being finalised until investigations such as the ANNE study have been completed and reported to the effected communities.

Another response from a grouping of local authorities described the introduction of “where possible” as a weakening of the balance struck in the previous objective. In their view the new wording introduces an acceptance that growth in night flights can or indeed should occur – a tilting of the balance in favour of economic objectives over social and environmental impacts. This response also described the tool of population number / noise contours as providing a valuable longitudinal measure of noise impact and progress made to reduce impact, which relates well with the land use planning regime, and the design of noise insulation measures and so this tool should be retained and referenced. It was noted that Heathrow has relatively few dedicated freight-only flights and operates a ban on scheduled freight-only flights in the Night Quota Period (23.30 – 06.00). This response could see no case to raise any expectation that this ban would be relaxed and called for the objective to distinctly address passenger and freight effects at local and UK levels and be framed in the context of overarching Climate Change objectives.

Another response expressed the view that significantly reducing the impacts of night flights needed to be the core policy objective – simply limiting them will not deliver the improved public health outcomes that local communities deserve. It was added that there can be no justification for any approach that would result in an increase in the numbers exposed to noise, nor would it be consistent with an approach which sought to reduce (or even limit) the impacts. This response welcomed the commissioning of studies to further understand the detrimental impact of night flights on local communities but was of the clear view that there is already ample research on which to base a meaningful policy which addresses this serious health issue. The response was of the view that WHO Environmental Noise Guidelines are clear that 40 dB L<sub>night</sub> should be treated as the key threshold for night noise to avoid adverse health effects.

**We asked: Would alternative wording be preferable for the night-time noise abatement objective (for Heathrow Airport)?**

Individuals who responded via the online smart survey, tended to express the view that the wording used did not have the correct focus on people and well-being, and that starting the objective with the general caveat referring to "sustainable growth and recognition of maintaining freight connectivity" gave the wrong impression and genuine intention behind this objective, which should be how to reduce noise and associated improvement of quality of life and health of citizens affected by night-time noise on a daily basis. It was also argued that the words "where possible" remove any obligation and should be cut, with the view that Heathrow and the airlines operating out of it should be required to take measures to minimise the adverse effects of aviation noise on health and quality of life. The view was expressed that there are far too many late-running planes in the night shoulder and early morning period at Heathrow preventing people sleeping. The objective as drafted was also described as too vague, and there were calls for terms such as "sustainable growth" and "health and quality of life" to be defined.

A campaign group gave the view that night flights should be banned at all UK airports for a full eight-hour period each night, other than for emergency or humanitarian purposes. They argued that if a ban is not implemented there should, at a minimum, be a formal presumption against night flights, given the known harms they cause. There should then be a burden of proof on the industry to demonstrate that any night flights can be justified. Operators should be required to satisfy a test of "critical necessity" for any services they wish to provide at night on an airport-by-airport and service type-by-service type basis.

Another campaign group argued that the objective should include a clear and robust mandate for night noise to be reduced. In their view, the current objective and proposal in the consultation for 'balance' would benefit from greater clarity and specificity. They added that noise abatement objectives need clear targets and enforcement rules to ensure that best practice is followed in reality. This response argued for a reduction in night noise, using a range of noise metrics for assessments including the number of noise events and perhaps the number of awakenings to be included in the objective.

One campaign group questioned the focus on freight and were of the view that the reference needed to be to aviation or to air service connectivity generically.

There were a small number of views expressed that there should be less emphasis on environmental and noise concerns, and more emphasis on connectivity, new jobs and freight capacity.

**We requested: Provide alternative wording on a night-time noise abatement objective.**

Suggestions made via individuals or community groups tended not to include the reference to "where possible reduce", instead calling for "further limits to" and for "reduction to" aviation noise at night, generally through calls for stricter noise limits and operating restrictions during the night period. There were also calls for the objective to reflect work towards a total ban on night flights, or for targets to be set to phase out all night flights at Heathrow over the next night flight regime, and for an 8-hour night flight ban between 11pm and 7am to apply to Heathrow with effect from 2028.

A response from an environmental group called for the objective to avoid, prevent or reduce on a prioritised basis the harmful effects of aircraft noise at night; to ensure that services at night are only provided if there is a conclusive economic case for them (having

considered all available evidence and taking a precautionary approach in relation to their adverse impacts) including that they are of critical necessity, that they could not be provided at less harmful times of day, and that they could not be satisfied by other means; to ensure that flights at night are priced at levels that incentivise flying at less harmful times and that reflect their full costs to society on all occasions in line with the polluter pays principle; to ensure that total aircraft noise and noise impacts at night are reduced progressively and materially at all times and against clear time phased targets; under no circumstances shall there be an increase in the number of permitted aircraft movements during the night noise period.

Other responses included calls for the objective to also reference climate change and other environmental harm, in addition to noise. A response from a County Council called for the objective to include a commitment to implement a ban on scheduled flights for a 6.5 hour period between 23:00 and 07:00. They added that any growth in night-time operations should be conditional on there being a balance between the local and national economic and consumer benefits of night flights, both in terms of passenger and freight operations, and the social and health implications.

There was a response which called for the objective to recognise that aviation connectivity is important to the UK economy and that the government's clear intention that any growth should be provided as sustainably as possible, in order to minimise the adverse effects of aviation noise at night on sleep disturbance, health and quality of life. This response suggested that the aim at Heathrow should be to encourage the use of the quietest available aircraft at night and where reasonably possible reduce overall noise emissions relative to those pre-COVID.

Another response from a local community group suggested that the objective should look to reduce the harmful effects of aircraft noise at night with a specific focus to reduce the number of people experiencing 10 and 20 movements over 40dB, 50dB and 60dB L<sub>Amax</sub>.

### **We asked: How should the proposed night-time noise abatement objective for Heathrow Airport be assessed to ensure it is successful?**

Individual responses via the online smart survey, tended to call for total aircraft noise and noise impacts at night to be reduced against clear targets. Various suggestions received included to increase the number of hours where there are no take-offs or landings throughout core night-time hours (2300-0700); to widen the ban on aircraft which are not allowed to take off and land during the 2300-0700 time period down to QC1; to reduce or remove the need for flights to be held in stacks on arrival during the 2300-0700 time period.

There were suggestions for an objective to be "SMART" - Specific; Measurable; Attainable, Realistic and Time-bound. There were also calls for metrics to fully reflect the health and quality of life impacts, and for metrics to be based on adopted WHO guidance. Further responses suggested metrics on decibel levels in residential areas between 8pm and 6am and the decrease/change in NHS patients for ailments related to noise pollution.

A number of respondents said that the frequency of aircraft overflight is a factor in noise disturbance and the N60 >10 metric should be used to provide an indication of the number of people exposed to at least 10 events each night where the noise level exceeds 60dB.

Others called for a commitment to reduce the size of the area experiencing more than 20 noise events above 60dB.

A Parish council made the point that average noise levels do not capture the disturbance that a flight makes to individuals, particularly in rural areas where there is little background noise. They argued that noise levels should be assessed relative to background noise and if it exceeds a specified (low) threshold, then the flight is likely to be causing disturbance to the community.

Email responses to this question included a local authority response recognising that the use of population number / noise contour provides a valuable longitudinal measure of noise impact and relates to land use and the planning regime and should be retained for this purpose.

### **Gatwick**

**We asked: To what extent do you agree, or disagree, with our night-time noise abatement objective for Gatwick Airport?**

**“Whilst supporting sustainable growth and recognising the importance to the UK of maintaining freight connectivity, to limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life.”**

Individual responses received via the online smart survey from those who strongly disagreed with the objective, generally called for residents' health to be put first before the commercial gains of aviation, and for night-time aircraft noise to be eliminated altogether, not merely 'reduced'. The point was made that the allowance for night flights at Gatwick is already considerable and it was suggested that this should be reduced, and landing fees increased to reflect the health implications of night flights. Responses referred to night-time flights resulting in broken sleep patterns, causing serious deterioration of people's health with resulting increased pressure on the NHS. Another response of this type focussed on the objective seeming to disregard the fact that the problem is not simply aircraft noise. They argued the problem is the difference between the noise generated by a single aircraft and ambient noise in that position. Another response was of the view that the objective does almost nothing to require Gatwick to alter its patterns of flights in order to reduce the number of times that residents are disturbed.

One individual respondent who also disagreed with the objective, suggested something more precise is needed, and suggested the wording of the objective should be that the overall noise dose must be reduced from current levels, with specific targets for this. They went on to say that at present only the noisiest category of aircraft are banned from flying at night at Gatwick, and that instead government could and should mandate that only the quietest planes can fly at night, for example QC 0.5 and below. In their view, this would immediately have a benefit to society and send a clear message to the industry that the momentum of travel is one of reduction.

A campaign group argued that the objective failed to take seriously the increasing evidence, from WHO and others, that night noise from aircraft has very serious health consequences for impacted people and needs to be drastically reduced. They gave the opinion that, as drafted, the objective facilitates an increase in the number of flights permitted to operate in the night period. They were also of the view that the objective makes an unsubstantiated assumption that freight connectivity can only be maintained

with night flights. They argued that whilst day-time slots are available there should be no need for night freight operations.

One local authority response via the smart survey described the objective as unacceptable because in their view it shifted the balance towards the economic/business case to the detriment of local communities impacted by night-time noise. Another local authority response stated that the wording of the objective did not give sufficient weight to the need to control the impacts of night flights. A response from a Parish council described the use of 'where possible' as 'non-explicit' and as such suggested that the objective is vague and considered non-committal. A further local authority response did recognise that the move away from focusing on the number of people overflown, to focusing on the adverse effects of aviation at night on health and quality of life was to be welcomed. However, this response felt that it is not clear why the onus within the new objective is on "freight connectivity". In their view, the scope of the objective could be expanded to include all flight types, and not focus on freight.

Of those individuals who expressed agreement with the objective, there was recognition of the importance of global connections, whilst still trying to reduce impacts on the environment including in relation to aircraft noise. Other responses noted that Gatwick is an important part of the local economy and argued that whilst there may be issues with aircraft noise this should be balanced by the fact that modern aircraft are a lot quieter than they used to be. It was also noted that night-time flights provide employment to the local area not least the extra jobs resulting from night shifts.

A response from industry via the online smart survey was also in agreement with the objective and made the point that significant progress has been made in reducing night noise. The response referred to advances in engine technology in particular reducing the QC impact of noise on communities surrounding Gatwick Airport and was of the view that this trend will continue as airlines progressively switch to "new generation" aircraft. The response added that with the UK being an island nation, it is dependent on air services for both passenger and vital cargo operations, whether it be for business or leisure purposes. They argued that any reduction in the capability to operate night movements would inevitably lead to a reduction in services, a loss of economic value to the UK, and ultimately, a loss in jobs.

For those who responded via email, a common theme expressed was that contained within a template response of which 252 such emails were received, stating the following:

*"We would like to see a mandatory ban on night flights at Gatwick Airport from 11pm to 7am. All noise abatement procedures must be mandatory to protect those most impacted by night flights.*

*We would like the policy to be worded as below, putting residents' health before the commercial gain of aviation –*

*"Whilst supporting quieter and greener aviation growth we recognise the health impacts of night flights as such aviation must adhere to set noise abatement procedures at designated airports to reduce, the adverse effects of aviation noise at night on health and quality of life".*



These template responses were received from individuals located predominantly across Sussex, Surrey and Kent.

Aside from the template responses, we received a response from an individual who stated that councillors and community groups at Gatwick have consistently said night flights are their single biggest concern. This response went on to add, that at the same time, airlines have explained that a 3 rotation business plan means they must operate for most hours of the day in order for their model to work.

Industry responses via email, generally supported the proposed night-time noise abatement objective. However, with the exception of responses received from freight carriers, responses tended to argue that the generalisation around freight capacity within the objective for Gatwick was not appropriate as this is not applicable to the current operation at Gatwick. It was suggested that specific reference to freight be replaced with a form of words that recognises the significant contribution of both freight and commercial passenger air services to the economic benefits derived from commercial aviation in the night-time. This view was also expressed by an airport consultative committee, who made the point that with regard to 'freight connectivity' Gatwick has almost no dedicated freight flights. Therefore, to exclude passenger flights in the Gatwick statement establishes a disproportionate restriction on the airport's activity compared to using the same term for other London airports. Other industry responses stressed that the Balanced Approach must be applied appropriately.

One industry response acknowledged the replacement of the 'number of people significantly affected' in the current policy with 'the total adverse impacts on health and quality of life', and described this as creating a more complete objective, which better reflects both the feedback received from local stakeholders but also the mitigation efforts of the airport in tackling noise impacts.

Industry responses pointed out that a number of elements within the proposed objective required more specific definition.

One industry response suggested that it is too early to provide an informed view on the specific metrics that might support the assessment of an airport's performance against the objective. In this context without more clarity on the term 'sustainable growth' it is challenging to propose what might be considered effective and meaningful metrics. It was proposed that once the objective is finalised, the question of metrics be addressed as part of the consultation due to follow on the night flight regime itself.

A response from an airport consultative committee noted that the proposed wording of the objective does reflect the movement away from an objective focusing on the number of people affected by noise, to a greater focus on the adverse effects on health and quality of life and this was welcomed. This response also noted that the objective requires a reduction in night flights only "where possible" without any attempt to define the criteria to be used in determining what is "possible".

The response went on to say that the Civil Aviation Act which governs the night noise regime was passed in 1982. Since then, night noise has grown all around the country and other UK airports almost certainly now surpass the number of night flights the designated airports had in 1982, but yet only the same 3 airports remain designated. The response was of the view that it seemed unfair that Gatwick should have a night flight regime but not

other airports (given any flights may cause health issues for residents). It was stated that there is a case for strengthened and more consistent night flight regulation, and reductions in night flights, at all UK airports. The response proceeded to encourage the Department for Transport to consider additional airport designation to achieve that goal, provided it does not result in additional night flights or night noise at Gatwick.

An email response from one local authority argued that the wording of the proposed objective did not give sufficient weight to the need to control impacts of night flights. The response suggested that other than for emergencies, the objective should seek to limit and substantially reduce, the number of night flights and the consequent impacts on health and quality of life. However, this and other responses from local authorities did also welcome the move away from an objective focusing on the number of people affected by noise, to a greater focus on the adverse effects on health and quality of life.

Another local authority response called for definition of terms such as “health and quality of life”. The response suggested the retention of the existing metrics for the core night period, whilst also suggested an additional metric, “the area and number of people in the ‘one additional’ noise awakening contour.

A Parish council wrote of their belief that there should be a silent period at Gatwick between 0100 and 0500 hours. They pointed out that Gatwick does not have any all-freight movements which are commonly undertaken during the night period. In the view of the Parish council, restricting night flights for this four hour window should not result in any significant impact on airline operators. This response went on to add that most of the night period flights at Gatwick are low-cost holiday carriers. The response stated that if restrictions were to lead to lower utilisation, then it is accepted there will be an impact on air fares, but there is a need to weigh in the balance, the impact of flying emissions on climate change, as well as whether cheap flights at inconvenient times of the day are as high a priority in present circumstances.

### **We asked: Would alternative wording be preferable for the night-time noise abatement objective (at Gatwick Airport)?**

Of those individuals who responded via the online smart survey, the point was stressed that the health of residents must come before aviation growth and profits. The proposed wording of the objective was described as too biased to the merits and assumption that aircraft growth is good economically and something that has to happen. It was said that to bring change, targets and goals need to be SMART, and it was argued that the proposed objective did not meet this remit.

A response from a Parish council described noise levels overnight at Gatwick and the areas overflowed as already excessive and disruptive, and impacting on the quality of life for residents.

A response from a local authority was of the view that by making no mention of passenger flights and recognising the importance of freight within the objective, there is a clear implication that increased cargo flights are considered legitimate and that there is no particular constraint on these flights. The response described this as a particular concern for communities around Gatwick as the airport has by far the greatest number of night flights in the summer period of any of the designated airports.

A response from a campaign group argued for night flights to be banned at all UK airports for a full eight-hour period each night, other than for emergency or humanitarian purposes. If such a ban were not introduced, they argued that flights other than emergency or humanitarian purposes should be limited to flights of proven substantial economic and time critical importance that could not be operated outside of the night period. They added that these flights must be priced at a cost that fully reflects their cost to society.

**We requested: Provide alternative wording on a night-time noise abatement objective.**

There were responses from individuals which suggested the objective should open with “whilst supporting quieter and greener aviation growth”, but then to “recognise the health impacts of night flights as such aviation must adhere to set noise abatement procedures at designated airports to reduce the adverse effects of aviation noise at night on health and quality of life.”

There were also calls for a simpler objective, including one which banned night flights between 23:30 and 07:00. Another suggestion for the objective included a reference to net-zero sustainable growth and called for the noise dose to be reduced by 15% over five years from 2025 to 2030. Another respondent suggested an objective which would deliver a 20% reduction in night flights by 2026. Another response was of the view that whilst allowing flights of substantial economic importance that could not be operated at other times of the day, and emergencies, the objective should be to limit and substantially reduce, year on year, the number of night flights at Gatwick, and the adverse effects of aviation noise at night on health and quality of life.

A response from industry called for the objective to include recognition of the social and economic benefits of night flights for consumers, as well as recognising the importance to the UK of maintaining freight connectivity, and to limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life.

A response from a local authority, called for the objective to be revised to reflect current government policy that there should be a balance between the local and national economic and consumer benefits of night flights, both in terms of passenger and freight operations, against their social and health implications, in line with ICAO’s Balanced Approach. This response added that other than for emergencies, the objective should seek to limit and substantially reduce, the number of night flights and the consequent impacts on health and quality of life.

Another response from a local authority suggested that the word “freight” should be deleted from the Gatwick objective, or instead the objective should be expanded to reference “passenger and freight.” Other responses too called for this recognition of both passenger and freight operations.

**We asked: How should the proposed night-time noise abatement objective for Gatwick Airport be assessed to ensure it is successful?**

Responses to this question via the online smart survey, included suggestions of measuring frequency of flights, noise generated by flights and the number of people impacted, as well as local economic improvement, new jobs created, and new routes created.

A campaign group argued for the following tests to apply:

1 - Every night service should be required to satisfy a test of critical necessity, that is, they should only be permitted if there is a conclusive economic case for them (having considered all available evidence and taking a precautionary approach in relation to their adverse impacts), that they could not be provided at less harmful times of day, and that they could not be satisfied by other means.

2 - The government should satisfy itself periodically that flights at night are priced at levels that incentivise flying at less harmful times and that reflect their full costs to society on all occasions in line with the polluter pays principle.

3 - Total aircraft noise and noise impacts at night should be reduced progressively and materially at all times and against clear time phased targets.

4 - Noise targets at Gatwick/Stansted should take account of the fact that many impacted people live in rural areas with low ambient noise. The effects of aircraft noise are therefore greater than those living in urban environments and targets should be set at a lower level to take account of this fact.

A local authority response noted that the Department for Transport have commissioned an Aviation Night Noise Effects (ANNE) study, to examine the impact of aviation noise on sleep disturbance and annoyance, and in their view, it would be better to await the outcome of this study before determining any metrics for the assessment of impacts of night noise. In this sense they regarded this consultation as premature.

Another local authority response suggested that in order to ensure the success of the objective for Gatwick Airport, clear targets should be set that seek to reduce noise at night, both through seeking to avoid flying in the night period, whilst also continuing to limit the use of the loudest aircraft in the night period – for example, QC4 aircraft are banned in the night period, and this could be expanded to QC2 aircraft. The response added that although reference to the number of people overflown is proposed for removal, in favour of a focus on health, it would still form an important indicator for measuring success.

### **Stansted**

**We asked: To what extent do you agree, or disagree, with our night-time noise abatement objective for Stansted Airport?**

**“Whilst supporting sustainable growth and recognising the importance to the UK of maintaining freight connectivity, to limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life.”**

Responses received via the online smart survey, who strongly disagreed with the objective made the point that they considered it too vague, or arguments were made that "to limit" does not say whether the limit will be higher, lower or the same as currently. Some of these responses were of the view that the mental health of the population that are disturbed by aircraft noise should take priority over the profitability of airlines. The point was also made that residents living in rural areas, having no background noise, will experience aircraft noise as significantly disturbing, and that sleep deprivation for residents will harm mental and physical well-being.

A campaign group response did not support growth of night-time flights and in particular freight operations at Stansted. This response was of the view that the night-time noise abatement objective must be to progressively reduce night flight movements by 10% a year leading to a complete ban on night flights other than for emergency or humanitarian reasons.

A response from a Parish council argued that the new objective wrongly puts the emphasis on 'sustainable growth' and 'freight connectivity' ahead of reducing the impact of aircraft noise on those living nearby. Another Parish council who strongly disagreed with the objective, stated that night-time aircraft noise is a major issue for their residents who live under or close to a departure flight path. They argued that with aircraft overhead at just over 4,000ft, noise levels are compounded in this open and rural environment, and the impact is interrupted sleep leading to frustration and anxiety. They added that freight aircraft are a particular problem, as they are generally larger and noisier than passenger aircraft.

Another Parish council called for the objective to reduce night-time flights for passenger and freight operations progressively, by 10% per annum with the ultimate objective to be a complete ban on night flights at Stansted. One more Parish council expressed the view that Stansted is the designated airport likely to see the greatest growth over the next three years of the three airports being consulted upon – in the view of the Parish council the recent planning approval and the presence of predominantly Low Cost Carriers ensures this, which raises the prospect of long-term pressures on the night noise period at Stansted. In the view of the Parish council, a more appropriate night noise policy for Stansted would be to reduce the noise quota now when it is not actually needed, to incentivise day-time efficiency as the focus for future growth.

One response from an individual took a different view in stating that Stansted has very few residents affected by noise and referred to the airport's huge potential as a major freight traffic handler during the night. An industry response via the online smart survey also agreed with the objective and argued that Stansted offers a real opportunity via the QC reductions being delivered by new aircraft, to be a focus airport for the London area for growth.

A response received by email from an individual called for night flights by jet aircraft at all airports, not just the designated airports, to be banned between 11pm and 7am. However, this response supported the introduction of quiet hybrid hydrogen/electric powered aircraft and called for the government to mandate that only this type of commercial aircraft be permitted to fly between 11pm and 7pm. They argued that this would stimulate the manufacture of green aircraft and thereby accelerate the reduction in noise and pollution.

A response received from industry stated that with progressive and better targeted night-time noise restrictions, there is an opportunity to drive growth in use of new generation aircraft with associated benefits. This response argued that by contrast persisting with the current night flight restrictions at Stansted would damage the local economy and disincentivise airlines from investing in the UK. This response called for the total removal of Stansted's night movement control and a prohibition of night-time movements by aircraft rated QC1 or higher.

Another response from industry highlighted concern that the current statutory regime requires fundamental review. It was stated that with the introduction of the Balanced

Approach and the noise action planning process required by the Noise (England) Regulations 2016, the regulatory framework has become incoherent and contradictory.

This response also noted that passenger services provide important connectivity, make a valuable social and economic contribution to the UK and are a critical part of the business model of passenger airlines. It was argued that the night-time noise abatement objective should not distinguish between the connectivity provided by freight and passenger services.

A response from a local authority also expressed concern with the specific inclusion of the term “freight connectivity” within the proposed objective as well as the introduction of the term “and where possible”. In the view of this respondent, this suggested greater dispensation will be given to freight activities and a watering down of the existing objective which states “limit or reduce the number of people affected”. It was argued that the term ‘where possible’ is undefined and weakens, already inadequate night-time protections for residents. The local authority made clear that it is their corporate policy to seek a reduction in night flight activity at Stansted Airport, and they did not consider that the proposed objective assists in achieving this reduction. This local authority response went on to add that they did not consider further support need be given to night-time freight at Stansted Airport, and nor should the strength of night noise controls, and therefore protections to residents, be weakened purely to support economic growth. The local authority called for an evidence-led and balanced approach to be taken, which considered economic needs set against negative impacts on sleep and health.

A response from an airport consultative committee described the wording of the proposed objective as rather passive and felt that it did not indicate a need to drive change. This response also noted that the reference to “freight connectivity” fails to recognise the extent of commercial aviation that may contribute to night-time noise. It was said that the phrase “to limit and where possible reduce” would be better framed as “work towards limiting and reducing the adverse effects”, requiring active management in reduction of the effects. The response also called for clear targets to be set at each airport to reduce the impact of aircraft noise at night and operations measured against the targets. The response added that there is a need to have measurable and achievable outcomes against which progress can be assessed to give all stakeholder groups confidence in the effectiveness of the new objective. This response was also of the view that the current metrics should be retained as the new objective is pursued, and that further metrics should then be identified once definitions of some of the terminology used in the objective are complete. Support was expressed for number above contours to capture the frequency of noise disturbance.

**We asked: Would alternative wording be preferable for the night-time noise abatement objective (for Stansted Airport)?**

Only a small number of responses were received on this question, including one from a Parish council who argued that the new wording does not put a 'greater focus on the adverse effects on health and quality of life', and were of the view that the objective should balance the needs of all stakeholders better.

**We requested: Provide alternative wording on a night-time noise abatement objective.**

Suggestions received from individuals and community groups tended to call for the objective to feature wording such as to “further limit and reduce the adverse effects” or to “avoid, prevent or reduce the number of people significantly affected by aircraft noise at night”.

A response from a Parish council called for the objective to be worded such that there would actively be a reduction in the number of night flights between the hours of 23:00 and 07:00, including encouraging and supporting technologies that reduce aircraft noise, leading to the elimination of night-time flights, other than in emergencies, within 10 years, thereby improving the physical and mental well-being of local communities. Another Parish council response called for the objective to include reference to night noise limits reducing over a set monitorable period.

Several suggestions did provide wording for an objective which recognised the importance of aviation connectivity to the UK economy. A local authority response acknowledged the need to be mindful of the need to support economic growth but called for the objective to limit and reduce the number of people significantly affected by aircraft noise at night, including through encouraging the use of quieter aircraft, and acknowledging that many historic buildings cannot easily be retrofitted to mitigate against aircraft noise.

An industry response suggested recognition of supporting sustainable growth and local employment and recognising the importance to the UK of maintaining freight connectivity, whilst limiting the adverse effects of aviation noise at night on health and quality of life.

Another response from industry suggested that the proposed objective might be amended to read “recognises the importance to the UK of maintaining connectivity” or “connectivity for both passengers and freight”. This response added that whilst balance is implicit in the proposed objective’s support for “sustainable growth” the proposed objective needed to make this balance explicit to guide the decision-maker in making these trade-offs.

### **We asked: How should the proposed night-time noise abatement objective for Stansted Airport be assessed to ensure it is successful?**

Responses from the online smart survey called for "SMART" objectives, which need to be regularly measured, published in an accessible way and with consequences for breaches. Suggestions made included number of people affected, noise levels recorded at various points under the flightpath and the number of complaints received. It was also suggested that noise from aircraft on the ground during the night also needs to be measured, recorded and limited.

A response from a campaign group called for the objective to be assessed over 8 hours (23:00 to 07:00) for the reduction of the number of people in the 48dB LAeq night contour. To ensure successful achievement of this objective this response claimed it would be necessary to monitor adherence to progressively reducing the number of flight movements by 10% a year, leading to a complete ban other than for emergency or humanitarian reasons. A number of responses from Parish councils also supported assessment over an 8- hour period.

A local authority responding via email expressed the view that the current night-time noise abatement objective being measured by the number of people affected by aircraft noise should remain a key metric. They added that in the case of Stansted, which is situated in a district home to the second largest concentration of listed, historic buildings in England,

this metric should be more nuanced, taking into account residential buildings for which it is difficult, by way of their built fabric to well-insulate them against noise (in part due to heritage and town planning controls), which are located within flightpaths, the airport environs and other affected areas.

An industry response stated that for the proposed night-time noise objective, it is not clear how the government will balance its support for "...sustainable growth..." against its objective to "...reduce, the adverse effects..." In the view of this respondent, reintroducing a simpler test of maintaining the benefits would make the assessment of the objective simpler and more transparent.

## **GENERAL RESPONSES FROM INDUSTRY (FOCUSSED ACROSS MORE THAN ONE NOISE DESIGNATED AIRPORT)**

Consultation responses from industry frequently stressed that night flights play a recognised, critical role both in supporting commercial airline operations and in facilitating international trade, with UK-wide social and economic benefits. Airports were described as engines of growth, and it was said that further restrictions on night flights would place the UK and UK businesses at a competitive disadvantage. A common view from these responses was that night flights play a key role in enabling route viability, operational resilience, connections to key export markets, and increased regional connectivity, as well as more choice and better fares for passengers, enabling the high utilisation of aircraft to their full potential. However, there was also recognition of the need to manage the impact of aircraft noise on local communities, and to continue to work to reduce the impact of night noise.

One industry response stated that at a time when the sector is focused on recovering from the devastating impact of the COVID-19 pandemic and advancing the opportunities of the Brexit agenda, the need to maintain a stable regulatory platform with a flexible operating environment had never been so critical for connecting the UK and its regions to world markets.

It was argued that the economic centre of gravity for the world's economy is projected to continue shifting to the east until 2050 at least, making markets in Asia and the Far East attractive to UK businesses. Given the location of these and other high growth markets, time zone changes, flight times and the strong business passenger preference for overnight travel, it was felt that the growing demand for night flights in the UK will persist. It was suggested that failure to satisfy this demand would undoubtedly have a detrimental impact to the UK's international competitiveness and economic activity.

One industry group response welcomed the recognition of the importance of supporting sustainable growth and the explicit, new reference to freight connectivity within the objective. However, given the important role of night flights to also supporting passenger services for consumers, this response supported the objective also referencing commercial passenger services alongside freight. This was echoed by another industry group response, who noted that whilst night flights have a special relevance in the context of freight flights, flights in this time period are also key for passenger services. This response therefore recommended that "maintaining freight connectivity" becomes "maintaining passenger and freight connectivity". Another industry response argued that the noise abatement objective must not be limited to the benefits of freight operations and must also recognise and include the importance to the UK of passenger connectivity due



to the relevance of inbound and outbound passengers on night flights. This response added that restricting the ability of passenger airlines to operate night flights would have a severely negative impact on passengers, consumers, and the overall economy.

Another industry response called for the economic and societal value of night flights to be explicitly recognised within the objective and suggested 'recognising the economic and societal importance to the UK of maintaining commercial passenger air services and freight connectivity'.

An industry group response added that with further advances in technology and the introduction of the next generation of quieter aircraft, as well as initiatives ongoing or being considered to mitigate the impacts to local communities, there should be opportunity for a further upward increase in aircraft movements within the scope of this objective, whilst limiting or reducing the noise impacts and providing additional economic value in a controlled manner.

An industry response argued that the current night flight regime does not reward improvements made in noise performance with any opportunities for growth. It was said that since movements at Heathrow have remained static for many years, all the advantages of noise reductions through improved operational practices and modern technology have been delivered directly to the community around the airport. This response was of the view that the introduction of continually improving operational efficiencies and voluntary measures offer the best prospect for reducing the impact of night flights, whilst avoiding the commercial and economic damage that would be brought by more restrictive regulation and blanket operating restrictions.

An industry response called for the focus to be on enriching the positive impacts and suppressing the negative impacts of night flights. Therefore, to successfully gain broad stakeholder support, it was recommended that this aspect of the proposed objective should be moved into the middle ground with a view 'to enhance quality of life effects.'

There were calls for clarity on the intent of what is meant by terms such as quality of life and sustainable growth. Responses stated that it is critical to provide clarity on these definitions to avoid any future misunderstandings and disagreement between stakeholders at the designated airports. It was suggested that the objective is issued with, or as part of, a short explanatory note, setting out what the government sees these terms as meaning.

A further point made was that assessing the benefits of 'sustainable growth' and the proper application of the Balanced Approach requires that the full economic benefits of night flights are properly assessed. An industry group response suggested that it would also be helpful for the Department for Transport to commission regular independent assessments on the economic value of night-flights to the UK economy, with respondents saying this is important as the Transport Analysis Guidance (TAG) undersells this value.

On metrics, consultation responses from industry called for these to be easily measured, tracked and accountable to the parties concerned, and the Noise Abatement Objective for Dublin Airport was frequently cited as a strong example in this regard. An industry group response suggested that the debate on metrics could be explored further with the whole industry in the context of the main night flight regime consultation. Another response called for the setting up of a technical group to develop suitable mechanisms and economic,

health and operational indicators that enable progress in any regime period to be tracked over time against SMART future-proofed objectives.

Metrics for 'health and quality of life' could include assessments of sleep disturbance, annoyance, respite and population exposure levels under noise contours. It was noted that quality of life impacts of night flights will not all be adverse, and it is important to recognise that the impact of night flights on 'quality of life' can be both positive and negative – as these flights support direct local economic activity and support local jobs. Responses stated that it is important to recognise and assess the positive health benefits of things like stable employment, travel opportunities and family/business connectivity afforded by the aviation industry and how this contributes to overall health impacts.

Metrics for 'Sustainable growth' could include passenger services and freight connectivity, annual cargo tonnage and the value of cargo, passenger numbers, and UK employment generated and supported. Other responses suggested that measurable criteria could include annual metrics of increased employment (direct and indirect), number of UK passenger/freight movements to competitive markets, number of destinations and trade routes served, freight volumes and value of cargo (where not commercially sensitive).

One industry response expressed the view that there is no need to change the current objective, describing it as having worked effectively in terms of enabling a balance to be reached between the benefits that night flights bring and the required respite for local communities.

Another industry response disagreed with the substitution of "the number of people significantly affected by aircraft noise at night" with "the adverse effects of aviation noise at night on health". In their view, the objective must include achievable and measurable outcomes and this response argued that the new statement fails to deliver this.

Some industry responses called for the objective to explicitly reference that the approach to night noise must ultimately be 'in accordance with the Balanced Approach' as advocated by the International Civil Aviation Organisation (ICAO). It was argued that referencing the Balanced Approach would ensure all elements are integrated and ensure that the objective allows for flexibility in how the desired outcomes are to be achieved without seeking to prescribe the approach, for example, by including the need to provide night flight bans. It was also suggested that referencing the Balanced Approach in the objective is particularly essential for supporting the land-use planning element, i.e. a range of measures is needed to focus attention on avoiding tendencies for population encroachment to negate improvements made by industry.

The assertion was made that local authorities need more accountability with new housing developments, over which the aviation industry has no control. It was suggested that government should plan to make allowance for changes in population due to housing development under flightpaths, as it is clearly not a failing of an airport's own noise management process if local councils allow more houses to be built where there is already aircraft noise. Responses stated that any increase in health or adverse quality of life impacts resulting from what was described as "inappropriate development" would need to be discounted in some form in any assessment.

Responses from the freight industry were broadly supportive of the proposed noise abatement objective and its continued focus on balancing benefits of night flights with

limiting and where possible reducing the adverse effects of aviation noise. Responses welcomed the recognition of freight connectivity in the proposed noise objective, in recognition of the particular importance of night flights to the freight sector. Clarification was sought on the meaning of “sustainable growth”, particularly as to whether this encompassed the government’s broader objectives of economic growth and trade promotion, rather than just the growth of the number of flights.

Responses were keen to stress that the speed of delivery that air freight can offer is vital for the UK’s manufacturing, automotive and pharmaceutical industries, especially where just-in-time practices and high value commodities are being flown. It was argued that night flights allow the latest possible collection time from customers whilst guaranteeing next day delivery, and that enabling late flights or early arrivals facilitates UK imports and exports and makes UK airports an attractive proposition to move freight through.

Express operators made the argument that night-time flying is a necessity for their shippers and their customers, and not simply a convenience. There was a call for the careful application of the Balanced Approach because the ability to provide express services relies heavily on night-time operations, which often bear the brunt of noise-related restrictions.

One response from the freight industry suggested delaying adoption of a new objective until greater clarity can be offered to air carriers and the affected communities as to the actual scope of the proposed language used in the objective. Another response from the freight industry, whilst pleased with the recognition of freight connectivity, was concerned that the government's larger goals of economic growth and trade promotion were not included. They added that whilst the new national aviation noise policy statement refers to the “economic and consumer benefits of aviation”, the proposed night-time noise abatement objective for the designated airports made no mention of these benefits.