



Via email to: night.flights@dft.gov.uk

Transport for London
City Planning

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2 March 2021

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Dear Sir / Madam,

Response to consultation on night flight restrictions 2022-2024 and beyond

I am writing on behalf of the Mayor of London in response to the latest consultation on night flight restrictions at Heathrow, Gatwick and Stansted. The harmful effect to health of night flights – and the sleep disturbance it causes – is well understood and alarming in its severity. This includes increased risk of high blood pressure and heart attack, stroke and dementia as well as reduced reading comprehension in school children. It is imperative that we strive to eliminate these impacts. The proposed policy objective must not be merely to limit, but to reduce the number of people significantly affected by aircraft noise at night. Moreover, the route to achieving this needs to be both using quieter aircraft and reducing the number of night flights over populated areas.

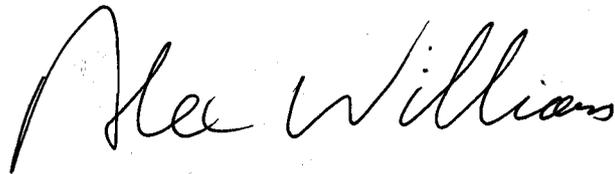
The significant drop in night flights over the last year – and associated reduction in sleep disturbance – has provided considerable relief to local communities and these valuable health benefits should not be squandered. The actual number of night flights flying – and not the existing night flight movement quota – should serve as the starting point for the new regime.

The current approach seeks to set the significant health impacts of night flights against the economic benefits of these flights. But questions remain as to the scale of these benefits, not least given the extent to which many night flights can be rescheduled to other times of day and/or redistributed to other airports (the latter particularly applicable to dedicated freighter flights). Moreover, it is becoming increasingly clear that it is the pace of recovery in aviation demand that will be the limiting factor for several years to come – rather than any tightening of the night flights regime. With Heathrow Airport now forecasting recovery to 2019 levels potentially not before 2026 (in its recent regulatory submission), there are likely to be both fewer night flights operating and more available capacity in which to accommodate them in the pre- and post-night

period. Moreover, when the sector does recover, it will do so in a changed aviation landscape – including very different, quieter fleet compositions. It would be highly counterintuitive to seek to determine the night flights regime without acknowledging this pandemic context.

This is a unique opportunity to implement a more environmentally ambitious regime as part of the Government's wider green recovery, which supports the return of aviation and encourages continuing technological innovation while delivering a meaningful and sustained improvement in the night noise environment and, so, public health.

Yours sincerely

A handwritten signature in black ink that reads "Alex Williams". The signature is written in a cursive, flowing style.

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APPENDIX: Detailed response

Movement and noise quota limits

Local communities are likely to benefit from the transition to quieter aircraft and traffic below pre-pandemic levels and this is an opportunity to embed those benefits for the future. The most notable example of the former is the phasing out of Boeing 747-400s – including their full retirement by London's two largest operators longhaul operators, British Airways and Virgin Atlantic. Rather than merely watching change that could reduce noise exposure, Government policy should be driving change to secure continuing reductions. This means implementing a very significant decrease in both the seasonal movement limit and noise quota limit.

The consultation is clear that the carry-over of limits between the summer and winter seasons is not being used as intended, with airports often using this to effectively increase their summer or winter limit on a regular basis. We support closing this loophole by removing the carry-over option. If the airports can demonstrate this will cause genuine difficulties because the peak Easter period can fall in either season, there might be a case for replacing the two seasonal limits with a single annual limit.

We do not support unused night quota allowances being banked, nor would we support attempts to ringfence movements for different types of air traffic. Both appear to run counter to the purpose of the regime to reduce, rather than enable, night flights.

We would also call for the night noise quota period to be brought in line with the full night period as per UK policy and WHO guidelines, namely 11pm-7am. This would need to be implemented in a way that did not permit any increase in movements or noise quotas in any of the constituent night periods, as well as overall.

Operational ban on noisiest aircraft

To ensure the 'QC' (quota count) system remains sufficiently robust into the future, it is essential that new, lower QC noise levels are determined so as to capture the sound profile of future aircraft technologies. As things stand, a zero QC rating still equates to 84 EPNdB (effective perceived noise in decibels). This is comparable to a diesel lorry travelling at 50mph 50ft away, which constitutes a significant noise associated with aircraft movements. In a similar vein, we do not support introduction of an exempt category of aircraft movement.

We support the tightening of the restrictions on the noisiest aircraft but we would urge Government to move further and faster. Airlines have considerable flexibility in the aircraft they deploy on any particular route, not to mention the trend of retiring many older, noisier aircraft during the pandemic. Government

should be using the night noise regime to influence decisions on future aircraft acquisition and route allocation.

We welcome the proposal to increase the scope of the ban of QC4-rated aircraft movements (primarily departing Boeing 747-400s) from scheduled flights to include all operations (i.e. including when the result of delays) with the start of the new regime. Moreover, we support extending the ban to cover the full night period, from 11pm to 7am, but that this should also commence with the start of the new regime – recognising that there are rarely Boeing 747-400 departures in the night shoulder periods.

Likewise, as the consultation recognises, there are extremely few QC2-rated aircraft movements operating in the night period – and the phasing out of the Boeing 747-400s, which are QC2 rated on arrival, means this also applies to the period from 6 to 7am. As such, we support the discussed scheduled ban of QC2 aircraft movements during the full night period and propose that this could also be implemented with the start of the new regime – with a full operational ban by 2024. Indeed, recognising the pace of fleet replacement, Government should, by 2024, be targeting a night-time scheduled ban of QC1 aircraft movements as a minimum.

Dispensations

Any refinement of the guidance surrounding dispensations from the night noise regime must not allow for any loosening. The dispensations were drafted to be deliberately limited to genuine health emergencies and this should remain the case. We support greater clarity about and transparency in the application of dispensations.

Wider policy

We would welcome an explicit night noise reference in the UK aviation noise objective but it must be focused on reducing night noise exposure – and not seek to trade off the significant social and health impacts for questionable economic benefits and consumer conveniences.

Should the Government decide to introduce criteria for designation of airports to be subject to noise controls, these should be a function of the scale of populations overflown.