

LAANC Briefing – Night Flights Part 2

Night Flight Restrictions – Heathrow Gatwick and Stansted

Closing Date for Consultation 3rd September 2021-08-23

Link to Consultation:

<https://www.gov.uk/government/consultations/night-flight-restrictions-at-heathrow-gatwick-and-stansted-airports-between-2022-and-2024-plus-future-night-flight-policy/night-flight-restrictions>

Background

The Government consulted, in December 2020, on its night flights regime for the three main London Airports (closed 3rd March 2021).

The main proposal under Part 1 of the consultation was whether to “roll over” the current regime for another 2 years.

The Government announced its decision in respect of the Part 1 proposals on 19 July 2021. The decision document can be found at

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1003621/night-flight-restrictions-at-heathrow-gatwick-and-stansted-decision-document.pdf

The July 2021 Decision

In summary the Government has decided not only to roll over the existing scheme as foreshadowed but to extend the “roll over” period for 3 more years.

It is now proposed that the existing scheme will be reassessed in time for a new regime to commence in October 2025. A further consultation is promised in 2023, well before the introduction of any new regime.

The second main proposal within Part One of the consultation was to place an operational ban on QC4 rated aircraft movements at the designated airports during the night quota period (23:30 – 06:00).

The Government has decided to proceed with the implementation of its proposed ban after 2024. This will however be of academic interest only at Heathrow (the QC 4 fleet having been withdrawn due to the impact of Covid 19). It is claimed that the ban will still benefit communities by taking the noisiest aircraft out of operation during the night quota period.

Part Two of the consultation, seeks views and evidence on policy options for the Government’s future night flight policy at the designated airports beyond 2024 (now 2025).

This includes:

- whether it should amend national noise policy to include specific policy for night noise
- revising its night flight dispensation guidance
- whether there should be set criteria for airport designation
- what any future night flight regime at the designated airports should look like

A reason for extending the closing date of Part Two was to allow consideration of a long awaited technical study from the CAA on Night Noise Annoyance (SoNA 14 Night). The study and Peer Reviews were published as part of the Stage 1 decision and can be found at the following links:

CAP2161a	SoNA 2014: Aircraft Noise and Sleep Disturbance Peer Review	22 July 2021
CAP2161	CAP 2161 Survey of Noise Attitudes 2014: Aircraft Noise and Sleep Disturbance	22 July 2021
CAP1506d	SoNa 2014: Technical Peer Review	22 July 2021
CAP1506c	SoNA 2014: Aircraft Noise and Annoyance Peer Review	22 July 2021
CAP1506a	The 2014 Survey of Noise Attitudes (SoNA) Technical Report (final report)	22 July 2021
CAP1506	Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition	22 July 2021

The Council has already considered both Parts 1 and 2 of the consultation. This can be found at:

<https://cabnet.richmond.gov.uk/documents/b14406/Councils%20proposed%20response%20to%20the%20Governments%20Nightflights%20consultation%20Thursday%2025-Feb-2021%2019.0.pdf?T=9>

Implications of SoNA 14 – Night

The SoNA Night Report supports, to some extent, the view previously expressed by the council that the numbers of aircraft events at night are what annoys people rather than the average noise level over a 6.5 hr period (23:30 – 06:00).

The report authors (CAA) however claim insufficient evidence was found from the survey data to justify a change of approach in terms of UK night flight restrictions on

the basis of this single study (which it is claimed was designed to test daytime annoyance rather than night noise annoyance and sleep disturbance.)

Analysis of the report data however confirms that night noise annoyance was found to be significant for many residents. (around 18% per cent of subjects reported being highly annoyed where they were exposed to 30 – 40 events per night of 60dB LAmax or higher (N60). Many residents who live under or close to the existing Heathrow flight paths would fall into this banding.

Night Noise Assessment: The Government states it intends to continue to measure night noise performance at all three London airports using the metrics proposed in the consultation namely:

- The area of and number of people in the 48dB LAeq 6.5 hour night contour. [REDACTED]
- Sleep disturbance impacts associated with night flights, assessed using TAG [REDACTED] methodologies. [REDACTED]
- The average noise of an aircraft (as measured by the average noise Quota Count [REDACTED] per aircraft movement over the course of a season.) [REDACTED]

In terms of the last performance indicator it is worth noting that since the inception of the QC Scheme in Winter 93/ 94 the average Quota Count / Movement decreased from 1.9 to 0.9. (2015 – 2017). In noise terms this represents on average, at best, an improvement of around 3 decibels for affected residents. A difference of 3dB is generally considered to be at the margin of being perceptible.

The QC Scheme: As part of its Part 1 decision the Government confirmed that at present it considers the Quota Count (QC) system to be the best tool for categorising aircraft for noise purposes.

However in Part 2 of the consultation, in connection with a set of longer term proposals, the Government is seeking views as whether night flight restrictions should refer to the full night period of eight hours (23:00 – 07:00) rather than 23:30 – 06:00.

LAANC's position is that there should be a phased operational ban of all flights during the full night period at Heathrow and has already responded at Stage 1 to this.

Adoption of WHO Environmental Noise Guidelines for the European Region (2018),

The Noise Guidelines strongly recommend that in order to prevent adverse health effects, noise levels produced by aircraft during the 8 hr night should not exceed 40dB_{Lnight}.

The Part 1 decision contains what is considered to be the clearest indication yet that the Government has no intention of adopting the Guidelines. The decision document states: ^[1]_[SEP]

- night-time to 40dB L_{night}, these have always been intended as guidelines rather than binding limits. These levels also apply to noise from all sources and not just aviation. Addressing aviation noise in isolation is unlikely to achieve these levels given the totality of noise from all sources.

Dispensations

The decision document provides helpful clarification that the night noise contours produced as part of the consultation are derived from using actual flight times, irrespective of scheduled flight times. Thus the contours as presented do include the impact of all dispensed flights. The Government confirms that it intends to continue this practice.

Conclusions

The report and accompanying Peer Reviews confirm the Council's claim that Heathrow Night Flights are a serious problem for a large number of residents affected by night flying from Heathrow. It provides the clearest objective support yet for residents' claims that the numbers of aircraft movements at night are what annoys people rather than average noise dose and QC points.

The 3 Year Roll Over – is an appalling decision, without foundation and without any prior consultation at all.

Overall The Government has still failed to provide any objective evidence to support its assertion that night flights (at Heathrow) offer significant benefits to the UK. The claim that many of these benefits have been foregone and have future value to the UK economy are also considered to be without foundation in the absence of a cost / benefit evaluation. In the absence of the supporting information we fail to see how the Department is acting within its declared policies of sustainability and we call again for a phased removal of all flights at Heathrow between 23:00 and 07:00.

ENDS 22/08/21/CS