

NIGHT FLIGHT RESTRICTIONS CONSULTATIONS MARCH 2021



INTRODUCTION

The Heathrow Community Engagement Board Ltd (HCEB) is currently undergoing changes to its own structure. In light of the significant reduction in our responsibilities and activities resulting from the suspension of all active DCO processes, HCEB is reverting to its former role as an airport consultative committee for the foreseeable future. Our focus and functions will be as outlined in the DfT's Guidelines.

We welcome the opportunity to respond to the Night Flight Consultation through our Transport, Environment and Noise Advisory Group (TENAG) and Passenger Services Group (PSG).

TENAG will cease to operate at the end of March 2021, but PSG will carry on providing advice to the HCEB.

Both of these groups have different remits, and so their respective responses will necessarily reflect this.

TENAG AND PSG

TENAG was established by the HCEB to advise it on Surface Access, Noise, Air Quality and Public Transport so as to help it deliver on its terms of reference and strategic objectives in relation to its role as an Airport Consultative Committee.

TENAG's membership comprises of senior technical experts from within the relevant industries along with members of the local community.

The Passenger Services Group has one simple objective, to consider on their own initiative, or by the direction of the HCEB, any issue in connection with Heathrow Airport that would improve the passenger experience, and to report their conclusions and recommendations to HCEB.

The Passenger Services Group comprises of between 6 – 8 independent members who cover a broad range of airport passengers along with a representative from each of the following organisations Which magazine, ABTA, the GTMC and the Airline Operators Committee.

Both groups are currently chaired by non-executive Board members of HCEB Ltd.

TENAG'S RESPONSE

Introduction

TENAG is the Advisory Group set up to represent the local community both in relation to airport expansion and, more generally, in terms of liaison between local people and Heathrow. Our membership comprises a combination of residents, people who work at the airport and transport experts.

This letter is a response to the DfT consultation on night flights and is based on a combination of principles as well as the effects of the specific proposals. The focus is on Heathrow.

1. Health Impacts

There is growing evidence of the adverse health impacts of night flights on overflowed communities, especially in

terms of interruption to deep sleep. Studies show that there is a higher risk of high blood pressure and increased rates of strokes and heart disease. The reduction in early morning arrivals and late-running during the lockdown has given people the experience of quieter nights, the effects of which could be part of ongoing research.

2. Night flights

The majority of TENAG support a complete ban on night flights for eight hours every night. We do not think that health impacts should be balanced against local, national and economic needs especially via traditional calculation of cost-benefit methods, which are being challenged on a wide basis. Our suggestion is banning all night flights from 11 pm to 7 am. Other members feel this is less likely to be adopted in the near time frame but still put it down as a marker for the future with incremental extensions as soon as possible. To quote one member, who is a local resident, *“aircraft flying over densely-populated areas should have restrictions at night to enable human beings to achieve a decent amount of sleep. The 4.30 am arrival is for the convenience of travellers who use the flight on that day, meanwhile, those woken up by these flights experience the noise almost every morning..”*

3. Respite

This is a complex issue and we do not consider that sufficient stakeholder and public engagement has been carried out. There is also a lack of Survey of Noise Attitudes (SoNA) on night data. The DfT should provide far more inclusive research and engagement to share and understand more about the social, environmental and health effects of the different respite options. Linked to the respite issue are the opportunities from new technology. In the future planes Performance-based Navigation will enable (apart from those under the final approach) more precision so night flights will be easier to share around. Similarly, new approaches to air space management will give more opportunity for respite periods.

4. Dispensation

TENAG would also like to see the dispensation criteria tightened with greater transparency and publication of data on the circumstances and the approach to scheduling that causes it. For example, airspace delays should not be a legitimate reason for dispensation within the context of the business model of low-cost carriers which allows little resistance and recovery time – thus making dispensation frequent and inevitable. On the same count, the dispensation for flights between 5 and 6 am should be challenged and alternative approaches to scheduling used to avoid knock-on effects. We are also opposed to exemption of the quietest planes.

5. Measurement:

We are against relying solely on the ‘averaging out’ of noise measurement which should be complemented by a ‘numbers’ metric specific to noise levels of different planes. Indeed, the whole ICAO classification requires re-assessment especially in the light of Heathrow (unlike many other airports) flying over high-density residential areas. It is worth reiterating that QC categorisation is an ideal, somewhat arbitrary construct based on industry certification unrelated to the specific procedures adopted by a commercial airline. So for example, locations commonly found the A380 to be noisier than 747 QC4 planes even though it was in a markedly lower category. Real world noise values need to be used to make any classification system relevant. Another suggestion is that measurements could be extended to the ‘shoulder times’ which would contribute to future discussions on respite policy.

Conclusion

We understand the reasons for extending the current five-year regime at the designated airports including Heathrow. However, we hope that this will provide an opportunity to

consider our points above during the extension to 2024. Technology is moving fast and there could be new research, mitigation and other opportunities to reconcile economic and local community impacts during this period.

THE PSG RESPONSE

- The Passenger Service Group has always been supportive of the “balanced approach” to noise mitigation.
- We support maintaining the existing night flight restrictions at Heathrow from 2022 to 2024.
- The impact of COVID-19 has dramatically accelerated the retirement of older and noisier aircraft to the point where almost an entire category (the Boeing 747) has been withdrawn permanently. This provides an important opportunity for Heathrow to become an even better neighbour. It is, however, worth reinforcing the constant efforts and marginal gains through aircraft type change, technology and procedures which have reduced noise significantly over the last decade. We encourage all parties to continue this journey.
- We do not support the proposal to ban QC4 rated aircraft movements during the night quota period – it is largely moot and our concern here would be any non-UK operator who maintains a QC4 rated fleet with no immediate aircraft type alternative. Although we usually restrict our remarks to passenger travel only this pandemic and the ongoing (well into the medium term) changes to essential cargo operations are also a factor.

- In relation to the wider consultation, we would stress at the stage the strategic importance of those few but vital flight arrivals between 0430 and 0600. Every effort should be made to keep these to an absolute minimum, but we recognise the importance to ‘Global Britain’ and the passengers we represent of flights which leave the Far East, Africa and occasionally the Eastern Seaboard of the United States at times which ensure the ability to land and connect on to other destinations both domestic and international. Those connecting passengers bringing more commercial viability to the onwards short-haul flights and those remaining in London a full business day ahead. We would not support a hard curfew which prevented this flexibility.



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