

# Night-time noise abatement objectives for the designated airports from October 2025

## Personal details

Q1. Your (used for contact purposes only):
<b>name?</b> Peter Willan
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Q2. You are responding as an:
organisation?

## Organisation details

Q3. Your organisation is:
a community group?

  

Q4. Your organisation name is?
Richmond Heathrow Campaign

  

Q5. What is the main activity of the organisation?
RHC aims to reduce noise and other environmental impacts on local communities in Richmond Hill, Richmond town and Kew from Heathrow operations and to this end it seeks: an end over time to night flights (11pm to 7am); no increase in the statutory limit of 480,000 flights annually by any means including whether it be through one or more additional runways or mixed mode; no loss of respite from half day alternation between north and south runways (emergencies excepted) and any measures operational or otherwise that reduce noise. Within these confines RHC supports more efficient and effective use of Heathrow and related aviation assets. It seeks a share of any benefits for the local communities.

  

Q6. What is the number people your organisation employs?
<b>Above 100</b> We are an amenity group representing over 2,000 members but we have no employees

## Night-time noise abatement objectives for designated airports

Select the airport for which you wish to provide your views (you may select more than one option).
Heathrow

## Heathrow

Q7. To what extent do you agree, or disagree, with our night-time noise abatement objective for Heathrow airport?

Strongly disagree

## Heathrow - night-time noise abatement objective

Q8. Provide a reasoning for your answer.

The objective as it is applied "sustainable growth" supports growth and increased noise impact from night flights for a large number of people around Heathrow. The words "limited" and "where possible limited" have wide interpretation and as used by the objective do not prevent increased noise and certainly not seek to achieve reduced noise impact which is our community objective. The balance between aviation industry and community is biased in favour of the former. The Polluter Pays principle is ignored. There is strong evidence that sleep deprivation is harmful. 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.

## Heathrow - night-time noise abatement objective

Q9. Would alternative wording be preferable for the night-time noise abatement objective?

Yes

## Heathrow - night-time noise abatement objective

Q10. Provide a reasoning for your answer.

Our research and that of others on the health and economic impacts of night flight demonstrates passengers at Heathrow can and should be deferred to flights during the day. The claimed benefits of hub status of Heathrow does not stand up to scrutiny and there is no justification for international transfer passengers being exempt from APD including those arriving at night. Night flight tickets neither reflect the APD or the cost of harm to Heathrow communities. The objective should take these issues into account.

Q11. Provide alternative wording on a night-time noise abatement objective.

1. Targets should be set to phase out all night flights at Heathrow over the next night flight regime.
2. During the transition to a ban of night flights, the exemption from APD on international to international night flights should be removed.

## Heathrow - assessing the night-time noise abatement objective

Q12. How should the proposed night-time noise abatement objective for Heathrow airport be assessed to ensure it is successful?

1. Implementation of targets for phasing out night flights should be monitored.
  2. Adherence to targets should be controlled by penalties and incentives (for example by facilitating alternative daytime slots)
  3. Harm from noise should be measured and assessed and there should be targets for reducing noise and its impact on health
  4. The economic impact of deferring passengers from night flight to day flight travel should be measured and the cost for night flights increased,
- These parameters should be assessed so as to achieve the objective in a way that reduces the harmful noise impact as quickly as possible and with minimal cost to the the aviation industry and passengers.

## Final comments

Q25. Any other comments?

Clearly there is strong industry resistance to a night flight ban and so far the government has avoided a decision to ban night flights. We do not support a compromise because of the substantial unnecessary harm caused by night flights. However, so long as the government continues to support night flights at Heathrow then they need to be managed in a better way and the objective should recognise this. For example, exemptions should be reduced, late runners should be reduced, noisier aircraft should be banned and better control of the early morning shoulder period at Heathrow should be implemented. Operational use of the airspace should be improved to share the noise impact in an equitable way. The noise quota system has insufficient effect in reducing noise impact on health.