

**NIGHT-FLIGHT RESTRICTIONS
HEATHROW, GATWICK AND STANSTED AIRPORTS FROM OCTOBER 2025**

**DfT CONSULTATION
RESPONSE FROM RICHMOND HEATHROW CAMPAIGN
22 MAY 2024**

INTRODUCTION

1. This is a written email response of the Richmond Heathrow Campaign (RHC) to the DfT's consultation titled 'Night-Flight Restrictions, Heathrow, Gatwick and Stansted Airports from October 2025'. The consultation process seeks views on the regime at the designated airports from October 2025 to October 2028.
2. RHC represents three amenity groups in the London Borough of Richmond upon Thames: The Richmond Society, The Friends of Richmond Green, and the Kew Society, which together have over 2000 members. Members of our amenity groups are adversely affected by noise from Heathrow Airport's flight paths, poor air quality and road and rail congestion in west London. Night flights have a substantial harmful impact. We acknowledge Heathrow's contribution to the UK economy and seek constructive engagement in pursuit of a better Heathrow. We are an active participant in the Heathrow Noise and Airspace Community Forum (NACF).
3. Our response here refers only to Heathrow since Heathrow aircraft noise has the main impact on our members. We have not responded to questions 10 to 17 on Gatwick and Stansted.
4. There is a section on Night-flights on the RHC website that includes previous responses to night-flight consultations and presentations and we mention in particular presentations on night-flights to the NACF on 29 November 2023 and 20 March 2024.
5. This response is divided into the following sections:
 - Personal Details and Organisation Details as requested (p3)
 - DfT proposals - Heathrow Airport (p3)
 - DfT Consultation Question (p3)
 - RHC Comment on DfT Question (p3)
 - RHC Proposals - any other Comments (p6)
 - Night-time Noise Objective (p6)
 - Metrics (p6)
 - Heathrow Night-flight Schedules (p8)
 - Night-time Respite (p10)
 - Balanced Approach (UN ICAO Policy) (p10)
 - Heathrow Time-shift of flights from Night to Day (p13)
 - Action not Deferral (p14)
 - Annex: Flight schedules (p15)

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6. RHC Recommendations are as follows:
1. **RHC Night-Time Noise Objective Recommendation:** The objective should be revised to recognise the polluter-should-pay principle and to include noise distribution.
 2. **RHC Metrics Recommendation:** Government to take action without further delay to:
 - a. Establish the legal status of the WHO guideline values, 2018,
 - b. Establish a UK strategy and timetable for reducing the levels of community noise from aircraft and from other major sources to the WHO guideline values, 2018,
 - c. Integrate the WHO guidelines with the key Heathrow Community Noise Objective concerning reduction in adverse impacts of noise.
 3. **RHC Scheduling Recommendation:** We have made a number of recommendations here in regard to Night Flight Schedules. In summary, we recommend the principle aim should be to reduce and where possible eliminate unscheduled flights during the night time, 23:00-07:00.
 4. **RHC Balanced Approach Recommendation:** In summary, greater emphasis should be placed on implementing the Balanced Approach as applicable to night flights in respect of all four priorities - (1) Reduction in Noise at Source, (2) Land Use Planning and Management, (3) Noise Abatement Operational Procedures and (4) Restrictions including bans on the more noisy aircraft.
 5. **RHC Time-Shift Recommendation:** RHC believes the case for time shifting night flights to the day-time should extend across the night period from 23:00 to 07:00. In the first instance a time-shift assessment should be prepared for a route from a single airport in each of the main night flight zones, such as the far east. The assessments should consider all the main issues that stakeholders are interested in - including the net incremental economic cost/benefit from time-shifting flights from night to day. The assessment should include the incremental reduction in health costs from shifting night flights to the day. The economic costs should be examined in terms of the UK and commercial stakeholders, such as the airlines and Heathrow, and in terms of passengers. Generally speaking, we would not be supportive of a time-shift from the Night Quota Period into the Late Evening or Early Morning shoulder periods.
 6. **RHC's Action Recommendation:** Action should be taken now to reduce Heathrow Night flight noise impact and end the 50 year delay.

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PERSONAL DETAILS

- Q1. Name: Peter Willan
- Q2. Contact: action@richmondheathrowcampaign.org
- Q3. Are you responding on behalf of an organisation: Yes

ORGANISATION DETAILS

- Q4. Organisation: Community group
- Q5. Organisation name: Richmond Heathrow Campaign (RHC)
- Q6. 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 seeks: an end over time to night flights, (23:00 to 07:00); 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; and any measures operational or otherwise that reduce noise.
- Q7. Number of people your organisation employs: None, but the three societies comprising RHC have over 2,000 resident members.

DFT PROPOSALS - HEATHROW AIRPORT

- 7. The DfT says ‘We propose a bridging regime of 3 years, covering October 2025 to October 2028, whilst we await further evidence that could support change in the future. Designated airports are given a noise quota which is an aggregation of quota count for individual aircraft, used to define a seasonal limit or usage by comparison with the applicable limit.
- 8. For the next night flight regime we are proposing that movement and QC limits for Heathrow Airport would remain the same as they are now. This is:
 - 1. Winter limit of 2,550 movements and a QC limit of 2,415.
 - 2. Summer limit of 3,250 movements and a QC limit of 2,735.’

DFT CONSULTATION QUESTION

- 9. **Q8. To what extent do you agree, or disagree, with our proposal for the next night flight regime at Heathrow Airport?**
- 10. **RHC Answer - Strongly disagree**

RHC COMMENT ON DfT QUESTION, Q9

- 11. RHC responded to the DfT on the current night flight regime, 2022-2024 on 3 March 2021, and on 3 September 2021 on policy options for the government's future night flight policy at the designated airports beyond 2024 and nationally. On 8 May 2023 RHC responded to the DfT consultation on Night-time Noise Abatement Objectives at the designated Airports from October 2025. These three responses are on RHC's website at www.richmondheathrowcampaign.org and we submit them as background for our response to the current consultation because the many unresolved issues are dealt with in some detail by these previous responses. Most of the issues remain unresolved with decisions deferred and it is of considerable concern that the responses from RHC and others will be lost in the mist of time and have to be updated and re-presented if and when given the opportunity.

12. RHC is most disappointed and very concerned at yet further delay in dealing with night flight noise affecting a large number of peoples' sleep, health, quality of life and productivity. The delay is only too evident as can be seen from the following paragraphs.
13. The DfT published its decision on the 2022-2024 regime in July 2021, which in summary was as follows:
 - *'The night noise objective and existing restrictions will be rolled over for a period of three years rather than two as originally proposed in our consultation.'*
 - *'The government will proceed with the implementation of a ban on QC4 rated aircraft movements, at the designated airports, during the night quota period.'*

RHC said in its response of 3 September 2021 how very disappointed we were that the DfT imposed a three-year rollover of current night flight restrictions while consulting on a two-year rollover. Also, we expressed considerable concern at the DfT's failure to provide evidence supporting the economic benefits and costs of night flights and the impact of night flights on public health, raised by RHC and others in their responses during March 2021.

14. RHC noted in its response of 3 September 2021 that the DfT said *'We now aim to publish a further night flight restrictions consultation during 2023, and it is at this stage that we will set out firm proposals for longer-term policy reform.'* But this did not happen and instead the DfT has published alongside the current consultation its responses to the policy options for future night policy beyond 2025. Apart from a new deficient night-time noise objective and some tightening of the dispensation arrangements, all the longer term issues have yet again been put on the back burner for a further two, three or more years. One reason given is the commissioning of an aviation night noise effects (ANNE) study, to examine the relationship between aviation noise on sleep disturbance and annoyance, and how this varies by different times of the night. The results are not expected before 2025. Another reason given is an aviation noise attitudes survey being conducted by the Civil Aviation Authority (CAA) is anticipated in 2025 to 2026.
15. Decisions on the following issues have been deferred by the DfT:
 - a. **QC System:** The DfT says *'we continue to consider the QC system to be the best tool for categorising aircraft for noise purposes. We also believe the existing controls of a movement limit and QC quota will be sufficient to deliver the night-time noise abatement objective. Furthermore, we do not believe at this point that we have the evidence to support amending the current controls.'* RHC disagrees - The system has no impact on reducing noise levels and encourages more movements in response to any reduction in noise levels.
 - b. **QC levels and Movement limits** are unchanged from 2018/19 and will have been in existence for nine years by 2028. If anyone believes they are useful tools to reduce noise then why are the limits not reduced to below current levels to achieve noise reduction.
 - c. **The 48 dB LAeq 6.5 hour contour.** The DfT has decided this is the only metric to be used in spite of evidence that other metrics and lower noise level metrics are needed. The DfT remains undecided on other metrics.
 - d. **Length of Regime.** 3 years are chosen for the next regime but other terms (? 3, 5, 10 years) remain undecided.

- e. **A New QC category.** The DfT says *'If a new category was introduced for the quietest aircraft, this could mean an introduction of a QC0.0625 band.'* A new category remains undecided.
- f. **Reintroduce an QC exempt category.** Since 2017 all aircraft movements are included in an airport's movement limit. Reintroduction remains undecided.
- g. **Re-baseline the noise quota system.** QC0.125, QC0.25, and QC0.5 could be re-based to QC1 to QC4. Remains undecided.
- h. **Night quota period.** QC limits cover the period 23:30 to 06:00 but could be extended to cover the late evening shoulder, 23:00 to 23:30, and morning shoulder period, 06:00 to 07:00. RHC would strongly oppose a single period 23:00 to 07:00 unless there were also separate shoulder period controls. Remains undecided.
- i. **Banning the noisiest aircraft.** All QC4 rated aircraft movements, at the designated airports, were banned during the night quota period from October 2022. However, extending the ban to the shoulder periods and banning QC2 aircraft, scheduled and operational, and during quota and shoulder periods remains undecided.
- j. **Future movement and noise quotas:** managing night noise through QC limits only. Remains undecided.
- k. **Ring-fencing** in separate pools for scheduled services, ad-hoc movements and freight. Remains undecided.
- l. **Unused allocation during seasons.** Each designated airport's movement and QC limits are split into separate quota pools by the respective airports' scheduling committees. Within the scheduled service pool, each airline that has service during the NQP is allocated a proportion of the pool, and they report to the airport when they use any allocated movements and QC. Currently airlines can 'bank' unused QC points but question is this appropriate. Remains undecided.
- m. **Carry-over of limits between seasons.** The night flight regime allows airport operators to carry over limits between seasons and borrow from future seasons. The system lends itself to misuse. Remains undecided.
- n. **Health impacts and economic value of night flights.** Progress on these highly significant issues remains in the wings.
- o. **Future technology.** The DfT says aircraft are getting quieter. But that is only part of the story. Introducing Performance Based Navigation (PBN) and resultant concentration will have potentially huge adverse impact on communities due to noise concentration. Also, airlines seek to increase passenger numbers each year by increasing the size of aircraft and hence seats or by increasing the frequency of flights within airport capacity constraints. Also, routes are becoming longer and hence require more fuel on departures. The overall weight of Heathrow's fleet is increasing and that in turn increases noise, other things being equal. These issues are not brought adequately into focus when considering night flights.

RHC PROPOSALS, Q18 - ANY OTHER COMMENTS

NIGHT-TIME NOISE OBJECTIVE

16. The night-time noise abatement objective introduced by the Government with effect from October 2025 following public consultation in May 2023 is of considerable concern to RHC. The objective is stated as:
“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.”
17. RHC’s concerns are:
 - a. “Sustainable Growth” supports more night flights and increased noise impact.
 - b. Words “Limited” and “Where possible reduce” do not prevent increased noise and do not seek to reduce noise.
 - c. “The Polluter pays” principle is ignored. Airline growth pays to invest in less noisy aircraft but at the expense of noise impact on communities. It should be the travelling public that pays. Night flight ticket prices and the APD exemption for International-to-International transfer passengers fails to pay for the pollution.
 - d. There is no target to reduce night flight noise over time.
 - e. The objective fails to recognise that the distribution of noise, as well as its aggregate value, needs an objective. For example, (1) where aggregate noise can be reduced, preference should be directed at those most significantly affected by noise, and (2) dispersion should be sought instead of concentration of flight paths and noise.
18. **RHC Night-Time Noise Objective Recommendation (1): The objective should be revised to recognise the polluter-should- pay principle and to include noise distribution.**

METRICS

19. The sole metric relied upon by the Government for its night flight regime is the 48 dB LAeq 6.5hr and yet it is acknowledged that the established night-time LOAEL is 45 dB LAeq 8hr and that the World Health Organisation (WHO) recommends 40 dB LAeq 8hr. The N60 6.5hr and N60 8hr and the 48 dB LAeq 8hr are included as supplementary metrics. RHC’s opinion is that these supplementaries are at least as significant as the 48 dB LAeq 6.5hr.
20. Noise objectives should include a commitment that operations at Heathrow Airport will move towards compliance with the WHO’s limits on noise (individual noise level and average noise level) in each hour of the night period (23:00-07:00). Such a commitment is long overdue, bearing in mind that noise from air traffic at night is still a major disruption for many people living within audible distance of Heathrow's flight paths, despite night flying restrictions having been in operation at Heathrow for fifty years.
21. In 1980 the WHO recommended community noise guideline of 45 decibels (LAeq) in the night. Then in 1999 it recommended an additional guideline of 60 decibels (Lmax) in the night. The WHO also recommended that most people need 8 hours sleep.
22. In 2009 the WHO Regional Office for Europe published the Night Noise Guidelines for Europe, which took into account research since 1999 and recommended:

- 40 decibels (LAeq) as the long term target at night (i.e. instead of 45 decibels (LAeq) as recommended since 1980); and
 - 55 decibels (LAeq) as an interim target at night where 40 decibels cannot be achieved in the short term "for various reasons, and where policy-makers choose to adopt a stepwise approach."
23. In 2018 the WHO issued revised Noise Guidelines to protect human health - Environmental Noise Guidelines for the European Region. Key recommendations were: *'For average noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft below 45 dB Lden, as aircraft noise above this level is associated with adverse health effects. For night noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft during night-time below 40 dB Lnight, as night-time aircraft noise above this level is associated with adverse effects on sleep.'*
24. The absence of any meaningful action by Government on introducing WHO Guideline target values for noise over the last 45 years (1980-2024) means it is increasingly impossible to achieve the targets. In July 2004 the DfT gave the following commitment regarding achieving the WHO targets for night flights by 2030: *'The guideline values are very low. It would be very difficult, if not impossible, to achieve them in the short to medium term without draconian measures - but that is not what the WHO proposed. The recommendation was that the Guidelines for Community Noise should be adopted as long term targets for improving human health. The UK Government is committed to take account of this. In respect of aircraft noise at night, the 30 year time horizon of the White Paper, provides a suitable parameter for 'longer term.'*
25. Figure 1 illustrates the population numbers impacted by Heathrow Night Noise 2018-2019 using the DfT actuals for LAeq 8hr night 23:00-07:00 and RHC's extrapolation to lower exposure levels on the assumption of doubling the area for 3dB reduction and uniform population density. At 40 dBA 2.5 million people would be impacted at night.

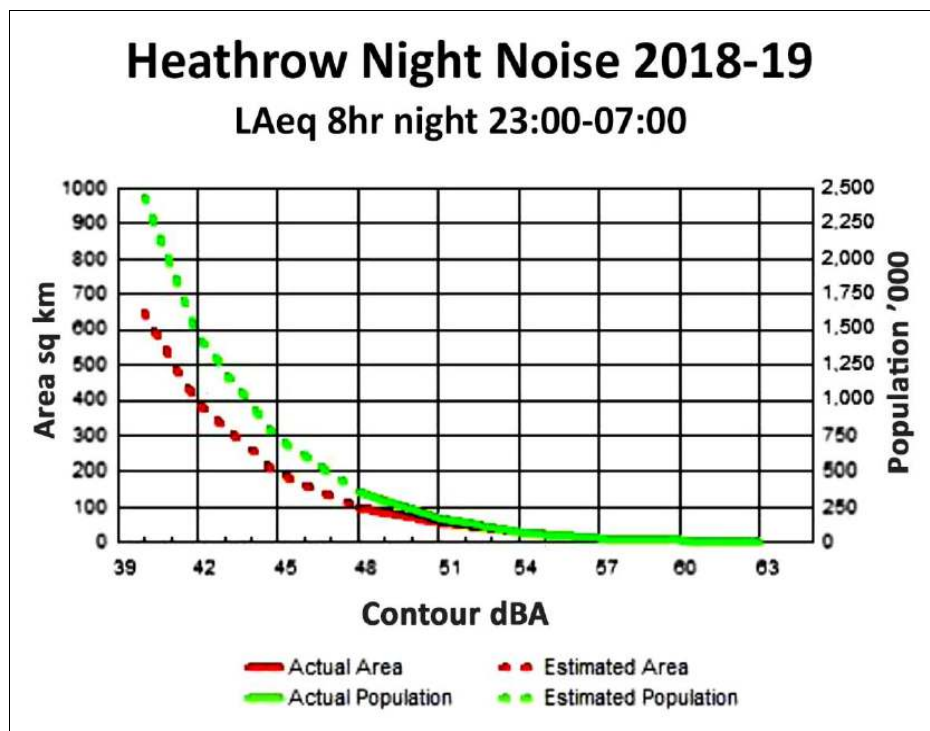


Figure 1 Source Actuals DfT consultation and RHC estimates based on doubling of area for 3dB reduction and uniform population density.

26. The substantial evidence on the harmful impact of noise used by the WHO in establishing its Guideline target values means the values are robust. While the ever advancing research on the negative health impact is useful, the case for Government action has long been firmly established by the WHO and yet there continues to be interminable delay in introducing robust metrics to control noise and its impact.
27. **RHC Metrics Recommendation (2): Government to take action without further delay to:**
- Establish the legal status of the WHO guideline values, 2018,**
 - Establish a UK strategy and timetable for reducing the levels of community noise from aircraft and from other major sources to the WHO guideline values, 2018,**
 - Integrate the WHO guidelines with the key Heathrow Community Noise Objective concerning reduction in adverse impacts of noise.**

HEATHROW NIGHT FLIGHT SCHEDULES

28. Figure 2 shows the number of flights per night 2018 Summer and Winter totalling 80.8 flights per night on average. 58.9 are scheduled and 20.1 unscheduled and 1.8 dispensed.

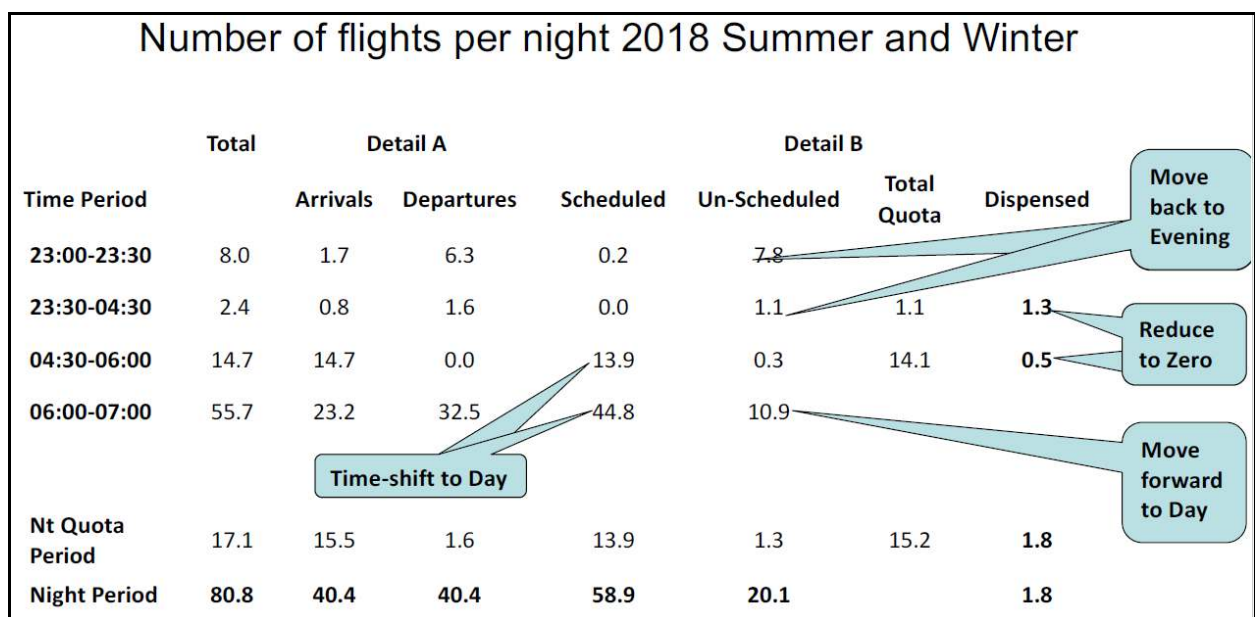


Figure 2 Prepared by Richmond Heathrow Campaign, August 2019. Source: Table A HAL Reports Heathrow Night Flight Report 2018 Q4 21 February 2018. Table B Heathrow Daily Operational Data Report 2018. Note slight differences of Table A. Arrival and Departure proportions 23:00-23:30 and 06:00-07:00 estimated by Richmond Heathrow Campaign. Night Quota Period 23:30-06:00; Night Period 23:00-07:00

29. **RHC Recommendation: Heathrow to take the following action:**
- Late Evening Shoulder period, 23:00-23:30.**
The average 6.3 unscheduled departures (late runners) should be substantially reduced and moved back to plan during the preceding evening hours. Analysis of the number of unscheduled flights each night in the shoulder period ranges from zero to 35. We believe Heathrow has capacity in the hours before the shoulder and therefore lack of capacity should not be a reason for late running flights in the late evening shoulder period. **RHC recommends a reduction of 6.3 flights be achieved by a mix of restrictions of unscheduled departures and penalties. Unscheduled**

arrivals may be more difficult to eliminate but this should be attempted. There should not be any scheduled flights in this period and the 0.2 needs explaining.

b. Night period, 23:30-04:30.

- i. **Dispensations.** We have seen the DfT's updated dispensation guide which takes effect from winter 2024. Steps taken seem to be in the right direction but it is too early to judge whether they will be meaningful in reducing the average dispensations of 1.3 in the core period and also that they do not just transfer the flights to the unscheduled category.
- ii. **Unscheduled.** We are not clear why there is an average of 1.1 unscheduled flights during this time during which there is a voluntary agreement to ban movements. **RHC recommends every attempt should be made to move the 1.1 flights back into the previous evening.**

c. Night period, 4:30-06:00.

Most of the 14.7 movements in this period are scheduled arrivals. Attached here in an Annex are the originating airports for arrivals in the Noise Quota Period and the stand arrival times at Heathrow for the summer 2018 and winter 2018/19. These schedules may be somewhat out of date but they highlight the limited number of airports involved, given that Heathrow has around 200 destinations, the airlines and the main parts of the globe involved in night flights to Heathrow. **We recommend these 14.7 flights be re-timed to the day and we examine this below in more detail with a similar re-timing recommendation for scheduled flights between 06:00 and 07:00.**

d. Early Morning Shoulder 06:00-07:00.

- i. **Unscheduled.** We understand the 10.9 unscheduled flights are largely due to aircraft arriving ahead of schedule, especially from the far east, to be first in the queue to be called down to land. RHC has for many years sought the scrapping of the first-in first-out system. Aircraft departure times at originating airports and flight times can be better controlled nowadays and should be used to ensure aircraft arrive just in time. **RHC recommend the 10.9 could and should all be moved to the day.**
- ii. **Scheduled.** **We recommend these 44.8 flights be re-timed to the day and we examine this below in more detail with a similar recommendation for scheduled flights between 04:30 and 06:00.**

30. There is a degree of confusion in times stated because of the difference between stand and runway time. On arrival, stand time is around 10 minutes after runway time. In the evening, a stand time is of benefit to communities because aircraft are overhead that much earlier but in the mornings the reverse is true. The opposite occurs with departures and the time between stand and runway can be much more than 10 minutes. Published times are stand times but we believe runway slot allocation by ACL is based on runway times. The difference can reduce night-time respite by 20 or more minutes. **RHC recommendation: Arrival and Departure Times to be annotated with an "S" for stand time and "R" for runway time.**

31. **RHC Scheduling Recommendation (3): We have made a number of recommendations above in regard to Night Flight Schedules. In summary, we recommend the principle aim should be to reduce and where possible eliminate unscheduled flights during the night-time 23:00-07:00.**

NIGHT-TIME RESPITE

32. Table 1 illustrates our understanding of the current Night Flight Respite regime. As far as we are aware the current arrangement is reasonable and fair. We are not making any recommendation here.

Night Flights - Runway Alternation Respite from <u>Scheduled</u> Flights Existing 2 Runways				
Table 1	Evening Shoulder 23:00-23:30	Night Quota 23:30-06:00	Morning Shoulder 06:00-07:00	
		Wind permitting	Westerlies	Easterlies
East of Airport				
Arrivals	Respite	3 wks respite out of 4 wks 15.5 flts/nt	1 wk out of 2 wks but with TEAM 23.2 flts/nt	Respite
Departures	Respite	Respite	Respite	1 wk out of 2 wks but with TEAM 32.5 flts/nt
West of Airport				
Arrivals	Respite	3 wks respite out of 4 wks 15.5 flts/nt	Respite	1 wk out of 2 wks but with TEAM 23.2 flts/nt
Departures	Respite	Respite	1 wk out of 2 wks but with TEAM 32.5 flts/nt	Respite
Prepared by Richmond Heathrow Campaign Confirmation needed from HAL				

BALANCED APPROACH (UN ICAO POLICY)

33. The Balanced Approach is failing as a regulatory tool in many ways. There are four levels of priority in dealing with noise.
34. **Reduction in noise at Source.** The reduction in noise at source from new types of aircraft and the rate of fleet change tend to be overstated. The pandemic and carbon constraints on air travel will impact aircraft fleets using UK airports with potentially significant consequences for carbon emissions, air pollution and noise.
35. The noise impact from an increasing proportion of the aircraft fleet being comprised of larger aircraft (notwithstanding the demise of the Boeing 747 and ultra large A380) should be included but too often is ignored.
36. The uncertainties of fleet composition are growing and require urgent review before noise at source levels are assumed for the future. We cannot rely on a reduction in noise at source to reduce Night-time noise and its impact any time soon.
37. There is increasing pressure on aviation to reduce its carbon footprint and it seems likely demand management will be required, and as we recommend, the number of night flights should be the first to be reduced.

38. **Land use planning and management.** The confusion in planning law and the pressure to build housing in London makes it very difficult for local authorities to reduce the impact of aviation noise through the land use planning.
39. There is a serious lack of information on the future number and location of flight paths resulting from Airspace Modernisation, which is causing major blight across London. The introduction of Performance Based Navigation (PBN) and potential concentration of flight paths and noise will likely have a major impact on the distribution of Heathrow aircraft noise. The cessation of the Cranford Agreement and Airspace Modernisation could also significantly affect the distribution of aircraft noise.
40. Noise improvements ultimately rely on less noisy aircraft but the benefit long term is potentially offset by London's population growth, which should be included in airspace design but too often is ignored.
41. Land use planning potentially can reduce the impact of aircraft noise on communities but this is unlikely to be applicable more than a few kilometres from the airport - yet still important because this is where the noise levels are the highest. The noise criteria for insulation are far too high to benefit most of the community affected by night flights.
42. **Noise abatement operational procedures.** The Inquiry by the All Party Parliamentary Group on Heathrow and the Wider Economy in its report 'Noise from Heathrow Airport, December 2014', found 'the effect of the procedures individually and collectively in reducing in absolute terms the present air traffic noise levels will be somewhat marginal'. The procedures include continuous descent, landing gear timing, reduced flap setting and steeper approaches. Heathrow's Noise Action Plans implement procedures for noise reduction within the confines of trade-offs with fuel, carbon and NOX. Improved procedures while welcome, especially in the aggregate, are insufficient to materially reduce night-time noise.
43. **Restrictions.** We are disappointed the DfT's has introduced the ban on all QC4 aircraft for the Night Quota period only instead of the whole night period and has not sought to ban any QC2 aircraft.
44. We expressed above our reservations as to the effectiveness of the Quota System in reducing the noise energy at night. A further issue with the QC system is aircraft certification which is sometimes understated when compared to noise during real operations. We explained above our recommendations for banning all unscheduled movements at night.
45. The Night Period from 23:00 to 7:00 is divided into three periods: Late Evening Shoulder, a Night Quota Period and Early Morning Shoulder. Table 2 describes the existing restrictions in these periods in black and DfT Proposals, 2025 to 2028, in Red and RHC Proposals in Blue:

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Table 2		HEATHROW NIGHT FLYING RESTRICTIONS					
	Late Evening Shoulder 23:00-23:30	Night Quota Period 23:30-6:00			Early Morning Shoulder 06:00-07:00		
Movement Limits	None	Winter 2018/19: 2,550 Summer 2019: 3,250 Unchanged 2019 to 2028			None		
Noise Quota Points- Limit	None	Winter 2018/19: 2,415 Summer 2019 : 2,735 Unchanged 2019 to 2028			None		
Carry-over between seasons - Movements		Yes					
Carry-over between seasons - NQ Points		Yes					
Ban on Noisiest Aircraft:	Schedule	Operational	Schedule	Operational	Schedule	Operational	
QC/16 & QC/8 0; 0*	Ban	Ban	Ban	Ban	Ban	Ban	
QC/4 2;10	Ban	No Ban Ban	Ban	No Ban Ban	Ban	No Ban Ban	
QC/2 521; 365	No Ban Ban	No Ban Ban	No Ban Ban	No Ban Ban	No Ban Ban	No Ban Ban	
QC/1 558; 617	No Ban Ban	No Ban Ban	No Ban	No Ban Ban	No Ban	No Ban Ban	
QC/0.5 1,125; 1,175	No Ban Ban	No Ban Ban	No Ban	No Ban Ban	No Ban	No Ban Ban	
QC/0.25 503; 587	No Ban Ban	No Ban Ban	No Ban	No Ban Ban	No Ban	No Ban Ban	
QC/0.125 4; 12	No Ban Ban	No Ban Ban	No Ban	No Ban Ban	No Ban	No Ban Ban	
QC less than 0.125 0; 0	No Ban Ban	No Ban Ban	No Ban	No Ban Ban	No Ban	No Ban Ban	
Dispensations	Yes		Yes		Yes		
Runway preference	Westerly		No Preference		Westerly		
Runway Rotation	Yes		Yes		No (TEAM)		
* Aircraft Movements winter 2018/19; summer 2019. Black existing Feb 2021; Red DfT proposal; Blue RHC proposal							
Prepared by Richmond Heathrow Campaign May 2024							

46. **RHC Balanced Approach Recommendation (4): In summary, greater emphasis should be placed on implementing the Balanced Approach as applicable to night flights in respect of all four priorities - (1) Reduction in Noise at Source, (2) Land Use Planing and Management, (3) Noise Abatement Operational Procedures and (4) Restrictions including bans on the more noisy aircraft.**
47. However, we do not believe that the reduction of unscheduled flights (Recommendation 3) and Balanced Approach actions (Recommendation 4), even if implemented successfully to the full will reduce sufficiently the impact of Heathrow night flight noise on communities' sleep, health, well being and productivity. RHC therefore believes it essential to go further and reduce the number of night flights between 23:00 and 07:00. We address this in the next section on time-shifting flights from night to day.

HEATHROW TIME-SHIFT OF FLIGHTS FROM NIGHT TO DAY

48. There is No Good Reason for Night Flights. The following numbers may be slightly out of date but that in itself is further evidence that services are not fixed or essential.
- What is so special about the 18 originating airports that they require night flight arrivals between 04:30 and 06:00 whereas 174 originating airports are without night flights? No Good Reason.
 - Why do only six airports in the Far East need pre-06:00 access to Heathrow whereas more than 26 originating airports in the region do not? No Good Reason.
 - Why do the 18 originating airports require night-time arrivals when many denser routes do not? No Good Reason.
 - Of the 18 routes why do 7 not operate in the summer and 3 not in the winter seasons? No Good Reason.
 - Why do some airlines operate night flights less than seven days a week?
 - All the night-time routes have day flights to/from Heathrow with spare capacity and there is airport capacity to re-allocate slots from night to day.
 - Are late departure curfews the reason for some of the early arrivals at Heathrow? Curfews do not explain night arrivals from US airports and others, which depart in the local daytime. Curfews are No Good Reason.
 - **The only reason for night flights is that the DfT allows them.**
49. The argument presented by Heathrow that night flights support essential international-to-international (I-I) transfers is a myth. There are just 300,000 I-I transfer passengers a year at Heathrow on thin long haul routes out of 23 million I-I transfers (CAA/DfT data for 2011 and 2016). Examination of the night flight routes suggests that none of the routes would be unviable without I-I transfers. A loss of around 500,000 I-I transfer passengers out of 1.84 million night flight passengers in our view would have no negative impact on the UK and would benefit local communities by a reduction in noise. N.B. I-I transfers are exempt from Air Passenger Duty.
50. Examination of Heathrow's hourly schedules for Arrivals and Departures in Winter and Summer shows that at least 90 flights can be handled an hour and these allow for unscheduled contingencies. Averaging 90 movements over 16 hours (07:00-23:00) and 365 days a year results in a theoretical scheduled capacity of 526,000 movements. Deducting the legal limit of 480,000 air transport movements and 6,000 non-ATMs a year leaves contingency capacity of 40,000 per year (110 flights a day) or 7.6% of the theoretical scheduled capacity. No capacity increase is assumed for mixed mode which communities would oppose. RHC believes that besides runway capacity Heathrow does have terminal capacity in the day to add 1.84 million night-time passengers to the existing approximately 80 million day-time passengers a year.
51. In September 2016 Heathrow said it would like to unlock the 480,000 ATM legal limit and add 25,000 flights a year before a 3rd runway is opened. It said that *'Overall flight numbers will rise by 25,000 a year with four million more passengers. The airport says new technology will allow this without causing more delays for existing flights.'* We would strongly resist unlocking the planning limit of 480,000 ATMs a year but point out that

Heathrow believes there is spare day-time capacity for at least 25,000 ATMs. This could be used for re-timed night flights.

52. Figure 2 shows there are approximately 5,075 (13.9x365) scheduled flights between 23:00 and 06:00 and 16,350 (44.8x365) scheduled flights between 06:00 and 07:00 or 21,425 in total that potentially could be time-shifted to the day. This excludes night-time dispensations.
53. Examination of the airlines and originating airports involved in night flights confirms that all have one or more day-time flights. Night-time passengers re-timed to the day could increase day-time load factors, justify larger aircraft and increase day-time route frequency by means of additional slots allocated to the airlines as a priority (subject to slot allocation and scheduling rules).
54. **RHC Time-Shift Recommendation (5): RHC believes the case for time shifting night flights to the day-time should extend across the night period from 23:00 to 07:00. In the first instance a time-shift assessment should be prepared for a route from a single airport in each of the main night flight zones, such as the far east. The assessments should consider all the main issues that stakeholders are interested in - including the net incremental economic cost/benefit from time-shifting flights from night to day. The assessment should include the incremental reduction in health costs from shifting night flights to the day. The economic costs should be examined in terms of the UK and commercial stakeholders, such as the airlines and Heathrow, and in terms of passengers. Generally speaking, we would not be supportive of a time-shift from the Night Quota Period into the Late Evening or Early Morning shoulder periods.**

ACTION NOT DEFERRAL

55. The current consultation highlights the lack of action on reducing the impact of Heathrow's night flight noise on communities over the last 50 years. There has been a systemic failure to recognise and deal with the substantial impact of Heathrow night flight noise on the sleep, health, well being and productivity of over 2 million people. IT IS TIME FOR ACTION.
56. RHC welcomes the two new reports by the DfT and CAA being prepared on noise impact but there is already sufficient robust evidence from many reports including those by the WHO to take action now. Preparation of new reports is too often given as reason for deferral of action which is tantamount to no action.
57. RHC is not suggesting an out-right ban of all night flights. Rather we recommend a collaborative initiative between the main stakeholders to consider whether some and perhaps all of the passenger demand for the current 80 night flights a night can be reasonably serviced during the day.
58. **RHC's Action Recommendation (6): Action should be taken now to reduce Heathrow Night flight noise impact and end the 50 year delay.**

Annex: Originating airports for arrivals in the Noise Quota Period and the stand arrival times at Heathrow for the summer 2018 and winter 2018/19

NIGHT FLIGHT RESTRICTIONS - HEATHROW

**DFT CONSULTATION
RICHMOND HEATHROW CAMPAIGN RESPONSE 22 MAY 2024**

Please note these schedules are not entirely up to date (as of May 2024).



Figure 1 Heathrow Arrivals Night Quota Period Summer 2018/19

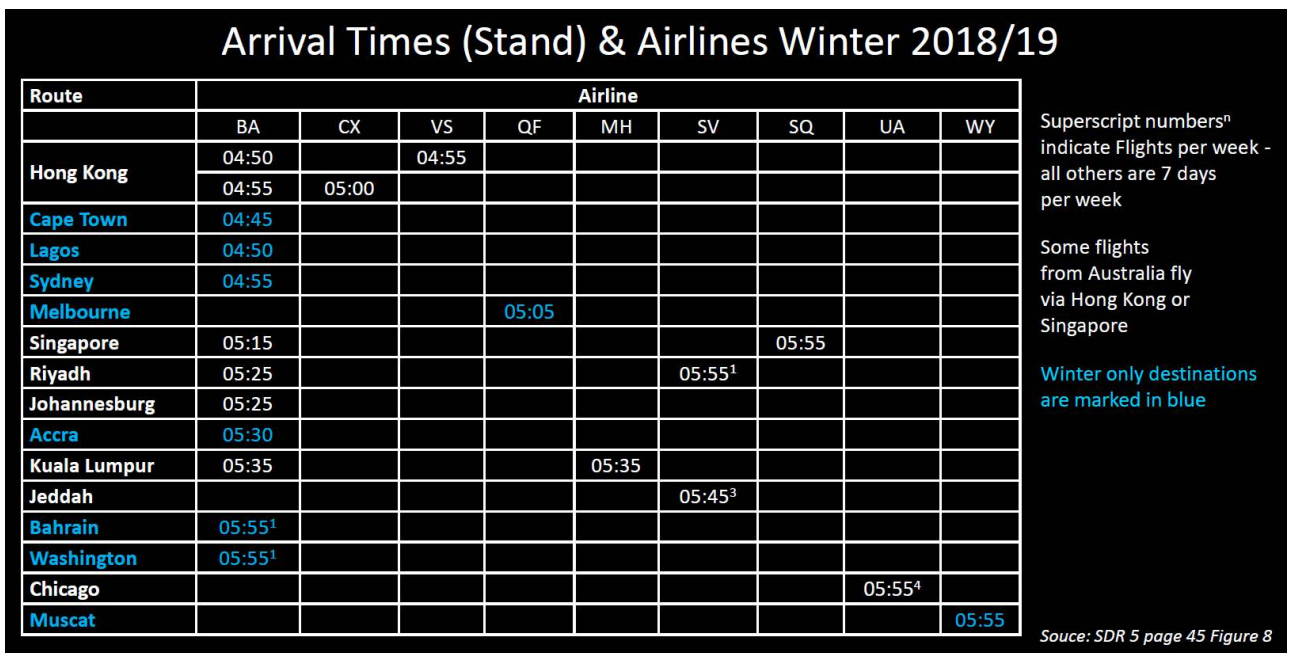


Figure 2 Heathrow Arrivals Night Quota Period Winter 2018/19