

ICCAN response to Department for Transport's consultation on night flight restrictions, part one.

ICCAN was established in 2019 as an independent advisory body, set up to act as an impartial, credible voice on all matters concerning aviation noise and how it affects communities.

We are currently preparing our substantive response to the Government's consultation on night flights, now extended to May 2021.

Our views on the two issues raised regarding the current regime follow.

Extending the current regime to 2022:

We recognise the pressures that the Covid-19 pandemic has put on the aviation industry, and the Government's ability to make time for its officials to conduct a rigorous and robust consultation on the next regime, in time for it to be put into effect. In the circumstances, we agree with the extension of the current regime (and with it the noise objective) to allow that time and will look to ensure that proper and due consideration is given to various options for the next regime, in the coming months.

The banning of QC4 rated movements from the night quota period:

In principle, the removal of louder aircraft such as the 747 from the skies around the designated airports is to be supported, due to the beneficial impacts on communities that otherwise would have suffered from being overflowed by them during the night period. However, we would make two observations.

First, it is our view that such a move should in normal times be considered holistically across the country, notwithstanding the current different responsibility for night flights between designated airports and non-designated. There is a danger that banning such aircraft from the three designated airports in the South East may simply move them to other airports in the UK. We know from our engagement, and from surveys, that the issue of equity and fairness is one that is important to communities, and the consistency of approach to policies across the UK is important to industry. While we understand the need to allow for local authorities to decide upon restrictions (or otherwise) at non-designated airports, decisions such as these may have unintended consequences for other communities, without any due say in the matter. This goes to the point about why, and whether, there should be three designated airports. While not a question addressed at this stage of the consultation, we are considering our view on the issue and see proposals such as banning 747s at the designated airports (but allowing them to continue everywhere else, particularly and potentially increasingly their use in freight operations at night) as a good illustration of the problems this approach throws up. Our view is that this is one such issue where ICCAN can, in the future, set national standards or guidelines about night flight restrictions.

Second, such a move allows for an obvious criticism to be targeted at the Government: bringing in regulatory restrictions once and only when industry decisions/activity allows it. The retirement of the 747s, while having benefits from a noise point of view, was brought on by the impact of the pandemic on aviation levels. The Government's own consultation text acknowledges this: 'we propose taking advantage of the withdrawal of QC4 rated aircraft (for example Boeing 747-400 on departure) from most scheduled services due to the pandemic'. While welcome, it is

hard to see how such a move can be seen to drive change and improved outcomes, and the criticism of shutting the stable door could be fairly levelled. In our substantive response to the consultation, we will be asking the Government how it intends to show real intent to incentivise lower levels of noise with its future night flights regime, and making suggestions of ways to do so.