

To: night.flights@dft.gov.uk

From: PHASE / info@planehellaction.org.uk

Date: 27.2.21

Plane Hell Action SE (PHASE)

<https://planehellaction.org.uk/>

responds to

Department for Transport's Open Consultation on Night Flights – Part 1:

- extending the existing night flights regime beyond its current expiry date of October 2022 until October 2024
- stopping the use of the noisiest Quota Count 4 (QC4) -rated aircraft at night

[Plane Hell Action SE](#) (PHASE), representing those under Heathrow (and London City Airport) **arrivals** paths in S and SE London, as well as supporting a strategy for arrivals and departures operations that fairly considers those under flight paths, supports the responses to Questions 6 – 12 of the following organisations:

Aviation Communities Forum

HACAN (Heathrow Association for the Control of Aircraft Noise)

No 3rd Runway Coalition

Teddington Action Group:

We make **additional comments, prefaced PHASE**, that consider S and SE London communities under **ARRIVALS** flight path/s to Heathrow.

And we start by highlighting **Government's flawed policy to 'minimise impact'** which has resulted in unconsulted concentration of flight paths, often for up to 20 miles at low altitude for 19 hours, over communities who have had no say in the policy and do not benefit from, in this instance, Heathrow's operations and are yet forced to endure a soul-destroying 'quality' of life and negative health effects due to near-constant aviation noise and fuel emissions. Before anything else is considered this 'minimise impact' policy needs to be translated to mean 'share the impact by reducing concentration, giving everyone a complete break from aviation noise, and at least 8 hours' sleep at night'. Minimising the impact does not equate to minimising the numbers impacted.

Additionally, there are no restrictions on noise for Heathrow arrivals flights¹ and this should change forthwith in line with restrictions/fines in use for Heathrow departures.

¹ [https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/noise/reports-and-statistics/reports/airspace-and-noise-performance-reports/annual-reports/LHR-ANP-AR2018-approved\(online\).pdf](https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/noise/reports-and-statistics/reports/airspace-and-noise-performance-reports/annual-reports/LHR-ANP-AR2018-approved(online).pdf) pg 5, 3.1 & pg 28, 6.6

Neither do S and SE London benefit from runway alternation, being too far from landing (Matt Gorman, HCNF).

This flawed approach by Government is unjust and inhumane and singles out communities who have no choice or say in the matter yet contribute to UKplc as much as those who are not negatively impacted by these 'motorways in the sky'

QUESTION 6. Do you agree with our October 2022 to 2024 night noise objective for the designated airports? Provide evidence to support your view.

PHASE:

- What is the objective? How many people are currently affected by aircraft noise at night, in this instance, Heathrow? What is the target for reducing the numbers affected? How do you propose to do this unless by ending all flights between 2200 hrs and 0700 hrs? And by when?
- The proposed approach does not suggest any practical proposal to reduce the number of aircraft operating at night, nor introduce operational practices that may reduce noise at night nor, most importantly, reduce the quota limit at designated airports. It is unclear what the DfT would consider 'successful delivery of policy' to look like.
- The objective claims the purported economic benefits of night flights but provides no justification or evidence to support this. Similarly, there is no estimate of associated health costs caused by night flights and no specific targets included in the objective to either improve health or reduce noise.
- **Dft claims (this consultation) that aviation contributes 230,000 jobs and a £22bn** to the UK economy. We draw attention to the creative industries, decimated by aviation's insistence on keeping flights going, spreading disease and forcing lockdown on British citizens to the huge detriment of the (mainly self-employed) creatives. Pre-Covid-19 this sector not only contributed majorly to the health and wellbeing of the population; it made a greater contribution to the UK economy than the aviation sector, not just for the UK public but in terms of attracting overseas visitors. It is arguable that the UK cultural, entertainments, catering and home tourism sector employed far more people than the aviation industry: **prior to the Pandemic the Creative Industries contributed £115.9bn to the UK economy, which is greater than the automotive, aerospace, life sciences, oil and gas industries combined and employed over 2m people.**² These life-enhancing opportunities provided by so many specialist talents have been decimated by aviation who seek to benefit only their (mainly) foreign shareholders. **NB** The cultural sector has been the last to receive financial support from Government during Covid-19 lockdown yet has provided for the wellbeing of huge numbers during this time.
- By contrast, overseas tourism, fuelled by the UK aviation industry's predict-and-provide model, ensures that British people spend more money abroad than

² <https://www.creativeindustriesfederation.com/statistics>

overseas tourists spend in the UK. Night flights and the associated negative health impacts add a burden to the already-overstretched NHS, particularly in the current Covid-19 environment.

QUESTION 7 Do you agree with how our October 2022 to 2024 draft noise objective for the designated airports will be measured?

PHASE:

- No. Many studies have been done which highlight the link between night flights and poor health, particularly around the risk of cardiovascular deaths.³ We quote BMJ blog '*There is insufficient appreciation of the fact that aircraft noise has substantial effects on cardiovascular disease including hypertension, ischemic heart disease, heart failure and stroke*'.⁴
- The 'lived experience' is evidence enough of the negative impact of night flights and 'running on empty' PHASE can give any number of examples of those who are already suffering under concentrated flightpaths and who will confirm the soul-destroying impact this has had on their lives, with particular reference to sleep deprivation due to the current night flight regime at Heathrow:

Five hours' sleep combined with the endless whine of planes between 4.30am until 11.30pm is sheer hell. Earplugs, white noise, noise cancelling devices – none of these work, particularly in hot weather when windows are open for fresh, cool air.'

The recent South London Press article will corroborate this:

<https://londonnewsonline.co.uk/campaigners-urge-government-to-ban-night-flights-into-heathrow/>

- The World Health Organisation (WHO) 2018 noise guidelines, recommended that the safe level for aircraft noise at night was 40dB Lnight.⁵ Consequently, the continued use of the 48dB Lnight contour appears to not be in line with the balanced approach.
- Due to arrival touchdown being allowed from 0430 hrs, Londoners suffer arrivals noise overhead from before 0425 hrs at 61-67dBL decibels as planes fly at below 3500 feet to join the ILS at more than 12 nm from threshold (over central London). The noise contour map for Heathrow⁶ ignores noise events further out than Barnes (Battersea at a pinch), but these are highly disruptive to the more distant overflown communities of Brockley, Camberwell, Greenwich,

³ <https://academic.oup.com/eurheartj/advance-article/doi/10.1093/eurheartj/ehaa957/6007462>

⁴ <https://blogs.bmj.com/bmj/2019/06/18/the-harms-to-health-caused-by-aviation-noise-require-urgent-action/>

⁵ http://www.euro.who.int/_data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf?ua=1

⁶ CAA Heathrow Airport 2018 Summer Noise Contours and Noise Action Plan Contours / ERCD REPORT 1901 Figs B7, B8, B9

Lambeth, Woolwich at 18 nm and beyond. This is the problem with averaging (LAeq) which is known to misrepresent the effects of noise on the overflown. (Annex G)

- Further, it has the effect of lowering the total number of people disturbed by aircraft noise at night which downplays the negative impacts – this would have significant impact on any costs benefit analysis.
- To reduce the size of the population within this lower level contour would require more severe restrictions on night flight operations which simply cannot be achieved by extension of the existing regime.

QUESTION 8 Do you agree that we should maintain the existing restrictions for two years from October 2022 to October 2024?

PHASE:

- NO, we should seek to reduce the current level of Heathrow-related night flights immediately.
- The nightly flight restriction is not 2300-0600, but for residents overflown by arrivals, the night flight restriction is in fact 2330-0430 hrs.
- Londoners are unfairly affected by Heathrow westerly operations which operate even when winds are southerly or light easterly i.e. approximately 70% of the year.
- Londoners affected by these early arrivals do not benefit from any financial compensation as they are considered to live 'too far away'. However, overflight is occurring at heights of 3500 feet and under as planes approach threshold from 18nm distance.
- It is disproportionate and even cruel to count the numbers of households affected by overflight as a 'noise disturbance metric': inflicting all the noise on the same households is an abuse of power; it is a problem caused by the increasing use of PBN and can be avoided by using controllers to guide in the fewer planes that land up to 0600 hrs. (Annex G)
- See Q7: The 'lived experience' is evidence enough of the negative impact of night flights and 'running on empty' PHASE can give any number of examples of those who are already suffering under concentrated flightpaths and who will confirm the soul-destroying impact this has had on their lives:

Five hours' sleep combined with the endless whine of planes between 4.30am until 11.30pm is sheer hell. Earplugs, white noise, noise cancelling devices – none of these work, particularly in hot weather when windows are open for fresh, cool air.'

The recent South London Press article will corroborate this:

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- Heathrow should not accept 0430 hrs early arrivals from far away airports. It should negotiate new arrival times with these airports that allow Londoners the chance of 8 hours' sleep. These Londoners are not referred to in the consultation and this is another way of misrepresenting the numbers affected by noise since it conveniently allows low overflight to be implemented further from threshold than is necessary.
- WHO guidelines should and must be adhered to with respect to night time overflight, 40 decibels rather than LeAq, and sleep.
- Arrivals should not occur before departures start. The current operation of doing so has created a disproportionate and unbalanced overflight situation that results in a further misrepresentation of what actually happens to people trying to sleep in their homes. This imbalance may exist partly to provide an opportunity for carriers to prepare departure planes using the ones that arrived an hour earlier. This is not a valid reason for disturbing the sleep of Londoners at 0430 hrs.
- Many areas of London lying east of Heathrow suffer from arrivals at the end of the day: these can be 'late' and overflight can occur in these cases as late as midnight. The same residents then additionally suffer overflight again from 0425 hrs, as the first flights of the day approach threshold.
- Areas overflown by night flights, including Southwark, Lambeth, Chelsea, must not be sacrificed and forced to become red zones where residents' quality of life is dramatically reduced by sleep interference from overflight, up to 30 flights between 0430 hrs and 0600 hrs.
- Early/late arrivals should meet the ILS closer to threshold and therefore not overfly huge areas of E, SE and S London. A return to a more westerly join point such as existed in 2010 should be implemented.
- A return to a more westerly join point should be implemented together with a round-robin use of approach paths, to minimise the current density of consecutive arrivals overhead. It goes against the ICAO's so-called Balanced Approach to bring arrivals over the same residents, one after the other.
- **In summary:** WHO stipulates a minimum of 8 hours sleep for physical and mental well-being. Healthy people function better and make a greater contribution to the UK economy.

QUESTION 9 What would be the impacts to you should the government maintain the existing restrictions for two years, from October 2022 to October 2024 (provide evidence to support your view)?

PHASE:

- Continuation of the same impact, see answer to Q8. In reality, Covid-19 has not stopped the approx. 30 noisy freight/belly cargo arrivals 0430 hrs – 0600 hrs arrivals to Heathrow.
- The continuation of the current level of sleep deprivation when Heathrow is on westerly operations, approximately 70% of the year, does not reflect ICAO's so-

called Balanced Approach. Arrivals flights must be shared over all communities – see our opening remarks.

- For those impacted by Heathrow's operations: ARRIVALS do not cease until 2330 hrs and start again 0430 hrs, sometimes earlier, giving those living under the arrivals flight path in S and SE London a mere 5 hours' peace.
- In addition to noise, planes produce emissions. Those living under concentrated flight paths are forced to breath aviation-fuel-polluted air as well as being deprived of sleep. Many of us in S and SE London have seen planes ejecting excess kerosene in advance of landing, although such emissions are illegal and should have been achieved at sea before reaching land-based UK airspace.
- **In summary:** WHO stipulates a minimum of 8 hours sleep for physical and mental well-being. Healthy people function better and make a greater contribution to the UK economy.

QUESTION 10 What would be the impacts to you should the government allow the night flight restriction in place at the designated airports to lapse (provide evidence to support your view)?

PHASE:

- Catastrophic and unbearable to contemplate yet more intrusive noise and noise events during the hours of rest, along with polluted air – see Answers to Q8 & Q9.
- Night flights between the hours of 2200 hrs and 0700 hrs should never take place apart from for national emergencies and humanitarian reasons
- PHASE underlines that night flights can never be mitigated against: insulation, noise cancelling devices, double/triple glazing, earplugs, white noise do not work and do not work when fresh, cool air and open windows are necessary. Night flights should be banned between the hours of 2200 hrs and 0700 hrs.
- **Noise contours: S and SE London are impacted by noise levels much higher than the nearest noise contour, 48dB, which does not even show Brockley, Camberwell, Greenwich, Lambeth or Woolwich yet these areas suffer much higher levels of noise than CAA is prepared to admit.** Arrivals currently operate at low altitudes for up to 18 nm+ from landing.
- Planes must remain higher for longer and descend more steeply – 5% and not 3-3.2% as currently. This is possible ref ICAO Doc 9888 Noise Abatement Procedures.
- Each airport must set specific arrivals (and departure) standard operating procedures relevant to that airport; cf currently individual airlines and/or pilots choose to set their own flight approaches and departures with no consideration for those communities over which they fly. e.g. flying at low altitudes, landing gear lowered to early, low altitudes maintained at takeoff etc. Airlines' sole aims are financial efficiency for their shareholders by reducing engine wear and tear, and savings on fuel And we remind you of our comments to fuel ejected over communities before landing, answer to Q9.
- **In summary:** WHO stipulates a minimum of 8 hours sleep for physical and mental well-being. Healthy people function better and make a greater contribution to the UK economy.

QUESTIONS 11 & 12 Do you agree we should ban QC4 rated aircraft movements from operating at the designated airports between 23:30 and 06:00 from October 2022?

PHASE:

- Yes. There should be an outright ban immediately on all QC4- and, additionally, all QC2-rated aircraft movements from operating between 2200 hrs and 0700 hrs. Very few of these aircraft are currently in operation and their removal will make less difference to the economy, than the greater cost, should they continue, to the NHS coping with the negative harm on those affected by sleep deprivation. **These flights must not be replaced by lesser-rated aircraft.**
- PHASE highlights Heathrow's refusal to acknowledge that there have been changes in flight patterns, types of planes, hours of operation over S and SE London communities since 2016 destroying, overnight, the peace of whole communities who had, until then, enjoyed living in a near-plane-free environment.
- Noise levels for arrivals flights are not considered relevant by DfT/CAA when considering the impact on those living under a flight path where planes fly far too low over long distances before landing. This is despite the fact that SE London has Heathrow's easternmost-sited noise monitor (511: Camberwell) which records on a daily basis noise levels of 60dB+ from 0430 hrs.
- cf answer to Q9 re noise contours: **S and SE London are impacted by noise levels much higher than the nearest noise contour, 54dB, which does not even show Camberwell, Greenwich, Brockley, Lambeth yet these areas suffer much higher levels of noise than CAA is prepared to admit.** Arrivals currently operate at low altitudes for up to 20 miles from landing.
- We draw particular attention to TAG's responses which have a specific relevance to communities under arrivals flight path/s when considering the flawed SoNA study, and the poorly-understood and under-researched effects of steamrolling concentrated flight paths for arrivals over the same communities.

In summary: WHO stipulates a minimum of 8 hours sleep for physical and mental well-being. Healthy people function better and make a greater contribution to the UK economy. Bring all UK night flights to an end, if not immediately to take advantage of Covid-19 flight reductions, then no later than 2022.

Dr Maureen Korda & Bridget Bell / PHASE
27.2.21