

<b>Committee:</b>	Stansted Airport Advisory Panel	<b>Date:</b>
<b>Title:</b>	Government consultation on night flights restrictions at Heathrow, Gatwick and Stansted Airports beyond 2024, plus national night flights policy.	Wednesday, 18 August 2021
<b>Portfolio Holder:</b>	Portfolio Holder for Planning and the Local Plan	
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## Context

1. This report is an updated version of the one that was deferred at the meeting of the Panel on 19<sup>th</sup> May 2021. The reason for deferment was the extension of the consultation period from 31<sup>st</sup> May to 3<sup>rd</sup> September.
2. The consultation as originally published in December 2020 had two main purposes. The first was to consult on a proposal to maintain the existing night flight restrictions at the designated airports (Heathrow, Gatwick and Stansted) from October 2022 until October 2024 and to ban QC4 rated aircraft movements during the Night Quota Period (NQP) between 2330 and 0600. The second purpose (the subject of this current consultation) is to seek early views and evidence about future night flight policy both at the designated airports and nationally beyond 2024 (now 2025 – see next paragraph).
3. The consultation on the first purpose closed on 3<sup>rd</sup> March. The Council submitted its response by that deadline following an informal meeting of members of the Panel on 16<sup>th</sup> February. The Government has now published its decision on the restrictions that will run from October 2022. Quoting from the executive summary of the decision document (author's underlining):

*"Firstly, 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. A two-year rollover, which would have necessitated consultation on new proposals in 2022, would no longer provide enough time for the government to have conducted thorough research to properly inform and develop a new evidence-based night noise regime. This is because of a change in the government's view on the pace and trajectory of the aviation sector's recovery. By rolling over for three years, the extra year will allow the government to develop a more meaningful evaluation of the costs and*

*benefits of night flights (as called for in a number of consultation responses from community groups), taking into account the effects of the pandemic and the extent and speed with which aviation demand returns. This will enable decisions to be taken against a background of a wider evidence base, including on the negative impacts on sleep and health, against which the economic benefits of night flights have to be balanced”.*

*“Secondly, the government will proceed with the implementation of a ban on QC4 rated aircraft movements, at the designated airports, during the night quota period. Despite receiving some opposition to the proposal from industry, the government has not received robust evidence that this would have more than a minimal impact on industry, while benefitting communities by taking the noisiest aircraft out of operation during the night quota period”.*

4. Considering the uncertainty over the nature and speed of the recovery of the aviation industry from the pandemic, it is perhaps unsurprising that the existing restrictions have been rolled forward for three years. Nonetheless, this is still a disappointing decision, especially for local communities. The pledge by the Government to use the extra period of roll-forward to carry out a more meaningful evaluation of the costs and benefits of night flights is welcome, provided that local communities have a full opportunity to give evidence to that evaluation. The Council supported the QC4 ban during the NQP, so that is a welcome but small victory as there were no QC4 flights during the NQP at Stansted in the winter 2018/19 and summer 2019 periods.
5. Following closure of the current consultation, the Department for Transport (DfT) has said that responses received on revisions to its current night flight dispensation guidance (Annex F) will be used to revise the guidance for airport operators. The updated guidance will be published before the new night flight restrictions commence in October 2022. DfT aims to publish a further night flight restrictions consultation during 2023, and it is at that stage that firm proposals will be set out for longer-term policy reform and for the subsequent restrictions at the designated airports beyond (now) October 2025.
6. Of the consultation extension to 3<sup>rd</sup> September, DfT said in May of this year in an email to members of its Airspace and Noise Engagement Group (ANEG):

*“The Department received requests from stakeholders to extend the consultation deadline to allow them to incorporate evidence expected to be available within the next three months in their consultation responses. This includes the CAA’s Survey of Noise Attitudes 2014 : Aircraft Noise and Sleep report (“SoNA Sleep”), which is now expected to be published early in the summer.*

*Extending the consultation into early September will allow respondents the time needed to consider and comment in detail in light of this further*

research”.

7. The SoNA Sleep study was finally published on 22<sup>nd</sup> July and is available at <https://caa.co.uk/cap2161>. The study focusses on self-reported attitudes to sleep disturbance from aircraft noise, taken from responses to questions from within the larger SoNA 2014 study. A short summary of the study is attached as Appendix C.
8. Officers are concerned at the lateness of the publication of the study in view of the impending consultation deadline and the onset of the main holiday period. They expressed this concern to DfT at the most recent ANEG meeting and in a follow-up email. DfT has subsequently agreed that, whilst the on-line consultation portal will close on 3<sup>rd</sup> September, the Council’s response can be submitted by email no later than Friday 1<sup>st</sup> October. This will allow the Council time to refine its response after Cabinet on 2<sup>nd</sup> September, particularly in the light of any new considerations prompted by the study. SASIG has received a similar dispensation from DfT in order to allow time for its members to endorse its response at the full meeting on 29<sup>th</sup> September.

## Recommendations

9. That the Panel:
  - i) considers the officers’ response to the second purpose of the consultation and advises of any changes and / or additions it would like made, and
  - ii) endorses the response which will then be put to Cabinet on 2<sup>nd</sup> September. It will be recommended to Cabinet that the Director of Public Services, in consultation with the Portfolio Holder be authorised to sign-off the Council’s final response for submission by 1<sup>st</sup> October.

## Financial Implications

10. None.

## Background Papers

11. None.

## Impact

- 12.

Communication/Consultation	This consultation runs until <u>3<sup>rd</sup> September 2021</u> .
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Community Safety	To be considered by the Government.
Equalities	To be considered by the Government.
Health and Safety	To be considered by the Government.
Human Rights/Legal Implications	To be considered by the Government.
Sustainability	To be considered by the Government.
Ward-specific impacts	Those parts of the District affected by night flights.
Workforce/Workplace	Officer and Member time in considering the Council's response.

## Situation

13. The consultation is available on gov.uk, an updated link to which is given here - <https://www.gov.uk/government/consultations/night-flights-restrictions-at-heathrow-gatwick-and-stansted-airports-beyond-2024-plus-national-night-flight-policy/night-flights-restrictions-at-heathrow-gatwick-and-stansted-airports-beyond-2024-plus-national-night-flight-policy>
14. The consultation is an industry-wide one. It is not expected that consultees will respond to every question. Some questions seem to be directed towards the aviation industry, and others to individual consultees rather than groups or organisations.
15. It is not intended to go through each question individually in this report, but rather to concentrate on the main issues that could affect the district. In the remainder of this report, officers' comments are in **bold** to distinguish them from the explanatory text.
16. Appendix B sets out how the existing night flight restrictions work, and how they evolved from the previous ones which expired in October 2017.

## Background

17. In the consultation, the Government says that it:

*“recognises that noise from aircraft taking off and landing at night is often regarded by communities as the most disturbing form of airport operations. We also recognise that there is evidence, including in the World Health*

*Organisation's revised Environmental Noise Guidelines for the European Region, that sleep disturbance caused by aircraft night operations can have adverse health impacts on overflowed communities.*

*At the same time, the aviation sector has material value to the economy and night flights are an important contributor to this at many airports. The aviation industry plays a significant role in the UK economy and it connects people and UK businesses with the world. Prior to the coronavirus (COVID-19) pandemic, the UK's aviation network was the third largest in the world, after the USA and China. In 2019, UK airports served over 370 destinations in around 100 countries and handled over 297 million passengers. Aviation also facilitates global trade with £95 billion of goods exported by air extra-EU countries in 2018. The sector directly provided around 230,000 jobs with many more employed indirectly and the sector contributed at least £22 billion annually to UK gross domestic product (GDP).*

*The COVID-19 pandemic has had a profound impact on the aviation sector. The core focus in government at this time is combatting coronavirus and working with the sector on restart and recovery. The report of the Global Travel Taskforce, published in November, is the next step towards recovery for the travel and tourism sectors. It is nevertheless important that we continue to work on longer-term priorities, including those relating to aviation noise and night flights.*

*COVID-19 has meant that many people have had to profoundly change the way they live, work and travel. It is therefore sensible that the government explores how these changes in behaviours should influence future policy decisions.*

*It is also important the government finds the right balance between limiting the adverse environmental impacts that night flights have on communities, while supporting the aviation sector (passenger, freight, general aviation and so on), and the businesses that depend on the availability of night flights to deliver critical goods and services”.*

## Dispensations

**18.**At this stage, the Government is seeking views on its night flights dispensation policy. The way the policy operates is set out in Appendix B. Annex E of the consultation contains a review of airport dispensation reports between 2016-19.

**19.**In summary, the Government says that it does not have significant concerns over the use of dispensation powers. It does say that interpretation of the accompanying guidance by some has meant that some movement dispensations may not strictly meet the criteria. The Government intends to refine the guidance to improve clarity particularly around delays caused by weather, industrial action and network capacity and publish before October 2022. The Government also proposes that the guidance clarifies the

process by which an airport's decision to grant a dispensation can be rejected by the Secretary of State where the dispensation does not meet the criteria.

**20.**In relation to Stansted Airport, Annex E advises that dispensations are generally not applied for during the winter season as there is greater unused capacity at that time and an ability to absorb unscheduled night movements into the seasonal quota. However, the airport is particularly prone to disruption and delay during the summer season, possibly due to the low-cost business model that requires multiple rotations of aircraft and which does not provide much resilience. The charts provided within Annex E indicate that in summer 2018 there were 1,722 dispensations granted at Stansted, which:

- constituted 17.9% of total night movements
- were mostly granted for arrivals between 23:30 – 00:30,
- were mostly for network capacity reasons, and
- were mostly granted to Ryanair (88% of the total).

**21.**In Annex E the Government comments that network capacity delays mostly result from restrictions, imposed by air traffic control (ATC), on particularly busy ATC sectors due to high volumes of traffic and staffing levels to safely transit aircraft through the sector. It wrote to each designated airport in summer 2018 to state that this type of delay, without an underlying cause that is exceptional, does not meet the dispensation criteria. The Government does, however, acknowledge the efforts made to address the need for dispensations, which reduced to 379 at Stansted in summer 2019.

**22.**To improve dispensations transparency, the Government proposes to:

- make the dispensation process more transparent through greater scrutiny at an airport's noise and track keeping group (at Stansted this is a sub-group of the Stansted Airport Consultative Committee),
- provide guidance to airports on the information they should share with the public and on websites, and
- implement periodic reviews of dispensations, which could be commissioned either from the Independent Commission on Civil Aviation Noise (ICCAN) or the Civil Aviation Authority (CAA).

**23.** The measures set out in paragraph 22 are all sensible and should be adopted without delay. An obvious question to ask is what the greater scrutiny at the noise and track keeping group would involve other than it becoming a "talking shop". For instance, would there be any powers to act if the group considered that the airport operator was being, or was still being less than transparent. There are clear sensitivities for local communities around Stansted when they observe that most dispensations appear to be for leisure-based flights that are subsidised through low fuel taxation. Dispensations should be minimised to

**encourage airline business models that are more environmentally robust.**

**24. The review responsibility should ideally go to ICCAN, which was established at the start of 2019 as an impartial advisory body on all matters relating to civil aviation and how it affects communities. ICCAN's new Corporate Strategy 2021-2024 includes a longer-term ambition to empower people through being engaged and informed on issues related to aviation noise. ICCAN could also publish the guidance on the information that airports should share with the public and how it is provided, including ease of accessibility on websites.**

**25. The Government's aim in redefining and clarifying its guidance to airport operators should be to prevent the return of a high level of post-pandemic dispensations.**

#### Structure of the restrictions regime beyond 2024

**26. The Government is consulting on the length of the next regime beyond 2024 (now 2025). It asks whether there would be benefits from a much longer regime (10+ years). Historically, regimes have been for 5 years or shorter, which some stakeholders have indicated does not allow for long-term planning. The Government has remarked that it has not proposed a regime of shorter than 3 years, as consultation and notification requirements would mean that consultations on the subsequent regime would need to start soon after the new regime was coming into effect. On page 1 of Annex C, the Government says:**

*"it is equally important to acknowledge that there are still two years remaining of the current night flight regime and further evaluation of the regime will take place and be set out as part of the second stage consultation on the night flights regime in 2022".*

**27. The second stage consultation will now be in 2023. With shorter regimes, there is little time to analyse their effect once implemented before consultation starts on the next regime. In this current case, the start of the consultation was delayed due to the pandemic because DfT staff were seconded to restart and recovery. If it had not been delayed, there would still only have been about 18 months to assess the effect of the introduction of the new QC0.125 category before the new consultation started. With proposed shorter regimes, the temptation is always to roll forward the previous one (as has occurred in this case) on the presumption that a longer regime that can incorporate more change will follow. Rolling forward is often an easy way out, although understandable from 2022-2025 to allow a fuller appreciation of the**

effects of the pandemic.

**28. It is considered that there would be benefits to having longer regimes (10+ years). In particular:**

- there would be adequate time for a mid-regime review (led perhaps by ICCAN) that could feed into the consultation on the next regime,
- airport operators and airlines would have more time to plan to meet medium and longer term targets, which could justifiably be more challenging due to the longer lead-in times, and
- there should be more certainty for residents over what would happen in the longer term.

#### The QC system and related matters

**29.** The Government is of the view that the QC system (which has been in place since 1993) continues to be the best for limiting noise at the designated airports. Annex B contains more information on how the system works (as does Appendix B), as well as a CAA study on QC classifications. The QC system is an averaging based one, as it allows the operation of a larger number of less noisy aircraft or a smaller number of noisier ones within the same tariff.

**30.** Disturbance and dissatisfaction are events-based issues and not averaged or aggregated ones. What matters today to residents is the number of night flights and whether they are genuinely needed. In ICCAN's 2020 review of aviation noise metrics and measurement, it continues to support use of averaging metrics for noise monitoring and statutory reporting where appropriate. However, it also recommends that supplementary single event metrics are routinely published by airports to better reflect the way in which noise is experienced on the ground.

#### *A new QC category*

**31.** An option is to introduce a new QC category (QC0.0625) for aircraft between 78 – 80.9 EPNdB. QC0 would then relate to aircraft rated 77.9 EPNdB and below. Annex H contains a list of aircraft expected to be covered under the new category and contains some illustrative footprints at 60dBLA<sub>max</sub> compared to the Airbus A320neo, which is QC0.125 on arrival and departure. Generally, QC0.0625 aircraft would be business jets and propeller-driven aircraft. On westerly Clacton departures, for instance, the population size and number of households within the footprint would halve. The Government says in Annex H that:

*“whilst the noise footprints of a new QC0.0625 rated aircraft would be significantly smaller than the A320neo, the impacts of a QC0.0625 aircraft*



*are not insignificant”.*

*Reintroduce an exempt category*

32. Under the 2017 restrictions, the Government removed an exempt category for the least noisy aircraft, to provide more transparency, meaning that all QC0 aircraft still counted towards the movements limit (see [Appendix B](#)). This has led to the business general aviation sector stating that there have been times when it could not obtain, at short notice, sufficient night slots to deliver services which were previously able to operate at night as exempt flights. According to Annex D, there were 297 QC0 flights at Stansted during the winter 2018/19 and summer 2019 seasons compared to 0 at Heathrow and 18 at Gatwick.

33. The Government is suggesting reintroducing an exempt category which could be QC based, or based on aircraft size and/or weight, passenger loading or variations thereof. It asks whether the economic benefits of these movements outweigh the adverse health impacts. An option to reintroducing an exempt category would be a ring-fencing system for QC0 aircraft to ensure a fair share of night slots are available for commercial passengers, dedicated freight and business general aviation. The ring-fencing system could include guidance to airports and/or the scheduling committees, or a legal mechanism supported by the night flights regime.

*Re-baseline the noise quota system*

34. In recent years, new QC categories have been introduced to account for less noisy aircraft that were not in operation when the system was introduced in 1993. Decimalisation has been used for aircraft in categories less noisy than QC1, progressively QC0.5, QC0.25, QC0.125 with a now proposed QC0.0625. This seems very complicated, and the Government is suggesting re-baselining to ensure there is no current classification less than QC1. For instance, the current noisiest aircraft would become QC16 and QC8 and the QC0.5 - 0.125 categories would become QC4 – 1. The simpler decimalised categories could then be reserved for future generations of aircraft with lower noise signatures.

*Night Quota Period (23:30 – 06:00)*

35. The Government says it is open to broadening the NQP to 23:00 – 07:00 to be consistent with the full Night Period. Movement and QC limits would need to reflect movements that already take place in the shoulder periods. A mechanism might be needed if evidence shows certain periods of the night are more sensitive for communities than others.

*Banning the noisiest aircraft*

36. The Government says it is open to extending the operational ban that it is proposing on QC4 aircraft during the NQP up to 2024 (see Part 1

consultation) to the full Night Period beyond 2024. It also remarks that there are relatively few QC2 rated aircraft operating at night at the designated airports and is interested in exploring whether there is potential to introduce a scheduling ban on QC movements beyond 2024 during the NQP and eventually to the full Night Period.

- 37. Introducing a new QC0.0625 category would be a logical progression of technological advance, coupled with scheduling and/or operational bans referred to in Paragraph 36. In summer 2019, QC2 movements at Stansted during the NQP were only 3% of the total (277/8455), which is approximately the percentage that they have been for a while now. Moving aircraft from QC0 to QC0.0625 would be in line with Paragraph 3.3 of the 2013 Aviation Policy Framework, which expects the aviation industry to share the benefits of technology improvements between itself and local communities.**
  
- 38. Re-baselining the system would make it easier to understand, but any “rounding up” or “rounding down” that is necessary should have an overall neutral effect.**
  
- 39. On the evidence of what has happened in the past at Stansted, the reintroduction of an exempt category is not favoured due to the potentially high number of exempt aircraft that could operate at the airport (170 during summer 2019 according to Annex D). Basing an exemption on aircraft size and/or weight, passenger loading or variations thereof (see Paragraph 33) could be complicated and lack transparency. A ring-fencing system would seem the best option to meet the concerns of the business general aviation sector, but this really is a matter for the airlines and airport operator. The abolition of an exempt category was bound to result in teething problems, but that is no reason to reverse the decision now.**
  
- 40. If the NQP is broadened to the full Night Period, the QC and movement limits would need to be adjusted to reflect movements in the existing shoulder periods, which are busy – especially 06:00 – 07:00. At Stansted, the declared summer 2020 and winter 20/21 capacity for the runway is a maximum of 33 departures from 06:00 – 06:59 within an overall declared capacity of 50 2-way movements (summer) and 44 (winter). It would not be acceptable for any broadening of the NQP to allow (in particular) the earlier or later movement of aircraft in the first and last waves unless part of a prior consultation with local communities.**
  
- 41. Any such consultation should also consider whether respite should be offered (say between 01:00 – 05:00) when no movements other than genuine emergencies would be allowed. In the background section to the national night flight policy part of the consultation, the Government**

**says it expects the industry to seek ways to provide respite wherever possible and to minimise the demand for night flights where alternatives are available. According to information contained in Stansted Airport's Noise Complaints Analysis Report 2020, from 2016-2020 the greatest intensity of complaints registered were during the evening shoulder period, followed by the morning shoulder period.**

*Managing night noise through QC limits only*

42. Subject to changing primary legislation, the Government thinks it would be possible to have a future regime based on QC limits only, without any movement limits. It thinks this could incentivise the use of quieter aircraft.
43. **Whilst this may be possible, it is certainly not desirable. Movements limits are an integral part of the International Civil Aviation Organisation's (ICAO) Balanced Approach to dealing with aviation noise and have consistently been imposed at Stansted. In the absence of a movements limit, it would be possible for an airport operator to double the number of movements (say by operating QC0.25 instead of QC0.5 aircraft) and stay within a QC limit, which would certainly be noticeable to local communities.**

*Unused allocation during seasons*

44. The Government explains that the 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 a service during the NQP is allocated a proportion of the pool, and they report to the airport when they use part of their allocation. If a service that is scheduled for the NQP actually operates during the day period, it can "bank" that allocation for use later in the season.
45. **So long as the "banked" allocation is used during the season, either by that airline or another and not as carry-over (see next paragraph), there should be a neutral effect.**

*Carry-over of limits between seasons*

46. The existing regime allows airport operators to carry over limits between seasons and borrow from future seasons (see [Appendix B](#)). The Government comments that an important aspect of this is to allow operators to manage Easter movements which can fall in either the winter/spring or summer seasons. However, airports have often used the process to increase the limit on a regular basis, calling into question whether the current process remains appropriate and proportional. Annex D indicates that Stansted has exceeded its summer movements limit (whilst staying within

the QC limit) from 2016 – 2019.

**47. The Council should again urge the phasing out of the carry over and overrun arrangements. Prolonged use of these at Stansted both disguises and perpetuates higher summer limits which are not transparent, and which are not evident from the movement and quota limits set under the restrictions. Certainty and transparency for local residents can only be achieved by absolute limits, which airport operators will be able to plan for in setting their schedules. If the new regime were to be longer than 5 years in duration, this would assist airport operators in their longer-term planning. Easter dates are known for many years ahead and should be able to be planned for within existing and proposed QC and movement limits.**

#### National night flight policy

**48. The Government's approach to managing aircraft noise is based on the principles of the ICAO Balanced Approach, which takes into account both health and economic factors. The Balanced Approach sets out four pillars to managing noise, which are sequential in nature:**

- 1. Noise reduction through technology*
- 2. Improving noise perception through better noise planning*
- 3. Noise reduction through better operation*
- 4. Operating restrictions on aircraft if the other three pillars are exhausted*

**49. Under the Balanced Approach (the operation of which is set out in Annex A), operating restrictions should only be introduced at airports if there are no other ways of achieving the desired benefits. The APF recognises that the costs on local communities are higher from aircraft noise during the night, particularly the health costs associated with sleep disturbance. However, it also recognises the importance to the UK economy of certain types of flights, such as express freight services, which may only be viable if they operate at night.**

**50. The Government has consistently argued that night flight restrictions under Pillar 4 are needed at the designated airports to protect local residents. Back in the January 2017 consultation which set the current restrictions, the Government said:**

***“the failure to impose any operating restrictions would mean these communities would not be adequately protected from the harmful impacts of aircraft noise and the Government would be failing to limit or reduce the number of people significantly affected by aircraft noise”.***

51. The Government says it expects the aviation industry to make extra efforts to reduce and mitigate noise from night flights, such as by encouraging the use of best-in-class aircraft and best practice operating procedures. It also expects the industry to seek ways to provide respite wherever possible and to minimise the demand for night flights where alternatives are available.

52. The Government is keen to explore how future technology will benefit communities, consumers and the industry. Noise at source (and carbon) has been reduced through advances in airframe and engine technology, but it is unclear what future technological advances will be, and whether there will continue to be reductions in both forms of environmental emission.

**53. Noise reduction through technology is Pillar 1 of the Balanced Approach, but this is insufficient in itself to adequately mitigate the adverse environmental effects of night flights. The Government is right to exercise caution over the future contribution that technology can make, particularly in the short term. Technological improvements tend to come mainly in steps from the introduction of new generations of aircraft rather than gradually year-on-year, and Stansted has a relatively modern fleet mix. There is also a need to fully understand how new aircraft and engine technologies will affect noise signatures and noise mapping.**

*Proposal to include a night noise reference in the Government's noise objective*

54. In the APF, the Government's overall policy on aviation noise is:

*"to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise, as part of a policy of sharing benefits of noise reduction with industry".*

55. The Government is asking whether there should be specific reference to the balance between the impacts of night noise and the economic benefits of both passenger and freight operations. It is suggesting the following addition:

*"There should be a balance between the local and national economic and consumer benefits of night flights, both in terms of passenger and freight operations, against their social and health implications, in line with the ICAO Balanced Approach".*

56. The intent of this expanded overall policy would be to provide a framework when competent authorities set individual noise abatement objectives at airports. In particular, the Government would expect local planning authorities, when assessing a planning application, to consider this overall

policy and ensure that both national and local factors are taken into account when making its decision.

**57. The Council should support the proposal to include a night flights reference in the Government's overall policy. This would be consistent with Section 2 of the National Planning Policy Framework which sets out overarching but interdependent objectives (*economic, social and environmental*) as a means of achieving sustainable development. The expanded policy would put airport operators on notice that the full effects of night flights should be set out in environmental statements that accompany planning applications at both designated and non-designated airports.**

*Airport designation*

**58.** Stansted has been designated for the purpose of avoiding, limiting or mitigating the effect from aircraft noise since 1971. The Government recognises that there are currently no criteria for deciding whether an airport should be designated in England or Wales. There could be a number of factors, such as population affected, number of night flights, baseline background noise levels or the strategic importance of any airports. The Government is not proposing to designate or de-designate any airport as part of this consultation but is open to considering criteria for designation.

**59.** A final question in the consultation asks about the impact that de-designation of an already designated airport would have on a number of stakeholders, including communities.

**60.** SASIG's view, as expressed at the meeting with DfT, is that any proposals for the designation of other airports would need clear grounds and a degree of pragmatism. At some smaller regional airports, noise is locally managed via discussions with communities. Officers suggest that the Council endorses SASIG's view on the designation of other airports.

**61.** De-designation could have a potentially disastrous effect on communities in the absence of a suitable replacement scheme. Much would therefore depend upon what is put in its place and who the responsible authority would be for running any replacement scheme. The Council would expect any replacement scheme to be based both on an up-to-date assessment of the economic benefits vs the environmental disbenefits of night flights and on research into which types of night flights are truly essential to the economy. Flights deemed to be non-essential should either be rescheduled for the day period or, if they do still fly during the night period, incur a higher tariff.

## Risk Analysis

62.

Risk	Likelihood	Impact	Mitigating actions
The Government is not able to take the Council's views into account as part of the consultation process.	1 The consultation process is designed to allow all views to be considered.	2 Greater weight could be given to the economic case for night flights than to the environmental case for their restriction.	Respond to the consultation.

1 = Little or no risk or impact

2 = Some risk or impact – action may be necessary.

3 = Significant risk or impact – action required

4 = Near certainty of risk occurring, catastrophic effect or failure of project.

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