T&E response to the Public Consultation for the Evaluation of the Balanced Approach Regulation

November 2026

T&E welcomes the opportunity to give feedback on the Balanced Approach Regulation, following our call for evidence response. We stress the importance of meeting *both* of its objectives: to facilitate the achievement of noise abatement objectives, including health aspects, at the level of individual airports, while respecting the rules laid down in the Environmental Noise Directive and national legislation; and to enable the use of operating restrictions in accordance with the Balanced Approach so as to achieve the sustainable development of the airport and air traffic management network capacity.

1. Citizens' health: Operating restrictions offer the most immediate, effective noise protection

As acknowledged in the consultation questionnaire, despite advancements in aircraft noise reduction, the increasing volume of air traffic means that many EU citizens continue to be exposed to high noise levels around airports. The European Aviation Environmental Report 2025 states that while the total airport noise exposure is still slightly below 2019 levels, trends at the individual airport level vary, with an increase in noise exposure at about one third of these major airports between 2019 and 2023.

According to T&E's Down to Earth study, passenger air traffic at European airports will more than double in 2050 compared to 2019, if Airbus and Boeing growth projections materialise. Major expansions are announced at many airports, including Brussels, Dublin, Frankfurt, Lisbon and Paris. However, large capacity increases would not be matched by improvements to noise at source. According to a 2025 study by Trinity College forecasting airport noise associated with future air traffic at Dublin Airport, an increase in flights and larger planes would result in a more extensive noise footprint by 2030, with noise unlikely to return to 2023 levels by 2040. The authors note serious implications for community and stakeholder engagement as well as public health.

Thus **operating restrictions must be fully considered and prioritised** amongst measures taken, where they offer the most immediate, effective protection of citizens' rights, health, well-being and productivity. This was the case in the Balanced Approach procedure for Amsterdam Schiphol Airport concluded in 2025: the Netherlands

prioritised operational restrictions including limiting total annual aircraft movements to 478.000, and limiting aircraft movements to 27.000 annually during the night period, in order to meet its short-term noise objective.

In the Balanced Approach procedure for Dublin Airport concluded in 2026, Ireland was notified that an increased limit of annual night movements to 35.672 was not in compliance with the Regulation, as measures other than operating restrictions were not considered. In this case, the European Commission's decision protected the lower existing 2022 limit of an average of 65 flights per night; however it did not ensure legal compliance after the limit was consistently breached in recent years (85 in 2025).

According to a 2026 report by UECNA, the voice for airport community groups in Europe, the number of night flights using European airports has risen by more than 350,000 over the past 20 years, while claims of their benefits often ignore significant costs to health and quality of life. Limiting noise from night flights with particularly harmful health effects is a targeted, sensible measure which has been already implemented by at least 30 key airports across Europe and should be systematically considered and privileged.

Operating restrictions are the main effective and swift tool available for noise mitigation needed to fulfill national and airport-level targets. This accords with the experience of environmental organisations and voice of airport communities such as the Aviation Environment Federation in the UK, which is closely engaged with the ICAO Balanced Approach procedures. Operational procedure choices mainly affect the distribution of noise, without necessarily reducing the total noise exposure. Land-use planning is an instrument with long-term timelines, often conflicting with pressures on local authorities to provide more housing. Reduction at source relating to fleet renewal, also follows longer timelines as it can be dependent on updates to ICAO standards occurring in phases lasting beyond five years. What has been effective for reduction at source, are higher airport charges for noisy aircraft, especially during the night.

The Balanced Approach procedure risks slowing down effective responses to protect citizens from noise problems. In the Netherlands, the government announced in 2021 that aircraft noise around Schiphol Airport needed to be reduced, while operational measures only entered into force in 2025. During these four years, residents continued to face excessive noise exposure, despite political and judicial recognition that the situation was unsustainable. And, noise goals were reduced because they were unreachable through these measures alone. The Regulation thus postpones benefits that could be better achieved by compliance with national law, while creating costs for public health, wellbeing and economic productivity.

2. Costs and benefits : Optimising the societal value of the airport network within limits compatible with noise protection

Effective noise management is crucial to safeguard the well-being of people residing near airports. The Regulation stresses that "the importance of health aspects needs to be recognised in relation to noise problems, and it is therefore important that those aspects be taken into consideration in a consistent manner… [and] be assessed in accordance with Union legislation on the evaluation of noise effects." In practice, the cost-effectiveness analysis gives little attention to the costs to society of health problems as well as property devaluation caused by airport noise, and to the societal benefits of operating restrictions including gains related to the economic productivity of airport communities. Citizens' health must be protected and prioritised, which requires that there be **better accounting for the societal and economic costs of airport noise**.

Air traffic noise in particular is responsible for cardiovascular disease and sleep disturbances. It therefore represents an estimated social cost of €5.6 billion at the national level, according to a study by Ademe, France's Ecological Transition Agency. And yet in the experience with the Balanced Approach for Paris Charles de Gaulle airport, operating restrictions were excluded from the measures considered, despite the public consultation noting that "traffic projections for 2030, incorporating the measures set out in the first three pillars of the Regulation without any new operating restrictions, show that improving the acoustic performance of fleets and implementing optimised operational measures will not be enough to achieve noise reduction targets."

Aircraft noise is also associated with losses in wellbeing. In the United Kingdom, a report commissioned by the Department for Transport concluded that affected households would require an additional income of around £900 a year in order to compensate them for loss in wellbeing resulting from one decibel of additional aircraft noise, and £3,100 for additional nighttime aircraft noise. The government's Aviation Night Noise Effects study and Aviation Noise Attitudes Survey confirm significant annoyance impacts from aviation noise at lower levels than previously evidenced.

The frequency of overflights is often a decisive factor in perceived annoyance and health impacts. Repeated aircraft movements cause cumulative stress, sleep disturbance and reduced quality of life. Nevertheless, regulatory assessments primarily rely on averaged long-term noise indicators. These metrics insufficiently reflect the disruptive effect of frequent overflights and therefore risk underestimating the actual burden experienced by residents.

The Regulation does not specify which costs and benefits should be taken into account in a comparison of the measures. In the procedure for Belgium, it is unclear upon which basis and criteria the cost-benefit analysis is being carried out. Impacts on public health and wellbeing, economic productivity, academic performance, and property value depreciation are often underestimated or excluded, leading to biased and economically inefficient decisions. Clearer definition of the basis for cost-benefit analyses is needed to guide development of measures to ensure compliance with legal noise limits.

Aviation must be considered as part of the broader European mobility system, which includes other modes of sustainable transport such as high-speed rail. Many short-haul flight routes within Europe connect city pairs where a credible rail alternative exists. Use of rail alternatives also bolsters EU strategic autonomy and resilience by reducing fossil jet fuel dependency. When assessing operating restrictions, claims of harms to connectivity must be balanced against the benefits of using rail alternatives.

The questionnaire states that a noise strategy must carefully balance the interests of citizens living close to airports with the interests of those who wish to use air transport or depend on it. According to the European Commission's decision on the introduction of operating restrictions at Amsterdam Schiphol Airport, the Netherlands had carried out a study in the initial stages of the Balanced Approach process, which concluded that a reduction to 400.000-440.000 flight movements per year would not harm Schiphol Airport's and the Netherlands' connectivity. A core network of strategic destinations would remain intact allowing Schiphol Airport to continue operating as a hub.

And a separate academic study in the Netherlands, commissioned by environmental organisation Natuur & Milieu in 2024, found that the Dutch government's network quality framework which measures the value of individual destinations, is inadequate from an environmental and societal perspective. When correcting for climate costs and comparing economic value across transport modes, it finds that about a third of all flights could be removed without negative economic consequences. These findings show that **prioritising quality over quantity, by optimising the economic and societal value of the network rather than maximising the volume of flights, is compatible with meaningful noise protection**.

Such substantive arguments should be better reflected in a more accurate and complete consideration of the costs and benefits of operating restrictions. In this light the efficiency of the assessment of costs and benefits has not been comprehensive, and coherence with EU sustainability and health goals has not been optimal, in the implementation and functioning to date.

3. Respecting national laws and democratic processes

In the Netherlands, according to the experience of Natuur & Milieu, the procedure tended to support the status quo and incumbent industry interests, rather than evolving environmental and societal priorities. The process was perceived as untransparent, with a lack of information to the Parliament. Information that was shared often came too late. Members of Parliament were not able to influence the process, which undermined its role of consent, in a context of significant lobbying by European and US airlines.

In Belgium, the procedure has been initiated following a court decision requiring the application of the Balanced Approach after legal challenges to the environmental permit for Brussels Airport granted by the regional government of Flanders. In 2024, the Belgian Superior Health Council's scientific advisory report arrived at the primary recommendation of a ban on night flights; and a further conclusion that an expansion of the number of flights was not acceptable, given the high health burden on neighbouring residents in terms of noise exposure and air pollution.

According to experience of Bond Beter Leefmilieu, the only environmental organisation and voice representing airport communities amongst multiple industry and government stakeholders in the consultation, the procedure creates specific risks in Belgium's case. Even after completion, the permit might still not be granted or could be repealed by the court if broader environmental criteria including air pollution, climate impacts and other hazards, subject to parallel national legal proceedings, are not sufficiently addressed. In this context, the procedure risks prolonging uncertainty for authorities, communities and airport operators alike rather than contributing to legal certainty.

In Portugal, a 2022 government-appointed working group assessed the impact of night flight noise on public health and concluded, based on a comprehensive cost-benefit analysis and epidemiological evidence, that night flights needed to be significantly reduced. This process involved public entities, health authorities, and aviation sector representatives, culminating in a Council of Ministers Resolution that mandated implementation of a strict nighttime curfew and additional operational restrictions. The subsequent initiation of the Balanced Approach procedure introduces redundancy, creating the risk of significant delays in the implementation of measures that are already technically and scientifically substantiated and democratically legitimized.

Respect for democratic processes and compliance with national legislation should therefore be the starting point for any Balanced Approach procedures, rather than being undermined. In this light the effectiveness of the achievement of the Regulation's objectives, as well as the EU added value, have not been optimal in the implementation and functioning to date.

Conclusion

Experiences with the Balanced Approach Regulation to date in France and in the Netherlands have shown that its implementation and functioning have not been optimal, impairing the effective achievement of its objectives.

In view of the new procedures being initiated in Belgium and Portugal, and to better facilitate the realisation of noise abatement and health goals through swift action where residents' rights are at stake, T&E recommends:

- Fully consider and prioritise operating restrictions;
- Optimise the societal value of the airport network, within limits compatible with noise protection; and
- Respecting national laws and democratic processes.

This will enable the use of operating restrictions as a key tool to achieve sustainable airport network capacity.

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Further information:

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