

Government decision on Part 1 of Night flights restrictions at Heathrow, Gatwick and Stansted: AEF responds

September 2021



Between December 2020 and February 2021, the Department for Transport (DfT) consulted on Part 1 of its vision for the future of night-time restrictions at the three designated airports (Heathrow, Gatwick, and Stansted).

Our response set out AEF's key concerns with the proposals, including:

- Challenging what was meant by “encouraging the use of quieter aircraft” and the “existing benefits of night flights” in the DfT’s night noise policy objective. With the consultation offering neither clarity nor evidence around the night noise objective, we stressed that it was difficult to reach any informed conclusion about it.
- Calling for the Government to carry out research to establish or refute the benefits of night flights, and whether any benefits truly justified the negative impacts on communities exposed to noise. We also called for an immediate post-COVID-19 study to update forecasts on the introduction of quieter aircraft operating, especially at night.
- Expressing serious concerns about the DfT’s proposal to maintain the existing restrictions at the designated airports for a further two years, rather than taking immediate and bold action on aircraft noise at night. We stated our support for the call for a ban on night flights, not only at the designated airport, but nationally.
- Supporting the proposed ban of QC4 aircraft at night as a step in the right direction, while calling for the scope to be extended: in addition to the operating ban on QC4 between the hours of 2330 and 0600, we said protection should be provided for a full eight-hour night period.
- Calling for a scheduling ban on QC2 aircraft between the hours of 2330 and 0600, to apply continuous pressure on the industry to reduce noise.

How did the Government respond?

The night noise objective. In forming its decision on the night noise objective, the Government noted “the strength of feeling expressed by the individual and community responses” about aviation night noise. The majority of individuals and communities, it said, had argued that the current night noise objective was not strong enough, and that restrictions should be stricter, for example, factoring in a full eight-hour period of respite

during night-time. The DfT also referred to points made about unsubstantiated claims around the “existing benefits” of night flights. Reference was additionally made to community responses arguing that COVID-19 should not be used as an excuse to do nothing to strengthen the night noise objective.

Nevertheless, the Government’s decision was that the current noise objective should be maintained, and the reasons given were as brief as they were disappointing. The Government continues to believe in the existing benefits of night flights, and thus believes that the aviation sector should not have to deal with changes to policy objective while it recovers from the impacts of COVID-19. In an attempt perhaps to placate individuals and communities, the Government indicated that it remains open to a revision of the night noise objective. No firm commitment was given for a review, however. It would happen, the Government said, only “in the longer term”.

Rollover of the existing regime. On the proposed rollover of the current regime at the designated airports for two years, the Government noted the “strong message” from communities asking for an immediate reduction in night flights, as well as the call for an outright ban (with genuine emergencies excepted). Surprisingly, however, the Government went on to deploy requests for top-down research into the benefits of night flights as a pretext for further delaying any immediate action to significantly reduce aviation noise. The impacts of COVID-19 on the aviation industry, the Government said, will take time to be fully understood. In order to carry out the research communities and individuals called for, the existing regime should thus be rolled over – not for two years, as proposed in the consultation document, but for three.

Yet, despite the Government’s acceptance of the need for a cost-benefit analysis of night flights, assumptions about existing – and also *future* – benefits of night flights underpin the Government’s decision-making rationale:

the government ... recognises that night flights ... offer significant benefits to the UK. These include the benefits to consumers and the economy through both increased competition and choice for business and leisure customers as well as helping to preserve the UK's connectivity to a wide range of locations. ... Night flights also have wider economic benefits, for example those brought about by the freight sector and next day delivery services that these flights support. The fact that many of these benefits have been foregone during the pandemic in no way diminishes their future value to the UK economy.

QC4 ban. After apparently considering consultation responses, the Government decided to proceed with a ban on QC4 aircraft. Because the costs to airlines would, it said, be minimal.

Conclusion

AEF feels that the Government’s decision on the first part of its night flight consultation has serious shortcomings. It’s difficult to believe DfT’s statement that strong community objections to the proposals have been taken into account, only to summarily dismiss them

using an assumption-based rationale that benefits the aviation sector to the detriment of those who are overflowed at night. The Government's arguments around the economic benefits of the sector in support of its decisions are especially weak.

We are also concerned that the Government appears not to understand the World Health Organisation's [Environmental Noise Guidelines](#) (2018), cited by many communities and individuals to support their calls for immediate action to be taken on aircraft noise at night. The Guidelines strongly recommend reducing aircraft noise at night to 40dB Lnight:

“For night noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft during night time below 40 dBLnight, as night-time aircraft noise above this level is associated with adverse effects on sleep.”

According to the Government, however, “these levels also apply to noise from all sources and not just aviation. Addressing aviation noise in isolation is unlikely to achieve these levels given the totality of noise from all sources.”

Communities poured considerable time and effort into responding to the Government's consultation, and they did so in good faith that their concerns would be taken seriously. We feel that, ahead of Part 2 of the night flight consultation, the Government's decision on Part 1 will have eroded community trust and confidence in its engagement exercise and whether the consultation is meaningful.