

Aviation Communities Forum  
Aviation Environment Federation  
Airport Expansion Opposition (Southampton)  
Communities Against Gatwick Noise Emissions  
Friends of the Earth Southampton  
Gatwick Area Conservation Campaign  
Heathrow Association for the Control of Aircraft Noise  
Kings Newton Residents' Association (East Midlands)  
Luton and District Association for the Control of Aircraft Noise  
Melbourne Civic Society (East Midlands)  
CPRE Nottinghamshire (East Midlands)  
People Against Intrusive Noise (East Midlands)  
WINGS (East Midlands)  
Stop Bristol Airport Expansion  
Stop Stansted Expansion  
Teddington Action Group  
Whitecrook Aircraft Noise Association (Glasgow)

Robert Courts MP  
Parliamentary Under Secretary of State  
Department for Transport  
Great Minster House  
33 Horseferry Road  
London  
SW1P 4DR  
United Kingdom

10 November 2020

Dear Minister

## **NIGHT FLIGHTS**

We understand the government intends to publish a consultation and call for evidence on night flights later this year. We look forward to participating in that process.

We are writing to you now to set out our high level views and to ensure that your consultation does not repeat the mistakes made in 2017, when the government decided its policy on night flights before it sought views.

In summary:

- night flights, other than for emergency and humanitarian purposes, should be banned at all UK airports;
- night should be defined to mean an eight hour period, giving people around airports and under flight paths the opportunity to have a full night's sleep consistent with health guidelines; and
- if any night flights are to be permitted, their number and impacts should be regulated far more robustly than they are now, at all airports.

The historic justifications for night flights no longer withstand scrutiny.

- At some airports they perpetuate a low-cost carrier business model that generates unsustainable levels of leisure flights, principally for a small section of society, which is inconsistent with climate imperatives.
- The business interactions they previously facilitated, particularly at Heathrow, have largely been replaced with video calls and other alternatives to air travel.
- The cargo night flights deliver is rarely time critical.

Meanwhile the proven and serious health effects and other adverse impacts of night flights, and the wider disruption they cause, are becoming increasingly clear. If building aviation back better is to mean anything it must mean putting people's health and welfare ahead of cheap flights for the small section of society who fly frequently, and airline profits.

### **The consultation**

The government's 2017 night flight consultation was fundamentally flawed. By announcing before it sought views that the asserted benefits of night flights had to be maintained, the Department gave itself licence to curtail its analysis and focus on minor adjustments to the regulatory regime rather than the core issues. No bottom-up analysis of the costs and benefits of night flights was done. No options involving meaningful change to the current regime were considered. The government decided the answer before it asked the question, and so passed up the opportunity to review policy in a serious way. It failed to take its regulatory responsibility for night flights at the Designated airports seriously, and ignored other airports entirely.

This policy development failure must not be repeated, and the current flawed policy should not be extended for a further period, as we understand the government intends to propose. It is now almost 15 years since the government considered night flights in a meaningful way, despite recognising, it says, that they are "*the least acceptable form of aircraft operations*" and claiming to take them "*very seriously*".

Extending current policy, bringing the total of such extensions to seven years in a 20-year period, would be unacceptable in principle and result in there being no effective controls over the noise of individual night flights for any period of reduced traffic. The government should instead take advantage of the current decline in night flights to ban them as soon as possible, giving airlines and airports an opportunity to plan new schedules now.

We look forward to engaging with you and your officials during the forthcoming consultation and to ending the scourge of night flights.

Yours sincerely,



For:

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cc:

The Rt Hon Grant Shapps MP, Secretary of State for Transport  
Ian Elston, DfT  
Jonathan Friel, DfT  
Richard Moriarty, CEO, Civil Aviation Authority  
Robert Light, Head Commissioner, ICCAN