

# Night-time noise abatement objectives for the designated airports from October 2025

## Personal details

Q1. Your (used for contact purposes only):

**name?** Charles Lloyd

**email?** info@aef.org.uk

Q2. You are responding as an:

organisation?

## Organisation details

Q3. Your organisation is:

**another type of organisation?**

Environmental non-governmental organisation

Q4. Your organisation name is?

Aviation Environment Federation

Q5. What is the main activity of the organisation?

National environmental organisation representing communities living under flightpaths.

Q6. What is the number people your organisation employs?

1 to 50

## Night-time noise abatement objectives for designated airports

Select the airport for which you wish to provide your views (you may select more than one option).

Heathrow

Gatwick

Stansted

## Heathrow

Q7. To what extent do you agree, or disagree, with our night-time noise abatement objective for Heathrow airport?

Strongly disagree

## Heathrow - night-time noise abatement objective

Q8. Provide a reasoning for your answer.

We strongly disagree with the proposed objective for several reasons.

It would substantially reduce community protection from aircraft noise at night by facilitating an increase in the number of flights permitted to operate in the night period. The structure of the proposed objective prioritises "sustainable growth", and requires noise only to be "limited", which is defined to mean mitigated and minimised, and "where possible reduced". Given the current government has made clear, for example through its Jet Zero policies, that it regards all currently forecast aviation growth as being sustainable, the objective could allow unconstrained growth in night flights that would have significant community impacts.

For the reasons above, the objective would not achieve the balance the government says it wants to achieve; it favours the aviation industry at the expense of impacted communities.

The proposed constraints on the adverse effects of night noise - that they should be limited and where possible reduced - are subjective and undefined. No attempt has been made to define these terms.

The proposed objective does not set clear targets to reduce aircraft noise at night or establish a basis on which such targets could be set.

The Government states that it expects the trend towards quieter aircraft to continue. In stating this, the Government offers no certainty that quieter aircraft will be taken up by aircraft operators who will have to bear the cost, especially post-pandemic when airlines may have chosen to review the timing of planned fleet upgrades. The statement also ignores the way in which freight operations, which tend to be at night, frequently use older and noisier aircraft adapted for the purpose.

In addition, the economic benefits of night flights have not been adequately evidenced by the Government. In 2021, AEF commissioned a study of the aviation industry's claims around the economic benefits of night flights. The study concluded that industry claims were weak and unsupported. Unless and until the Government can evidence its convictions around the economic benefits of night flights, its claims about adopting a balanced approach look wobbly to say the least.

Meanwhile, there is already sufficient evidence that disturbance to sleep as a result of night flights have had significant negative physical and mental impacts. Despite this, the Government seems averse to applying the precautionary principle to protect the health of communities.

The proposed objective is weaker than, and inconsistent with, the aim of the Environmental Noise Directive (and the related UK Regulations), to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise.

The objective ignores the wider environmental, economic, health and community impacts of night flights, such as the emissions they generate and local transport congestion and noise. These should be factors in any consideration of future night flight limits.

Finally, the night flight objective should not sit beneath the government's overall aviation noise policy statement, because the latter is itself one-sided and has not been properly consulted on.

## Heathrow - night-time noise abatement objective

Q9. Would alternative wording be preferable for the night-time noise abatement objective?

Yes

## Heathrow - night-time noise abatement objective

Q10. Provide a reasoning for your answer.

In our view night flights should be banned at all UK airports for a full eight-hour period each night, other than for emergency or humanitarian purposes.  
If a ban is not implemented there should, at a minimum, be a formal presumption against night flights, given the known harms they cause. There should then be a burden of proof on the industry to demonstrate that any night flights can be justified. Operators should be required to satisfy a test of "critical necessity" for any services they wish to provide at night on an airport-by-airport and service type-by-service type basis. This would require them to demonstrate, inter-alia: that the services proposed to be provided at night were genuinely time critical; that there was a conclusive economic case for them; that they could not be provided at less harmful times of day; that they could not be satisfied by other means and that they were to be priced at a level that reflected their full costs to society (including the government's carbon values) on all occasions.

Q11. Provide alternative wording on a night-time noise abatement objective.

The night noise objective should be:

- 1 - To avoid, prevent or reduce on a prioritised basis the harmful effects of aircraft noise at night
- 2 - To ensure that services at night are only provided if there is a conclusive economic case for them (having considered all available evidence and taking a precautionary approach in relation to their adverse impacts) including that they are of critical necessity, that they could not be provided at less harmful times of day, and that they could not be satisfied by other means.
- 3 - To ensure that flights at night are priced at levels that incentivise flying at less harmful times and that reflect their full costs to society on all occasions in line with the polluter pays principle.
- 4 - To ensure that total aircraft noise and noise impacts at night are reduced progressively and materially at all times and against clear time phased targets.
- 5 - Under no circumstances shall there be an increase in the number of permitted aircraft movements during the night noise period.

## Heathrow - assessing the night-time noise abatement objective

Q12. How should the proposed night-time noise abatement objective for Heathrow airport be assessed to ensure it is successful?

The following tests should apply:

- 1 - Every night service should be required to satisfy a test of critical necessity, that is, they should only be permitted if there is a conclusive economic case for them (having considered all available evidence and taking a precautionary approach in relation to their adverse impacts), that they could not be provided at less harmful times of day, and that they could not be satisfied by other means.
- 2 - The government should satisfy itself periodically that flights at night are priced at levels that incentivise flying at less harmful times and that reflect their full costs to society on all occasions in line with the polluter pays principle.
- 3 - Total aircraft noise and noise impacts at night should be reduced progressively and materially at all times and against clear time phased targets.

## Gatwick

Q13. To what extent do you agree, or disagree, with our night-time noise abatement objective for Gatwick airport?

Strongly disagree

## Gatwick - night-time noise abatement objective

Q14. Provide a reasoning for your answer.

We strongly disagree with the proposed objective for several reasons.

It would substantially reduce community protection from aircraft noise at night by facilitating an increase in the number of flights permitted to operate in the night period. The structure of the proposed objective prioritises "sustainable growth", and requires noise only to be "limited", which is defined to mean mitigated and minimised, and "where possible reduced". Given the current government has made clear, for example through its Jet Zero policies, that it regards all currently forecast aviation growth as being sustainable, the objective would allow unconstrained growth in night flights with very significant community impacts.

For the reasons above, the objective would not achieve the balance the government says it wants to achieve; it favours the aviation industry at the expense of impacted communities.

The proposed constraints on the adverse effects of night noise - that they should be limited and where possible reduced - are subjective and undefined. No attempt has been made to define these terms.

The proposed objective does not set clear targets to reduce aircraft noise at night or establish a basis on which such targets could be set.

The Government states that it expects the trend towards quieter aircraft to continue. In stating this, the Government offers no certainty that quieter aircraft will be taken up by aircraft operators who will have to bear the cost, especially post-pandemic when airlines may have chosen to review the timing of planned fleet upgrades. The statement also ignores the way in which freight operations, which tend to be at night, frequently use older and noisier aircraft adapted for the purpose.

In addition, the economic benefits of night flights have not been adequately evidenced by the Government. In 2021, AEF commissioned a study of the aviation industry's claims around the economic benefits of night flights. The study concluded that industry claims were weak and unsupported. Unless and until the Government can evidence its convictions around the economic benefits of night flights, its claims about adopting a balanced approach look wobbly to say the least.

Meanwhile, there is already sufficient evidence that disturbance to sleep as a result of night flights have had significant negative physical and mental impacts. Despite this, the Government seems averse to applying the precautionary principle to protect the health of communities.

The proposed objective is weaker than, and inconsistent with, the aim of the Environmental Noise Directive (and the related UK Regulations), to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise.

The objective ignores the wider environmental, economic, health and community impacts of night flights, such as the emissions they generate and local transport congestion and noise. These should be factors in any consideration of future night flight limits.

Finally, the night flight objective should not sit beneath the government's overall aviation noise policy statement, because the latter is itself one-sided and has not been properly consulted on.

## Gatwick - night-time noise abatement objective

Q15. Would alternative wording be preferable for the night-time noise abatement objective?

Yes

## Gatwick - night-time noise abatement objective

Q16. Provide a reasoning for your answer.

In our view night flights should be banned at all UK airports for a full eight-hour period each night, other than for emergency or humanitarian purposes.

If a ban is not implemented there should, at a minimum, be a formal presumption against night flights, given the known harms they cause. There should then be a burden of proof on the industry to demonstrate that any night flights can be justified. Operators should be required to satisfy a test of "critical necessity" for any services they wish to provide at night on an airport-by-airport and service type-by-service type basis. This would require them to demonstrate, inter-alia: that the services proposed to be provided at night were genuinely time critical; that there was a conclusive economic case for them; that they could not be provided at less harmful times of day; that they could not be satisfied by other means and that they were to be priced at a level that reflected their full costs to society (including the government's carbon values) on all occasions.

Q17. Provide alternative wording on a night-time noise abatement objective.

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- 4 - To ensure that total aircraft noise and noise impacts at night are reduced progressively and materially at all times and against clear time phased targets.
- 5 - Under no circumstances shall there be an increase in the number of permitted aircraft movements during the night noise period.

## Gatwick - assessing the night-time noise abatement objective

Q18. How should the proposed night-time noise abatement objective for Gatwick airport be assessed to ensure it is successful?

The following tests should apply:

- 1 - Every night service should be required to satisfy a test of critical necessity, that is they should only be permitted if there is a conclusive economic case for them (having considered all available evidence and taking a precautionary approach in relation to their adverse impacts), that they could not be provided at less harmful times of day, and that they could not be satisfied by other means.
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- 3 - Total aircraft noise and noise impacts at night should be reduced progressively and materially at all times and against clear time phased targets.
- 4 - Noise targets at Gatwick should take account of the fact that many impacted people live in rural areas with low ambient noise. The effects of aircraft noise are therefore greater than those living in urban environments and targets should be set at a lower level to take account of this fact.

## Stansted

Q19. To what extent do you agree, or disagree, with our night-time noise abatement objective for Stansted airport?

Strongly disagree

## Stansted - night-time noise abatement objective

Q20. Provide a reasoning for your answer.

We strongly disagree with the proposed objective for several reasons.

It would substantially reduce community protection from aircraft noise at night by facilitating an increase in the number of flights permitted to operate in the night period. The structure of the proposed objective prioritises "sustainable growth", and requires noise only to be "limited", which is defined to mean mitigated and minimised, and "where possible reduced". Given the current government has made clear, for example through its Jet Zero policies, that it regards all currently forecast aviation growth as being sustainable, the objective would allow unconstrained growth in night flights with very significant community impacts.

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In addition, the economic benefits of night flights have not been adequately evidenced by the Government. In 2021, AEF commissioned a study of the aviation industry's claims around the economic benefits of night flights. The study concluded that industry claims were weak and unsupported. Unless and until the Government can evidence its convictions around the economic benefits of night flights, its claims about adopting a balanced approach look wobbly to say the least.

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## Stansted - night-time noise abatement objective

Q21. Would alternative wording be preferable for the night-time noise abatement objective?

Yes

## Stansted - night-time noise abatement objective

Q22. Provide a reasoning for your answer.

In our view night flights should be banned at all UK airports for a full eight-hour period each night, other than for emergency or humanitarian purposes.

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Q23. Provide alternative wording on a night-time noise abatement objective.

The night noise objective should be:

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- 5 - Under no circumstances shall there be an increase in the number of permitted aircraft movements during the night noise period.

## Stansted - assessing the night-time noise abatement objective

Q24. How should the proposed night-time noise abatement objective for Stansted airport be assessed to ensure it is successful?

The following tests should apply:

1 - Every night service should be required to satisfy a test of critical necessity, that is they should only be permitted if there is a conclusive economic case for them (having considered all available evidence and taking a precautionary approach in relation to their adverse impacts), that they could not be provided at less harmful times of day, and that they could not be satisfied by other means.

2 - The government should satisfy itself periodically that flights at night are priced at levels that incentivise flying at less harmful times and that reflect their full costs to society on all occasions in line with the polluter pays principle.

3 - Total aircraft noise and noise impacts at night should be reduced progressively and materially at all times and against clear time phased targets.

4 - Noise targets at Stansted should take account of the fact that many impacted people live in rural areas with low ambient noise. The effects of aircraft noise are therefore greater than those living in urban environments and targets should be set at a lower level to take account of this fact.

## Final comments

Q25. Any other comments?

There should be an independent peer review of WebTAG as it applies to aviation noise generally and specifically its application to noise at night. There is currently little confidence that WebTAG adequately reflects the latest health-based evidence of the impacts of aviation noise on people and communities. Additional metrics, including the frequency of noise events, should be incorporated into WebTag in line with the precautionary principle.

The approach to the management of noise at night in other commercial sectors should be reviewed and lessons for aviation adopted. In most other sectors the working hours of noise generating commercial operations are much more robustly controlled by regulations or planning conditions.

The definition of night needs to be reviewed and a full eight-hour period adopted.

DfT should review and report on progress towards achieving the WHO's guideline values for night flight noise, delivering on its 2004 commitment to take account of them as long-term targets with 30 years as a suitable time parameter for "longer term".

The night flight regulatory system needs to be reviewed, including the appropriate combination of movement limits, quota limits and economic incentives not to fly in periods that have the greatest community impact. Any future QC system should include progressive and challenging reductions in noise quotas over time that lead and incentivise the industry to cut noise, rather than DfT's current passive approach which simply locks in modest gains once the industry has achieved them.

The quota ratings of some aircraft types should be reviewed and potentially adjusted given the failure of some aircraft to achieve their assigned ratings in operating conditions.

There needs to be specific consideration of the regulation of dedicated freight flights at night (and in the day) given the greater average age and noise of freighters and therefore the current weak application of the noise at source element of the Balanced Approach.

The arrangements for dispensations need to be substantially revised to prevent events that should be accommodated in normal scheduling processes and within standard resilience planning being claimed as dispensations and to prevent the wider abuses seen in recent years.

Charging arrangements for night flights should be reviewed to ensure night flight costs are consistent with the polluter pays principle and incentivise airlines to operate only the least noisy categories of aircraft at night.