

Night flight restrictions: Heathrow, Gatwick and Stansted airports from October 2025

Personal Details

Q1. Your name is?

Charles Lloyd

Q2. Your email is?

charles@aef.org.uk

Q3. Are you responding on behalf of an organisation?

Yes

Organisation details

Q4. Your organisation is:

another type of organisation:
Environmental NGO

Q5. Your organisation name is?

Aviation Environment Federation's Airspace and Noise Community Forum

Q6. What is the main activity of the organisation?

AEF campaigns on the environmental impacts of aviation

Q7. What is the number of people your organisation employs?

1 to 50

Heathrow Airport

Q8. To what extent do you agree, or disagree, with our proposal for the next night flight regime at Heathrow Airport?

Strongly disagree

Heathrow proposal reasoning

Q9. Provide a reasoning for your answer.

The AEF's longstanding position is that the government should ban night flights at all UK airports for a full eight-hour period each night other than for emergency and humanitarian purposes.

If any night flights are to be permitted, they should be limited to those that have been independently demonstrated to be essential for economic reasons. Given the known harms caused by night flights there should be a presumption against their operation unless an airport can provide conclusive evidence of very substantial economic benefits on a route-by-route basis.

The government should develop and implement regulation to ensure that any night flights which are permitted are operated by the least noisy categories of aircraft on all occasions and that future pricing of night slots fully reflects the costs they impose.

If the existing system is to be retained, both summer and winter quota limits at Heathrow should be reduced to a level somewhat below current actual utilisation to provide an incentive for the airport to use the least noisy aircraft at night.

Gatwick Airport

Q10. To what extent do you agree, or disagree, with our proposal for the next night flight regime at Gatwick Airport?

Strongly disagree

Gatwick proposals reasoning

Q11. Provide a reasoning for your answer.

The AEF's longstanding position is that the government should ban night flights at all UK airports for a full eight-hour period each night other than for emergency and humanitarian purposes.

If any night flights are to be permitted, they should be limited to those that have been independently demonstrated to be essential for economic reasons. Given the known harms caused by night flights there should be a presumption against their operation unless an airport can provide conclusive evidence of very substantial economic benefits on a route-by-route basis. We do not believe any such flights are operated at Gatwick.

We are aware that some airlines argue that night flights enable them to achieve higher aircraft utilisation and offer lower prices. We understand these arguments but do not believe they justify night flights at Gatwick. Gatwick's services are almost exclusively leisure related so night flights at the airport do not have significant economic or trade value. The health and other community costs they impose are too high a price to pay for cheap flights predominantly for the small section of society who fly frequently.

The government should develop and implement regulation to ensure that any night flights which are permitted are operated by the least noisy categories of aircraft on all occasions and that future pricing of night slots fully reflects the costs they impose.

If the existing system is to be retained, the winter night flight movement limit at Gatwick should be reduced to a level far closer to actual usage, say 2,300. At present the excess movement limit simply provides headroom for the airport to exceed its summer limit by carrying over unused winter allowance to the summer period.

In addition, both summer and winter quota limits should be reduced to a level somewhat below current actual utilisation to provide an incentive for the airport to use the least noisy aircraft at night.

Stansted Airport

Q12. To what extent do you agree, or disagree, with Option 1 for the next night flight regime at Stansted Airport?

Strongly disagree

Option 1: reasoning

Q13. Provide a reasoning for your answer.

In no circumstances should night flights at any airport be managed through a QC limit only. This is because QC limits on their own are not effective in controlling night (or any) aircraft noise. Setting limits by reference to QC ratings only would permit very substantial increases in night movements as aircraft become less noisy by increments that are not perceptible to human beings. Given the frequency of aircraft noise events is a more significant factor for many people than their individual noisiness this would be manifestly unjust.

This view is endorsed by past government night flight consultations which make clear that the number of flights is a critical factor as well as their QC level. The 2017 consultation stated: "This [the then existence of an exempt category] could undermine the purpose of the restrictions set by the Government and would fail to prevent communities being exposed to the harmful impacts large numbers of these flights could cause. The potential for a large number of exempt operations would also mean the restrictions would fail to offer the transparency that communities around airports would expect it to, or offer any reassurance of the total number of flights that they could expect to be exposed to." The same arguments apply to removing the movement limit, with even greater force. Since 2017 additional evidence on the impact of night flights on health has emerged and the WHO has advised governments to adopt stricter controls over them.

In addition, we note that the Inspector at Stansted made clear that the proposed noise contour and QC limits should apply in conjunction with the existing DfT controls and not instead of them.

Finally, we note that airports have increasingly chosen to breach planning conditions and either seek retrospective change or challenge under-resourced (and in some cases conflicted) planning authorities to take enforcement action. As a result, the effectiveness of the planning system as a means of controlling aviation noise impacts is questionable.

Stansted Airport

Q14. To what extent do you agree, or disagree, with Option 2 for the next night flight regime at Stansted Airport?

Strongly disagree

Option 2: reasoning

Q15. Provide a reasoning for your answer.

For the reasons above, we strongly oppose this option.

Stansted Airport

Q16. To what extent do you agree, or disagree, with Option 3 for the next night flight regime at Stansted Airport?

Strongly disagree

Option 3: reasoning

Q17. Provide a reasoning for your answer.

The AEF's longstanding position is that the government should ban night flights at all UK airports for a full eight-hour period each night other than for emergency and humanitarian purposes.

If any night flights are to be permitted, they should be limited to those that have been independently demonstrated to be essential for economic reasons. Given the known harms caused by night flights there should be a presumption against their operation unless an airport can provide conclusive evidence of very substantial economic benefits on a route-by-route basis. We do not believe any such flights are operated at Stansted.

We are aware that some airlines argue that night flights enable them to achieve higher aircraft utilisation and offer lower prices. We understand these arguments but do not believe they justify night flights at Stansted. Stansted's services are almost exclusively leisure related so night flights at the airport do not have significant economic or trade value. The health and other community costs they impose are too high a price to pay for cheap flights predominantly for the small section of society who fly frequently.

The government should develop and implement regulation to ensure that any night flights which are permitted are operated by the least noisy categories of aircraft on all occasions and that future pricing of night slots fully reflects the costs they impose.

If the existing system is to be retained, the winter night flight movement limit at Stansted should be reduced to a level far closer to actual usage, say 3,000. At present the excess movement limit simply provides headroom for the airport to exceed its summer limit by carrying over unused winter allowance to the summer period.

In addition, both summer and winter quota limits should be reduced to a level somewhat below current actual utilisation to provide an incentive for the airport to use the least noisy aircraft at night.

Any other comments

Q18. Any other comments?

We are extremely disappointed with virtually all of the Government's proposals. Recommending a continuation of the existing quota counts at the three relevant London airports means most communities will have seen little improvement in the night noise exposure for many years. In fact, taking into account the increasingly large number of dispensations, the situation has worsened.

We note that community and environmental group views have been disregarded in virtually all areas previously consulted on, in favour of industry views. It is particularly regrettable that in many cases the government has not responded to suggestions made by community and environmental stakeholders. A one-sided approach to night flight issues, together with extremely slow progress in delivering promised research on the impacts of night flights, has undermined, and continues to undermine, confidence in the Government's decision making in this important and sensitive area.

We do not support the Government's night time noise abatement objective. We note that the objective fails to define or clarify in a meaningful way the obligations it imposes on the aviation industry or expected outcomes. It is meaningless and a recipe for continued inaction.

We also note that the objective now includes reference to the asserted benefits of passenger flights at night without providing any evidence of those benefits. A 2023 peer-reviewed and independent report commissioned by AEF shows the boom in air travel since 2015 has failed to increase UK productivity or GDP growth. Business use of air travel – a key argument for expansion – has declined by 50% since 2013. Meanwhile, air travellers spend £32 billion more abroad than foreign travellers spend when visiting the UK. The report argues that this compounds regional inequality and damages the domestic tourism sector. [https://neweconomics.org/2023/07/losing-altitude].

The New Economics Foundation's 2021 night flights consultation response critiqued the industry's evidence on the benefits of flights during the night period. The response stated:

"The single largest impact of a reduction in passengers resulting from a night flying policy change would be a reduction in outbound international tourists. This would act effectively to reduce the UK's trade deficit and increase the amount of money available to be spent domestically in the UK." [https://www.aef.org.uk/uploads/2021/09/NEF-the-economics-of-night-flying_consultation-response.pdf]

As NEF's 2021 response points out, this would align with the Government's 2021 Tourism Recovery Plan, which "has a key focus on improving the competitiveness of domestic tourism against outbound international tourism". However, the response has been neither referenced nor acknowledged by the Government.

Job creation could compensate for some of the impacts described above, but even before the pandemic, at a time of record passenger numbers, jobs in the air transport sector had declined since 2007. In fact, NEF's assessment shows that the sector is one of the poorest job creators per pound of revenue, with wages lower than they were in 2006. [https://neweconomics.org/2023/07/losing-altitude].

We are extremely disappointed that the government has failed to deliver its commitment to conduct "thorough research to properly inform and develop a new evidence-based night noise regime" in time for this latest review of the night noise arrangements at the designated London airports. The causes of this delay are not transparent, but the result is that there has been no proper assessment of the benefits and costs of night flights for well over 15 years, if ever.

The government has had many years to consider properly the extensive health and other costs night flights impose on local communities and to put in place much more robust regulatory mechanisms that ensure such flights only take place where there is exceptional evidence of substantial net economic benefits. In that time it has made significant progress in areas that benefit some aviation stakeholders. But it has made negligible progress on night flight issues that are of great importance to local communities and many of which were flagged up very clearly in recent consultations. Its failure to take account of the growing evidence that exposure to aviation noise, particularly at night, has adverse effects on health is irresponsible.

We are also extremely disappointed that the government has failed to make any meaningful changes to the night flight dispensation regime. Airports appear to be abusing the current regime systematically to increase the number of night flights they operate and the government is no longer enforcing the core test that dispensations should only be granted in "extraordinary" circumstances. The government's assertion that it does not have sufficient evidence to justify further changes is feeble.

Further reform of the dispensation process is urgently needed. This should include much tighter definitions of flights qualifying for dispensations, removal of the arrangements by which airports approve their own dispensations and better reporting and monitoring of the dispensations, including by the Department for Transport.

We are disappointed and surprised that the government has decided not to proceed with its proposals to extend the operational ban on QC4 aircraft to the full night period and to introduce a scheduling ban on QC2 aircraft. We see no good reason to delay these measures.