

Night Noise Consultation May 2024

The government has published its next stage consultation on Night Flights at Gatwick, Heathrow and Stansted. The consultation closes 24th May. Details are [here](#).

We are in the process of compiling a detailed response which will be published here shortly. Meanwhile below is an outline of our views. If you have specific views on night flights you'd like us to include please email us at info@gacc.org.uk with your comments – but don't forget to put in your own response to the consultation.

General views.

We are extremely disappointed with virtually all of the Government's proposals.

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 even troubled to respond 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 will continue 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 now includes reference to the asserted benefits of passenger flights at night without providing any evidence of those benefits. We also note that the objective fails to clarify in a meaningful way the obligations it will impose on the aviation industry. It is vacuous and a recipe for continued inaction.

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*" before bringing forward new proposals. There appears to have been inadequate project management and governance of this work, with the result that there has been no proper assessment of the benefits and costs of night flights for well over 15 years.

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. There is overwhelming evidence that airports are systematically abusing the current regime to increase the number of night flights operated at airports and that the government is no longer applying 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 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 QC 2 aircraft. We see no good reason to delay these measures.

On Q2 relating to Gatwick here is our initial draft response:

2 To what extent do you agree, or disagree, with our proposals for the next night flight regime at Gatwick Airport? Provide evidence to support your view.

We strongly disagree with the Government's proposals.

GACC'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.