

## **NIGHT FLIGHT CONSULTATION PART 2 GACC SUMMARY RESPONSE**

### **The regime from October 2022 to October 2024**

We do not agree that the existing restrictions at the designated airports should be maintained for a further two years from October 2022 to October 2024. This would be complacent and irresponsible.

It is wholly unacceptable that there has been no bottom-up review of the night flight regime since 2006. Further prolonging this is indefensible. The Government is failing to take seriously the aviation noise that it acknowledges is least acceptable and is neglecting increasing evidence that night noise from aircraft has serious health consequences for people overflown. This proposal is also inconsistent with policy in other sectors: the working hours of most noise generating commercial operations are much more robustly controlled by regulations or planning conditions.

In the remainder of the current regulatory period, to 2022, the government should make clear to designated and other airports that it expects them to eliminate night flights or reduce them substantially by restricting them to services of substantial economic importance and emergencies. There is no reason to continue to operate services at night when there is ample capacity at times of day that have less serious health and community impacts.

Thereafter, from 2022, it should ban night flights at all UK airports. If any night flights are to be permitted they should be limited to those that are genuinely essential for economic reasons. The government should also develop and implement regulation to ensure that any such flights are operated by the least noisy categories of aircraft on all occasions and that future pricing of night flights fully reflects the costs they impose. These arrangements should include a ban on all QC4 and QC2 aircraft movements for a full eight-hour night period.

### **Night flight dispensations**

The government's review of night flight dispensations shows that system is not fit for purpose. The definitions of flights qualifying for dispensations are inadequate and the arrangements by which airports approve their own dispensations have been abused. Thousands of flights that do not qualify for dispensations have been approved and dispensations have routinely been used to increase the number of flights operating at night in the summer. The reporting and monitoring of dispensations, including by the Department, has been inadequate.

Disruption of any kind should only qualify for dispensation in genuinely exceptional circumstances. Any event that occurs regularly (annually or more often) at an airport is clearly not exceptional and should be accommodated in airports' routine scheduling processes. The definition of exceptional events should be by reference to external reporting, for example Met Office Red or Amber warnings or the declaration of a Major Incident by the relevant Police Force.

Disruption that is within the control of an airport or the aviation industry generally, or which can be accommodated by operational procedures and proper resilience planning, such as network capacity, IT failure, cumulative delays and industrial action, should never qualify for dispensation.

Dispensations should be granted by the Secretary of State, not by airports. Each dispensation should be reviewed thoroughly and reported to all relevant stakeholders. There should be a

process for disputing dispensations, and consequences if dispensations are granted incorrectly.

### **Night flight restrictions at the designated airports beyond 2024**

The government should ban all flights (other than emergencies and humanitarian flights), for an eight-hour period each night at all UK airports. The precise timings of that ban should reflect the periods of the day that have the greatest community and health impacts at each airport.

If any night flights continue to be permitted they should be limited to those that are genuinely essential for economic reasons and they should be robustly regulated through a combination of movement limits, quota limits and economic incentives not to fly in periods that have the greatest community impact. In those circumstances future movements should be limited on both an annual and a daily basis, with no carry over between months or seasons and no exempt aircraft category. Any future QC system should include progressive and challenging reductions in noise quotas over time. Any future regulatory system should ensure that airlines are financially incentivised not to operate in periods that have the greatest community impact and that charges for those periods fully reflect the costs they impose and vary in a way that helps ensure that such flights are operated by the least noisy categories of aircraft on all occasions.

### **National night flight policy**

Current night flights policy does not balance health and economic objectives. There has been no meaningful attempt to carry out a proper evaluation of the costs and benefits of night flights for many years. Historic limits have been rolled over repeatedly, or, in the case of quota limits, tweaked to take account of technological progress already made by the industry. The current limits do not reflect up-to-date evidence on the health and other costs of night flights or any serious assessment of the economic benefits of night flights. The government should therefore urgently carry out a detailed, objective, assessment of the costs and benefits of night flights.

In our view the historic justifications for night flights no longer withstand scrutiny. At some airports they perpetuate a low-cost carrier business model that generates levels of leisure flights that are inconsistent with climate imperatives, which primarily serve a small section of society, at prices that do not reflect the true costs they impose. Facilitating multiple daily aircraft rotations by low cost carriers is not a valid economic rationale for night flights. Many of the business interactions night flights previously facilitated, particularly at Heathrow, have been replaced with video calls and other alternatives to air travel, and the cargo night flights deliver is rarely time critical. √

None of these facts have been considered properly by government and none is reflected in the current night flight limits and wider regulation.

By contrast numerous studies have found a link between night flight noise, annoyance, stress and ill-health. Night flights also contribute to the industry's climate impacts. When all these factors are taken into account the true economic value of night flights is likely to be negative in most cases.