

To: [night.flights@dft.gov.uk](mailto:night.flights@dft.gov.uk) / 22 May 2024

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

### Introduction

Thank you for responding to our consultation to obtain your views and evidence on proposals for the next night flight regime at Heathrow, Gatwick and Stansted Airports which presents proposals for movement and quota count limits for these airports for the next night flight regime which will commence in October 2025.

Closing date is 22 May 2024

### Personal Details

1. Your name is?

Plane Hell Action

2. Your email is?

[info@planehellaction.org.uk](mailto:info@planehellaction.org.uk)

3. Are you responding on behalf of an organisation? \*

I am a co-founder of and campaigner with Plane Hell Action, campaigning against concentrated flight paths, night flights, aircraft noise and emissions

### Proposals

We set night-time operating restrictions at Heathrow, Gatwick and Stansted airports.

These airports are designated for the purposes of noise regulation under the Civil Aviation Act 1982.

We last consulted on these controls in December 2020 [[opens in a new window](#)]. The decision, published in July 2021, rolled-over the existing restrictions for a period of 3 years, putting in place the current regime covering the period from October 2022 to October 2025 [[opens in a new window](#)].

In March 2023 we consulted on night-time noise abatement objectives for Heathrow, Gatwick and Stansted airports [[opens in a new window](#)]. The night-time noise abatement objective for the next night flight regime, commencing in October 2025 will be:

“To limit and where possible reduce, the adverse effects of aviation noise at night on health and quality of life, whilst supporting sustainable growth and recognising the importance to the UK of commercial passenger and freight services.”

This consultation now seeks views and evidence on proposals for the next night flight regime, commencing October 2025, at:

- Heathrow Airport
- Gatwick Airport
- Stansted Airport

The impacts of the COVID-19 pandemic meant that flight and passenger numbers remained well below 2019 levels throughout most of 2020 and 2021. Numbers began to increase from March 2022 onwards. However the aviation sector is still in recovery, and we have not yet seen a complete return to pre-pandemic levels of traffic at all 3 of the noise designated airports (Heathrow, Gatwick and Stansted).

There are 2 important studies on aviation noise which are now underway, but which will not have reported in time to influence the next regime. Neither of these studies could have commenced any earlier given that fieldwork would have been impacted by the pandemic.

We:

- have commissioned an Aviation Night Noise Effects (ANNE) study, to examine the relationship between aviation noise during the night on sleep disturbance and annoyance, and how this varies by different times of the night which is due to report in 2025.
- are awaiting results from the Aviation Noise Attitudes Survey, which is being managed by the Civil Aviation Authority to gather data about experiences of exposure to day-time aviation noise, this is anticipated to report in 2025 to 2026

Whilst we await evidence from both studies we propose a bridging night flight regime of 3 years, which would cover the period from October 2025 to October 2028.

[Greater information about our proposals are detailed in the consultation information \[opens in a new window\]](#).

## Heathrow Airport

We propose a bridging regime of 3 years, covering October 2025 to October 2028, whilst we await further evidence that could support change in the future.

For this consultation we are defining:

- a movement as being a take-off or landing of an aircraft
- quota count (QC) as a weighting attributed to the arrival or departure of a specified aircraft type by reference to its certificated noise performance

Designated airports are given a noise quota which is an aggregation of quota count for individual aircraft, used to define a seasonal limit or usage by comparison with the applicable limit.

For the next night flight regime we are proposing that movement and QC limits for Heathrow Airport would remain the same as they are now. This is a:

1. Winter limit of 2,550 movements and a QC limit of 2,415.
2. Summer limit of 3,250 movements and a QC limit of 2,735.

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

I strongly disagree

## Heathrow proposal reasoning

9. Provide a reasoning for your answer.

It is too convenient for the DfT to avoid addressing the problems of night flights by suggesting there is neither no, or not enough, research data available nor that business has not yet returned to pre-Covid 19 levels.

The DfT has access to many peer-reviewed international research publications on the impact of noise and the impact of sleep deprivation. It has also had 7 years to remedy this so-called lack, 2017 being the year Plane Hell Action SE came into being, and its first consultation to respond to being Night Flights.

Stay Grounded has issued a Fact Sheet, February 2024 (attachment 1) which includes comments on the impacts on health of aircraft noise and emissions:

In summary:

Flying poses a long-term risk for the climate and a livable future. It also is an immediate health risk for people living near airports and under flight paths, as well as for cabin crew and passengers. This paper summarises the current science on health effects associated with noise and air pollution and explores ways to tackle them.

On the issue of business and pre-Covid 19 levels the DfT and the industry has chosen to ignore the fact that business flights are declining and leisure flights are becoming increasingly expensive (despite the VAT-free support Government continues to gift the aviation industry). i.e. the boom year of 2019 may well not be seen again. Moreover, the Government and the industry should seek to work within the constraints demanded by climate change and the increasingly-reported slow pace of research to find new, zero-emissions fuels required to replace the damaging emissions caused by fossil fuels.

Everyone would do well to remember that no one has a 'right' to fly in the way that no one believes they have a 'right' to a subsidised car.

If a noise quota or flight movement quota is not used in its entirety within any given period there should be a ban on rolling the unused quota into the next quota period.

There are too many dispensations being granted. Only military or humanitarian reasons for arrivals or departures in the 'night' (and 'shoulder') period should be classed as 'dispensations'.

Night flights are not important to the UK economy:

1. most night flight-delivered freight is not time critical. It also uses heavier, noisier aircraft types;
2. many cheaper flights operate during the night (and shoulder) period. Studies show that thanks to cheap flights from UK British people spend more money abroad than overseas tourists spend in the UK

Aircraft fuel should include VAT and be brought into line with other fuels, such as e.g. petrol which include VAT, and thus reflect the more truthful cost of flying.

Many studies have been done which highlight the link between night flights and poor health, particularly around the risk of cardiovascular deaths. A BMJ blog notes 'There is insufficient appreciation of the fact that aircraft noise has substantial effects on cardiovascular disease including hypertension, ischemic heart disease, heart failure and stroke'.

The 'lived experience' is evidence enough of the negative impact of night flights and 'running on empty'. Plane Hell Action can give any number of examples of those who are already suffering under night-time and shoulder-period concentrated flightpaths and who will confirm the soul-destroying impact the resultant sleep deprivation has had on their lives:

Five hours' sleep combined with the endless whine of planes between 4.30am until 11.30pm is sheer hell. Earplugs, white noise, noise cancelling devices – none of these work, particularly in hot weather when windows are open for fresh, cool air.' And 2024, 14 Apr: Key Worker O C to HAL, copied to Plane Hell Action:

I am registering yet another noise complaint. The last week has been unbearable with plane noise morning and evening. It is so bad I can feel the vibrations in my room. The lack of sleep has had a very adverse effect on my physical mental health as follow;

-Very low mood

-Struggling to get up in the mornings

-struggling to stay awake at work

-falling asleep on the train and missing my stop to exit

I cannot continue like this - this plane noise has to stop. It is absolute abuse to torture individuals in this way. I don't understand what gives the airlines the right to deprive people of their sleep..

The South London Press article of 24 February 2021 will corroborate this:

<https://londonnewsonline.co.uk/campaigners-urge-government-to-ban-nightflights-into-heathrow/> (and Attachment 2)

It is clear from the above reported experiences that night flight noise negatively impacts those many miles from touchdown, approximately 18 miles for both

correspondents based in SE London, and they gain no benefit from these flights. Neither does Heathrow provides any mitigation assistance for any but the closest communities to the airport.

NB note the reporter comments in 2021 that the consultation under discussion was night flights to 2024. And yet, today 22 May 2024, we continue to be consulted on continuing to operate night flights, this latest consultation described as a 'bridging regime' while research, which should have been started as early as 2017, is carried out and concluded. That is: another 4 years of immense and intense suffering for those overflowed communities at distance from runway who gain no benefit nor mitigation. Moreover, these night flights are flown along concentrated paths to devastating effect on those communities, flight paths which the CAA describes as 'noise sewars' and one could add 'sewers of poisonous emissions'.

WHO stipulates a minimum of 8 hours sleep for physical and mental well-being.

Healthy people function better and make a greater contribution to the UK economy.

There should be a ban on all flights between 10pm and 7am apart from those flights required for military or humanitarian emergencies.

## Any other comments

18. Any other comments?

I draw your attention to the response to this consultation by the Aviation Environment Federation (Attachment 3) of which Plane Hell Action is a member. I support its response in addition to those comments contained in this 'bridging regime' questionnaire. I also draw your attention to Plane Hell Action's response to DfT's consultation of 2021 (Attachment 4) which underlines much of what I include in this current response.

There should be a ban on all flights between 10pm and 7am apart from those flights required for military or humanitarian emergencies. Bridget Bell

22 May 2024

Attachments 1, 2, 3, 4