

CONSULTATION RESPONSE

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

Introduction

1. This document is Hatfield Broad Oak Parish Council's (HBOPC) response to the above consultation with specific reference to Stansted Airport. The council has also completed the online consultation questionnaire and wish both submissions to be included in the Government's response assessment.
2. This response has been prepared by the Hatfield Broad Oak Parish Council Planning Working Group using its expertise together with feedback received from residents.

Consultation Response Principles

1. The general principle adopted by HBOPC is that night noise at Stansted Airport should be continually reduced, eventually leading to no scheduled night flights.
2. This principle is based on the noise and disturbance affecting communities surrounding airports is, *"despite the significant improvements in aircraft technology and the associated noise reduction benefits, noise from aircraft operations at night remains widely regarded as the least acceptable aspect of aviation noise and the government has long recognised this"*.
3. The ANNE study on aviation noise effects, investigating sleep disturbance and annoyance will not be completed until the end of 2025, thus not available for stakeholder review or comment prior to a new night noise regime being required.
4. Following the Night-time Noise Abatement Objectives consultation in 2023 , the decision was reached "that the following night-time noise abatement objective will be in place for the next night flight regime to start in October 2025: To limit, and where possible reduce, the adverse effects of aviation noise at night on health and quality of life while supporting sustainable growth and recognising the importance to the UK of commercial passenger and freight services." We believe that 'to limit' the impact of aviation noise imposes a key restriction, that nothing should be done or allowed that would increase, i.e. the reverse of limit, the adverse effects of aviation noise

However, the ‘decision’ in its entirety is meaningless in that “where possible” suggests there would be a number of ‘excuses’ for not reducing aviation noise which, in any case, would not be independently qualified. Furthermore, whilst “sustainable growth” is acknowledged, again there is no independent evaluation of said sustainability.

5. In the absence of critical evaluation and monitoring, HBOPC requires a simple objective, which is to reduce night flights, eventually leading to no scheduled flights in the night time hours.
6. The current Government statements and ‘objectives’ for night flights and noise in general are too vague in lacking in definition and the outputs not subject to independent scrutiny, control and enforcement.

Consultation Response

1. The Government’s stated policy on noise from 2013 and reiterated in the Green Paper ‘Aviation 2050’, is that *"the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the industry must continue to **reduce** and mitigate noise as airport capacity grows"*.

This statement refers to all noise, whenever it occurs and as a result of existing operations, future operations or changes to operations.

2. The only reason Manchester Airports Group (MAG) / Stansted Airport would want to increase Night Flights or press the Government to consider de-designating Stansted would simply be to permit greater night flight operations, hence the ‘growth’ of night flight capacity. This is in contravention of extant Government policy and the ICAO Balanced Approach as enshrined Annex 16, Volume I to the ICAO Chicago Convention and in EU regulation 598/2014, transposed into English Law by The Airports (Noise-related Operating Restrictions) (England and Wales) Regulations 2018.

Capacity and volume issues are addressed later in this response.

3. Subsequent Government objectives outlined in the ACOG Masterplan, when referring to airspace modernisation, seek to water down the requirement for noise reduction by suggesting a trade-off between any supposed economic benefits and the balance between operational efficiencies and environmental considerations. However, the fundamental requirement that noise be continually reduced still remains for the objective of all airport operations, despite apparent policy inconsistencies.

4. There has been no considered evaluation of the economic benefits / disbenefits of night flight operations, hence this consultation is fundamentally meaningless without any information or data. In 2018 the Department for Transport commissioned a model which would have allowed potential benefits to be estimated and set against environmental and health costs. The Department did not respect the findings of the work and hence have not made use of the modelling available to them, but nor have they attempted to rectify any perceived shortcomings of the earlier work so that there is reliable modelling capable of assessing current and future economic benefits. In absence of such modelling, which the Department have had over three years to develop, we can only assume that the analysis cannot be made to stack-up positively and pointing heavily towards the conclusion that there is no economic justification for night flights at Stansted and that they should consequently be banned.
5. The current night flight regime has been rolled over' for a number of iterations due to the absence from the DfT of any satisfactory impact analysis, covering economic, noise, nuisance or health metrics. Consequently, the current regime is based purely on historic precedent rather than any form of acceptable technical evaluation.
6. In order to keep within its planning permission for 274,000 aircraft movements, Stansted indicated in its [2022] planning application that it would 'release' 8,000 of its 16,000 freight movements to commercial passenger flights. This is because, overall, MAG earns considerably more from a passenger flight per slot, than from a dedicated freighter – in fact in the order of three to five times more. In making more movements available to commercial flights Stansted will need to manage its runway slots both in and outside the peak periods, especially if longer haul routes are to be accommodated.
7. MAG Stansted has the stated objective of making greater use of its runway during certain times of the day, with a preference for attracting long haul routes. Some of these routes may have a greater propensity to arrive during the night period and moreover will be heavier, larger aircraft types and therefore noisier. However, since Stansted has failed to show any evidence of significant increased long haul activity, the justification for maintaining a night flight capability for this purpose is mute.
8. The reality is short haul services dominate at Stansted and with mainland Europe now well served, the no-frills, budget airlines at the airport, the major mix, are venturing further afield, and targeting destinations with sector lengths of flight times of 4-5 hours, (for example, the Canary Islands, Turkey, Greece and its islands and other similar destinations). When one of these longer distance destinations is included in an aircraft's schedule, the Budget airlines struggle to complete sufficient rotations (usually a minimum of three) to meet their business models requirements within the standard daytime period.

We suspect therefore that Stansted wishes to relax or eliminate night flight restrictions to accommodate a greater number of these so-called ‘mid-haul’ operations which will seek to depart or arrive outside the current daytime hours. This should be resisted otherwise night noise will increase substantially with the increased volumes and pressure will be exerted on even the current QC allowance.

9. Of course, there must be a system to allow late arrivals due to unforeseen conditions or emergencies, however these must be rigorously, and independently enforced. One would question quite how effectively this is being currently enforced at Stansted as 1,200 dispensations were permitted for such emergencies, three times that of Heathrow. In our view, aircraft should also not be given clearance at the departure point if they will arrive in the night period at Stansted.
10. With the proposed development of Manston, Doncaster, Bournemouth as dedicated freight airports, there will be scope for freighter only movements at Stansted to be reduced whilst tonnages carried bellyhold should increase. We believe, therefore, that a ban should be imposed on any freighter movements at Stansted outside normal operating hours – with no exceptions and that this should be enforced as part of the night flight restrictions.
11. It has long been HBOPC’s view that the QC periods should be amalgamated and that there be no ‘carry over’ allowance, as merely allows QC points to be stored and used to accommodate more night flights.
12. Night flight operations at Stansted are permitted to 13,700 movements whereas the much larger Heathrow is only allowed 5,800. Again, there is no economic or environmental justification for relaxing night flight restrictions at Stansted if Heathrow, where the pressure for early morning arrivals is far greater, can manage with less.
13. It is understood that despite entering into a S106 planning agreement with Uttlesford District Council “not to seek any relaxation of the night flight restrictions currently in force for the night period of 23.00 – 06.59 or for the night quota period of 23.30 – 05.59”, MAG has been lobbying Government to do just that. This is in clear contravention of its obligations, entered into freely, both legally and morally. This sort of behaviour by a national infrastructure owner should not be permitted and should indeed be not only be instantly discounted, but penalised. It also demonstrates why externally imposed rules need to be rigidly implied and enforced at Stansted.
14. It has long been recognised that dB noise contours are an insufficient metric to accurately measure the event impact of aircraft noise. The Stansted Airport Consultative Committee Environmental Interest Group recommends full use of ‘Numbers above’ metric, i.e. a count of the number of aircraft noise events passing incremental levels, or contours. This system should be utilised to accurately evaluate the event impact of night noise.

15. Parliamentary Replies:

Q.3. Question (HL7853) asked by Viscount Waverley on 15 May 2023: “To ask His Majesty's Government what assessment they have made of restrictions on night flights on the competitiveness of the UK”.

A. Baroness Vere of Norbiton on 22 May 2023: “The Government recognises the benefits that night flights bring to the economy, through connectivity and the movement of time-critical freight. We also recognise that aviation night noise can disturb people’s sleep - with the potential for health impacts. To strike a balance between the benefits and detriments, the Government sets restrictions on night flights at Gatwick, Heathrow and Stansted airports, and local planning authorities set restrictions at other airports.

For the airports where restrictions are set by Government, the Government regularly consults on appropriate restrictions to find this balance. The most recent related consultation closed in early May, and we will consult on future proposals towards the end of this year. The Government is aware that the aviation industry has in the past sponsored research to assess the economic impact of night flying in the UK. Through these consultations, it is incumbent on the aviation industry to continue to develop the evidence base and demonstrate the value that night operations bring to the UK economy.”

The Minister’s reply recognises the potential health impacts of night noise and for that reason why Stansted is a designated airport under Government restrictions. This should remain the case.

It should also be noted that neither Government nor industry has produced the evidence base mentioned to justify night flights.

16. It is the view of HBOPC that in general the current arrangements for the regulation and enforcement of aircraft noise are not fit for purpose and require significant reform to strengthen their effectiveness and set a binding programme of noise reduction and impact.

For regulation to be effective there should be noise limits at each airport, set by a body that is independent, expert and has enforcement powers, set at levels that give effect to government policy and updated at least every five years.

That the general deficiencies in aircraft noise regulation and enforcement also apply to airspace change proposals (through which modernisation will largely be delivered) and to planning assessments. There are currently no effective mechanisms to ensure airspace modernisation or airport expansion will deliver community benefits in the way or to the extent policy requires, or that any noise/environmental benefits asserted to be achieved will actually be delivered.

17. An ANEG review in December 2021 made, among others, the following key suggestions:

DfT should review the benefits and costs of night flights at each designated airport, and potentially other airports

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 maximum time parameter for "longer term".

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 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

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

The review also argued that there needed to be a more open, visible and accountable night flight review process, with more stakeholder involvement, given the lack of progress on these and other issues over many years.

18. In response to the options listed in the consultation, HBOPC has the following comments:-

Option 1 – Removing Government controls on the number of Stansted night flights and the permitted aggregate night noise level in October 2026.

This option is unacceptable as it would release Stansted from any form of Government control or oversight, resulting in potentially significant and unrestricted night flight operations.

Option 2 – Removing Government controls on the number of Stansted night flights in October 2025, whilst maintaining the controls on the permitted aggregate night noise level.

This option also has unproven need. Even if the QC system remains, technology developments with quieter aircraft would result in greater night flights. It is a backdoor method to achieve unrestricted night flights.

Option 3 – Government night controls to remain (as per Heathrow and Gatwick).

HBOPC strongly recommend the retaining of Government night controls, however, however we suggest these are examined and noise levels and exposure reduced, dependent upon demonstrated need and regulated use, until night flights at Stansted can be all but eliminated.

19. As a supplementary, but very important issue, night flights as well as early departures and late arrivals, generate considerable traffic through our district's villages. Many of these villages were named in the Domesday Book and were certainly not designed to accommodate the type of volume of traffic experienced today. Flight arrivals and departures outside of the working day generate additional traffic noise and vibrations, causing nuisance and disturbance.

Summary

1. There are many reasons for the Government to resurrect its policy of reducing night time aircraft movements and hence night noise disturbance. Sight of this objective appears to have been lost in under the banner of Net Zero.
2. The Airspace Modernisation Process should include an explicit requirement to reduce aircraft noise generally and night time noise in particular.
3. The ACOG Airspace Modernisation Masterplan must include a specific requirement to reduce noise generally and night noise in particular. The current masterplan does not accurately reflect extant published Government policy.
4. Option 3 – Government night controls to remain (as per Heathrow and Gatwick).

HBOPC strongly recommend the retaining of Government night controls, however, however we suggest these are examined and noise levels and exposure reduced, dependent upon demonstrated need and regulated use, until night flights at Stansted can be all but eliminated.

Hatfield Broad Oak Parish Council
April 2024

