

Reference: DfT – 2016 – 42

Consultation: Night flight restrictions at Heathrow, Gatwick and Stansted

CONSULTATION QUESTIONS

Section one: Personal Information

Name:

Email address:

I am responding as an individual.

Section two: Organisation details: not applicable

I would like this response to be fully taken into account in the Government's consideration of consultation responses.

I wish to make clear that the Government's night flight consultation and assessment is not fit for purpose. The Government says it recognises that noise from aircraft at night is the least acceptable aspect of aircraft operations. It acknowledges increasing evidence that night flights can have serious health consequences for those overflown. But it has failed to take any serious account of these factors in its proposals, either qualitatively or quantitatively.

Finally the Government's suggestion that aircraft noise at night affects only some 4,300 people at Gatwick is shocking. It betrays either a deep ignorance of the true impact of night flights, or a desire to distort the analysis so as to justify the outcome the Government wants. Either way it renders the consultation invalid.

Section three: Response type

My response is mainly about Gatwick airport.

Section four: Environmental objective

Q1a How strongly do you agree or disagree with our proposed environmental objective for the next regime:

Strongly disagree.

The objective is not appropriate. The government's role as regulator is to assess carefully the benefits and costs of night flights and strike an appropriate balance. Setting an objective of "maintaining the existing benefits of night flights" precludes such an assessment, and the Government has not carried one out. No meaningful options appraisal starts by assuming what the right answer should be. By defining its objective in this way the government has unacceptably circumscribed the work done and failed to consider an appropriate range of options.

Q1b Any additional comments on our proposed environmental objective for the next regime?

The Government must carry out a full, objective, assessment of the costs and benefits of night flights. Its failure to take account of the growing evidence that exposure to aviation noise, particularly at night, has adverse effects on health is irresponsible and unacceptable. The proposals in the consultation are neither evidence-based nor sustainable. They cannot be regarded as achieving appropriate proportionate regulation of aircraft noise at night.

Section five: regime length

Q2a How strongly do you agree or disagree with our proposal for the length of the next regime?

Strongly disagree. The proposed period is not appropriate. Given the limitations inherent in the government's proposed objective and in the work it has therefore carried out, the next regime should be set for the shortest period needed to carry out a proper assessment of the costs and benefits of night flights. This should be no more than two years.

Q2b Any additional comments on our proposal for the length of the regime?

It is unacceptable that there has been no fundamental review of the night flight regime since 2006. The opportunity for environmental improvements has been lost. The Government is failing to take seriously the aviation noise that it acknowledges is least acceptable to people and is neglecting increasing evidence that night noise from aircraft has seriously health consequences for people overflown.

Section six: The Quota Count System

Q3a How strongly do you agree or disagree with our proposal to introduce a new QC/0.125 category for aircraft between 81 and 83.9 EPNdB?

Agree

Q3b How strongly do you agree or disagree with our proposal for all aircraft quieter than this to remain QC/0 but count towards the airports movement limit?

Agree

Q3c Any additional comments on our proposals for the Quota Count System?

No

Section seven: Movement limits

Q4a How strongly do you agree or disagree with the proposal for movement limits to remain unchanged at Heathrow?

Neither agree nor disagree

Q4b Any additional comments on our proposal for Heathrow movement limits?

No

Q5a How strongly do you agree or disagree with the proposal for movement limits to remain unchanged at Gatwick?

Strongly disagree. They should be reduced materially in every future year and banned entirely from 2030. The economic justification for them is weak.

The winter movements quota of 3,250 movements should be reduced to match the actual usage in the past five years of under 2,000. The ability for the airport to carry over unused movements should cease.

Q5b Any additional comments on our proposal for Gatwick's movement limit?

The Government should announce that all night flights, other than emergencies, will be banned by 2030.

Q6a How strongly do you agree or disagree with the proposal to raise Stansted's movement limits to reflect the current number of exempt aircraft in operation?

Neither agree nor disagree

Q6b Any additional comments on our proposal for Stansted's movement limit?

No

Q7a How strongly do you agree or disagree with our proposals to encourage the use of quieter aircraft at Heathrow?

Neither agree nor disagree

Q7b Any additional comments on how you feel noise quotas can be set in order to encourage the use of quieter aircraft at Heathrow?

No

Q8a How strongly do you agree or disagree with our proposals to encourage the use of quieter aircraft at Gatwick?

I agree with the proposal to reduce the noise quotas to match existing use. This would remove the potential for a large increase in noise at night, which would be unacceptable. Having a large surplus of noise points has meant that the noise quotas have been totally ineffective in their aim to encourage quieter aircraft.

Strongly agree with the suggestion in paragraph 3.25 that the noise quotas may be reduced by 5% a year so as to be 20% lower by 2022. This proposal should be up-graded to a definite policy when the Government announce their decisions on the new night flight regime.

Q8b Any additional comments on how you feel noise quotas can best be set in order to encourage the use of quieter aircraft at Gatwick?

No

Q9a How strongly do you agree or disagree with our proposals to encourage the use of quieter aircraft at Stansted?

Neither agree nor disagree

Q9b Any additional comments on how you feel noise quotas can best be set in order to encourage the use of quieter aircraft at Stansted?

No

Section eight: Additional comments

Q10 Add any further views on our proposals or their potential impact on government's ability to fulfil the requirements of the Public Sector Equality Duty (note commercially sensitive information must be emailed to night.flights@dft.gsi.gov.uk)

The suggestion in the consultation paper (paragraph 1.38) that noise at night only affects some 4,300 people at Gatwick (the number the DfT state is within the 48 Leq.night contour) is entirely inappropriate and implausible. It takes no account of ground noise, reverse thrust, the increase in traffic using local roads or overwhelming evidence that people up to 25 miles from the airport, and well outside the Government's contour, are seriously disturbed by night flights. The Government is well aware of all these factors. As a consequence of ignoring them, the Government's assessment of the costs of night flights is materially wrong.

We wish to see a longer night quota period, matching the World Health Organisation Guidelines on Community Noise which suggest that night should be defined as 11.00 pm to 7.00 am.

We note the extreme variation in the number of night flights, from 76 a night in some weeks in the summer peak to only 7 a night on some unpopular weeks in winter. The Government should impose a maximum number of flights per night throughout all seasons.