

## DEPARTMENT OF TRANSPORT CONSULTATION ON NIGHT FLIGHT RESTRICTIONS

### SECOND PART RESPONSE by RUSPER PARISH COUNCIL

31 August 2021

1. This Response by Rusper Parish Council is focussed on Night Flights at Gatwick Airport. The issues and circumstances relevant to Gatwick Airport are, in many respects, fundamentally different to those affecting the other two main London airports – Heathrow and Stansted.
2. In considering the future night flight regime at Gatwick, the DfT is requested to have regard to these significant differences and in seeking to avoid a 'one size fits all' approach should agree to recognise these differences in its determinations regarding the future Gatwick night flight regime.
3. It is important to recognise that the flightpaths into and out of Gatwick are over rural areas with otherwise negligible background noise, particularly at night. Hence the impact of low flying aircraft taking-off or landing at night is a cause of material and unique disturbance.
4. Rusper Parish is located immediately adjacent to Gatwick Airport and directly in line with its runway. Prevailing winds mean that approximately 70% of night flights take-off over Rusper – and it is, of course, a given that take-offs result in significantly more noise than landings.
5. Rusper Parish Council is actively represented on GATCOM and thus, in preparing this response, we have had the benefit of reviewing a variety of reports and presentations relating to this consultation.
6. In essence, the issues on which the DfT will need to focus is the conflict of interests between the damaging effect of night noise on sleep deprivation leading to significant mental and physical health issues as against an assessment of the real economic impact of restricting night flights.
7. There is increasing and important medical evidence of the damaging effect of sleep disturbance and hence, it is evident that action needs to be taken to restrict as far as is possible any sudden or intense night noise. In the case of Gatwick Airport, while aircraft are generally quieter than (say) ten years ago, they are and will remain for the foreseeable future, significantly intrusive, particularly at night.
8. It is therefore, our strong recommendation that the existing night flight regime at Gatwick be changed so that there is a presumption of zero scheduled movements between the hours of 23.00 and 07.00.
9. It is, of course, recognised that there will need to be exceptions to allow for inbound delays (generally causing a lower level of disturbance) and for emergencies and in such cases, it is recommended that the operators of such flights should be required to make proportionate payments (ie – 'the polluter pays') in order to encourage them to avoid such inbound movements. The funds raised from such levies should be specifically used within the local communities (and not profit the airport itself).
10. The recent paper on the Economic Impact of Night Flying in the UK prepared on behalf of the airlines by York Aviation focusses on the apparent substantial economic costs of restricting night flights. A major part of this focus is, however, the cost benefit to the economy of overnight freight flights. It needs to be noted therefore that there are no overnight freight flights at Gatwick, nor are any in prospect.
11. With the majority of services from Gatwick being short-haul and predominantly leisure flights within Europe, the York paper also asserts that the travelling public prefer to fly from Gatwick between 05.00 and 07.00 and arrive back late at night. This seems counter-intuitive given the necessary disruption to such passengers in waking-up and travelling in the small hours. The argument provided that this will for example give holiday-makers more time in their resort seems unconvincing given that most resort hotels etc will not allow checking-in until after 15.00.

12. Equally unconvincing is the assertion that business travellers want to get out and back in a single day. Most commercial travelling is a mix of business and social requiring a minimum of one overnight stay. Any short in and out meetings will increasingly instead now be conducted electronically on Zoom etc.
13. The essential truth is that early morning and late night flights simply allow airlines to more intensively use their aircraft and thus leads to their being able to offer very low marginal cost fares for travelling at unsocial hours.
14. Government policy is increasingly focussing on the issues of climate change and much attention is being given to the damage caused by ever-increasing air travel. Such policy thus ought to be to discourage inessential air travel – and therefore such policy will be enhanced if the present ultra-low air fares become no longer economically available from the airlines because their intense scheduling into the night and early mornings are restricted.
15. It is thus asserted that the economic justification of night and very early morning flying at Gatwick is unproven and somewhat doubtful (although it is accepted that in the case of other airports, the identified economic issues of night freight and long-haul may be more compelling). Hence, the over-riding issues insofar as night flying at Gatwick is concerned should be the impact on sleep disturbance and resultant mental and physical health issues.
16. In summary, our response is as follows (as applicable specifically to Gatwick):
  - The existing 'night period' and 'night quota period' be merged into a single 'night period' from 23.00 to 07.00.
  - There be a zero baseline figure for movements during the night period.
  - That all actual movements during the night period (both landings and take-offs) be subject to an additional levy designed to discourage such movements and that such funds raised be allocated to the local communities.
  - That all such movements be subject to a regular (monthly) detailed publicly-available report explaining the specific reason for such movements.
  - That a statutory oversight body be empowered to review such report and recommend appropriate actions if there is evidence of the zero night flight regime being routinely abused or ignored.
17. We are more than happy to expand on these consultation responses if that would be considered helpful at any time.

For and on behalf of Rusper Parish Council  
Cllr Malcolm Fillmore