Night-time noise abatement objectives for the designated airports from October 2025

09/05/23

Summary

- Logistics UK's response provides views on all three airports (Heathrow, Gatwick and Stansted). Our members utilise the approved airports for time-sensitive express cargo flights that depart and arrive from Stansted, Gatwick and Heathrow, as well as the bellyhold of commercial planes at Heathrow.
- Logistics UK recognises the importance of reducing noise pollution and is generally in favour of the noise abatement objective's continued emphasis on weighing the advantages of night flights against limiting and, whenever possible, reducing the detrimental effects of aviation noise.
- Given the unique significance of night flights to the aviation industry, Logistics UK is pleased that the proposed noise target recognises freight connections.
- However, there is a need for policies that balance the need for noise reduction with the need to support economic growth. Logistics UK is concerned that the government's larger goals of economic growth and trade promotion are not included in the proposed noise abatement target, which makes reference to "sustainable growth" by the government. Whilst the new national aviation noise policy statement refers to the ”economic and consumer benefits of aviation”, the proposed night-time noise reduction aim for designated airports makes no mention of these benefits.

About Logistics UK

Logistics UK is one of the country’s largest business groups, supporting, shaping and standing up for safe and efficient logistics. We are the only organisation representing the entire logistics sector.

We represent a sector delivering an increasingly innovative, productive and sustainable system of essential national infrastructure. This system ensures the availability of the products that households, businesses and public services rely on every day, and is supporting the UK’s transformation for the future. Our membership of over 20,000 includes global, national and regional businesses and SMEs spanning the road, rail, sea and air industries as well as the buyers of freight services, such as retailers and manufacturers.

Response to consultation

Night flights are essential for many industries, including air cargo, emergency services and medical transport, which operate on a 24-hour basis. Restricting night flights would increase delivery times, disrupt supply chains and ultimately lead to increased costs for consumers and businesses. The aviation industry provides essential services to businesses and individuals and any restrictions on night flights would have a significant impact on the ability of these services to be provided.

The aviation industry plays a vital role in supporting the UK economy. Aviation supports over one million jobs and contributes £52 bn to the UK economy. A total of £16.5 bn in GVA was produced by flights during the night (23:00 to 06:59) in 2019, supporting around 213,200 jobs. With the loss of 20.7 million passengers and 480,000 tonnes of cargo annually, as well as the potential loss of up to 158,000 jobs, a complete ban on aircraft movements between the hours of 23:00 and 06:59 would have the greatest impact on the aviation industry and the wider UK economy.

Logistics UK recognises the concerns of local communities regarding noise pollution; however it is important to note that further night flight restrictions would curtail the ability for both inbound and outbound cargo. If the proposed restrictions were to be implemented, the following factors are to be expected as a result:

- Limited availability of cargo slots. Leading to increased competition among cargo operators for available slots. This can result in delays and increased costs for cargo operators.

- Reduced operational efficiency. Cargo operators may have to adjust their schedules and routes to comply with the night flight ban, monitoring the transit times and costs of cargo operations, resulting in longer transit times and increased costs.
- Reduced customer satisfaction. Cargo operators may not be able to offer the same level of service as before due to reduced availability of slots and increased operational costs.
- Downturn in economic productivity. There is no mention of economic or trade benefits in the proposed night objectives, suppressing the growth of the sector. As well, cargo operators may also incur a cost of compliance such as higher fees for using noise-reducing technology or the need to use larger and quieter aircraft. Such compliance could increase the cost of operating at the airport, reducing the cargo operators profit margins.

Metrics

Prior to making any decisions about future night flight regulations, the Department for Transport must make clear which criteria it will use to evaluate the impact of any limits on night flying on air freight connectivity and the UK economy. The measures that may be used to gauge this freight connection are not now specifically mentioned. Additionally, it is necessary to define health and quality of life, as well as to check that any metrics employed will be able to conclusively show that the negative consequences seen are brought on by aircraft noise.

Final Comments

The peak arrival time for in bound express freight is during the night period between 0600 and 0659, with the majority of this arriving in Heathrow. Further night-flight restrictions would curtail the ability for both inbound and outbound cargo. As such, no further restrictions on night-flights should be imposed.

If such restrictions are implemented, it is probable that air cargo operators will have to consider the costs and benefits of complying with the objective and determine whether or not it is feasible to continue operating at the listed airports under the new conditions. The following night flight policy must promote the government's own objectives of accelerating economic growth and global commerce rather than jeopardising the UK's attractiveness as a location for business.

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