



Department for Transport  
Great Minster House  
33 Horseferry Road  
London  
SW1P 4DR

Sessions House  
County Hall  
Maidstone  
ME14 1XQ

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By email:  
[night.flights@dft.gov.uk](mailto:night.flights@dft.gov.uk)

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Dear Sir/Madam,

**Department for Transport Consultation: Night Flight Restrictions**

This is Kent County Council's (KCC) response to the Department for Transport's (DfT) consultation on proposals for night flight restrictions at Heathrow, Gatwick, and Stansted airports from October 2025.

KCC has 81 elected Members representing approximately 1.7 million residents in Kent and has substantial experience with aviation issues affecting our communities. London Gatwick Airport in particular is situated approximately c.20km west of the Kent boundary. The Kent districts closest to Gatwick are Sevenoaks, Tonbridge and Malling, and Tunbridge Wells, all of which experience overflight from aircraft predominantly arriving but also departing Gatwick.

Whilst we endorse the continuing studies, such as the Aviation Night Noise Effects (ANNE) study, and the DfT's commitment to examine the adverse health impacts of night flights, KCC does not agree that the existing movement and noise quota limits should be maintained. Instead, night movements and noise quota limits at Gatwick should be reduced in order to give residents living under the flight paths, who are over-flown all day long as well as at night, at the very least, a decent night's sleep.

Our response to the consultation questions is set out below with a focus on Gatwick as this airport has the greatest noise impact on Kent's residents.

Yours faithfully,

Neil Baker  
Cabinet Member for Highways and Transport  
Kent County Council

## KCC Response to DfT Night Flight Regime Consultation

### **Q1. To what extent do you agree, or disagree, with our proposals for the next night flight regime at Heathrow Airport? Please provide evidence to support your view.**

KCC defers to those representing communities located within the vicinity of Heathrow Airport for detailed comments.

### **Q2. To what extent do you agree, or disagree, with our proposals for the next night flight regime at Gatwick Airport? Provide evidence to support your view.**

#### **Strongly Disagree**

It is understood that for the purpose of the next regime, the Department for Transport (DfT) intends on maintaining the existing night noise restrictions until October 2028. KCC's *Policy on Gatwick Airport* strongly opposes the current movement limits. In the summer months Heathrow is permitted 3,250 movements whereas Gatwick is permitted 11,200. In other words, more than three times as many. Whilst we accept that the reasons for this are due to the different operating models of the airport and the needs of low-cost carriers to have late night arrivals, it is still unreasonable to expect the communities surrounding Gatwick to have an unfair burden from night flights compared to the remainder of the London airports system. This is particularly true in West Kent where the disadvantages of the proximity of the airport are felt but the direct economic benefits are unproven when compared to other local authority areas closer to the airport.

Furthermore, residents had the benefit of quieter skies during the pandemic and despite the return to pre-pandemic levels being slower than expected, it is clear this is not necessarily the case for night flights. In 2023 Gatwick Airport's passenger numbers were approximately 40.9 million per annum (87% of the 47mmpa in 2019). Passenger numbers are expected to increase to just under 44mmpa in 2024, however, as can be seen from the current situation, night flight movements are already exceeding the movement limit in the summer period.

		Movement limit	Actual usage (2022/23)	Proportion (%)	Noise quota limit	Actual usage (2022/23)	Proportion (%)
Heathrow	Winter	2,550	2,390	94%	2,415	1,484.75	62%
	Summer	3,250	2,528	78%	2,735	1,507.625	55%
Gatwick	Winter	3,250	1,998	62%	1,785	636	36%
	Summer	11,200	13,123	117%	5,150	3,615.625	70%
Stansted	Winter	5,600	3,057	55%	3,310	1,467.5	44%
	Summer	8,100	10,884	134%	4,650	4,637.63	99.7%

Figure 1 – The current situation at Heathrow, Gatwick, and Stansted Airports<sup>1</sup>

<sup>1</sup> [Annex A: the current situation at Heathrow, Gatwick and Stansted Airports \(publishing.service.gov.uk\)](#)

KCC is aware that in addition to the movement limits imposed by the government, Heathrow Airport also has a voluntary agreement in place that sees no flights scheduled between 23:30 and 04:30. It also prevents flights scheduled between 04:30 and 06:00 from landing before 04:30. Further to this, Stansted Airport has an additional night noise limit on operations for the 8-hour night period (23:00 to 07:00) as a result of a recent planning condition. Gatwick therefore will be left as the only designated airport without additional night noise limits. Where it is not feasible to ban night flights except for emergencies, there is at least a strong case for lowering the movement limit and our policy states that numbers of night flights at Gatwick should be at least a level that is comparable with Heathrow.

Given the disturbance that dispensation flights cause to local communities during the night period, it is imperative that allowances are made only in the case of emergencies and that the government, airports and airlines do everything within their power to reduce the number of avoidable night flight dispensations. In April 2024 it was reported that London Gatwick Airport was the worst performing airport for UK flight delays, according to a Press Association study of Civil Aviation (CAA) data. Any delay risks a knock-on impact to subsequent scheduled flights and increases the chance of dispensations.

KCC believes that the ability to carry over a proportion of unused noise quota and movement quota should also be removed in the next regime. The current system results in uncertainty for communities and, because of the seasonality at Gatwick, effectively amounts to a higher summer limit.

KCC recognises the economic arguments for allowing limited night flights, particularly long-haul flights from emerging economies, which bring economic benefits to the UK. However, KCC does not agree that the existing movement and noise quota limits should be maintained, but rather that night movements and noise quota limits at Gatwick should be reduced in order to give residents under the flight paths, who are over-flown all day long as well as at night, are at the very least, allowed a decent night's sleep.

There is continually emerging evidence on the impacts of aviation noise that strongly demonstrates the real health costs felt by individuals, including evidence that people are becoming more sensitive to noise than they have been before. Additionally, research is now being carried out on areas of air quality that have previously had limited research in an aviation context, such as ultrafine particulate matter. Ultimately the financial burden of health impacts due to the aviation sector are picked up by the Public Health England (PHE) and National Health Service (NHS), and there are additional economic costs in terms of reduced productivity. However, unsustainable growth in the industry including more intensive use of the existing runways will lead to more intensive noise impacts. KCC cannot support growth at all costs and would therefore encourage a review to be undertaken following new evidence on health impacts for local communities affected by airport operations.

**Q3. To what extent do you agree, or disagree, with option 1 for the next night flight regime at Stansted Airport? Provide evidence to support your view.**

KCC defers to those representing communities located within the vicinity of Stansted Airport for detailed comments.

**Q4. To what extent do you agree, or disagree, with option 2 for the next night flight regime at Stansted Airport? Provide evidence to support your view.**

KCC defers to those representing communities located within the vicinity of Stansted Airport for detailed comments.

**Q5. To what extent do you agree, or disagree, with option 3 (our preferred option) for the next night flight regime at Stansted Airport? Provide evidence to support your view.**

KCC defers to those representing communities located within the vicinity of Stansted Airport for detailed comments.