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13 February 2017

Dear Sir/Madam,

Night Flight Restrictions at Gatwick – consultation response

I refer to the DfT's consultation on the next night flights regime for Heathrow, Gatwick and Stansted airports. GATCOM considered its response to the consultation at its meeting on 26 January insofar as the consultation proposals relate to Gatwick Airport.

GATCOM is the statutory, advisory body for Gatwick Airport and comprises representatives from local authorities and communities, business groups, the aviation industry, passengers, environmental interests and other users of the airport. We provide a forum for informed discussion leading to the provision of advice to the Government, the airport operator and other organisations. I would first say that our members acknowledge the need to strike a fair balance between protecting local communities from excessive aircraft noise and the needs of the industry where they are of benefit to the regional and national economy. One of the Committee's aims is to seek to ensure there is a continual improvement to the night noise climate through a combination of measures.

It is acknowledged that night flights restrictions have been in place at Gatwick since 1971 and that over the years the restrictions have been the subject of regular review to seek improvement to the night noise climate and which have been intended to incentive airlines to invest in quieter aircraft. Whilst GATCOM is generally supportive of the consultation proposals, the Committee is disappointed that the Government's delay in publishing the consultation proposals has meant that the amount of time within which interested parties can consider the proposals is significantly reduced given the need for the new regime to be in place in April 2017 to enable airlines to plan their autumn schedules. GATCOM is concerned that there has been no fundamental review of the night flight regime since 2006 and communities fear that the opportunity for seeking other environmental improvements to mitigate the impact of night flights has been severely restricted and allows very little time for the Government to fully assess and consider other suggestions that might come forward in response to the consultation.

(cont'd...)

BY EMAIL

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It is also noted that the DfT's impact assessment is not yet complete. GATCOM therefore seeks reassurance that the Government will both fully assess and consider other suggestions that may come forward as part of this consultation and continue to improve their own impact assessment, publishing that work at key stages, and put in place enabling provisions and guidance as to how additional measures based on those assessments can be brought forward over the term of the new regime.

GATCOM has considered the questions posed in the consultation document insofar as they relate to Gatwick. The Committee's responses are as follows:

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

GATCOM is generally satisfied with the proposed environmental objective and the measures. In particular, it welcomes the aim to encourage the use of quieter aircraft and the proposal to change the measure from the 55 dB contour to a 48 dB contour as that is in line with current health based guidance.

Q1b. Do you have any additional comments on our proposed environmental objective for the next regime?

It is recognized that average noise (Leq) contours provide a baseline for comparison and that some guidance is framed by reference to them. However, disturbance and annoyance by noise is still not well understood and other criteria are probably highly relevant - for example, the now defunct PPG24 used "events" (e.g., overflights and their noise levels) in determining spatial planning policy. The DfT should endeavour to devise, through research, some alternative format that be used to produce contours of disturbance and annoyance.

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

Strongly agree.

Q2b. Do you have any additional comments on our proposal for the length of the regime?

No.

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?

As it is stated that these aircraft can still create noise that could result in sleep disturbance, we 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?

As the consultation gives no indication of what aircraft, nor how many, nor when such aircraft could be expected to fall into the new QC/0 band (i.e. would be classified as below 81 PNdB) it is not possible to give a considered answer to this question. It is possible that during the life of this proposal the numbers would be so low as to make almost no difference to Gatwick's operation but on the other hand the simplification of all aircraft counting against the movements limit would provide comfort to those currently disturbed. On balance we therefore welcome the proposal.

Q3c. Do you have any additional comments on proposals for the Quota Count System?

No.

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

No comment.

Q4b. Do you have any additional comments on our proposal for Heathrow's movement limit?

No.

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

We agree.

Q5b. Do you have any additional comments on our proposal for Gatwick's movement limit?

No.

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?

No comment.

Q6b. Do you have 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?

No Comment.

Q7b. Do you have any additional comments on how you feel noise quotas can best 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?

We strongly agree that the noise quota and movements limits ratio should be set such that it incentivises the acquisition of quieter aircraft types. We further agree that as the aircraft fleet improves, the noise quota should be progressively reduced in order to encourage that to continue but care should be taken to set figures so as not to penalise the industry which is clearly making significant improvements in this respect.

However we are unable, within the time-frame of this consultation, to assist with the request for "any relevant evidence that is submitted by stakeholders before deciding on the optimal, but realistic, reduction at each airport".

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

The government has previously stated that it "will take into account the freeze in quota

limits during [the] extension period when setting the next regime and expects airlines to continue to improve their environmental performance in the interim". GATCOM would ask that in setting the new quotas the government ensures that the proposal to reduce the quota (currently proposed to better match current usage) does take into account whether the environmental improvements made have indeed been commensurate with what would have occurred had reduced quotas previously been set.

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

No comment.

Q9b. Do you have 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.

Q10. Do you have any further views on our proposals, or their potential impact on the Government's ability to fulfil the requirements of the Public Sector Equality Duty?

No.

I trust you can take into account GATCOM's comments.

Yours faithfully,



Paula Street
Assistant Secretary