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18 August 2021

Gatwick Airport Consultative Committee (GATCOM)

SPECIAL MEETING

A special meeting of GATCOM will be held at **2:00 P.M.** on **TUESDAY 24 AUGUST 2021**. This special meeting is to consider and agree the Committee's response to the Department for Transport's consultation: Night Flight Restrictions at Gatwick Airport (consultation questions 13 onwards).

Note: This meeting will be held virtually with members in remote attendance. The key messages and minutes of the meeting will be placed on GATCOM's website as soon as possible after the meeting.

A limited number of places are available for members of the public to observe the virtual meeting on a first come, first serve basis. To register your interest to observe the meeting please contact the GATCOM Secretariat by no later than close of business on 20 August 2021 via secretary@gatcom.org.uk

Agenda

1. **Apologies for Absence**
2. **DfT Consultation: Night flight restrictions at Heathrow, Gatwick and Stansted airports**
- (a) **DfT Update on the Night Flights Regime and the SoNA Aircraft Noise and Sleep Disturbance Report**

Gary Marshall, Senior Policy Advisor, Airspace, Noise and Resilience Division, DfT to give an update on the night flights regime and the key outcomes of the [SoNA Aircraft Noise and Sleep Disturbance report](#).

(b) **The Economic Impact of Night Flying in the UK - York Aviation Study**

Richard Connelly, Principal Consultant, York Aviation LLP, to present the key findings from the study on the "[Economic Impact of Night Flying in the UK](#)" with specific reference to the average economic value of a night flight at Gatwick and the overall value of night flights at Gatwick to the UK economy.

(c) **Suggested GATCOM response to questions 13 onwards of the consultation** (Pages 3 - 20)

The Secretariat's paper sets out for consideration a suggested draft response to the second part of the DfT's Stage 1 consultation on the future night flights regime.

GATCOM is asked to agree its response.

3. **Date of next meeting**

The next meeting of GATCOM will take place on Thursday 14 October 2021 at 2.00pm.

Anticipated finish time of meeting - 4.00pm.

To all members and nominated substitutes of Gatwick Airport Consultative Committee

GATCOM**24 AUGUST 2021****DFT CONSULTATION: NIGHT FLIGHT RESTRICTIONS
SUGGESTED GATCOM RESPONSE TO QUESTIONS 13 ONWARDS****REPORT BY SECRETARIAT****SUMMARY**

This report sets out for consideration a suggested draft GATCOM response to questions 13 onwards of the DfT's consultation on night flights restrictions at Heathrow, Gatwick and Stansted airports insofar as it relates to Gatwick Airport. The suggested draft response is set out in Appendix 1 for GATCOM's consideration and agreement.

1. INTRODUCTION

1.1 The Government's [stage 1 of its consultation on the night flights regime](#)¹ was published on 2 December. The Stage 1 consultation sought views on:

- a proposal to maintain the existing night flights regime at designated airports for 2 years, from October 2022 to October 2024
- a revision to the night flight dispensation guidance
- the structure of the night flight restrictions at the designated airports beyond 2024

1.2 Shortly after launching the consultation, the DfT announced that the consultation would be considered in two parts with two different dates for responses to be submitted:

- Part 1 – the proposal to maintain the existing night flight restrictions for the designated airports between 2022 to 2024 plus banning QC4 rated aircraft movements between 23:30 to 06:00 – the night quota period (NQP). Responses were required to be submitted by 3 March 2021. GATCOM submitted its agreed response on 2 March. The Government announced its [decision](#) on this part of the consultation on 19 July. The main outcomes of this part of the consultation are that:
 - the existing night noise objective and night flight restrictions will be rolled over for a period of 3 years
 - the next night flight regime will run from October 2022 to October 2025
 - a ban on QC4 rated aircraft movements will be implemented at the designated airports during the night quota period from October 2022.

The DfT's representative will outline the Government's decision at the GATCOM meeting.

- Part 2 – seeking views on policy options for the future night flight policy, beyond 2024, at designated airports and nationally. Responses are required to be submitted by 3 September 2021. GATCOM is asked to consider and agree its response to this part of the consultation.

1.3 Since the last GATCOM meeting two reports have also been published:

- the CAA's report on Survey of Noise Attitudes 2014: Aircraft Noise and Sleep Disturbance (<https://caa.co.uk/cap2161>) (CAP2161). This report focuses on self-

¹ <https://www.gov.uk/government/consultations/night-flight-restrictions-at-heathrow-gatwick-and-stansted-airports-between-2022-and-2024-plus-future-night-flight-policy/night-flight-restrictions>

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reported attitudes to sleep disturbance from aircraft noise, taken from responses to questions from within the larger SoNA 2014 study.

- the York Aviation Report on “The Economic Impact of Night Flying in the UK” published on Airlines UK’s website <https://airlinesuk.org/wp-content/uploads/2021/08/The-Economic-Impact-of-Night-Flying-in-the-UK.pdf> . York Aviation will present the key findings from the study with specific reference to the average economic value of a night flight at Gatwick and the overall value of night flights at Gatwick to the UK economy at the meeting.

1.4 Both these reports have been circulated to GATCOM members for consideration.

1.5 GATCOM members views have been sought on the [suggested draft response](#) reported as part of the agenda papers to the GATCOM on 22 April. A couple of comments have been received and have been taken into account in the final draft suggested GATCOM response set out in Appendix 1. GATCOM is asked to consider and agree its response to the consultation.

2. BACKGROUND

2.1 GATCOM held a workshop for all members and support officers on 25 February 2021 to explore member organisations’ views on what is needed to be addressed in the Committee’s response to part 2 of the consultation in respect of the future night flights regime post 2024. The key points of discussion from the Workshop are attached at Appendix 2. The points raised have been taken into account in the preparation of the suggested GATCOM response.

2.2 The GATCOM Steering Group gave initial consideration to the first draft of the suggested GATCOM response at its meeting on 1 April 2021. A copy of the first draft response was circulated to all GATCOM members in advance of that meeting to give an opportunity to feed in comments for the Steering Group’s initial consideration. It was clear from members’ comments that there remained a diverse range of views on the approach to be taken by GATCOM and that many changes were needed to the first draft response. The general view of the Steering Group was that GATCOM should submit a themed statement reflecting a better balance of the environmental, economic and airline interests.

2.3 The main concern of the Steering Group was that the various aspects of the night flights regime and the implications of potential changes was a highly complicated and complex matter which required thorough evidence-based consideration. The aviation industry was in a state of flux at the current time due to the on-going pandemic and time was needed by the industry, recognising that key staff were currently on furlough, to enable full consideration and analysis of the detail of the consultation.

2.4 In addition there was much concern about the paucity of evidence on the economic benefits of night flights at Gatwick. The DfT’s commissioned Systra Report issued in 2017 illustrated that the night flights regime could have significant economic impacts on airports, airlines, passengers and public accounts. The Systra Report whilst helpful, does not however address the wider economic impact of night flights on GDP, employment or wider knock-on effects. The aviation industry stakeholders have commissioned new research with York Aviation to capture the role of, and societal and economic benefits derived from, night flights. The results of that study are now available on Airlines UK’s [website](#), details of which were circulated to GATCOM members on 9 August 2021.

2.5 The outcomes of the reports, the Steering Group’s discussion together with the comments received from members and the points raised at the GATCOM Night Flights Workshop, have been taken into account in the preparation of a revised GATCOM response which takes the form of a covering letter and statement. The statement gives the

background to Gatwick's operation and the impact on the surrounding economy and communities, the context of the consultation response as well as the need for an evidence-based approach. The suggested draft response is set out in Appendix 1 for consideration and approval.

3. NEXT STEPS

3.1 The DfT will analyse the responses to this part of the consultation, which will be used to shape long-term policy proposals for the period beyond 2025. Consultation responses received on revisions to the night flight dispensation guidance will be used to revise the guidance for airport operators with a view to providing better clarity. The DfT will publish this updated guidance before the new night flight regime takes effect in October 2022.

3.2 The Stage 2 consultation on future night flight restrictions beyond 2025 will be issued during 2023, and it is at that stage that the DfT will set out firm proposals for longer-term policy reform.

3.3 The DfT has also confirmed that it will ensure that the SoNA Night report (see paragraph 1.3 above) is taken into account, together with other relevant new evidence, in formulating proposals for the Stage 2 consultation.

RECOMMENDED

That, subject to the inclusion of any comments raised at the meeting, the suggested draft response set out in Appendix 1 be approved.

PAULA STREET
GATCOM SECRETARIAT

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REVISED SUGGESTED DRAFT GATCOM CONSULTATION RESPONSE**COVERING LETTER**

Dear Sir/Madam,

Night Flight Restrictions at Gatwick – consultation response part 2 (Questions 13 onwards)

1. GATCOM has now considered its response to the second part of the night flights consultation, consultation questions 13 onwards.
2. GATCOM's membership brings together a broad range of interests including local authorities, local community and environmental groups, businesses, tourism, airlines, passengers, and other users of the airport to discuss a wide variety of matters concerning the operation and future development of Gatwick Airport. Given this broad range of interests there is a diverse and disparate mix of views on the issue of night flights from those member organisations wishing to see a complete ban on night flights, those wishing to see changes to the existing restrictions to reduce the number of night movements and further reduce the negative impacts on communities and health as a result of sleep disturbance, to those wishing to see either no change in the current restrictions or a potential to increase night movements within an overall reducing noise envelope. GATCOM has however been able to reach a common position on various aspects which it asks the Government to explore in more detail prior to issuing the Stage 2 consultation through further engagement, including using established channels such as ANEG and ICCAN, in developing proposals for a future regime at Gatwick.
3. GATCOM fully recognises that the COVID-19 pandemic is having a catastrophic impact on all sectors, with aviation being one of the first and worse affected sectors. Gatwick Airport Limited and its airline and business partners are experiencing significant financial loss which is undermining the future prosperity of the regional economy. GATCOM is anxious to ensure that Gatwick 'Builds Back Better and Greener' and recognises the importance of Gatwick being at the heart of a strong, vibrant, diverse and sustainable economy while reducing the environmental and health impacts of the airport's operations.
4. Against this background, it is important that the night flights policy is not considered in isolation or outside of its impact on the aviation sector's ability to recover from the pandemic, and to compete in years to come in an increasingly competitive global economy. Linking the night flights review with the Government's wider review of the aviation strategy, and revisions to aviation noise policies and the net zero initiatives is essential and must take account of:
 - the negative impacts on health and the World Health Organisation's recommendations on suitable measures to reduce the population's exposure to night noise;
 - the need to also quantify the health and social benefits of night flights alongside the health impacts, e.g. employment, travel opportunities and family/business connectivity.

It is imperative that in developing an holistic and a "Balanced Approach" as advocated by the International Civil Aviation Organisation all factors, advantages and disadvantages of night flights are taken into account and fully assessed.

Appendix 1

5. GATCOM recognises that this will require much collaboration and compromise across all interests but the significant downturn in the industry presents the unique opportunity to bring about change in a planned and evidence-based way.

6. GATCOM fully understands the need to support the industry's recovery efforts and to maintain adequate utilisation of assets to sustain viable operations into the future but there are various aspects of the night flights regime at Gatwick that many communities under Gatwick's flight paths, who suffer sleep disturbance impacting on their well-being and health, want addressing and are seeking a reduction in night operations. The Annex to this letter therefore sets out for the Government's consideration suggestions on various aspects of the Night Flights Review which the Committee believes need to be explored and addressed prior to the publication of the detailed proposals.

7. The Committee hopes you find its response helpful and the points raised can be taken into consideration.

Yours faithfully,

DRAFT

Aspects of the Night Flights Review to be explored and addressed by Government

Background

8. Pre-pandemic Gatwick was the UK's second busiest airport and is an asset to the South East regional economy supporting around 85,000 jobs and around £5.3bn towards GDP¹. The COVID-19 pandemic has however had a catastrophic impact on the airport's operation and recent data published by Catalyst South² (a strategic alliance of six Local Enterprise Partnerships (Coast2Capital, Enterprise M3, Hertfordshire, South East, Solent and Thames Valley Berkshire)) as part of its "Future Airports Towns" initiative has revealed the extent of the impact of the pandemic on key towns around the South East region's airports, including Gatwick. A recent report commissioned by Gatwick Airport Limited evaluating the local economic impact of the airport produced by Oxera³ found that overall Gatwick Airport provides significant value to the local economy representing a total of 36,700 jobs and £2.1bn in GVA in the UK in 2020 through the economic activity on site (known as 'direct' impacts), in the supply chains to those firms (known as 'indirect' impacts), and to firms that locate close to Gatwick Airport because of the business opportunities that it offers ('catalytic' impacts).

9. The ripple effect of significantly reduced airport operations has brought into sharp focus the important role of Gatwick and the aviation sector being at the heart of a successful, thriving economy. Connectivity, customer choice and competition will continue to be the key drivers of the airport's ongoing success which needs to be reflected in a future regime. Gatwick, working in partnership with the aviation sector and businesses, is well-placed to drive the adoption of new, more sustainable technology bringing economic, social and environmental benefits.

10. The significantly reduced airport operation as a result of the pandemic has also seen a large reduction of night movements including periods where there have been no aircraft departures between the hours of 17:00 and 07:30 during the national lockdowns and ban on international travel resulting in a much improved night noise climate. Residents have become accustomed to the quieter skies and improved night noise climate. Therefore, it is likely that once night flights start to return people will be more sensitised to the noise of overflight leading to a disproportionate increase in the stress of those under the flight paths due to an increase in those negative feelings.

Context of Consultation Response

11. The aviation industry plays a significant role in the UK economy, connecting people and UK businesses with the world. Within this context, and whilst there is a paucity of Government evidence published alongside the consultation on the economic and social benefits of night flights and on health and climate impacts, there are some GATCOM members who believe night operations have a role in supporting both commercial airline operations (including route viability, business connections to key export markets, regional connectivity, passenger choice and enhancing operational resilience), and facilitating air freight

12. However, night flights also create substantial nuisance and disturbance for those communities under the flight paths which has an impact on health as a result of sleep

¹ [Gatwick Airport Master Plan 2019](#).

² [Catalyst South Future Airport Towns](#)

³ [Oxera Report](#) - Economic impact of Gatwick Airport: Evaluating the local economic impact of the airport

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disturbance. The 2019 noise exposure contours for Gatwick showed that there are 12,100 residents living within the 48 dB LAeq night contour and 33,850 residents living in the 10+ N60 contour at Gatwick. The N60 contour is important as it relates to the external 60dB LAmax level on the ground which equates to the 45dB LAmax level inside the house. The 45dB LAmax level is the level which the World Health Organisation (WHO) says will disturb sleep (with the associated adverse health effects) if they occur more than 10-15 times per night.

13. The current night flights regime at Gatwick allows 11,200 movements in the summer NQP which roughly equates to 50 per night. In 2019 there were on average an additional 56 movements per night during the shoulder periods. This equates to over 100 events per night exceeding the 45dB LAmax internally (if windows are slightly open for ventilation). As regards the winter season allocation historically there is an underuse of the movements limits and noise quota.

14. Most homes are well insulated with thermal double glazing which is adequate to exclude the noise of an overflying aircraft when they are closed. However very few have additional ventilation over and above an openable window. Therefore residents are faced with either a reasonable night's sleep with the windows closed or a disturbed night sleep with them open or even just ajar. However during the summer most residents want or must have their windows open to deal with the effects of overheating. Summer 2020 saw some of the longest warm spells the UK has seen and with climate change the likelihood of prolonged warm spells are only going to increase.

15. The significant investment by airlines to introduce the new quieter and cleaner aircraft types is commended and this, together with a combination of other measures, incentives and airport charging structures, has had a positive effect on reducing the daytime Leq standard and actual noise exposure contours at Gatwick. Whilst fully recognising the improvements achieved, communities still suffer disturbance from night flights, and it must be acknowledged that even the quietest aircraft types create a noise and disturb sleep.

16. GATCOM accepts that any noise measures eventually put in place must be proportionate, cost effective and take account of the local and national economic benefits of airport operations and that changes must follow the "Balanced Approach" as advocated by the International Civil Aviation Organisation. It is also recognised that any decision to significantly reduce night flights at Gatwick could potentially result in a reduction in overall flights at the airport and as a consequence could lead to less destinations being served from the airport, impacting regional and international connectivity, reduction in customer choice and competition. This is because the number of sectors an airline operates is limited by a finite number of aircraft an airline operates in order to serve multiple destinations – "lines of flying". The importance of addressing and reducing the negative impacts for communities must however be given equal weight as that given to ensuring the successful recovery of the aviation sector from the pandemic in the short term as well as into the future in a fair and balanced way. Communities wish to see any new night flights regime predicated on a reduction in aircraft movements to bring about a noticeable improvement in the night noise climate.

17. The combined movement and quota limit together with other noise abatement procedures is viewed as the best method of control for night flights at Gatwick. However there has been no fundamental review of the night flights regime since 2006, a concern raised by GATCOM in its response to the Government's 2016 night flights review, and communities fear that the opportunity for seeking further environmental improvements to mitigate the impact of night flights will again be missed. This response puts forward suggestions for the Government to explore working with the industry and other key

stakeholders as part of the current review, in advance of issuing the Stage 2 consultation, to help bring about change.

Evidence-based approach

18. To enable the Government to develop proposals for a future night flights policy and regimes for the three noise designated London airports it is essential that there is up to date and robust evidence on the economic and social value of night flights and their impact on health and climate change for each airport given the differences in their operations. Currently there is a paucity of Government and independent data, particularly in respect of the wider economic and social value of night flights. The DfT's commissioned [Systra Report issued in 2017](#) illustrated that the night flights regime could have significant economic impacts on airports, airlines, passengers and public accounts. This Report whilst helpful does not however address the wider economic impact of night flights on GDP, employment or wider knock-on effects.

19. A recent study commissioned by Airlines UK in partnership with a number of aviation stakeholders on the "The Economic Impact of Night Flying in the UK"⁴ provides an updated account of the direct and wider impacts of night flying to the UK economy in 2019 to give a greater understanding of the value attached to night flying. The York Aviation Report acknowledges that its study is not intended to be a full assessment of the costs and benefits of night flying in the context of the Balanced Approach. GATCOM therefore requests that the Government evaluates and builds upon this evidence base to provide a full assessment of the costs and benefits to also include the environmental and health costs associated with night flying prior to issuing the Stage 2 consultation. It is important that the results of this work are shared widely so that all interests gain a better understanding of the economic and societal costs and benefits of night flights.

20. In addition to this it would be helpful if the Government could include as part of the Stage 2 consultation the following:

- Comparison with other European Airports on night-time operating hours and turnover.
- What would be the real cost (to also include the environmental and health costs alongside the economic disbenefits) of removing night flights. How would this be reflected in ticket prices?
- Should there be a financial compensation package for residents who are overflowed at night? Flyers pay for the right to disturb residents. As with nuisance the more someone flies the greater the cost.
- Frequent flyer analysis – where, how long and why do they fly so often.

21. The evidence base of the health impacts of sleep disturbance however continues to grow and the outcomes from the CAA's recently published SoNA 2014: Aircraft Noise and Sleep Disturbance Peer Review⁵ and its recommendations for further study are noted. In considering its response to this consultation GATCOM has acknowledged that repeated sleep loss is damaging to the health, it increases the risk of cardiovascular disease, mental illness and has also been linked to dementia. Other 'costs' from the resulting tiredness include an increase in accidents, loss of productivity (see [Environmental Noise: Valuing impacts on: sleep disturbance, annoyance, hypertension, productivity and quiet: Defra November 2014](#)). All these costs are not only suffered by the residents but also costs UK plc through the NHS which pays for the healthcare.

22. Other relevant sources of evidence include:

⁴ York Aviation Report - [The Economic Impact of Night Flying in the UK](#)

⁵ [SoNA 2014: Aircraft Noise and Sleep Disturbance Peer Review](#)

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- 2011 the World Health Organisation (WHO) published the [Burden of Disease from environmental noise – Quantification of healthy life years lost in Europe](#).
- 2014 DEFRA published [Environmental Noise: Valuing impacts on Sleep Disturbance, annoyance, productivity and quiet](#). This estimated the cost alone of the loss of productivity due to noise in England as being between £2-6 billion per annum in England. Previous Interdepartmental Group on Costs and Benefits (IGCB(N)) research indicatively estimated the social cost of road noise at between £7-£10 billion per annum. The economic cost of aviation noise has not been evaluated however it is believed that night flights would be a major contributory factor to those costs.

23. It must also be noted that the noise impact stretches beyond the flight paths. Around Gatwick traffic noise is much higher during the night than in other areas due to the 24/7 nature of the airport.

Dispensations Review

24. The dispensation guidance is hugely important to airlines in helping to manage and recover from unplanned disruption on the network. GATCOM acknowledges that the airlines are supportive of maintaining the current arrangements. However, this is not a position shared by the majority of GATCOM members. There is a need to give greater public confidence in the way the process for granting and the monitoring of dispensations is managed and regulated.

25. At Gatwick dispensations have increased significantly in recent years (in Summer 2017 – 421 granted; in Summer 2018 – 1005 granted; and in Summer 2019 – 770 granted). Weather and ATC/industrial disruption cause the most dispensations and are now regular occurrences as the flight schedules become tighter and the airspace becomes more crowded.

26. Communities need greater confidence that disruption of any kind should only qualify for dispensation in truly exceptional and emergency circumstances. As bad weather and ATC strikes/disruption are now known knowns the Government is asked to explore with the industry the possibility for and the implications of planning for this type of disruption through building an allocation into the night flights quota and movements limits in a way that is fair to the industry but does not increase the overall number of night flights at Gatwick.

27. Scheduling slots and airline routes are programmed well in advance and aircraft are expected to operate to time. With very busy skies, especially in the summer months delays occur for a variety of reasons. Gatwick Airport Limited, working with its airlines, handling agents and aircraft servicing partners drive forward initiatives to ensure an efficient airfield operation and aircraft turn round process to achieve punctuality performance targets. This key focus is commended and encouraged but the greatest challenge in achieving punctuality targets is the capacity and resilience of the network. Despite the industry's investment in resilience initiatives and reasonably successful efforts to combat the challenges in improving and managing punctuality, NATS data would suggest that without airspace modernisation across the UK and Europe, the situation is likely to deteriorate as traffic recovers to pre-COVID-19 levels.

28. As part of the dispensation criteria review there is a need for the Government to analyse the root cause of regular known delays, their impact on the network capacity now and into the future (including forecast of improvements to be delivered with airspace modernisation) and the resilience of the network to recover from the cause of delay. Once the outcome of this analysis is known, planned changes can be implemented to ensure there is adequate resilience in the system benefiting not only

airlines, passengers and overall airport operations but also local communities who also suffer the consequences of delayed flights in the night period. Such an analysis will also help clarify the applicability of the current criterion for widespread and prolonged disruption.

29. As a way of building public confidence in the regulation and monitoring of the dispensations process, the Independent Commission on Civil Aviation Noise (ICCAN) could potentially have an important role in undertaking periodic reviews of night flight dispensations granted, to assess compliance as well as opportunities to further improve the process.

Night flights Regime beyond 2024

30. There is a diverse mix of views across GATCOM's membership about the length of the regime, the QC system, movements limits and carry overs and the hours covered by the NQP. As a way of building confidence with communities the Government needs to explore in more detail how the future regime can be designed to further mitigate the negative environmental and health impacts through a combination of movement limits, reviewed carry over limits between seasons, progressive reductions in noise quota limits and economic incentives not to fly in periods of the night that have the greatest community impact which is proportionate and follows the "Balanced Approach" as advocated by the International Civil Aviation Organisation.

31. Given the mix of views across GATCOM's membership, the committee has agreed that the principle aims, and matters to be explored further as part of the review and before issuing the Stage 2 consultation, should be to:

- (a) Provide a clear policy and a roadmap of how to incentivise a declining reliance on and demand for night flights over a longer time period through a stepped approach reflecting airlines' fleet renewal plans and gives certainty and incentives to airlines in planning schedules.
- (b) Continue with a 5 year review of the new regime given the uncertainty over the next few years particularly as the industry recovers from the COVID-19 pandemic, implications of Gatwick's Northern Runway project proposals and the airspace modernisation programme
- (c) Ensure there is a combination of aircraft movements limits, noise quota and economic incentives to operate the quietest aircraft types and to control the number and types of aircraft flying at night, particularly in the NQP. Communities wish to see any new regime predicated on a reduction in aircraft movements although this is not a position shared by airlines interests who wish to explore the potential to increase night movements within an overall reducing noise envelope. It is essential therefore that the overall number of night movements is not increased as a result of the review.
- (d) Include a re-baselined QC system to ensure it remains an effective tool as advanced technology and quieter aircraft types are introduced. The aim of any reviewed system, based on sound evidence, should continue to incentivise airlines to the use of the quietest aircraft types at night and should not result in an increase in overall aircraft movements, especially in the night quota period. It is important to give comfort to communities and regulators that there will be no immediate increase in the number of night movements whilst also reassuring manufacturers and airlines that the much respected QC scheme will only be amended on the basis of sound evidence.

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- (e) Ensure that a QC rating for any aircraft that has a noise footprint that exceeds 60dB L_{Amax} over any residential dwellings near an airport is captured by the regime. The [WHO environmental noise guidelines](#) state that 10+ events exceeding 45dB L_{Amax} internally (equating to 60dB L_{Amax} externally) are likely to cause an adverse health impact. Therefore any aircraft capable of disturbing a resident should be included in the QC system to ensure it remains fit for purpose. Even a relatively 'quiet' aircraft generates a noise level which has an adverse impact on the peace and tranquillity of the resting population beneath and to both sides of its flightpath. Counting all aircraft in an airport's movement limit is viewed as the correct approach and any reintroduction of an exempt category should only be considered if it can be proved there would be no adverse impact on residents.
- (f) Ensure the NQP remains a feature of the regime and the hours covered by the NQP recognises that sleep disturbance is not limited to 23:30-06:00. Sleep patterns vary and are complicated but to maintain good health evidence suggests 7-8 hours of sleep are required on average. Ways in which to address this need to be explored.
- (g) Address the headroom in the noise quota and movements limits at Gatwick, especially in the winter season.
- (h) Commence the process of exploring the possible phasing out of the scheduling QC2 rated aircraft from the NQP to ensure the continual improvement in the night noise climate. QC2 are only 3dB quieter than a QC4 so still have a significant impact on residents and have a large 60dB L_{Amax} footprint, affecting a large number of people around an airport. It should be noted that the airlines could only contemplate such bans on aircraft that are QC2 on arrival (e.g. B747) in line with any position taken on QC4 departures and also takes into account airlines' fleet investment cycles. The Government is nonetheless asked to start to explore with the industry the potential timing and process of such a phase out as new airline fleets are introduced.
- (i) Review the arrangements for any underuse of the limits and quotas to be carried forward to the following season with measures also put in place to incentivise airlines not to schedule slots in the NQP. The carry over allowance taken together with the number of dispensations granted can potentially add a significant number of extra night flights in a season.

Revised aviation noise objective

32. There is a need for the aviation noise objective to be reviewed to ensure continuous improvement in the night noise climate, particularly in respect addressing the frequency of aircraft overflight for affected communities during the night period and the associated health impacts of night noise. The night noise objective underpins the four principal elements of delivering a balanced approach. Two of the four principal elements – reduction in noise at source and noise abatement operational procedures - have brought about improvements in the overall noise climate at Gatwick.

33. However, the other two principal elements – land use planning management and the night flights operating restrictions have seen little improvement. In the case of land-use planning, the situation has worsened since the weakening of planning law in 2010 making it easier for developers to build in less favourable locations. The DfT, Defra and MHCLG need to collectively review the objective.

34. In seeking a more ambitious objective, the Government is asked to consider the possibility of including a target to reduce the number of people affected by the 10+ N60

contour. Houses are still being built in high noise exposure locations increasing the number of residents being adversely affected by noise.

Criteria for airport designation

35. A number of airports have expansion proposals planned and the government needs to ensure there is robust criteria in place that can potentially offer some protection to local communities in cases where the planning system does not effectively capture noise control, abatement and mitigation.

36. It is important that a draft set of criteria for designation should be developed together with proposals for the effective regulation of aircraft noise (in both day and night periods) in consultation with airports, the industry, local planning authorities, communities and airport consultative committees. Early engagement through established channels such as ANEG, ICCAN and UKACCs should be used to identify the key aims and objectives of the criteria and on the initial draft criteria before formal consultation.

AGREED BY GATCOM ON XXXX

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GATCOM NIGHT FLIGHTS WORKSHOP

25 FEBRUARY 2021

KEY POINTS RAISED

PURPOSE: The need to establish GATCOM's approach to the consultation response on the future night flights policy beyond 2024 and to help identify where a consensus view can be achieved.

PRESENTATIONS:

Night Noise & Health Impacts: The paper highlights the impacts of noise and sleep loss on stages of sleep – lack of deep sleep is a contributory factor to Alzheimer's and Dementia; REM (Rapid Eye Movement) sleep is linked with anxiety and depression. Also highlights other negative impacts of sleep disturbance on health, welfare and quality of life; the economic costs of those impacts and the WHO guidelines on mitigation against noise.

Scheduling and Use of Slots in the night period: Paper highlights the Gatwick AOC view of all airlines operating at Gatwick. The Paper is not specific to passenger traffic but also cargo. Any reduction in night flights at Gatwick will result in an overall reduction in Gatwick activities and as a consequence there would be a diminished customer offering in range of destinations and route frequency. This would impact the local economy. Confirmed that the current noise objective presented a balanced approach and that the AOC supports the proposal to roll forward the current objective to 2024 and beyond. Time is needed to gather the data needed to respond to consultation in view of changed circumstances such as the UK's withdrawal from the EU and also the recovery from the pandemic. Concerns about the lack of review since 2006 are understood. The AOC considers that a review cycle of 10 years would be more in line technology developments and with fleet renewals. No specific objection to QC4 operational ban but believe that a scheduling ban in the quota period would be more appropriate rather than a pure operational ban. A more in depth review of the QC system was needed.

Community Noise Groups' priorities: presentation [slides](#) are available here.

Night Flights Regime: The paper sets out initial thoughts of GATCOM's Lead Member for Noise and Independent Technical Adviser on the outstanding issues from the previous review which were not addressed as part of the current review and possible changes needed to the current regime. There is an expectation that each night flights review should bring benefits to local communities and should not just be a simple roll forward. The justification of the Government's approach needs to be considered, dispensation criteria needs to be revisited, clarified and those dispensations regularly granted for weather/ATC disruption which are a regular occurrence needed to be built into the allocation. A balance needs to be struck but the community needs to be offered something better than is currently in place. If a night flights ban is being contemplated, then it needs to be applied across all airports to ensure a particular airport is not unfairly disadvantaged.

DISCUSSION TOPIC 1: THE EXISTING REGIME AND WHAT NEEDS TO CHANGE COMMENTS RAISED:

- Rollover from one season to another should not be permitted. The main origin of the rollover is because Easter can on occasion fall in the winter season. Annual allowance had previously been considered but is not the answer. The carry over allowance is counter to the government's objective to limit and reduce noise. Taken together, the carry over allowance and dispensations can potentially add a significant number of extra night flights in a season.
- The underuse of the Winter Season allocation needs to be addressed.

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- Recognition that the summer cap bites. GAL advised that it had prevented an airline operating one year to ensure Gatwick operated within the night flights cap
- The need for a fair distribution of night traffic across London airports. Gatwick has 4 times the number of night flights compared with Heathrow and Stansted. Gatwick night flights should therefore be reduced to a similar level as other noise regulated airports. GAL explained that all London airports are different. The night flight cap at Gatwick is around 5% of total flights at Stansted it is around 7% of total flights. All airports have different operations making it difficult to compare like with like.
- Need to see a declining reliance on night flights as a way of building confidence with the community. Need a roadmap of how that can be achieved in partnership with the airlines, engine manufacturers, capacity of aircraft, scheduling of holidays and more equitable distribution of flights.
- The time is right to consider a ban on night flights nationally as well as at Gatwick. This is something that GAL offered to the Airports Commission in relation to additional runway proposals so is something that could be reconsidered. There was also the view that it was not realistic to have a total ban on flight nights but there should instead be much more control over the numbers and noise quotas. Any ban on night flights needed to be planned and phased in.
- Need to take into account that not just about noise from aircraft but also the disturbance from passenger traffic and shift workers accessing the airport, on airport activity and supplies.
- Better scheduling will result in better jobs with a reduction in night shift working which in itself has health and well-being impacts for those who work night shifts.
- Pricing for night flights needs to be reviewed to disincentivise night travel. Suggestions included airlines and passengers paying twice the price for flying at night compared with those ticket prices/airport charges in daytime operational hours or passenger tax with monies being allocated to community projects. GAL advised that at night it is a good time to fly as, setting noise impacts aside, has environmental benefits as enables flights to fly more efficiently as many of the network delays do not exist at night therefore emissions are much improved.
- Need to reduce the impact on health and well being on communities. Even with noise insulation aircraft noise disturbance is still a problem, particularly as ambient noise levels are lower making the noise more noticeable. Highlighted that compared with Heathrow the health impacts of night flights around Gatwick are less as more sparsely populated.
- Dispensations need to be taken into account in the movements limits and factored in the Government's restrictions.
- Government policies need to give incentives and consider how environmental interventions can influence change in policy.
- Airspace modernisation and reducing aircraft separation will help achieve greater throughput in the day which could reduce the need for night flights.
- Questions were raised about the value of inbound/outbound tourism and use of night flights and whether aviation is an exporter of wealth from the UK. Gatwick is viewed as predominantly a leisure airport but airlines also bring in inbound tourism and serve the business travel market. ABTA has subsequently provided recent publications – [Tourism for Good](#) and [Travelling Together – The value of UK outbound tourism](#). The importance of tourism to UK economy should not be overlooked.
- Need to look at reasonableness of night flights. 50% of population fly once a year 10% of people are responsible for 50% of all flights per year. Ban or compensation to those affected through tax on those who wish to fly at night so that the monies can go back into communities affected by night flights disturbance. GAL advised that the CAA's data for aircraft leaving and arriving is not broken down for night movements. But UK leisure for outbound flights 62% was through Gatwick, foreign leisure inbound 23%, UK business 10% and foreign leisure 5%.
- The significance of climate change initiatives will start to bite and will have an impact on demand and cost of flying.

- Light pollution from night flights and activity on airport. GAL clarified that aircraft anti-collision lights are a safety requirement as are navigation lights. Light pollution around airport and on-airport was also highlighted.
- Civil Aviation Act removed aviation noise from law of nuisance and was questioned whether it was time for the Government to address this. The DfT advised that the main reason transport noise is not a statutory nuisance is because the enforcement of it is not possible for Local Authorities to determine and there were difficulties as to how to enforce aviation sources of noise pollution of overflight. The DfT therefore look at other mechanisms/policies to control noise. It was questioned whether it could be a matter for the courts to decide through common law nuisance.
- Questioned whether recovery of 70% to 2019 levels is achieved whether the 70% would be focussed on daytime slots or spread evenly between daytime or night time slots. Is there a preference? It was difficult for Gal and the airlines to answer this question.
- Need to consider scope to have a "silent time" in the night quota period e.g. a four hour period when there is no flights.
- QC system is in need of review and a re-baselined before new regime in 2024
- Importance of commercial operation and flights for local businesses and local economy as well as tourism not being overlooked.
- Challenge is to balance the different imperatives with a vast and varied approach to airline business models and a successful aviation industry. Crucial for aviation to be able recover, thrive and grow. Aviation can help UK to recover economy and return to economic prosperity.
- Recognition of the significant investment by airlines in recent years in new quieter and cleaner aircraft types and use of new technology has had an effect on reducing the area with the noise contours.
- Even the quietest aircraft types make a noise. Aircraft should only be exempt from regime if they do not disturb community under the flight path. They are however still counted against the movements limits.
- Plea to airlines that as part of recovery from pandemic not to bring in night flights all at once as communities have got used to quiet skies and will notice them more than previously.

DISCUSSION TOPIC 2: DISPENSATION CRITERIA

COMMENTS RAISED:

- The DfT is seeking views to ensure that dispensations are there to be used for exceptional circumstances outside the airport's and airlines' control. There are no limits on the number of dispensations – they are there to enable the handling of aircraft in emergency or extraordinary circumstances.
- Very important to retain the ability for dispensations and have seen the value of dispensation in the transport of medical supplies.
- Dispensations should be for genuine exceptional circumstances.
- Widespread and prolonged disruption criterion needs review. The airspace network is very congested and those should now be anticipated. Clarification on this point would be welcomed by airports.
- There has been an increase in the number of dispensations granted in recent years and as such skews the actual number of nights flights.
- Consider including a percentage of dispensations in the summer and winter seasons movements limits in respect of those dispensations that regularly occur in respect of delays from ATC problems or weather.
- Is there a case for the dispensations to be pre-approved by the DfT before they are granted rather than relying on the airport to grant. DfT advised that it does operate a duty office but these are operational decisions that require a quick decision and the airport manager is more likely to be aware of the circumstances to make an informed decision rather than the duty office at the DfT.
- Dispensations are widely drawn and there should be a tightening up of regulation.

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- GAL clarified that in 2019 it turned down around 3rd of requests for dispensations and acknowledged the need for the rationale for dispensations to be reviewed.
- If dispensation granted are there additional charges imposed on the airlines? GAL is regulated in the amount of charges that it can impose under its economic licence conditions.
- Noted that Weekly Report of dispensations is issued to DfT. It was questioned whether in the event that the Secretary of State deciding a dispensation granted was inappropriate what mechanisms were there to rectify the matter. The DfT clarified that the last time this happened was in 2015 which resulted in the airline losing a slot for the dispensation that had been awarded and as such had to adjust its flight schedule.
- In 2018 GAL granted 500 summer dispensations that in the view of the Aviation Minister were not in line with the interpretation of the guidance. It was questioned why the decision had not been reversed at the time and; had they been reversed; would GAL still have been compliant for the movements limits for that season. This case had resulted in the DfT providing further clarification on the application if the criteria and an initial calculation revealed that GAL did not breach its caps for that season.
- Dispensations need to be properly regulated by the DfT.

NEXT STEPS

The points raised by all participants in the workshop will be taken into account in the preparation of a suggested response to be reported to the next meeting of the GATCOM Steering Group on 1 April for initial consideration. A copy of the suggested draft response will be circulated to all GATCOM members at that time with a request for views to feed into the Steering Group's deliberations.

Following the deliberations of the Steering Group, the suggested draft response will be further refined and revised and presented to GATCOM on 22 April for consideration and approval.

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