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Dear Sir/Madam,

Night flights restrictions at Heathrow, Gatwick and Stansted airports beyond 2025, plus national night flight policy

GATCOM has now considered its response to the second part of the night flights consultation, consultation questions 13 onwards.

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 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.

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.

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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.

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.

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 on the basis that effective differential charging mechanisms are in place to incentivise the use of the quietest and cleanest aircraft ensuring the cost of noise disturbance, particularly at night, is sufficiently reflected in airport landing charges and fees¹. However 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.

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

Yours faithfully,



Deputy Secretary

¹ CAA's CAP1119: Environmental charging – Review of impact of noise and NOx landing charges recommends as good practice that noise charges for operations occurring at night should be greater than those that occur during the day - <https://publicapps.caa.co.uk/docs/33/CAP%201119%20Noise-related%20charging%20review.pdf>

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

Context of Consultation Response

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.

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 GDP². The COVID-19 pandemic has however had a catastrophic impact on the airport's operation and recent data published by Catalyst South³ (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 Oxera⁴ 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).

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. 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.

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 the 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. GATCOM recognises that as night flights return it is likely that 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.

² [Gatwick Airport Master Plan 2019](#).

³ [Catalyst South Future Airport Towns](#)

⁴ [Oxera Report](#) - Economic impact of Gatwick Airport: Evaluating the local economic impact of the airport

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

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.

Most homes in the UK now have thermal double glazing which is adequate to exclude the noise of an overflying aircraft when windows 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.

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. The noise climate during the night has not however seen the same improvements when comparing the data for 2011 with 2018-19. The data given in the table on Page 8 of Annex C of the consultation material shows that the area within the Gatwick LAeq 8hr night contours (actual usage) had increased across most the contour ranges compared with the area covered by those contours in 2011. Whilst fully recognising the improvements achieved at Gatwick in recent years against a backdrop of growth in air traffic movements, communities continue to suffer disturbance from night flights, and it must be acknowledged that even the quietest aircraft types create a noise and disturb sleep.

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.

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

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.

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"⁵ 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.

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.

⁵ York Aviation Report - [The Economic Impact of Night Flying in the UK](#)

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 Review⁶ 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.

Other relevant sources of evidence include:

- 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.

It must also be noted that the noise impact stretches beyond the flight paths and with the extensive rural area around Gatwick the noise impact is more noticeable given the low ambient noise levels. It also needs to be recognised that 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

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.

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.

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 all stakeholders the possibility for and the implications of planning for this type of disruption through building an allocation into the night flights quota and

⁶ [SoNA 2014: Aircraft Noise and Sleep Disturbance Peer Review](#)

movements limits in a way that is fair to the industry but does not increase the overall number of night flights at Gatwick.

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.

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.

As a way of building public confidence it is important that the Government takes the responsibility for the proper monitoring of the dispensations process. To further assist in building confidence 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

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.

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 ensure 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 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.
- (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 all stakeholders 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

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.

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 reform of planning policy framework in 2012 and the loss of PPG24 on planning and noise making it easier for developers to build in less favourable locations. The DfT, Defra and MHCLG need to collectively review the objective.

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

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.

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 24 AUGUST 2021