

# Public Document Pack

**Tony Kershaw**  
**Honorary Secretary**

County Hall  
Chichester  
West Sussex  
PO19 1RQ

Telephone 033 022 22543

Website: [www.gatcom.org.uk](http://www.gatcom.org.uk)

If calling ask for Mrs. Paula Street  
e-mail: [secretary@gatcom.org.uk](mailto:secretary@gatcom.org.uk)



18 February 2021

## **Gatwick Airport Consultative Committee**

### **SPECIAL MEETING**

A special meeting of the GATCOM will be held at **2.00pm** on **Thursday 25 February 2021**. This special meeting is to consider and agree the Committee's response to the DfT's consultation: Night Flight Restrictions at Gatwick Airport (consultation questions 6-12 only).

**Note:** Due to the current COVID-19 public health emergency, 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 23 February 2021 [secretary@gatcom.org.uk](mailto:secretary@gatcom.org.uk).

### **Agenda**

1. **Apologies for Absence**
2. **DfT Consultation: Night flight restrictions at Heathrow, Gatwick and Stansted airports**

- (a) **Usage of existing regime at Gatwick** (Pages 3 - 20)

Presentation by Andy Sinclair, Head of Airspace Strategy & Engagement, Gatwick Airport Limited (GAL) on the usage of the existing movements limits and noise quota over the period covered by the existing night flights regime, dispensations granted, the routes served by night flights, and the importance of night flights at Gatwick.

- (b) **Suggested GATCOM response to questions 6 to 12 of the consultation** (Pages 21 - 28)

The Secretariat's paper sets out for consideration suggested draft responses to consultation questions 6 to 12 relating to the proposal to roll forward the existing regime by two years to 2024 and the proposal to ban the operation of QC4 rated aircraft in the night period. GATCOM is asked to agree its response.

3. **Date of next meeting**

The next meeting of GATCOM will take place on Thursday 22 April 2021 at 2.00pm.

**Anticipated finish time of meeting: 3.00pm.**

**To all members of the Gatwick Airport Consultative Committee**

# Night Flight Restrictions at Gatwick Airport

GATCOM Night Flights Consultation Workshop

25 February 2021

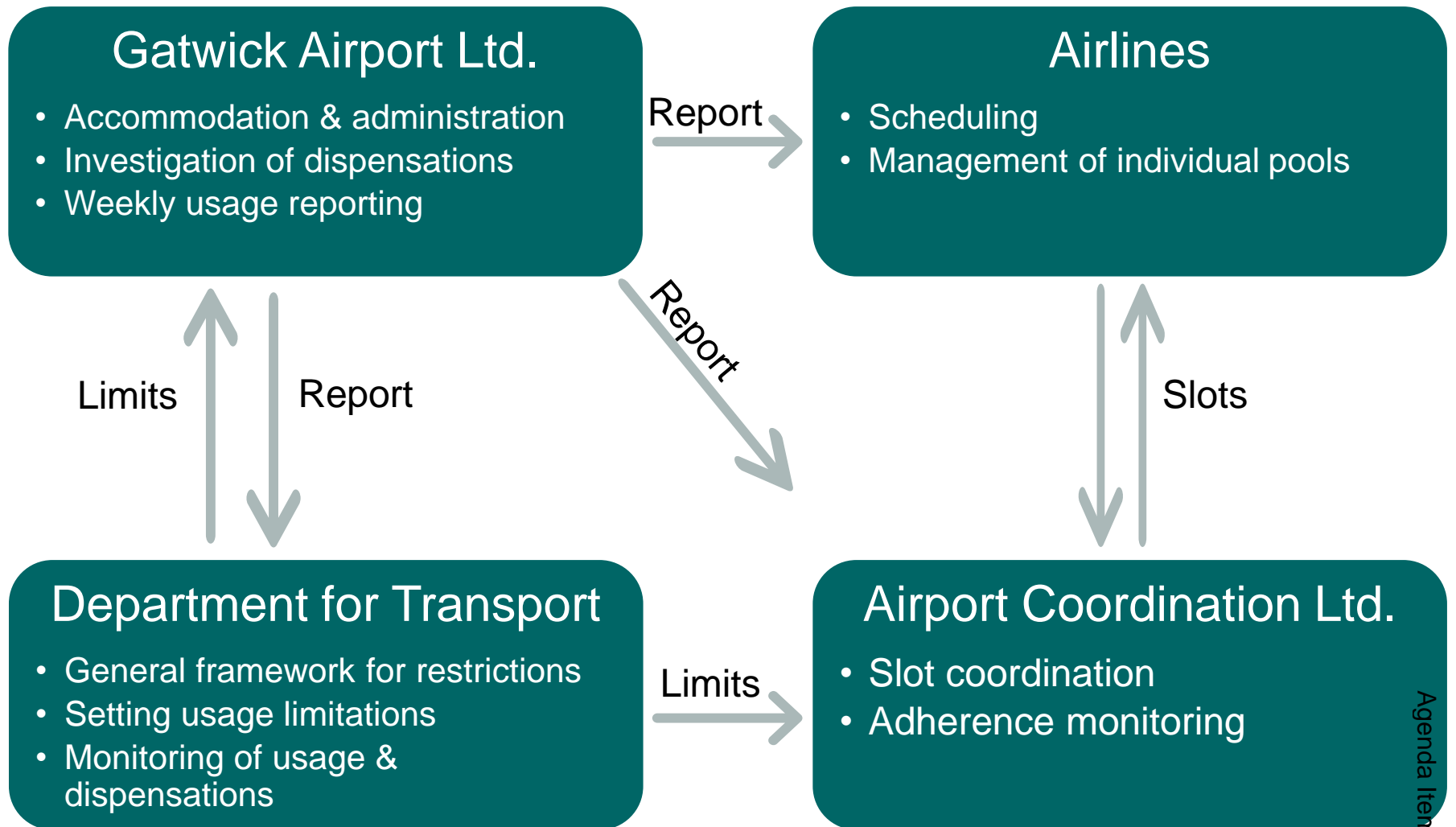


# Contents

1. Governance
2. Current regime & usage
3. Administration & dispensations



# Governance



# Current night flight regime



# Background

The current night flight regime came into effect in the Winter 2017/18 season. In addition to the decision document outlining the regime, a supplement to the AIP is published before each new season. Both can be accessed online:

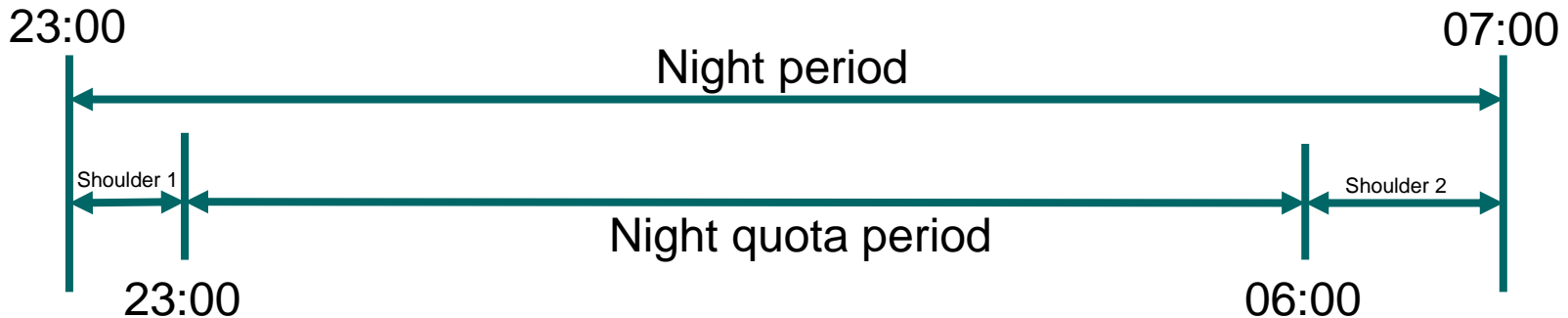
- [Decision Document \(2017\)](#)
- [Current AIP SUP](#)

Seasons coincide with the time periods of British Standard Time (Winter) & Daylight Savings Time (Summer)



# Definitions

- Quota Count (QC): Category/score based on aircraft noise certificate
- Air Traffic Movements (ATM): Take-off or landing



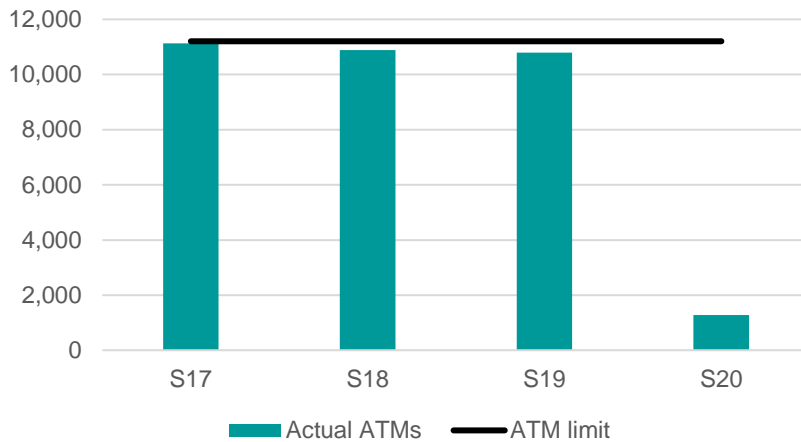
The night flight limitations apply to the night quota period. Additions:

- No QC8 or QC16 operations during night period
- No scheduled QC4 operations during the night quota period

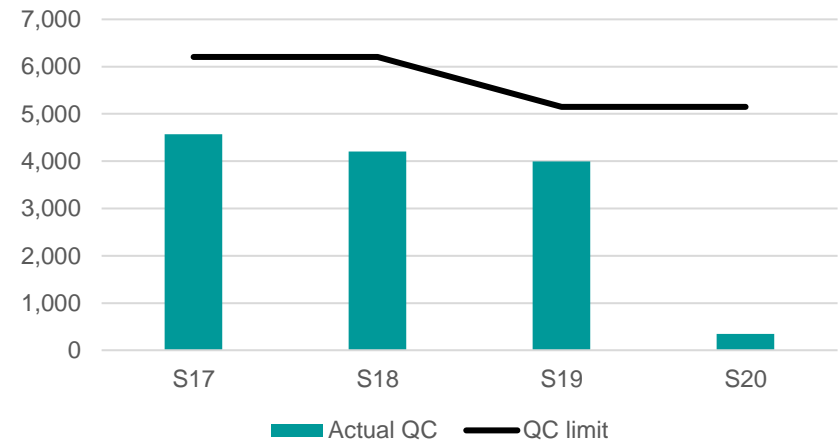


# Summer Season Performance

Movements in Summer Seasons



QC in Summer Seasons



The movement limit remained at 11,200.

The number of ATMs came close to this limit in past Summer Seasons but did not breach it.

The QC limit was reduced from 6,200 to 5,150 points in 2019.

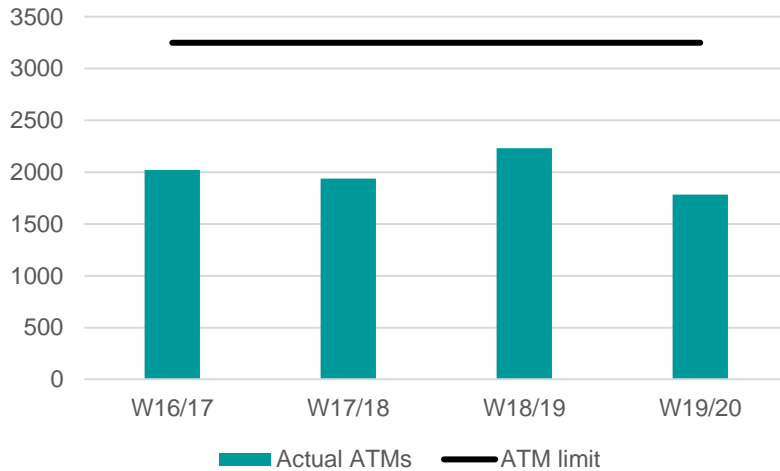
Gatwick has operated consistently within the limit in past seasons.

Agenda Item 2a

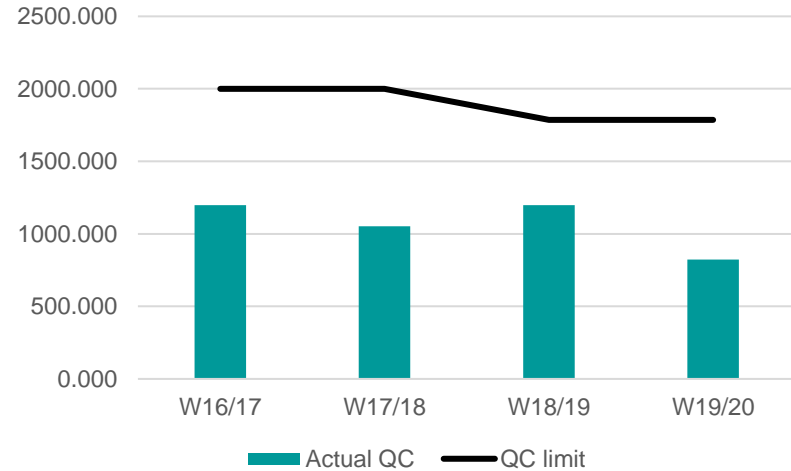


# Winter Season Performance

### Movements in Winter Seasons



### QC in Winter Seasons



The movement limit remained at 3,150.

Gatwick has consistently operated well within the limit in past seasons.

The QC limit was reduced from 2,000 to 1,785 points in 2018/19.

Gatwick has operated consistently well within the limit in past seasons.



# Administration of night flights regime



# Vetting and reporting

All night flights and their QC are checked against ATC logs to ensure that every movement is captured correctly.

The number of flights delayed into, or out of (avoided), the night period is recorded during this process as well.

The data is compiled into weekly reports:

- To airlines to help them manage their usage
- To the DfT for monitoring purposes
- To the ACL for monitoring purposes



# Dispensations

Dispensations may be applied to flights using the night period:

- By the Secretary of State (VIPs, relief, military)
- By the airport in case of:
  - Emergencies
  - Widespread and prolonged air traffic disruption
  - Serious hardship or congestion at the airport

See also Annex B of the [night flying restrictions \(2014\)](#).



# Dispensations

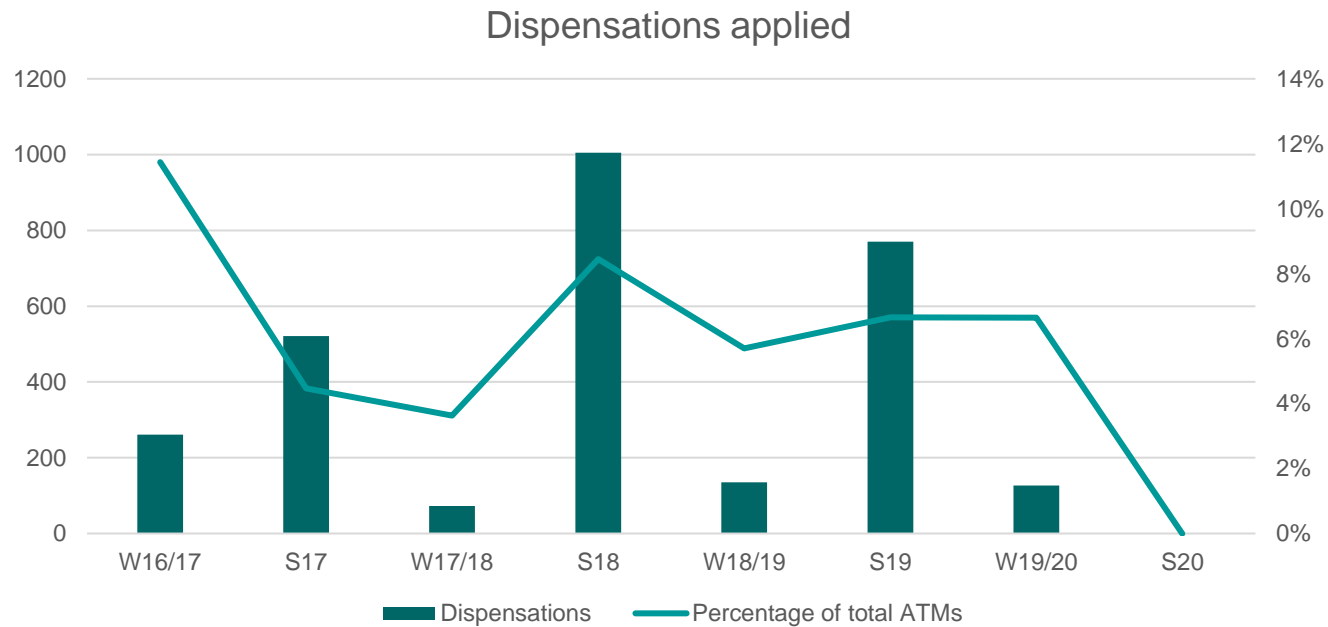
- Dispensations are applied by the airport following unplanned night flights.
- The number of potential dispensations is the difference between unplanned night flights and flights which avoided<sup>1</sup> the night quota period.
- If there is a potential to dispense, the Airspace Office investigates the causes with the airlines and the Airside Operations team.

Dispensations are reported to the DfT within 8 days and are subject to monitoring.



<sup>1</sup> Flights which had been scheduled for the night quota period but operated outside of it.

# Dispensations



The amount of dispensations fluctuates between Summer and Winter much like the amount of total movements.

The percentage of night flight movements which have been granted dispensation varied between 3-12%.

For regularly published reports, please visit our [website](#).



# Night flight benefits and impacts



# Existing benefits of night flights

- **Airport:** more ATMs, more passengers and operational resilience for delayed flights.
- **Airlines:** multiple rotations keep aircraft fully utilised; supports a range of destinations and the frequency at which they can be served; operational resilience for delayed flights to return, reducing knock-on delays.
- **Government:** tax revenues (including air passenger duty and VAT revenue) from airports, airlines, third party suppliers and employment.
- **Passenger:** Choice of destinations, flight frequency and times; and lower costs for all passengers.
- **Logistics:** enables delivery of time-sensitive cargo; enables same day delivery services; and contributes to competitiveness of UK businesses.



# Gatwick Summer Night Actual Leq Contours Area and Population

	Night 48 dBA km <sup>2</sup>	Population	% Reduction Night 48 dBA km <sup>2</sup>	% Reduction Population in 48 dBA
<b>2016</b>	107.1	14,600	-	-
<b>2017</b>	101	13,900	5.7	4.8
<b>2018</b>	91.6	12,300	14.5	15.8
<b>2019</b>	90.5	12,200	15.5	16.4



YOUR LONDON AIRPORT  
*Gatwick*



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**GATCOM****25 FEBRUARY 2021****DFT CONSULTATION: NIGHT FLIGHT RESTRICTIONS AT HEATHROW, GATWICK & STANSTED AIRPORTS****SUGGESTED GATCOM RESPONSE TO QUESTIONS 6 TO 12 OF THE CONSULTATION****REPORT BY SECRETARIAT****SUMMARY**

This report sets out for consideration a suggested GATCOM response to questions 6 to 12 of the DfT's consultation on night flights restrictions at Heathrow, Gatwick and Stansted airports insofar as it relates to Gatwick Airport. The suggested response is set out in the Appendix for approval.

**1. INTRODUCTION**

1.1 The Government's [stage 1 of its consultation on the night flights regime](#)<sup>1</sup> was published on 2 December. The Stage 1 consultation covers:

- **a proposal to maintain the existing night flights regime at designated airports for 2 years, from October 2022 to October 2024** - This would mean that the existing movements limits (3,250 Winter Season & 11,200 Summer Season) and noise quota allowances (1,785 Winter Season & 5,150 Summer Season) in place at Gatwick remain unchanged between October 2022 and October 2024. The existing night noise objective would also continue to apply to the night period (23:00 to 07:00). The only change as part of the proposed extension is that the DfT is proposing to place an operational ban on QC4 rated aircraft movements between 23:30 and 06:00.

The two year's extension will allow time for the impacts of the pandemic on the aviation industry to be understood and for evidence to emerge that can support longer-term policy changes. The DfT needs to publish its decision on the proposed extension in Summer 2021.

- **a revision to the night flight dispensation guidance** – following the DfT's review of the criteria for dispensations, whilst the Government does not have significant concerns relating to how airports have used the process for dispensations, it believes the dispensation process could be more transparent and is proposing to refine the government's guidance and future AIP, to provide better clarity through:
  - greater scrutiny at the airport's noise and track keeping group (at Gatwick this is NATMAG)
  - provide guidance to airports on the information it expects them to share with the public, including a proposal that they publish this data on their website
  - implement periodically reviews of night flight dispensations, to assess compliance as well as opportunities to further improve the process. This could be commissioned from the Independent Commission on Civil Aviation Noise (ICCAN) or the Civil Aviation Authority (CAA).

The DfT will use responses to revise the guidance for airport operators and will publish the revised guidance before October 2022.

<sup>1</sup> <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>

- **seeks views on the structure of the night flight restrictions at the designated airports beyond 2024** – the Government is seeking views and evidence on the potential options for a future regime in the longer-term.

1.2 Since the publication of the consultation, the DfT has revised the consultation deadline and has effectively split the consultation in two parts as follows:

- Part 1: consultation questions 6-12 – relating to the proposal to maintain the existing restrictions for a further two years to 2024 and the proposal to ban QC4 rated aircraft in the night period - the consultation period will run between 2 December 2020 and 3 March 2021
- Part 2: consultation questions 13 onwards – relating to future night flight policy beyond 2024 - will now continue in a new consultation, running from 4 March to 31 May 2021.

1.3 The DfT presented details of the consultation to the last meeting of GATCOM. The presentation slides are available on GATCOM's [website](#)<sup>2</sup>.

1.4 The purpose of the Special Meeting is for GATCOM to consider and agree its response to Part 1 of the consultation to enable a response to be submitted before the 3 March deadline. The Secretariat sought views from member organisations on consultation questions 6 to 12 via email to help formulate a suggested GATCOM response. As members will appreciate, a diverse and disparate mix of views have been received ranging from those seeking a complete ban on night flights, those wishing to see changes to the existing restrictions, and those wishing to see no change in the current restrictions. There were also comments about the need for the Government to take the opportunity presented by the significant downturn in traffic to embrace the unique opportunity presented by the effect the pandemic has had on the aviation industry as a catalyst to develop and embed a fresh approach to night flights policy in a balanced and fair way that continues to allow airports to operate effectively whilst recognising that night flights have significant health impacts on local residents.

1.5 In light of the diverse mix of views across GATCOM's membership it is fundamental for the Committee to acknowledge that it is not in a position to either support or oppose night flights at Gatwick and that there is a need to have mutual respect for different views in working together to develop a consensus position that strikes a balance between the priorities across the various interests.

1.5 All the comments received from the Secretariat's request for views have been considered and are encompassed as high-level themes in the suggested response set out in the Appendix. GATCOM is asked to consider and agree the response for submission to the DfT.

## **2. THE NEXT STEPS**

2.1 To assist the preparation of the suggested GATCOM response to consultation questions 13 onwards (Part 2 of the consultation), a workshop for GATCOM members and their support officers is to be held immediately following the meeting to start to explore member organisations' priorities and views on the future night flights policy beyond 2024. The outcomes from the workshop will be incorporated in a suggested GATCOM response for initial consideration by the GATCOM Steering Group on 1 April.

2.2 The final draft response will be then be considered by GATCOM at its meeting on 22 April.

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<sup>2</sup> [http://www.gatcom.org.uk/wp-content/uploads/2021/01/Item6a\\_DfTNight-flight-restrictions-GATCOM-presentation.pdf](http://www.gatcom.org.uk/wp-content/uploads/2021/01/Item6a_DfTNight-flight-restrictions-GATCOM-presentation.pdf)

2.3 Following the close of the Part 2 consultation on 31 May, the Government will assess the feedback and evidence received and aims to publish the Stage 2 consultation in 2022 which will set out firm proposals for the designated airports beyond 2024.

**RECOMMENDED**

- (1) That GATCOM adopts a position that it neither supports nor opposes the principle of night flights at Gatwick; and
- (2) That, subject to agreeing the addition of any further comments and views expressed at the meeting, the suggested response set out in the Appendix be approved and that it be submitted to the DfT.

**PAULA STREET  
GATCOM SECRETARIAT**

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## **SUGGESTED GATCOM CONSULTATION RESPONSE COVERING LETTER**

Dear Sir/Madam,

### **Night Flight Restrictions at Gatwick – consultation response part 1 (Questions 6 to 12)**

1. I refer to the consultation on the review of the night flights regime for Heathrow, Gatwick and Stansted airports and the future night flights policy. GATCOM has agreed its response to consultation questions 6 to 12 relating to the proposed roll forward of the existing regime for a further two years until 2024 and the proposal to ban the operation of QC4 rated aircraft in the night period. In considering its response the Committee also agreed to bring to your attention at this early stage in the process other matters of concern which it asks the Government to address as a matter of priority as a part of the current review process and in developing the Aviation Recovery Plan.
2. 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 vital need to ensure 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.
3. The impact of the Covid-19 global pandemic on aviation is profound. Passenger confidence in air travel has been substantially eroded, the impact on future demand is being questioned as businesses now routinely use digital alternatives to travel and changes to leisure travel are expected as airports, airlines and passengers adjust to new risks, restrictions, screening processes and regulation as well as coping with the economic realities of increased unemployment. Given the enormous challenges facing the industry, with recovery to pre-pandemic traffic levels not expected for many years to come, there is a need for the Government to embrace the unique opportunity presented by the catastrophic effect the pandemic has had on the aviation industry as a catalyst to develop and embed the necessary policies, technology and measures that will enable the industry to recover in a truly sustainable way, including meeting the challenge of climate change.
4. The successful recovery of the Gatwick Airport and the wider sector (and its supply chains and workforce) as the key driver of the recovery for our regional economy, including much needed employment opportunities, is of paramount importance. GATCOM advocates the 'Build Back Better' objective and recognises that this will not be achieved without a successful economy with a thriving airport and aviation sector at its heart.
5. GATCOM is disappointed however that the opportunity is not being taken at this early stage to better align stakeholders on shared issues, both national and international, some of which have lacked real progress for years. 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. There is a vital need to inject new thinking into refreshed policy goals to secure economic, social and environmental benefits, particularly in respect of reducing both the impact of aircraft noise on affected communities and aircraft emissions.

6. An holistic approach is needed by Government to find a better balance between the significant economic benefits aviation brings to the UK and regional economy to drive business, tourism, leisure and trade with the negative environmental and health impacts of night time operations. GATCOM accepts that this approach requires much collaboration and compromise across all interests but the significant downturn in the industry presents the unique opportunity to bring about change.

7. The current proposal to roll forward the existing regime for a further two years has attracted a diverse mix and many conflicting views across GATCOM's membership. On the one hand some local authorities and community groups cannot support the proposal to roll forward existing restrictions particularly given there is much available capacity at Gatwick during the day as a result of the significantly reduced operations at the current time; and the need to eliminate or significantly reduce the noise disturbance suffered by communities and its impact on human health. Whereas on the other hand the industry and businesses whilst acknowledging airlines are unlikely to be able to fully utilise the night movements allowances over the next few years, strongly support the extension of the current regime as it will provide an element of certainty for planning purposes and in doing so will support the recovery of the airport, the aviation sector and the wider economy around Gatwick.

8. Given the diverse range of views GATCOM can neither support nor oppose the principle of night flights at Gatwick. However, should the Government decide that the night flights regime at Gatwick is to continue, GATCOM has developed a consensus view in its response to the consultation questions 6 to 12 as set out in the Annex to this letter. In addition to those responses GATCOM also seeks reassurance that the Government will address as a matter of priority the need to refresh airspace and aviation policy goals particularly in respect of reducing both the negative impact of aircraft noise on affected communities and in reducing aircraft emissions through seeking a more efficient use of airspace and sensible flight scheduling which will in turn build better resilience in the system and improve operational performance to the benefit of both the industry, the environment, the economy and the emotional, physical, social and financial wellbeing of communities.

9. GATCOM's response to consultation questions 13 onwards is to be considered at its meeting on 22 April after which I will write to you again. In the meantime, GATCOM asks that the important points raised in this letter are addressed and taken into account as part of the current consultation but also in developing the Government's Aviation Recovery Plan.

Yours faithfully,

**ANNEX**

## **SUGGESTED NIGHT FLIGHT CONSULTATION RESPONSE – QUESTIONS 6 TO 12**

### **6. Do you agree with our October 2022 to 2024 night noise objective for the designated airports?**

Yes, over the short term given the significantly reduced level of traffic expected over the next two years at Gatwick.

However, for the longer term this objective is not ambitious enough and requires review 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 seen improvements at Gatwick. Airlines are to be commended for the significant investment in newer, quieter aircraft types and through a combination of noise abatement measures and other incentives to airlines this has resulted in a reduced night noise exposure contour. The other two principal elements – land use planning management and the night flights operating restrictions have seen little improvement. There has been no decrease in the movement limits at Gatwick for a number of years and 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. DfT, Defra and MHCLG need to collectively review the objective working with the industry and other key stakeholders.

It is also important to acknowledge the fact that during the night time period, and the early and late hours, even a relatively 'quiet' aircraft generates a noise level which has an adverse impact on the peace and tranquility of the resting population beneath and to both sides of its flightpaths and any new regime needs to take this into account.

**7. Do you agree with how our October 2022 to 2024 draft noise objective for the designated airports will be measured?**

Sleep specialists recommend that people should sleep for 7-8 hrs per night on average. Therefore, to assess the impact of night flights the whole night period needs to be assessed and not just the Night Quota Period (NQP). The 48dB  $L_{Aeq6.5hr}$  contour for the NQP is therefore a useful tool but does not assess the whole impact of night flights. To do this both the 48dB  $L_{Aeq8hr}$  and the number of people inside the 10+ N60 contour should also be used.

**8. Do you agree that we should maintain the existing restrictions for two years from October 2022 to October 2024?**

Yes, but given this point in time there is very little option but to roll forward the existing restrictions again. It is most disappointing that the continuous delay and low priority given by the Government to take forward a fundamental review of the night flights policy and regime at Gatwick has resulted in repeated carrying-over of quotas and movements.

Whilst recognising the importance of Gatwick Airport to the regional economy, and GATCOM fully supports measures to help the airport and the wider economy recover from the immense impact of the COVID 19 pandemic, it is nonetheless questioned whether the movements limits and noise quotas need to remain at the same level for the next two years, particularly in respect of the Winter season where historically the movements limits are underused. With traffic not expected to return to 2019 levels for a number of years, this is an unique and timely opportunity to adopt a fresh approach and to set appropriate restrictions reflecting developments in aviation technology, the use of quieter fleets and recent research into the impact of night noise on health in a balanced and fair way that continues to allow airports to operate effectively whilst recognising that the potential health impacts on local residents.

**9. What would be the impacts to you should the government maintain the existing restrictions for two years, from October 2022 to October 2024 (provide evidence to support your view)?**

GATCOM agrees with the Government's view that the impact on the industry of maintaining the existing restrictions to be minimal. At Gatwick, night flights include arrivals and departures and the number of flights varies significantly between the summer and winter seasons. Low-cost airlines use night flights at Gatwick to enable them to fit in three or four waves of services in a single day and to maximise the use of their planes to reduce costs.

The vast majority of night services at Gatwick are to and from short-haul destinations. While there may be potential for the airline community to evolve their business models over time, it is unlikely that any significant reduction in, or a ban on, night flights at Gatwick is an option in the immediate term given the currently unknown path to recovery from the pandemic.

However, in terms of the impact to affected communities this is likely to be significant. Over the past year communities have experienced quiet skies, very little night flight activity and associated ground movements as well as less traffic on roads around the airport resulting in an improved sense of health and wellbeing. As traffic starts to return people will be more sensitised to aircraft overflight and the associated disturbance with the impact on health and wellbeing probably being more detrimental than that experienced under 2019 traffic levels. For example, the impacts on residents under the flight path (within the 10 or above N60 contour) is the continued sleep disturbance resulting in potential cardiovascular disease, increased risk of accidents, loss in productivity and overall reduction of quality of life.

**10. What would be the impacts to you should the government allow the night flight restriction in place at the designated airports to lapse (provide evidence to support your view)?**

Given the default position of allowing the night flights restrictions to lapse is that Gatwick would no longer be under any operating restrictions from October 2022, is not a position supported by GATCOM. The absence of any operating restrictions at night would remove some of the fundamental safeguards to protect communities from the impact of night flights and, if there was a sharp return of traffic, the potential for a consequential deterioration in the productivity, health and wellbeing of people will become evident.

**11. Do you agree we should ban QC4 rated aircraft movements from operating at the designated airports between 23:30 and 06:00 from October 2022?**

Yes – such a ban is long overdue. However, it is felt that the QC4 ban should cover the whole night period (23:00 – 07:00) or there should be a scheduling ban during the shoulder periods at the very least. Looking ahead to the longer term, the Government is urged to commence the phase out of QC2 rated aircraft from night operations to ensure the continual improvement in the night noise climate.

**12. Provide evidence to support your view.**

There has been no QC4 movements in the NQP at Gatwick for a very long time with only around 0.05% of night flights in summer 2019 operated by QC4 rated aircraft. The impact of a ban on the industry would therefore be minimal. The ban will also ensure that the noise footprint at Gatwick can be contained into the future as when QC4 rated aircraft do operate in the night period the noise footprint extends much further out from the airport so causing more disturbance to more people than any other aircraft allowed to fly at night. GATCOM has recently welcomed Gatwick Airport Limited's commitment to introduce a voluntary ban on QC4 aircraft at night from Winter 2021.