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Dear Sir/Madam,

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

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 serious 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.

GATCOM is the statutory, advisory body for Gatwick Airport and comprises representatives from local authorities, 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 its impact on health 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.

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

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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.

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 critical 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.

GATCOM is extremely 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. The review of the night flight restrictions at Gatwick is one of those issues and the Committee finds it difficult to understand the Government's justification to propose another roll forward of the current regime by two years to 2024. 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.

With the significantly reduced level of traffic at Gatwick as a result of the COVID pandemic and with traffic levels not expected to recover for a few years, the majority of GATCOM members believe there is scope now to urgently introduce interim measures which ensure the movements limits and noise quotas reflect reduced usage and capacity that has become available during the day while the Government undertakes the full comprehensive review of the night flights restrictions and national night noise policy. This is a matter that also needs to be addressed as part of the Government's Aviation Recovery Plan and the road map to incentivise the industry to "Build Back Better".

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. There is a vital need to inject new thinking into refreshed policy goals to secure economic, social, environmental benefits, particularly in respect of reducing both the impact of aircraft noise on affected communities, aircraft emissions and on health.

Should the Government decide that the night flights regime at Gatwick is to continue, GATCOM has developed a response to 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 put in place, at the earliest possible time, interim movements limits and noise quotas at Gatwick reflecting the current reduced usage and capacity that has become available during the day as part of the Aviation Recovery Plan and road map to recovery of the sector while the Government undertakes the

full comprehensive review of the night flights restrictions and national night noise policy.

- The need to commence now the comprehensive review of whether the existing movements limits and noise quota can be reduced or progressively reduced.
- The need to commence an assessment of the benefits and costs (economic, social, environmental and health) of night flights so the analysis can inform the Government's Stage 2 consultation on a new regime post 2024.
- 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 on health 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.

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,



Deputy Secretary

GATCOM RESPONSE: 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?

Only 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 as well as the Night Quota Period (NQP). The 48dB LAeq6.5hr contour for the NQP is therefore a useful tool but does not properly assess the impact of individual noise events (i.e. overflights), which at night causes the sleep awakenings/arousals. These events are best measured using the N60 (Number above) contours. Therefore to assess the full impact of night flights on the NQP and also the whole night period (23:00-0700) then both the LAeq contour and the N60 contours (starting at the 10+ N60 contour) are required for both the Night Quota and whole night periods.

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

The 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.

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 a further 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.

Given this point in time and the fact that the default position is that the current restrictions will lapse in October 2022 if the Government does not roll forward the current regime, is a situation that GATCOM would not wish to see happen. GATCOM instead urges the Government to put in place at the earliest possible time interim movement limits and noise quotas at Gatwick reflecting the current reduced usage and capacity that has become available during the day time as part of the Aviation Recovery Plan, and the road map to building back better the recovery of the sector, while the Government undertakes the full comprehensive review of the night flights restrictions and national night noise policy. The Government successfully put in place urgent interim measures for the slot usage rules to assist the industry through the pandemic and it is felt that the same approach to introduce interim measures for night operations should be used to manage in a fair and balanced way reductions in night noise impacts for local communities and on health during these exceptional circumstances.

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 possibly 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.

However, in terms of the impact to affected communities and on health 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.

The catastrophic impact the pandemic is having on the aviation industry is fully acknowledged by GATCOM and the Committee recognises the critical importance of ensuring the successful recovery of Gatwick Airport and the sector to support the wider recovery of the regional economy, including much needed employment opportunities. The pandemic has led many businesses to evolve their business models to enable them to adapt to changed circumstances. The airline community will similarly need to adapt and evolve their business models as part of their recovery from the impact of the pandemic. GATCOM believes there is, as part of the review of night flights restrictions and in the Aviation Recovery Plan, a role for the Government to incentivise the sector to evolve their business models to reflect potential reductions in night operations going forward 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.

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.