SUMMARY

This paper sets out for GATCOM’s consideration the suggested response to the Department for Transport’s consultation on Night Flight Restrictions at Heathrow, Gatwick and Stansted, January 2017. GATCOM is asked to consider, amend and agree the response set out in the appendix to this report.

1. BACKGROUND

1.1 Noise from aircraft at night can cause significant adverse effects on local residents living beneath or close to departing and arriving aircraft over-flights, including health effects and other next day effects associated with sleep disturbance (such as fatigue and tiredness). The 2013 Aviation Policy Framework says that the Government recognises that night noise is the least acceptable form of aircraft noise and as a result it is necessary to ensure that the economic benefits of night flights are balanced with the costs these can impose on communities, including sleep disturbance. In order to limit the impact of night noise on local residents, night flight restrictions of some form have been in place at Heathrow since 1962, Gatwick since 1971 and Stansted since 1978, with the scheme in its current form being introduced at all three airports in 1993.

1.2 The current night flying restrictions at the three airports end in October 2017. As a first stage to formulating this consultation, the Department for Transport (DfT) held a series of focus group meetings in 2016 in order to ensure they had the best available evidence when assessing the costs and benefits associated with options for the next night flights regime, gathering views and evidence on a range of issues including the current regime, the costs and benefits of future options and airlines’ fleet replacement plans. Details of the focus group meeting to which GATCOM was invited were reported to GATCOM at the July 2016 meeting.

1.3 This consultation, published on 12 January 2017, now sets out the Department for Transport’s (DfT’s) proposals for the next regime. The consultation closes on 28 February 2017.

1.4 The full consultation documents can be found online at: https://www.gov.uk/government/consultations/night-flight-restrictions-at-gatwick-heathrow-and-stansted

Details of the consultation were circulated to all GATCOM members on 13 January for consideration. Comments received from members prior to the issuing of this report have
been taken into account in the suggested form of response set out in Appendix 1. GATCOM is asked to consider and agree the suggested response.

2. **THE CURRENT REGIME AS IT APPLIES TO GATWICK AIRPORT**

2.1 The night period to which restrictions apply is defined as 23.00 to 07.00 local time and for the purposes of allowing different controls for various times and different aircraft types that period is further sub-divided with shoulder periods of 23.00 to 23.30 and 06.00 and 07.00.

2.2 All aircraft arriving at and departing from Gatwick Airport during the night period are classified, each separately for both arrival and departure, into one of seven bands or quota count classifications (QC/16, 8, 4, 2, 1, 0.5 and 0.25), or as exempt, depending upon the noise created during that event.

2.3 During the the whole night period the noisiest aircraft types (QC/16 and QC/8) are banned. During the centre period (called the night quota period) the next noisiest category, QC/4, cannot be scheduled but can fly (if delayed etc.).

2.4 During the night quota period (23.30 to 06.00) aircraft movements are limited by maximum winter and summer movements limits and noise quota limits. Every aircraft (except those in the exempt category) counts once against the movements limit for every movement and counts against the noise quota limit by the value of its QC classification (i.e. a QC/2 aircraft movement uses two points against the total noise quota).

2.5 For various reasons some particular individual aircraft movements are not counted against the movements or noise quota limits for that particular movement (even though they are not exempt types). In percentage terms these are not high in number. Details are given in Annex C of the consultation document.

2.6 For the purposes of setting the Movements and Noise Quota limits two seasons, Summer and Winter, are defined based on the dates of British Summer Time.

2.7 The movements and noise quota limits and actual usage for the last two full seasons (Winter 2015/16 and Summer 2016) are:

<table>
<thead>
<tr>
<th></th>
<th>Limits*</th>
<th>Actual Usage</th>
<th>Proportion</th>
</tr>
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<tbody>
<tr>
<td>Summer night movements</td>
<td>11,200*</td>
<td>11303*</td>
<td>101%*</td>
</tr>
<tr>
<td>Winter night movements</td>
<td>3,250</td>
<td>1872</td>
<td>58%</td>
</tr>
<tr>
<td>Summer noise quota</td>
<td>6,200</td>
<td>4912.75</td>
<td>79%</td>
</tr>
<tr>
<td>Winter noise quota</td>
<td>2,000</td>
<td>953.00</td>
<td>48%</td>
</tr>
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* The limits shown do not include carryover (or over-run) allowances. Under the current scheme it is permitted to carry over up to 10% of any unused movement and quota allowances from the previous season meaning that the 101% proportion figure is compliant with the scheme.
2.8 The government’s current environmental objectives are:

<table>
<thead>
<tr>
<th>Environmental Objective</th>
<th>How it is measured</th>
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<tbody>
<tr>
<td>1. Limit and where possible reduce the number of people significantly affected by aircraft noise at night.</td>
<td>Area and number of people within the 6.5 hour night quota period contours, and in particular the 55 dB L Aeq contour. Population changes due to new housing development will be taken into account in measuring changes in number of people.</td>
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<tr>
<td>2. Maintain a stable regulatory regime pending decisions on future airport capacity and, at Gatwick and Stansted in particular, to allow growth within existing night movement limits and noise quotas.</td>
<td>Movements and noise quota used in night quota period.</td>
</tr>
<tr>
<td>3. Encourage the use of quieter aircraft during the night quota period so as to reduce the overall impact of aircraft noise and in particular the likelihood of sleep disturbance</td>
<td>Average QC points per movement. Proportion of movements made by the noisier types of aircraft (QC/4 and QC/2) during the night quota period</td>
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3. DfT PROPOSALS FOR THE NEXT REGIME

3.1 The DfT proposals for Gatwick Airport for the next regime are as follows (in bold).

3.2 It is proposed to replace the three environmental objectives with a single objective of ”Encourage the use of quieter aircraft to limit or reduce the number of people significantly affected by aircraft noise at night, while maintaining the existing benefits of night flights.”

and that the achievements against delivering this objective would be measured by:

- The area of and number of people in the 48 dB L Aeq 6.5hr night contour.
- The average QC per movement.
- Number of movements in the night quota period.

In respect of the LAeq for the 6.5hr night the consultation says "This is a different measure to that used for the current regime [which is 55 dB], but reflects increased evidence about the impacts of lower noise levels on sleep disturbance and health."

3.3 “We ... propose that the next regime should be set for a period of five years.” However the consultation continues by explaining that as the Aviation Policy Framework states noise controls are generally best agreed locally and says "in setting a five year regime, we want to ... ensure that this does not preclude more bespoke arrangements being put in place at each airport - either through arrangements tied to the planning process or other means. If locally agreed arrangements, can be put in place before the end of this proposed five year period, we believe it would in principle be appropriate for
these to replace the Government controls before October 2022”.

3.4 "1. A new QC/0.125 category [be] introduced for aircraft between 81 and 84 EPNdB* and 2. To ensure greater transparency and certainty for communities, while maintaining incentives for producing and purchasing quieter aircraft, all operations by aircraft quieter than this are counted towards an airport’s movement limit, but they remain exempt from the noise quota limits - i.e. QC/0."

(* The EPNdB is simply a specialised noise unit used for aircraft noise certification tests.)

As stated in paragraph 2.2 above, aircraft are classified into one of seven bands, or as exempt. Those currently exempt are those that generate lower noise levels than 84 EPNdB.

3.5 At the time of introduction of the scheme (in 1993) a Department of Transport sleep study had suggested that noise below a stated threshold was unlikely to cause sleep disturbance and it was decided that with aircraft quieter than 87 EPNdB should be exempt from the restrictions. The lowest band at that time (for aircraft just noisier than 87 EPNdB) was QC/0.5. Since 1993, evidence of the relationship between noise exposure and sleep disturbance has increased and subsequently a lower band of QC/0.25 was introduced for aircraft noisier than 84 EPNdB and less than 87 EPNdB (leaving, as said, those quieter than 84 EPNdB currently exempt).

3.6 However, the consultation states "Although currently exempt aircraft are quieter than those caught by the restrictions, they still create noise that could result in sleep disturbance." At Gatwick, while the number of exempt aircraft is currently small, over the next few years several new quieter jet aircraft, such as versions of the Airbus A320neo, will come into service that are quieter than the current QC/0.25 standard and will therefore be exempt from both the movement and the quota limits under the current restrictions.

3.7 At Gatwick for example easyJet have a large number of these aircraft on order and it is expected that about one-third of their fleet will be comprised of Airbus A320neos by 2021. Thus, there is the possibility for commercial airlines to operate a potentially unlimited number of these aircraft during the night quota period.

3.8 The proposal being discussed here is to count all aircraft (including any remaining at QC/0 after a new QC/0.125 is introduced) against the movements limits but allow the QC/0 aircraft to remain exempt from the noise quota.

3.9 "We ... propose that the current movement limits for Gatwick remain the same for the next regime. These are 3,250 in the winter and 11,200 in the summer."

3.10 This proposal is based on the fact that Gatwick has a "level that is very high in comparison with other airports", has "significant unused capacity" during the winter seasons and that the management of Gatwick Airport has indicated that it is not seeking any increase to its current night flights allowances and the Government believes that given the current level of flights, and the fact that the number of people exposed to night noise has increased over the course of the current regime, there is no case for further increasing the movement limits.

3.11 "We ... propose, that as a minimum, [Gatwick Airport's] noise quota [is] reduced to reflect the level of current noise quota usage. The reductions would be ... of at least 345 in the winter to 1655 and 1,330 in the summer to 4870."
3.12 Although Gatwick is struggling to meet its summer season movements limit (101% in 2016) it is using much less of its noise quota limits (i.e. 79%). As the current restrictions stand therefore, there is little to incentivise even greater use of quieter aircraft nor to prevent an airline from replacing an aircraft operating a route with a noisier one.

3.13 These quotas being proposed are based on the average noise quota per movement in the most recent summer and winter seasons, multiplied by the movement limits. This will therefore ensure that the airport would not use more noise quota than at present, if it uses its full movement limit.

3.14 The consultation also says in order to incentivise the use of quieter aircraft, the Government will consider whether there could be further gradual reductions over the course of the regime. For instance it is possible for the quota to be set at 100% of the proposed noise quota in year 1 of the regime, 95% of this amount in year two, ending at 80% of this amount in year 5.

4. GENERAL COMMENTARY

4.1 The proposals are considered to include many improvements from an environmental perspective but improvements which it is considered would not further limit night flights at Gatwick. This has been made possible due to past and planned improvements to the aircraft fleet operating out of Gatwick Airport - during 2015 about 98% of aircraft using the airport at night were ICAO classified Chapter 4 (until the recent introduction of Chapter 14, that being the best standard).

RECOMMENDED

That subject to the inclusion of additional comments agreed at the meeting, the suggested form of response set out in Appendix 1 be agreed and submitted to the DfT.

PETER LONG
Independent Technical Adviser
GATCOM
Consultation Document Questions

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

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

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

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

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

Strongly agree.

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

No.

Q3a. How strongly do you agree or disagree with our proposal to introduce a new QC/0.125 category for aircraft between 81 and 83.9 EPNdB?

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

Q3b. How strongly do you agree or disagree with our proposal for all aircraft quieter than this to remain QC/0 but count towards the airports movement limit?

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

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

No.

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

No comment.

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

No.

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

We agree.

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

No.

Q6a. How strongly do you agree or disagree with the proposal to raise Stansted’s movement limits to reflect the current number of exempt aircraft in operation?

No comment.

Q6b. Do you have any additional comments on our proposal for Stansted’s movement limit?

No.

Q7a. How strongly do you agree or disagree with our proposals to encourage the use of quieter aircraft at Heathrow?

No Comment.

Q7b. Do you have any additional comments on how you feel noise quotas can best be set in order to encourage the use of quieter aircraft at Heathrow?

No.

Q8a. How strongly do you agree or disagree with our proposals to encourage the use of quieter aircraft at Gatwick?

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

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

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

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

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

No comment.

Q9b. Do you have any additional comments on how you feel noise quotas can best be set in order to encourage the use of quieter aircraft at Stansted?

No.

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

No.