

PAS/G7/3

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29th October, 2004

Dear Sir/Madam,

Night Flying Restrictions at Heathrow, Gatwick and Stansted Airports

Thank you for providing us with the opportunity to comment on Stage 1 of the consultation on the night flying restrictions to apply at the three BAA London airports from 30th October, 2005.

The Consultative Committee at its meeting on 21st October, considered the questions posed in the consultation paper and need to strike 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. The Government's commitment to bear down on night noise is therefore particularly welcomed.

The Committee's response to the consultation is set out in the Annex to this letter and has received the support of all the different interests represented on the Committee.

I trust you will find the Committee's comments set out in the Annex helpful.

Yours faithfully,

Assistant Honorary Secretary

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ANNEX

NIGHT FLYING RESTRICTIONS AT HEATHROW, GATWICK AND STANSTED

RESPONSE BY GATWICK AIRPORT CONSULTATIVE COMMITTEE

GENERAL

The Consultative Committee brings together a wide range of communities, environmental groups, aviation, business and passenger interests and seeks to hold the precarious balance between these interests. In considering its response to the consultation paper, the Committee acknowledged the need to strike a fair balance between the environmental impact of night flights with the economic benefits to both the industry and the national and regional economy.

The Consultative Committee welcomes the Government's aim to bear down on aircraft noise particularly by encouraging the use of quieter aircraft at night. The proposed environmental objectives, the positive removal of scheduled QC/4 operations in the night period, a reduced night noise limit and the new night noise insulation scheme are therefore particularly welcomed.

The Consultative Committee continues to seek to ensure there is a continual improvement to the night noise climate through a combination of measures. The Government's aim to 'bear down' on aircraft noise and to strike a fair balance between environmental impacts and economic benefits is expected to be met in a number of ways, including tougher operating conditions and encouraging the use of quieter aircraft. However, at Gatwick, where existing air noise quotas are underused and especially so in the winter period, more needs to be done if a significant increase in air noise is to be avoided. The potential worsening of the night noise climate is well illustrated in the noise contours published in the consultation document.

Some increase is inescapable as aircraft movements grow towards the numbers experienced in 2000. Such steps as prohibiting scheduled QC/4 rated aircraft and the lowering of night noise limits will provide some relief but for a more significant benefit there does need to be a progressive lowering of the quotas as well as a substantial reduction of the movements limits and noise quota at Gatwick to address the current under use of the existing regime, especially for the winter season. This would signify marked progress towards achieving the fair balance which the Government seeks.

Given the timetable for stage two of the consultation (early January 2005) and decision (May/June 2005), it will be too late in the airlines' scheduling process. In addition, the airport's systems would need to be altered to reflect the new regime, which takes time to implement. The Consultative Committee therefore supports a further rolling forward of the existing night flight restrictions regime for a further year.

Q1. Are there any other matters that you think we should cover in this consultation in addition to those set out in paragraph 2.4 of this paper?

The aims and objectives of the DfT set out in the document are supported and the emphasis has to be on striking a balance between the economic/environmental/local community interests.

The objective of limiting or reducing the number of people adversely affected by aircraft noise is supported and we urge the Government to place greater emphasis on seeking a "reduction" in the number of people affected rather than "limiting".

To achieve the aims and objectives, it is essential that a regulatory framework, which enables the industry to operate viably and safely but with a careful mix of noise abatement measures that prevent the noisiest aircraft operating in the night period and a charging regime that encourages airlines to use the quietest aircraft, is put in place.

What also needs to be borne in mind in setting the objectives is the fact that it is not just aircraft noise that adversely affects local communities. The number of events as well as the whole operation of the airport during the night period should also be a key consideration in setting the movements limits and environmental objectives. Local communities also suffer disturbance from aircraft lights, on airport activities and ground noise as well as disturbance associated with surface access to the airport.

The Consultative Committee is disappointed that the consultation paper does not address at this stage the fact that the current noise quota and movements limits in the winter season were set too high for Gatwick. For example, the winter 2003/04 season only 37.2% of the noise quota and 52% of the movements limits were used. Therefore under the current regime there is potential for 63% more noise and 48% more movements in the winter period. With the flexibility built into the regime which allows 5% of the quota to be carried over or borrowed between seasons, it means that there is the potential to increase the summer season movements and quota by 10%. The Consultative Committee would therefore wish to see a more realistic and tighter regime applied in the future, especially for the winter season.

Q2. Do you have any comments on the assessments described in Annex B of the consultation document? (see paragraph 4.1)

The Consultative Committee would like to see a more accurate description for Gatwick in Annex B. We suggest that "The airport lies between the towns of Horley and Crawley, and surrounded by countryside with small villages and country towns". Reference should also be made to the fact that light aircraft are prohibited from overflying the village of Charlwood.

Q3. Do you have any comments on the presentation of the noise contours and other information in Annex C? (see paragraph 4.2 - 4.13)

It is most disappointing that the DfT chose to display the contours on aerial photos rather than the usual Ordnance Survey maps as it is not easy to identify the areas of population and other landmarks. The contours do however highlight that if the noise quota and movements limits at Gatwick were used to the full the night noise climate would worsen significantly. Measures therefore need to be put in place to prevent a worsening of the night noise climate. Measures such as prohibiting scheduled QC/4 rated aircraft and the lowering of night noise limits will provide some relief. For a more significant benefit there needs to be a progressive lowering of the quotas with a substantial reduction in the winter period.

In addition to the current presentation of "average" contours, it would be helpful to have contours presented for "actual" noise events.

Q4. a) Do you have any comments or suggestions for environmental objectives and specific noise abatement objectives for each airport? (see paragraph 6.6)

It is not just about noise and numbers but also the general disturbance of night flights on local communities. The number of events as well as the whole operation of the airport during the night period should also be a key consideration in setting the

movements limits and environmental objectives. Local communities also suffer from disturbance from aircraft lights, on-airport activity as well as disturbance associated with surface access to the airport.

We suggest the following environmental objectives:

- To reduce both air and ground noise at night
- To reduce the maximum noise limits at night
- To continue to improve CDA adherence
- To develop and optimise the use of operating procedures for both arrivals and departures to reduce the impact of noise on local communities

b) If so, please state for each objective the base case indicator against which it should be assessed

We suggest:

- reduction in the footprint of the L_{night} contours as compared with October 2002/03
- reduction in the number of people contained within these contours
- reduction in ground noise as measured at community locations in 2003
- reduction in the noise limits compared to the present maxima
- reduction in the proportion of aircraft failing to comply with CDA parameters compared to 2003/04.

Q5. Are you content that we should retain the QC system for classifying aircraft?

We support the retention of the QC system for classifying aircraft.

Q6. Do you have any comments on the proposals to:

(a) remove the weight limit for jet aircraft able to qualify as exempt but, at the same time, to extend the QC system downwards by a further band to QC/0.25 (84 - 86.9 EPNdB)?

The Committee supports, in principle, the proposal to introduce a new QC/0.25 band. This will however mean that certain aircraft that are currently exempt from the night flying regime will be brought within it. While it is recognised that this would mean that the movements limits and the noise quota would need to be adjusted, it is essential that the new banding is not used as a mechanism to increase number of events during the night period.

(b) retain the minus 9EPNdB adjustment for arrivals?

The retention of the minus 9 EPNdB adjustment for arrivals is considered sensible as if the adjustment was removed the whole classification system would need to be reviewed or an alternative put in its place to take account of the different noise impacts from arriving aircraft.

(c) prohibit QC/4 aircraft from operating between 2330 hours and 0600 hours (see paragraphs 7.5-7.23)?

The removal of QC/4 operations during the night period would no doubt improve the night noise climate. However the implications of a total ban on QC/4 operations on the airlines' ability to manage delayed departures and arrivals would be significant. Such a ban would also pose difficulties for

passengers and the airport management in cases where alternative "permitted" aircraft were not available to relieve delayed flights that extended into the night period. Recognising these difficulties, the Committee therefore fully supports a prohibition on the scheduling of QC/4 aircraft from operating in the night quota period, including cargo QC/4 operations. To accompany this prohibition, there must be some mechanism by which to discourage airlines operating QC/4 rated aircraft from arriving before their scheduled time of arrival in the early morning with penalties imposed on frequent offenders.

It is hoped that the prohibition on scheduling these aircraft in the night quota period can be introduced in the first part of the next regime.

The Committee also supports, at this stage, the Government's proposals for a reduction in the night time noise limits as well as a new night noise insulation criteria, should it decide to proceed with the three proposals set out above.

Q7. Do you have any comments on:

(a) the value of there being common arrangements at the three airports?

The Consultative Committee believes that since the introduction of the common arrangements in 1993 there has been a better understanding by both the airlines and the local communities over what restrictions apply as well as more transparency. The question as to whether the length of the night quota period should be extended has been carefully considered. Whilst the Committee felt that the main aim of the consultation was to bear down on night noise, the present night quota period should not be extended as the structure of the current regime has been effective and workable for all concerned. If the night quota period were extended there would be a significant impact for those airlines that currently schedule QC/4 aircraft between 2300 and 2330, and between 0600 and 0700 - a ban on those aircraft would be inappropriate. Introducing different movements limits for certain hours of the night period is also considered to be complex to operate as well as confusing for people to understand. Such measures could also result in a more concentrated period of movements in the early part of the day.

One of the Government's economic objectives has to be to make best use of existing runway capacity. Extending the night quota period would affect a significant number of services currently operating outside the quota period thus restricting existing runway capacity. This would therefore be in conflict with that economic objective.

(b) retaining the same night quota period at the three airports (see paragraphs 8.1-8.11)

The Consultative Committee wishes to see the same night quota period at the three airports. If different night quota periods were to be considered at each airport, there is concern that such a proposal could potentially increase the number of night flights at Gatwick if a more restrictive regime was implemented elsewhere. For example, if the work on the project for a sustainable development at Heathrow suggests a much tougher regime there then pressure may be put on Gatwick to accommodate more night flights. Gatwick already has the greater movements limit and noise quota compared to the other BAA London airports. The current regime for Gatwick, especially for the winter season has been set too high and there needs to be a

progressive lowering of the quotas with a substantial reduction in the Winter period.

- Q8. **(a) Points relating to density of population and ambient noise seem more germane to issues concerning the size of the noise quotas and the number of movements permitted, rather than to the length of the night quota period: do you disagree?**

No

- (b) Are you aware of any reason why we should not take account of the comment in the WHO *Guidelines* that responses to aircraft noise are less likely to be influenced by ambient noise than are some other types of noise? (see paragraphs 8.12-8.13)**

The Consultative Committee is not convinced that the WHO comment in their guidelines is robust enough to be taken account of. Experience of complaints shows strong awareness and annoyance of disturbance from aircraft noise at night in rural areas.

- Q9. **Do you have any suggestions for further controls on movements during the night quota period if it is extended? (see paragraph 8.14 - 8.17)**

The Consultative Committee would like to see a progressive lowering of the quotas as well as a substantial reduction in the movements limits and noise quotas, especially in the winter period at Gatwick. This would ensure a continuous improvement in the noise climate.

Noise from aircraft arriving in the early hours generates the majority of complaints from not only communities close to the airport but also further a field. The possibility of introducing controls to prevent bunching will need to be explored further when proposed quota and movement limits are available. It is generally felt however that introducing measures to prevent bunching of movements at different times through the night could result in a more concentrated period of movements in the early part of the day. Such a system would also be extremely complex to operate, unmanageable to regulate and difficult for local people to understand.