

Gatwick Area Conservation Campaign

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RESPONSE TO The Night Flight Restrictions Consultation 2017

Introduction

1. The consultation asks us to describe who we are and who we represent. GACC is the main environmental organisation concerned with Gatwick, and the only voluntary group that covers the whole area around the airport. Founded in 1968, we have as members many hundreds of individuals, over 50 District and Parish Councils, and over 40 community groups. These groups vary from three county branches of the CPRE, each with over 2,000 members, through over a dozen local aviation protest groups which have sprung up in the past four years in opposition to new flight paths, to many village amenity societies for whom aircraft noise is only one of their concerns. All our members pay us an annual subscription, demonstrating positive support. We also have several hundred supporters on our email list.
2. Our membership covers an area about 20 miles radius around Gatwick, from Guildford to Crowborough, from Tonbridge to Petworth. We have a formal constitution, and an Annual General Meeting at which our committee is elected. Care is taken to ensure that members of the committee come from all areas around the airport. Over the years we have established a reputation for accuracy and responsibility which has earned us the support of all local Members of Parliament. Recently we have led the successful campaign against a second runway.

3. This response has been discussed and approved by our committee. It has also been circulated in draft to all our members, and their comments invited and taken into account. Many members have written to support this response.
4. The consultation has been delayed: it was originally expected in October. That means that the consultation period has been cut short, to under seven weeks instead of the normal three months. It also means that decisions will be rushed in order that the new regime can be announced before 1st April when airlines need to start planning their autumn schedules.
5. We answer below the questions as posed in the consultation and add a few additional comments at the end. We fear, however, that the curtailed time-scale means little hope that any suggestions for environmental changes other than those included in the consultation paper will be considered.

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

6. We welcome the aim to encourage quieter aircraft. However the aim should be to reduce the number of people significantly affected – delete the weasel words ‘to limit’ (which in DfT speak can mean to increase but not too much).
7. It should be made clear that this objective can only be achieved by quieter aircraft not by merely introducing more concentrated flight paths.
8. The words ‘existing benefits’ are discussed in paragraphs 9-13 below.

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

9. Although the consultation refers to the existing benefits of night flights there is no attempt to quantify them. It is stated in paragraph 1 that aviation ‘directly supports around 230,000 jobs ... and contributes over £21 bn annually to UK GDP.’ but that is exaggerated and misleading: it includes flights at all times of day; it also includes aircraft manufacture and aerospace which are irrelevant.¹
10. The economic benefits of night flights at Gatwick are small. There is little or no freight which requires night-time delivery. Most of the night flights are to or from holiday destinations with no special justification on business grounds. We understand the argument that night flights allow airlines to make more use of their aircraft with three rotations a day but that is a doubtful argument: it is not applied to most other commercial operations such as noisy factories or retail deliveries which have their working hours firmly controlled by planning conditions.²

¹ According to the Office for National Statistics the total employment in air transport in 2015 (excluding manufacture and aerospace) was 125,900. Gross value added by air transport plus air freight was £7.3 billion (before deducting depreciation). That is under 10% of the gross value added by transport including road and rail. <https://www.ons.gov.uk>

² See Department for Transport Quiet Delivery Scheme. [Quiet Deliveries Demonstration Scheme - Gov.uk](https://www.gov.uk/government/consultations/quiet-deliveries-demonstration-scheme)

11. Any calculation of economic benefits is suspect unless it takes into account the hidden subsidy to airlines as a result of paying no fuel tax and no VAT, the benefit of which is about four times the revenue from air passenger duty.
12. In so far as there are economic benefits, in some cases they could be achieved by better scheduling. If aircraft to middle-distance destinations were scheduled to depart before 11.30 pm and scheduled to return after 6.00 am the benefits of three rotations could be achieved without flights at Gatwick during the night quota period.

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

13. We are content with the proposed five years. However a thorough analysis of the balance between the economic benefits and the health impacts / widespread disturbance of night flights should be made within the next two years, leading to a reduction in both the noise and number quotas.

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

14. We are shocked that there has been no fundamental review of the night flight regime since 2006. Thus the opportunity for environmental improvements has been lost. Until 2012 there was a progressive year-by-year reduction in the level of noise permitted at night at Gatwick. A clear indication that this progressive reduction would continue was given in a Ministerial Statement by the then Aviation Minister: *"The government will take into account the freeze in quota limits during this extension period when setting the next regime and expects airlines to continue to improve their environmental performance in the interim."*³

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?

15. We are content with this proposal.

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?

16. We welcome this proposal. There are very few such aircraft at Gatwick at present but as the consultation paper indicates a large number are on order. Including them in the movement quota will reassure the public that the system is comprehensive; counting them as QC/0 will encourage investment in the least noisy aircraft.

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

17. No

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

18. No comment.

³ Rt Hon Theresa Villiers. 12 March 2012.

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

19. No.

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

20. We strongly disagree. They should be reduced. As shown above, the economic justification for them is weak. At the very least the aim should be to achieve a steady year-by-year reduction. We support the call by Stop Stansted Expansion for the Government to announce that all night flights will be phased out by 2030.

21. The winter movements quota is not fully used. Paragraph 2.19 of the consultation paper says: *'There is however still capacity in the winter period and given the constraints on airport capacity in the south east, the Government does not think it appropriate to constrain this further'*. That is alarming, inaccurate and silly. Alarming because it indicates that the Government is prepared to accept a 60% increase in the number of night flights in winter. Inaccurate because with Stansted and Luton operating at little more than half capacity there are no real constraints on airport capacity. And silly because it is unlikely that any airline would want extra winter night-time slots when none are available in summer.

22. Instead, as a minimum, the winter movements quota of 3,250 movements should be reduced to match the actual usage in the past five years of under 2,000.

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

23. Many of our members feel strongly that there should be a total ban on all night flights. There is growing evidence of the adverse effects on health of aircraft noise at night.⁴ Heathrow is to have a total ban so why, it is said, should the same not apply to Gatwick and indeed other airports (although to the extent that a new runway is the price of a night flight ban that is not a price that GACC would be prepared to pay). Nevertheless the widespread demand for a total ban illustrates the strong hatred of all night flights.

24. Indeed it is anger at the failure to cut the number of night flights which has led to the request that a proper assessment of the economic benefits is made, followed within two years by a reduction in the movements and noise quotas.

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?

25. No comment

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

26. No.

⁴ See Aviation and Public Health: AEF. <http://www.aef.org.uk/uploads/Aircraft-Noise-and-Public-Health-the-evidence-is-loud-and-clear-final-reportONLINE.pdf>

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

27. 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?

28. No.

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

29. We support the aim to reduce the noise quotas to match existing use. This is a change which GACC urged in 2012 and in 2014 and we are delighted that it is at last being implemented – at least for the summer quota. It removes the potential for a large increase in noise at night which would be unacceptable. Having a large surplus of noise points has meant that the noise quotas have been totally ineffective in their aim to encourage quieter aircraft. The proposal to reduce the summer noise quota to 4870, which is slightly less than the actual use in the past three years, would fulfil this aim.

30. We are amazed, however, that the new noise quota for the winter is proposed at 1,655 which almost double the actual use in two of the past three years. That would negate the aim of setting the limits to match existing use, and would mean that the noise quota would be totally ineffective and would provide no incentive for the use of quieter aircraft. The new winter noise quota should be set at around 900.

31. We also strongly support the suggestion in paragraph 3.25 that the noise quotas may be reduced by 5% a year so as to be 20% lower by 2022. That would represent a big improvement in the situation at Gatwick, especially for the communities close to the airport which suffer the worst noise. It would put pressure on airlines to buy and to operate quieter aircraft. In the long run this type of measure is what encourages manufacturers to design quieter aircraft.

32. We are, however, worried that this is only described as ‘hypothetical’ and that it is not included in the summary of measures being proposed. Indeed in paragraph 4.6 it is stated that: ‘*we would only adopt a reduction in noise quota if evidence suggests this would act as a realistic incentive for airports and airlines to use quieter aircraft rather than to penalise them with unrealistic targets.*’ If this were to mean only reducing the noise quotas after the airlines had bought quieter aircraft it would provide no incentive.

33. We trust that the Department will resist lobbying from the aviation industry to water down this proposal. Only if the noise quotas actually put pressure on airlines to buy and operate quieter aircraft will they be beneficial: as Lewis Carroll said; ‘Medicine has to taste nasty!’ We therefore hope that this proposal can be up-graded to a definite policy when the Government announce their decisions.

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?

34. We are appalled at the suggestion in the consultation paper (paragraph 1.38) that noise at night only affects some 4,300 people at Gatwick (the number within the

48 Leq.night contour). We are glad that the consultation uses the 48 Leq.night measurement rather than the discredited 57 leq, but it still measures the average noise which is almost meaningless at night.

35. Some 50,000 people live in the northern part of Crawley and 20,000 in Horley, and many of them are affected by ground noise, especially the roar at start of roll and the use of reverse thrust. It is also our experience that complaints about night flights come from a far wider area, up to twenty miles around the airport - because of the low background noise in rural areas. Indeed the table in Appendix G paragraph G5 shows that the footprint of an A320 approaching from the east creates over 60dB for 20,000 people. That is above the WHO health recommendation.

36. A recent research study for GACC carried out by the Dutch research agency To70 found that: *'The percentage of annoyed residents is likely to be higher in areas with low ambient noise than in high ambient noise areas. It can be misleading to compare noise annoyance between different airports, when these local differences are not taken into account. Hence, the local difference between ambient noise levels should always be taken into account when calculating the annoyance.'*⁵

37. Another factor is the increase in traffic on local roads at night time generated by the flights during antisocial hours. All the local roads to and from the airport are busy through the night and this must affect the sleep of people living near those roads, even if their homes are not overflowed.

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

38. 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?

39. 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?

40. We have no comments on the Public Sector Equality Duty but do have the following further views.

41. We are concerned at the suggestion in paragraphs 3.3 – 3.5 that the present controls on night flights by the DfT may be replaced by 'bespoke' controls imposed locally, possibly through the planning system. The planning authority for Gatwick is Crawley Borough which benefits substantially from employment at Gatwick whereas other nearby councils suffer worse noise. Any new system should involve all the councils around the airport.

42. Paragraphs 2.28 – 2.32 in the consultation paper refer to land use planning. They are largely meaningless unless local planning authorities can have an

⁵ <http://www.gacc.org.uk/research-studies.php>

assurance that there will be no change in flight paths over the 50-100 year life-span of new houses, schools or hospitals.

43. We would wish to see a longer night quota period. Six and a half hours is too short for anyone to get a good night's sleep - even if they go to sleep on the dot of 11.30 pm and are not woken up by the bunching of early arrivals and early departures before 6.00 am. The World Health Organisation (WHO)'s Guidelines on Community Noise suggest that night should be defined as 11.00 pm to 7.00 am.