

CAGNE

Communities Against Gatwick

Noise and Emissions

Department for Transport (DfT) Night Flight Consultation

January 2017

Introduction

CAGNE, formed in 2014 out of the ADNID PRNAV trial, has since grown to be a major campaign group that opposed Gatwick expansion and seeks a fair and equitable distribution of arrivals and departures in West Sussex and Surrey, from the coast to the airport.

CAGNE concerns itself with all airspace issues created by Gatwick and has been delighted to help communities, MPs, parish and town councils with various aspects of airspace changes since 2014 producing sound, fact based arguments and documents that communities can understand and thus assist them in participating in complex aviation consultations.

Councillor *members* of CAGNE formed the new CAGNE Aviation Forum in 2016 whereby parish and town councils can become members and discuss airspace changes, Gatwick, ask questions about flight routing and have their own dedicated website for them and their parishioners to use. This assists councils and the chair of CAGNE to feed into aviation meetings on airspace changes, the NMB and other national aviation bodies, ensuring that community voices are truly represented alongside industry.

We would encourage you to participate in the Department for Transport night flight consultation as Gatwick. You have until 28th February 2017 and you may find the CAGNE response of assistance.

Gatwick's airspace is complex. It is under Heathrow and as well as suffering flight paths over arrivals from the west it has aircraft heading towards holding stacks for both the east and west end of the runway.. It also suffers from Farnborough airspace demands. As airports endeavour to grow the impact on those on the ground becomes even greater and with Gatwick's ambition of a 10% growth without a second runway, we have to ensure that community voices are as loud in the debate as those of aviation with their economic claims.

The current night noise regime for these airports was set in July 2014 following a two-stage consultation process in 2013 which at the time decided to await the Airports Commission report on expansion in the southeast. This was felt to be disappointing at the time.

We welcome feedback from communities and obviously we would like to see a complete ban on night flights at Gatwick as this is one of the major complaints received by CAGNE. We will continue to call for a ban and we would encourage you to do likewise.

If we cannot achieve a ban on night flights at Gatwick then we should at least expect a reduction in night time traffic (23:30 to 06:00hrs) However, this is not being offered,

as the Government seems not to wish to restrict Gatwick's growth following the runway decision.

'1.10 Gatwick has also indicated that it has no intention of seeking to increase its number of night flights at this moment. '

CAGNE asked the CEO of Gatwick during a Noise Management Board meeting, "...would he enter into a gentleman's agreement to ban night flights?" His reply was that they would agree not to seek an increase in night movements. We are delighted that this is detailed, as above, in this Department of Transport report but it ignores the fact that Gatwick has the most "noisy" movements compared to Heathrow and Stansted, and is permitted to continue to grow during the winter months by 60%.

In summary CAGNE would comment as follows on the DfT night flight consultation:

1. There should be a ban on night flights providing 8 hours of community tranquility.
2. The noise metrics (methodology for assessing noise levels) used do not reflect the impact night flights have on communities, especially those in rural areas. They should be changed.
3. There should be a reduction in night flights in the summer to at least 10,000
4. The night movements during the winter are 3,250 and thus should not be permitted to grow by 60% , which seems the suggestion with no cap
5. CAGNE desire research into health costs vs 'economic' benefits, where the latter seem over emphasised in this DfT consultation
6. Night restrictions should be extended from 23:00hrs to 07:00hrs
7. Better scheduling of night flights throughout the night with no concentration during specific periods of the night
8. The join to the ILS must remain at 10nm at night so to reduce noise for those closest to the runway who also suffer ground noise and light pollution
9. To reduce the light pollution of Gatwick on dark skies that surrounds it in rural areas and from areas of outstanding natural beauty
- 10.No change in runway protocol at night or daytime – IMM11 of the Arrival Review
- 11.A ban on night flights at Heathrow
- 12.We have found little evidence of the investment in quieter planes, in fact more evidence has been found of aviation investment in saving fuel and increasing aircraft passenger capacity whilst enhancing the passenger experience on board.

DfT Consultation Questions and CAGNE comments question by question:

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

☐

- Heathrow has 3,250, Gatwick 11,200 and Stansted 7,000 summer movements. Gatwick has, by far, more movements during the summer months than any of the other airport in this consultation; this is environmentally unacceptable.

No data is included to illustrate benefits and non-benefits of night flights to the environment. Setting an objective of "maintaining the existing benefits of night flights" impedes such an appraisal from the outset.

Gatwick only has currently 3,250 movements during the winter that allows for growth in movements, according to this consultation of 60% and we would therefore question the environmental impact of this growth. (figure 4 page 17).

- The phrase 'significant' is at the very heart of the problems with concentrated flight paths and so we are very apprehensive in the continued use of this wording by the DfT.

As stated, '*To reduce the number*' – can only mean greater concentration of flights at night and as Gatwick becomes busier this must mean more communities impacted by superhighways in the sky with or without PRNAV.

- Gatwick has introduced a charging process to encourage the use of quieter planes at night but as long as it allows over 20 year old planes to fly this will do little to stop disturbances at night from aircraft departures and arrivals where there are no restrictions. This would also question the criteria aircraft noise is judged by ICAO that allows such planes to fly at night.

Planes may be getting quieter but they will always make a noise especially at night in rural areas and no allowance for this is allowed in the proposals.

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

- It would seem that the Government has favoured the economic benefits over the cost to residents' health. We would have for at least a reduction in night flights at Gatwick to 10,000 in the summer months, as out of Heathrow, Stansted and Gatwick, Gatwick has the most night movements.

Defra estimated the cost to productivity of noise is up to £6bn per year (Defra 2014).

No value is placed on the cost to health leading to loss of work output. This needs to be quantified by what it costs annually in loss of man power due to lack of sleep/ sleep disturbance in adults and children as well as cost to the NHS in sleep disorders and health conditions as a result.

- It has been proved that the hours of 6am-7am are particularly harmful when residents, rapid eye movement, the restorative part of sleep patterns, are in a light sleep and more prone to heart attacks or other life threatening conditions. We would like to see this period added to the night flight quotas.

The relevance is the early morning departures that residents suffer at Gatwick as they commence from 5.30am.

Norah Study of 2015; "The question is no longer whether noise causes cardiovascular diseases; it is rather to what extent." (Wolfgang Babisch)

- Exposure to individual noise events as low as 33dB whilst asleep can have unconscious physiological reactions (changes in breathing, body movements, blood pressure and heart rate)

Importance of considering single event metrics: WHO concluded that events as low as 30 dB could lead to disturbance.

We note the increase in larger plane movements during the winter period of 2016/2017 at Gatwick and saw freight increase as a result.

4% increase in movements according to the Gatwick flight performance report.

- We are greatly concerned of this type of increase in movements as planes are heavier and thus fly lower on landing and take off. A seemingly increase in long haul destinations has been the reason for this growth. This growth is not expected for the summer period due to holidaymakers search for winter sun.

The Evening Standard, 16th January 2017 article - The DfT admitted the A380 is louder on arrival than predecessor planes, but is quieter overall.

- We would liked to have seen better scheduling of flights during the night periods as at present they permit airlines to dictate flight movements and scheduling which results in communities being heavily impacted at peak times during the night period. This leads to sleep disturbance resulting in light sleep and constant disturbances thereafter.
- We would also liked to have seen an acceptance that planes are crammed into the late slots, shoulder periods, at Gatwick due to late running of day time scheduling which is a time when most residents are endeavouring to sleep, 11-12pm and thus we would like to see this added to the night quota period.
- We would of liked to have seen an acknowledgement of light pollution in rural areas as Gatwick has significant impact at the airport as well as from areas of outstanding natural beauty. The night-light of aircraft arriving and departing has a major impact on those that naturally enjoy dark skies at night with no streetlights in the rural areas surrounding Gatwick.

<http://nightblight.cpre.org.uk/>

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

We would like to see less than five years as this consultation lacks sound evidence to some claims made and thus these assertions must be fully researched and a new consultation undertaken thus permitting informed judgements to be made by residents and the Government to the impact of aviation at night.

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

We are disappointed that interim reviews are not operated in a public manner allowing communities to comment during the 5 year period to address specific issues

that may arise as technology of aircraft progresses, international aviation guidance, etc.

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?

The new aircraft, which are being purchased by EasyJet, BA and some other airlines, would have fallen outside of the current QC ratings. We are therefore pleased to see this new QC otherwise these planes would have been uncounted in the number of ATMS at night. This must be welcomed by residents, if not airports, airbus and airlines that may have expected to fly 'for free'.

The neo planes make no appreciable difference, since the quota count classifications are only 3dB apart and 3dB is the change of noise level which is only just discernible, And worse than that, when it's averaged over 16 hours, the resultant noise contour has no relation to the nuisance caused.

For example, every aircraft at Gatwick was able to reduce its QC classification instantly by 3dB (i.e. to the next level down in Quota Count) and at the same time the number of these lower QC classification aircraft was instantly doubled. The actual 57dB LAeq 16-hour contour would remain the same. But residents would not be able to discern the reduction of noise levels from each aircraft. But what they certainly would notice is a doubling of fly-overs.

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?

We welcome the inclusion in the night quota as stated above in 3a.

(2.26 page 29)

It is to be welcomed but with the reservation of the fleet mix at Gatwick. We acknowledge that the A320 of EasyJet and the like are in the process of being modified but are concerned about new airline fleets and the type of planes they may operate, e.g. Medview. It is the less known airlines that do not necessarily fly newer planes that are the major concern.

The Noise Management Board community groups have campaigned for a sunset date for all A320 planes to be retro fitted and we welcome the fact that this should be completed by 2017, but ask of other airlines and that this becomes mandatory for any aircraft landing at UK airports must be retro fitted to comply.

We would like to see greater incentives for airlines to develop quieter planes. The A380 was deemed the quietest and yet this is now being questioned at Heathrow (ICAO Chapter 5). The larger the plane the lower they tend to fly on takeoff to reduce power and save fuel and the greater the visual and noise impact they have on rural areas. We also suffer Virgin 747s and BA747s that are very low and noisy on departure.

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

- We would use the example of Medview who do not meet scheduling and depart in the morning or early hours, e.g. 2am. It would seem little consideration is given to the noise impact created by the lack of appropriate scheduling to ensure that planes do not depart after 11pm.
- We would like to have seen more recognition for the impact aircraft noise has on rural areas especially at night when the ambient noise drops to 30-35dB and below. An aircraft departing or arriving has a significant impact on those under the arrival swathe or departing route, which can wake a considerable number of residents.
- It would seem consideration is only given to those closest to the runway, this is reflected in the new night noise contours because of the current noise metrics used.
- We would also liked to have seen acknowledgment of the northern runway being used for maintenance on the main runway that then creates greater ground noise for Horley.
- The suggested change in runway protocol, as suggested in IMM 11 of the Arrival Review, is deemed unfair to all communities in the west as it will mostly operate on the northern runway increasing night noise for Horley and Crawley, as well as departures for routes 3, 5 and 2 (currently departures are less than arrivals but this could change with Gatwick's aim of increase in long-haul).

It will create more noise for communities to the west at night, as this is a time when winds are at the quietest and would permit such a switch in landing direction. The noise of aircraft would increase *considerably* in the west due to tail winds, greater speed, flaps and gears used to slow aircraft. Aircraft would be more concentrated over communities that are already impacted by low flying departures on BOGNA and SAM routing.

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

- We are greatly concerned about Heathrow movements as they fly over Gatwick routings. Heathrow prevents CDO approaches into Gatwick and thus creates greater noise for Gatwick residents. It is hoped with R3 night ban that Gatwick could raise its night flights and conduct a greater number of true CDO approaches using the full swathe, 10-14nm.

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

We would have liked to have seen a ban now at Heathrow for reasons stated above and we would liked to have seen ban or a reduction on night movements at Gatwick.

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

- We would like to have seen a ban on night flights or reduced to 10,000 in the summer schedule as Gatwick has more night time movements than other London airports and is surrounded by limited ambient noise, buildings to absorb noise especially at night.

- As a strong campaign group that opposed Gatwick expansion, we are appalled by the suggestion in paragraph 2.19 that the Government does not want to restrict Gatwick's growth when Gatwick already impacts residents at night especially in the summer months when they wish to sleep with windows open or enjoy their gardens.
- Our major concern is the quota of night movements that Gatwick still permits a 60% growth in the winter. At present this is a period of time when residents receive, and expect, respite from Gatwick night movements. We would have liked to see a reduction or limitation of movements in the winter period for this reason, reduction in quota.
- Figure 4, page 17 - We would question the fact that Gatwick has not used its winter flight quota and the recession of 2008/9 witnessed Gatwick's overall ATM movements decline. It is only since 2014 that Gatwick has seen growth fuelled by the growth in low cost airline business that Gatwick specialise in.

With this in mind we would question how the Government can continue to subsidise the aviation industry with no VAT or duty allowing it for media headlines such as 'One Friend in Newcastle, the other in Birmingham. Train cost £105.....so they met in Malaga for £75!' (Daily Mail Saturday 14th January 2017). It is cheaper to fly out of Gatwick to Europe than it is to travel by Gatwick Express to London for local communities.

- Gatwick QC movements has seen a small fall of 7% in average for the winter period but with only a 2% overall fall for the summer which would seem insignificant. (Page 26)

Winter goes from 2013/14 0.55 to 2015/16 0.51

Summer goes from 2014 0.44 to 2016 0.43

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

- We would like to see a total ban on night flights or reductions in movements to 10,000 in the summer and a cap in the winter to 3,250 as well as a total ban on departures from 11pm – 7am.

If a ban is not feasible we would like the ICAO categories permitted to fly at night questioned; better scheduling in spreading out the flights throughout the night; the period of 6-7am to be included in night movement quotas; a total ban on departures after 11pm and before 7am; and that noise events of all 8hrs be included in night time and new noise metrics used to quantify noise event impact with no averages taken.

- We would like to see a study into the cost of sleep deprivation caused by aircraft noise vs the supposed economic benefits to the UK economy.

As found in the Norah study 2015:

Hypertension: a risk factor for heart attacks, strokes, and dementia)

- *A 10dBA Lnight resulted in a 14% increase in the probability of high blood pressure (Jarup et al, 2008)*
- *A 10 dBA increase in night-time aircraft noise was associated with a 34%*

- *increase in the use of medication for high blood pressure (Floud et al, 2011)*
- *But NORAH identified no significant immediate effects on blood pressure*
- *Cardiovascular disease:*
- *Daytime 63Leq and above correlated with a 24% higher chance of a hospital admission for stroke; 21% for coronary heart disease; and 14% for cardiovascular disease. (Hansel et al, 2013)*
- *Mortality from heart attacks increased with greater exposure to aircraft noise, particularly when exposed for over 15 years. (Huss et al, 2010)*
- *Risk of heart disease increased by 25% per 10dBA Lnight (Floud et al, 2013)*
- *Statistically significant associations for aircraft noise and heart attack, and for stroke when using Lmax for night noise*

- 1.35 States: 'There is still a large amount of spare capacity in the winter night quota period however, with the most recent season seeing less than 60% of the movements available utilised. Night flight activity at Gatwick therefore varied from an average of 52 flights per night in the summer 2016 season to 12 per night in the winter 2015/16 seasons. There is also significant in-season variability however, with the busiest week in the most recent summer season averaging 76 flights per night and certain weeks in the winter 2015/16 season averaging less than 7 flights per night. '

This illustrates a significant change and thus has a dramatic affect seasonal on changes at Gatwick and on its surrounding communities, going from relatively no disturbance to an abundance of movements during the summer period with concentration of arrivals and timing.

- Any reduction in noise or noise quotas has to be welcomed but we would question the following used in the consultation document (page 55 Lnight)

LAeq 6.5hr – this is the core of the night period whereas LAeq 8hr includes the shoulder periods which tend to be crammed with scheduled aircraft. As Gatwick is not as busy as the shoulder periods throughout the night this results in the average noise drastically reduced and does not give noise weight to status of the peak shoulder periods of noise events they deserve, 11-12pm and 6-7am.

- We see that there is no requirement or rules to govern the scheduling of Chapter 4 aircraft in tight day time slots only to find, for various reasons, they are forced into the night period when Chapter 4 are not permitted to be scheduled. We see this a loophole being abused by airports to allow these lanes to fly and use excuses/ dispensation such as pot holes in runway, weather, strikes, to justify these planes flying when they are not permitted to if scheduled into the night. This causes greater noise for communities without any consideration.

We would have liked to see this tightened up as it would seem to be abused. We would ask that the DfT investigate the 2015/16 core delays compared to previous years at Gatwick.

- 1.36 States: 'Flights at Gatwick arrive and depart throughout the night, but over two-thirds are pre- 2am arrivals. This reflects the business model of the low cost carriers based at Gatwick who rely on night flights to ensure they achieve the necessary number of rotations during a day in order to make maximum use of their assets. In 2014/15, about 46% of night flights at

Gatwick were by low-cost carriers, 31% were full service carriers, and 22% were charter services. The most popular services in the night are those between mainland Spain, Greece and the Balearics. ‘

We find it cold-hearted to subject communities to such levels of noise for package/ low cost holiday trips that takes money out of the UK economy.

- We are gravely concerned about the increase of night movements for the winter. Gatwick could still grow to give no respite from Gatwick noise with the season difference that we have come to expect.

WHO has argued that average night noise should not exceed 40 dBA Lnight, to protect public health

And yet residents around Gatwick are subjected to far greater noise nightly during the summer schedule.

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?

Stansted is operating well below its ATM capacity and it would seem *logical* to share the burden of aircraft noise and allow people to fly from a local airport instead of adding to emissions of road travel to get cheap flights. We would suggest however that Stansted communities would welcome a ban on night flights.

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

Stansted Airport would seem more desirable than Gatwick that is the wrong side of London for the north to develop.

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

We would like to see quieter planes used at all airports to reduce the impact on resident’s health but see no evidence of this in the consultation

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?

A ban on Heathrow night movements

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

We are not convinced that this actually will encourage quieter planes from being flown at night.

We obviously welcome the quota being reduced by 17% for the winter and 21% for the summer but are concerned about the introduction of PRNAV and superhighways that will cause greater misery for those under as we seek a fair and equitable distribution of arrivals for all and not just some. Rural areas are quiet at night, 30-35dB, so we are not convinced that planes can never have an impact upon.

Investment should be encouraged in quieter planes but we do not believe that these automatically use Gatwick. It would seem that the industry is investing in solar

powering of engines and increasing seating to 400 e.g. the British Airways Boeing 777 to accommodate 400 seats. With updated versions of planes to make them wide berthed rather than quieter the future is looking gloomy as far as noise is concerned. With heavier planes will come greater noise and visual impact as they plan to gain height with minimal fuel consumption and minimum rate of climb.

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?

- 1.33 refers to Crawley population and dismisses the surrounding areas that suffer the most over flight and noise during the day and night from Gatwick.

We are concerned that out of date noise metrics are used to judge noise impact and therefore does not give a true picture of noise events, as they are judged on an average. Gatwick currently will have periods of no noise, which then outweigh peak hourly actives.

- 1.38 details: 'In 2015/16, there were approximately 4,300 people exposed to noise levels of at least 48 dB LAeq 6.5hr night between 2330 and 0600'.

This statement continues to compare Gatwick to Heathrow number affected by aircraft noise. We find this comparison unreasonable as Gatwick is surrounded by rural areas, areas of outstanding natural beauty, and thus should not have as large a population as Heathrow urban neighbours.

- Ground noise is very different to over flight noise especially at night when there is little ambient noise or buildings to absorb aircraft noise. Aircraft landing noise is prominent at night due to lack of other traffic movements in and around Gatwick that is the daytime scenario.

If we are to be truly fair about night aircraft noise then old noise metrics to judge it can't be used and new noise contour maps that include the full impact of aircraft noise must be entertained. It is also the frequency of flights that is an issue and not accounted for as when it's averaged over 16 hours, the resultant noise contour has no relation to the nuisance caused.

- The population around Gatwick has increased when we refer to Crawley and Horley but not necessarily in the rural areas that feel the true impact of over flight of aircraft but still sit outside of the noise contours. (2.29 page 23)

Noise contours do not allow for the arrival swathes, which have aircraft at below 3-3,500ft vectoring, so creating considerable noise. The closer the aircraft to the runway the more noise it will make in reducing speed, etc.

- At night arrivals are deemed to approach to the east in greater numbers than the west but we would question the logic of this as many arrivals to the east pass over the west before joining the swathe or one of the two holding stacks of Willow (over West Sussex) and Timba (East Sussex).
- Night flights also arrive over the coast of Sussex and cause an impact due to the frequency and concentration of routing.

- The same area to the west of Gatwick suffers arrivals and departures, kept low due to Heathrow and other airspace users, and thus are unable to gain height or remain higher for longer.

This can also be said for further east, which is also impacted by Heathrow departures above 15,000ft.

Copthorne in particular suffers from the SEAFORD (Route 2) departure which is kept down only reaching 7,000ft by Lewes, and ground noise of westerly arrivals landing.

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

This is for Stansted communities to answer

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?

This is for Stansted communities to answer

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 comment but further details can be found at <https://www.gov.uk/government/publications/public-sector-equality-duty>

Additional comments:

- As Gatwick flight paths affect areas outside of the current planning council requirements, we feel that Surrey, West Sussex, Kent and East Sussex councils should have a formal say as Crawley has very little over flight of its residents and could be said to have an interest in Gatwick growing.
- 8 hours is recognised by the medical profession as a good night's sleep and yet this document seeks for a shorter period than this.

Sleep disturbance may lead to hypertension. Habitual short sleep of less than 6 hours is associated with obesity, diabetes, and cardiovascular disease

We note the BBC documentary on night sleep and that NATS ATC have special areas dedicated to sleep for controllers, so we would ask that communities be offered the same but within their home and that the 6 hours is too derisory.

Towns and cities do have night noise, cars, deliveries, trains, but rural areas do not therefore rural villages should be given protection from additional aircraft noise and every effort should be made to have planes higher for longer before reducing to secure the ILS beam.

The average person in the UK is under-sleeping by about an hour a night, losing the equivalent of an entire night's sleep a week, a survey for the Royal Society for Public Health (RSPH)* has found.

The poll of 2,000 adults, published in a report by the society, found the average sleep time is 6.8 hours, compared with the 7.7 hours people feel they need.

Many people said the deficit had knock-on effects on their health, with roughly half saying they had felt stressed as a result and about a third saying it caused them to eat unhealthy food. “Despite this, sleep is an often overlooked and undervalued component in the public’s health. In order to give sleep the attention it deserves we believe that the government should develop a national sleep strategy which would encompass action that schools, employers, healthcare professionals and the public can take to help us sleep better at night.”

Poor sleep is known to increase the risk of developing serious medical conditions, including obesity, heart disease and diabetes, and to shorten life expectancy.

The report suggests the slumber number for 18-to-64-year-olds should be seven to nine hours a day. The recommended amount of sleep increases the younger you are – peaking at 11 to 14 hours for one-to two-year-olds, but falling to seven to eight hours for people aged 65 and above.

•Around 580,000 live in areas above 48 Lnight around the UK’s major airports. Noise maps do not show exposure to WHO recommendations

- 2.32 This would seem too late as new housing is being built close to Gatwick in Crawley and thus Land Use Policy is only effective if true noise contours and noise metrics are used. Horsham has many new houses and schools being built which are directly under the flight paths and thus impacted by aircraft noise although they will not feature in any noise contour.

CAGNE are concerned by the Arrival Review IMM 3 document which details in figure 2 page 3 text ‘*sleep disturbance for the most sensitive people who choose to sleep with the windows open*’ CAGNE would argue this is a human right and not a fact of sensitivity. It also states ‘*The design of new housing could be conditioned in this zone to facilitate closed windows ...*’ again CAGNE would argue that air conditioning can lead to other health problems.

Many listed buildings in the surrounding areas of Gatwick already suffer unacceptable levels of aircraft noise and due to historic age cannot have modern insulation.

Gatwick is simply in the wrong location to be permitted to grow.

- 1.15 to carry over of night quotas; we do not believe this allowance of 10% should be continued from one season to the other.
- We would like to see a study carried out by an independent organisation, perhaps Sustainable Aviation, whereby the noise events, noise shadows, frequency of aircraft, is included into noise metrics for night and are subject to the overall calculations.

We accept that night noise metrics are already weighted due to the lack night-time ambient noise but until the full facts are researched to the true impact on communities' health, these facts continue to be unknown.

We understand that there is a new DfT methodology to the working of noise which the CAA are looking to use in the future. This should help to place some cost value on health impact of aviation noise compared to economic growth. This is welcomed with some reservation as will health costs be given equal prominence as the economic growth of the aviation industry?

WHO Noise Guidelines, which was then as follows:

“3.12The recommendation was that the Guidelines for Community Noise should be adopted as long term targets for improving human health. This is also consistent with the advice above. The UK Government is committed to take account of this. In respect of aircraft noise at night, the 30 year time horizon of the White Paper, provides a suitable time parameter for ‘longer term’.

- We would question any request to move the night join to the ILS to 8nm due safety concerns as stated and agreed by the CAA previously in night and day ATMs. The 10nm join was instigated as a noise abatement procedure, agreed by the CAA, and the Secretary for State to reduce the noise for those closest to the runway.

Planes landing at 8nm would be in the region of 2,050ft high and would be vectoring to the ILS with increased engine noise due to flaps and lowered gear.

We would also question visibility on safety grounds, as although the runway is lit at night and thus may give a clear visual to where the runway is, we would site the go around statistics of Gatwick Flight Performance team as go arounds seem to be caused by obstacles on the runway – would this be visible with such short distance to go to landing? Would this join give pilots time to organise flight deck or cabin crew?

CDO approaches are meant to reduce noise for communities:

The latest data from Gatwick - Sept 2015 - Sept 16 - core night period

In easterly arrivals NON CDO approaches were 257

In westerly arrivals non CDO 754

Total number of non CDO approaches 1262

Daytime CDO and Shoulder periods - 6-23.30 hours, Jul 15 - Sept 16

Easterly arrivals 6,000

Westerly arrivals 13,798

Go Arouds 2004-2016

23 unstable approaches

93 Runway occupied

8 Misjudged

4 Aborted take off

5 ATC spacing

7 FOD

8 Cabin not secure

4 weather

1 birdstrike

4 technical problems

CAGNE already receives complaints from those that suffer ground noise as far as Copthorne and Warnham and we would see a change in join to the ILS closer to the runway can only increase these complaints. We would also question how this would work when maintenance is being undertaken on the main runway as the northern runway has no ILS and is shorter making the landing of larger planes more difficult.

We would also point out that at 8nm the noise would be 'significant' whereas at present it could be described as 'insignificant' even though it is below the 4,000ft criteria where noise is the number one consideration. At present these residents may describe the noise as 'insignificant' due to the spread of aircraft across the full swathe and height, speed, and distance to go, as during the day they have the 8nm join to the ILS as well as departures where heights are restricted by other airspace traffic.

- We would strongly suggest this report lacks key terms of reduction of ATMs to improve quality of life for residents impacted by Gatwick and thus we call for a ban on night flights or at least a reduction to 10,000 in the summer schedule. We would not accept the combining of winter and summer scheduling as this could increase the summer movements to over 13,000 during the 6.5 hour period.

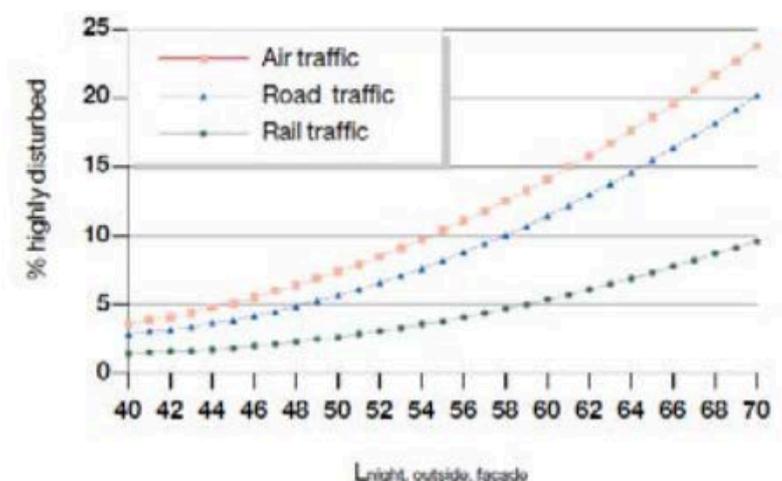


Figure 5: Dose-response relationships for transport noise sources and % of the population highly sleep disturbed. Source: WHO Europe 2009

Other countries acknowledge the problems of night flights, so why can't the UK? Aviation industry press, January 2017, wrote:

'Airport CEO Arnaud Feist claims that the airfield will lose 25% of its freight activity due to the new regulations while passenger airlines will also be negatively affected.

"With the end of tolerances, not only will night flights not be carried out, but standards will be so strict that many day flights will be condemned as well," Belgium's Luchtzak news quoted Feist as saying. "Brussels Airlines (SN, Brussels National) A320s will no longer be able to take off between 6 and 7 am. When the day comes that this Belgian airline is fined between EUR5,000 euros and EUR10,000 euros, I do not think that the parent company Lufthansa (LH, Frankfurt Int'l) will be amused and this will not help us to keep Brussels Airlines' business in Brussels."

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Seeking a fair and equitable distribution of arrivals and departures for West Sussex and Surrey to the east and west of Gatwick

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