

Tony Kershaw
Honorary Secretary

County Hall
Chichester
West Sussex
PO19 1RQ

Telephone 033022 22543
Website: www.gatcom.org.uk



If calling ask for
Mrs. Paula Street
e-mail: paula.street@gatcom.org.uk

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Dear Sir/Madam,

AIRPORTS COMMISSION DISCUSSION PAPER 05 – AVIATION NOISE

Thank you for providing us with the opportunity to comment on the important matter of aviation noise.

GATCOM (the Gatwick Airport Consultative Committee) is the statutory advisory body for Gatwick Airport and comprises representatives from local authorities, the aviation industry, passengers, business, environmental interests and other users of the airport. We provide a forum for informed discussion leading to the provision of advice to the Government, Gatwick Airport Ltd and other organisations on a range of matters concerning the operation and future development of Gatwick. As GATCOM represents a broad church of interests, there are a number of differing views across the committee's membership on the issue of future airport development and the need for additional capacity. However, there are a number of areas in relation to this where GATCOM has reached a common view.

Whilst GATCOM is not in a position to provide detailed evidence on the questions posed in your aviation noise discussion paper, we would like to offer some points/issues for the Commission to take into account in considering future airport capacity and expansion insofar as it relates to Gatwick and aviation noise. The key issues that GATCOM would like to see addressed are:

- **General noise climate** - recognition that aircraft noise tends to be more annoying in rural areas than in urban areas as the background (ambient) noise level tends to be lower and there is an expectation of peace and quiet in rural areas, albeit that fewer people are likely to be affected.
- **Concentration of flight paths** - as navigational accuracy has improved, what was a relatively wide swathe of aircraft trajectories has increasingly narrowed. This has resulted in fewer people being overflown but an increasing number of overflights for a specific number of people, causing significant disturbance and distress. The impact on local communities now and in the future planning of airspace must be a key consideration. GATCOM supports the idea of designating multiple flight paths within NPRs combined with a policy of concentration with alternation between paths.
- **Respite** - GATCOM generally supports the concept of respite provided that it does not involve diverting flight paths over areas which are at present peaceful. However, the implementation of respite could mean significant negative impacts for some people and in such cases some mitigation measures may be needed.

BY EMAIL

Airports Commission
6th Floor
Sanctuary Buildings
20 Great Smith Street
LONDON
SW1P 3BT

- **Land Use Planning** - The issue of planning and noise is an area in need of review. In the absence of appropriate Government guidance on planning and noise GATCOM considers it unacceptable to rely on the Noise Policy Statement for England 2010 for airport development and land use planning.
- **Noise Metrics** – the current noise metric may no longer be a satisfactory measurement for the onset of significant community annoyance, especially by those people living within, and those living outside, the noise contours. The frequency of overflight at a lower figure is increasingly a source of community annoyance rather than an aircraft noise event. Therefore the current noise metric is considered insufficient on its own as it does not adequately represent the noise climate in communities around airports and therefore needs to be supplemented by another metric that recognises the number of overflight disturbances.
- **Noise Metrics and Research** - There is an urgent need for research to be commissioned into the effects of aircraft overflight on communities looking beyond the effects of noise and examining the causes and cost of annoyance. GATCOM has asked the Government and the CAA to work with the industry to support independent research to improve understanding to enable the industry to respond and communicate its work. GATCOM hopes that the Commission can help to instigate the commissioning of this research.
- **Operating restrictions** - GATCOM supports proportionate operational measures which may mitigate or reduce the noise climate and levels of annoyance suffered by communities around airports. Greater use of differential landing fees might help incentivise airlines to operate quieter and cleaner aircraft, particularly higher landing fees at night on the noisiest type of aircraft as well as other incentives such as considering differentials on parking and other ground fees in both the summer and winter seasons.
- **Airport ground noise and noise from aviation related road traffic** – GATCOM asks that both these matters be addressed by the Commission as its work proceeds.

These points are discussed in more detail below.

General Overview - Balanced Approach

GATCOM supports the Government's aim to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise, particularly where this can be achieved as a result of quieter aircraft. In considering a long term strategy for aviation GATCOM acknowledges the need to strike a balance between the economic benefits of meeting demand and the needs of the aviation industry with the impact this has on local communities and the environment. It is essential that airports work in harmony with the local communities around them and establish measures to manage, monitor and mitigate the negative impacts of the airport's operation including airport (ground) and aircraft noise.

It is important that whatever airport growth/development options are taken forward to the next stage of the Commission's work that airport expansion plans are developed in such a way which prevents as far as possible a deterioration in the local environment around airports. It must be recognised that aircraft noise tends to be more annoying in rural areas than in urban areas as the background (ambient) noise level tends to be lower and there is an expectation of peace and quiet in rural areas, albeit that fewer people are likely to be affected. GATCOM therefore would like to see included in the Commission's report to Government recommendations and guidance on noise exposure levels to support the strategic overview given in the Government's Noise Policy Statement for England which currently lacks the detailed guidance needed on which planning decisions can be based.

GATCOM acknowledges the positive approach by the industry to address aviation noise, and has welcomed the work of Sustainable Aviation in producing its Noise Road Map¹. The Noise Road Map suggests that whilst there will be a growth in aircraft movements over the period to 2050, there would not be a commensurate increase in noise. Mitigation action e.g. quieter aircraft and operational procedures would be used to reduce noise impacts. GATCOM would however like the Commission to examine the robustness of that suggestion and how the balance should be

¹ <http://www.sustainableaviation.co.uk/wp-content/uploads/SA-Noise-Roadmap-Publication-version1.pdf>

struck between quieter aircraft and pollution levels. The Commission will be aware that Sustainable Aviation has identified issues around the design of new aircraft and to what primacy should be given to fuel efficiency against noise mitigation.

Use of Airspace and Concentration of flight paths

The current Government policy to minimise the number of people overflown by aircraft arriving at and departing from airports is well established. However this results in the concentration of flight paths. Also as navigational accuracy has improved, what was a relatively wide swathe of aircraft trajectories has increasingly narrowed. This has resulted in fewer people being overflown but an increasing number of overflights for a specific number of people, causing significant disturbance and distress. The increased navigational accuracy through the implementation of RNAV1 could exacerbate this situation unless the new routings are carefully positioned to avoid the most sensitive areas and targeted land use management policies applied to prevent encroachment under the flight paths and to ensure appropriate standards of noise insulation.

The majority of direct routeing flight paths are expected to be at high level for the foreseeable future with little impact on those on the ground. GATCOM is well aware of the work of the CAA in taking forward its Future Airspace Strategy as well as that of NATS in the redesign of the London Airspace Management Programme (LAMP). The challenges in valuing and quantifying the trade-offs between the key drivers of safety, capacity and the environment are acknowledged but the impact on local communities now and in the future planning of airspace must be a key consideration. The longer term developments indicate a possibility that aircraft routeings could be lower, and closer to airports, and so result in aircraft overflight of people who have not previously been overflown and who may have purchased their house following research into existing flight paths. GATCOM is concerned that in the consideration of environmental factors to be assessed, the potential for future impact of concentrating of flight paths in this way has not been widely consulted upon.

Nonetheless, GATCOM acknowledges the fact that RNAV1 gives a great opportunity to fly more accurately, discover which is the most appropriate line, or use of lines on a rotation, to fly within the designated noise preferential route (NPR). RNAV1 also provides the opportunity to discover possibly better paths to fly that may be just outside the NPR, but affects less people. It is highly likely that one size will not fit all when deciding the path to fly so respite needs to be investigated whether for departing or arriving aircraft. It should be possible to share the annoyance rather than concentrating on a specific population if an acceptable single route is unacceptable. In its Insight Note 02 "Aviation Policy for the Environment" the CAA has indicated that it would be technically feasible to designate multiple flight paths within a NPR and combine a policy of concentration with alternation between paths. GATCOM fully supports developing this approach wherever technically and operationally feasible.

The difficulties in balancing the Government's policy on minimising over-flight of populated areas with protecting National Parks and AONBs is also an issue. As stated above, the noise and disturbance impact for those areas and rural communities tends to be more noticeable than for those living in urban, more populated areas. It is therefore important that each airport is considered individually dependent upon its geographical location. Gatwick is surrounded by AONBs/National Park and the arrival routes in particular cannot avoid overflying the South Downs National Park and High Weald AONB.

Respite

Respite could be very valuable for some communities affected by noise. However, it should be balanced with the effects on carbon emissions, frequency of flights and thus disturbance. As mentioned above, GATCOM generally supports the concept of respite provided that it does not involve diverting flight paths over areas which are at present peaceful, or if consultation shows that the proposed scheme (eg twice as many planes on alternate days) would cause less annoyance. Implementation of respite could mean significant negative impacts for some people and in such cases some mitigation measures may be needed, assuming there are sufficiently strong benefits overall to justify the change.

GATCOM is aware that there are a number of counter views held in the communities around Gatwick where noise disturbance and annoyance during the day is felt to be a greater issue than night noise. This is more evident in the summer, when people are more likely to be enjoying outside space and have their windows open (hence minimizing the effects of sound proofing). GATCOM asks that the Commission takes this into consideration.

Land Use Planning

It is generally accepted that at most airports, the noise contour areas and the population within them are considerably smaller than they were some ten years ago. Whilst the overall reductions in contour areas and population have been due mainly to improvements in aircraft engine technology (and the phase-out of ICAO Chapter 2 aircraft (the more noisy aircraft)) there has also been the introduction of more stringent planning and operational controls on airports to manage the impact of aircraft noise on surrounding communities.

In recent years, where noise contours have shrunk, 'urban creep' around airports has been experienced thus increasing the number of people within the 57 dBA leq contour. Also, areas that were previously categorised as noisy areas have been released for residential development. This creates a risk of population encroachment in noise sensitive areas around airports which in some cases counteracts the noise improvements that have been achieved by the industry.

The issue of planning and noise is an area in need of review and GATCOM has raised this matter on many occasions to the Government. The now defunct *Planning Policy Guidance Note 24 (PPG 24)* on Planning and Noise, used noise events, e.g., numbers of overflights and their individual noise levels, in guiding spatial planning policy and it is hoped that any new land use planning guidance will continue this practice². The ICAO Balanced Approach Policy for Noise Management includes land use planning and management and so requires local authorities as well as the air transport industry to contribute to the solution by restricting inappropriate developments in areas most affected by noise.

In the absence of appropriate Government guidance on planning and noise GATCOM considers it unacceptable to rely on the Noise Policy Statement for England 2010 (NPS) for airport development and land use planning. The NPS states that it is not possible to have a single noise-based measure that can be applied to all sources of noise in all situations. It also acknowledges that further research is needed but that in the meantime the NPS will provide flexibility until further evidence and suitable guidance is available. There is a desperate need for overarching guidance for fairness and consistency when dealing with planning and development matters around airports and to strengthen and support local authorities' ability to enforce land use planning controls around airports.

Land use planning guidance also relates to the broader issue to be addressed on methodology by which disturbance is calculated.

Noise Metrics

The 57 dB Leq contour is a useful means for comparison over the years for measuring noise. But it is felt that this measurement may no longer be a satisfactory measurement for the onset of significant community annoyance, especially by those people living within, and those living outside, the noise contours. There are indications across a number of airports that frequency of overflight at a lower figure is increasingly a source of community annoyance rather than an aircraft noise event. Therefore the current noise metric is considered insufficient on its own as it does not adequately represent the noise climate in communities around airports and therefore needs to be supplemented by another metric that recognises the number of overflight disturbances.

The current LAeq noise contour measurement was originally based on surveys in towns. There are strong reasons for believing that in rural areas the noise is likely to be more annoying, partly because of the lower background noise, and partly because of the greater expectation of peace

² See External Review of Government Planning Practice Guidance submitted by Lord Taylor of Goss Moor (Annex D, Environmental Quality)

and quiet. This needs to be taken into account in any further research and deciding the level at which the onset of significant community annoyance is set. There is also a need for the Government to consider the monitoring and publishing of data on movements on approach routes.

Notwithstanding the information in ERCD Report 1208, there is an urgent need for research to be commissioned into the effects of aircraft overflight on communities looking beyond the effects of noise and examining the causes and cost of annoyance. GATCOM believes there is a need to improve understanding of how people become annoyed by aircraft noise, an issue which the Chairman of GATCOM raised with the Minister for Aviation, Rt Hon Simon Burn MP, at an event in the House of Commons on 23 April. GATCOM has asked the Government and the CAA to work with the industry to support independent research to improve understanding to enable the industry to respond and communicate its work. If evidence demonstrates that the current threshold is too high, or a different noise measurement is needed to establish the level of the onset of significant community annoyance, it should be reconsidered. GATCOM therefore hopes that the Commission can help instigate the commissioning of this important piece of research.

Airport related ground noise is also a source of disturbance and annoyance and as such should be recognised and addressed by the Commission in its consideration of options and included in the production of noise contours or any other new noise metric. Airport ground noise disturbance is not an issue addressed in your Discussion Paper.

Operating restrictions

Under the Balanced Approach, it is recognised that operating restrictions have a role to play, but the effectiveness of such measures is more limited than other key measures such as reductions at source and land use measures.

GATCOM supports proportionate operational measures which may mitigate or reduce the noise climate and levels of annoyance suffered by communities around airports. Measures need to be put in place to ensure the noise climate around airports is not worsened. Greater use of differential landing fees might help incentivise airlines to operate quieter and cleaner aircraft, particularly higher landing fees at night on the noisiest type of aircraft as well as other incentives such as considering differentials on parking and other ground fees in both the summer and winter seasons.

There are currently a number of voluntary arrangements in place at Gatwick for the management and mitigation of aircraft noise disturbance which have worked well. For example, collaboration and voluntary approaches on track keeping and continuous descent approaches. GATCOM continues to encourage Gatwick Airport Limited, NATS and airlines to further develop these voluntary arrangements so that the application of penalties would be the last resort.

In its response to the DfT's Stage 1 consultation on the next night flights regime for Gatwick GATCOM has sought a redefinition of the departure limits as this would encourage the manufacture of quieter aircraft and a review of the penalties for breaches of the limits. Although not a view shared by the airlines' interests represented on GATCOM, it is generally felt that new limits, with tougher penalties, would be more effective with the desired outcome of containing the noise climate around airports.

Lower landing fees for operating the quietest aircraft at night might incentivise airlines but this needs to be in conjunction with a meaningful movements and noise quota scheme. The current night flights regime at Gatwick is considered by some not to be particularly effective in winter as the quotas and movements limits have been set too high and are therefore underused providing little incentive for airlines to invest in/use quieter aircraft.

Noise Insulation Schemes

Gatwick Airport has in place a noise insulation scheme for local residents as well as for other noise sensitive buildings. It is felt by some that the current scheme could be more generous and should be applied to a wider area e.g. all rooms within a house should be eligible not just bedrooms and grants should be offered for the replacement of double glazing installed many

years ago as well as other forms of modern insulation e.g. roof insulation. GATCOM is pleased that the new owner of Gatwick is revisiting the terms of the airport's noise insulation scheme.

However, compensation schemes around major airports vary within the UK. GATCOM has questioned whether these should be standardized.

Other Matters

Your Aviation Noise discussion paper is comprehensive, however, there are two issues that appear to have been overlooked – airport ground noise and the management of its impact and the issue of traffic noise (and pollution) from vehicle movements related to the use of the airport. GATCOM hopes these issues will be addressed as the Commission's work proceeds.

I trust GATCOM's views can be taken into account.

Yours faithfully,



Assistant Secretary