

# **CAGNE**

## **Communities Against Gatwick**

### **Noise and Emissions**

NMB6 IPO8

## **Quiet Night Arrivals discussion paper**

4<sup>th</sup> August 2017

### **Introduction**

CAGNE was disappointed by the Government's nighttime regime that allows Gatwick to grow during the winter months by 60%. We acknowledge that planes are becoming quieter and that noise quotas are to be reduced, but the issue with Gatwick is that they have the most night movements all of London airports. It is the volume of aircraft, the lack of height, and poor scheduling that makes communities anti Gatwick at night.

The findings of any research undertaken in 2013 would be out of date, as airspace has changed as Gatwick has seen a rise in the volume of ATMs at Gatwick. Gatwick also introduced narrowing of arrivals and PRNAV on departures during 2013 and so any data would be subject to changes taking place as trials commenced.

The only reason to introduce PRNAV at night is because Gatwick seeks to have too many planes flying at night. The offer of 'respite' is like putting traffic lights on a roundabout because the roundabout can no longer operate efficiently due to too many vehicles at peak times.

We find the NMB6 IPO8 paper flawed in many respects –

1. It does not address the full airspace
2. It does not address those that suffer arrivals and departures at night nor multiple routes at very low heights
3. It does not take into account the bearing communities are impacted in the shoulder periods or during the day
4. We also find that there is no mention of ground noise and noise from Gatwick's ground operations
5. We see no mention of better scheduling of planes- departures and arrivals. It would seem that planes could be spread out during the night rather than allowing the planes to dictate landings and causing huge increase in aircraft noise which inevitable prevents residents from sleep or returning to sleep ie you wait for one bus and ten come at once.
6. CAGNE would not accept the 'numbers game, as rural areas have approx. 30dB at night whereas urban will still have some ambient noise and thus aircraft noise does not impact in the same way. Also rural areas do not have buildings to absorb noise

as urban areas do. Please see TO70 report for GACC  
<http://www.gacc.org.uk/resources/Ambient%20Noise.pdf>

CAGNE feels that any work on nighttime movements must take into account the full picture of airspace and those that are impacted the most and do not have any respite from Gatwick noise below 4,000ft.

To progress investigating arrivals in isolation would make any conclusions from trials or measurements unsound. Without consideration of the full picture of Gatwick's operations day and night the research would inevitably result in impacting other communities. For example we cite the CAA PIR review, CAA Review of Route 4, Arrival Review and changes made for LAMP 1 with City Airport point merge for arrivals that now impacts Gatwick's airspace.

## **Objectives**

The objectives set out seem far too narrow for this piece of work. Firstly we would re-iterate points 1, 2, 3 and 4 above.

*'Maintain arriving traffic within the current swathe'*

CAGNE questions this point as aircraft prior to 2013 joined directly from the north to the ILS. Both City and Heathrow are quiet at night and so we see no reason why this should not be included in the research/ trial.

*'Avoiding moving aircraft overflight and noise to areas that currently are not affected'*

In principle we would agree with this statement but raise the point above as well as ask that direct glide to the ILS be a consideration as Heathrow and City are not in operation at night. These areas have and continue to be overflown currently. To glide in using CDO would reduce noise and keep planes higher for longer. This does not suggest that there should be PRNAV routes or that it should constantly be used.

*'Increase the number of aircraft flying a "low noise approach"*

In principle we agree with this but as night movement already see 89-96% CDO compliant during the winter months dropping to 89-90% in day time and shoulder periods, we see that CDO is not the answer in reducing noise at night.

We see no mention of low gear low drag combination with CDO movements detailed to be explored as with less drag from wheels down early, non-stable approaches and having to reduce speed with haste, we see that noise would increase not decrease for those closest to the runway.

We would also like to see the consequence of a period of no fly at night, the ramifications of this on daytime and shoulder periods so that communities can make an informed decision.

We strongly oppose any removal of the join of the ILS to less than 10nm. The Secretary of State put the 10nm ruling in place for sound reasons at Gatwick, Heathrow and Stansted.

This is a noise abatement procedure, with the increase in aircraft movements and ground noise, we see no reason why this should be removed. We site points 1,2,3 and 4 under the Introduction.

## Planning

*'The first stage would focus on the concept development, design, agreement, trail and analysis of Quiet Night Arrivals P-RAV routes'*

Phase 1 - High-level objectives will not be met if only a small part of the community is engaged in this process that have specific desires eg the high level Gatwick meeting of departure groups that were predominantly all from Route 4, a single departure route that does not have arrivals or, for most of the route, does not suffer departure multiple routes.

Phase 2 – if this is similar to the process taking place currently at Edinburgh with new flight paths by Gatwick's owners, it is pitching communities against each other and we see no different with what is set out in Phase 2 as NATs, ANS and the CAA are to take this forward. This will be seen as aviation bodies playing 'god' with people's nighttime sleep.

We also see NATS, ANS and CAA conforming to Government policy to save time and fuel (CO2) with no consideration to the impact it has on the ground, ie the fear is that the inner edge will be flown at night and not the full swathe, 10-16nm and beyond in the west and 10-14 in the east.

Phase 3 – *'Engagement with NMB to review and endorse the concepts'*

This is wholly unacceptable as all must be consulted that are to be impacted and not just the community groups on the NMB as the majority of them are furthest from the runway.

Phase 4 – to wait until the majority of work has been completed and potentially decided upon before engaging *'with the wider area'* is too late.

*'The second state would take place once the Quiet Night Arrivals route(s) had been evaluated and would focus on how these routes could be use to 'deliver fair and equitable dispersal or respite' if this is considered desirable by community noise groups. The definition and requirements fro dispersal or respite would need to be assessed and agreed prior to commencing works route9s) utilisation.'*

CAGNE finds the above statement concerning. It is not for community groups on the NMB to decide who gets noise one night and not the next; get noise constantly so to give respite to those further out; this would suggest that residents are to have sleep on night and not the next which would be totally unacceptable and research of all communities to be impacted must be undertaken at the outset of this piece of work.

## Recommendations

1. All communities to be impacted should be informed of the work being undertaken by the NMB now on night flights.

2. Better scheduling of flights should be investigated and that arrivals and departures and those that suffer multiple routes, day and night, are given greater consideration when below 4,000ft.
3. Night ban between 23.30 and 6am should be investigated and the ramification on communities during shoulder periods and daytime researched. This ban was in place in the late 1970s through to the mid 90s. There should also be an investigation to ascertain who changed the rules, and when, for more night flights. This should be a priority as mounting evidence of the health implications\* of night flights grows. A night ban would be similar to the current rules of operation at many busy European airports. It is felt that the government, will continue to bungle their way around any night flight quotas, permitting Gatwick to continue to slowly increase its night movements.

\*<http://www.aef.org.uk/2016/01/12/new-report-finds-aircraft-noise-policies-put-the-health-of-over-one-million-people-at-risk/>

4. The full swath should be used at all times during the quiet night periods and busy to spread PRNAV routes and be FnE to all that suffer night movements, please see recommendations 1. Also historic movements pre 2013 LAMP 1 could be used to ease the numbers of aircraft over particular areas.
5. The full picture of ATMs must be incorporated in the work; please see points 1, 2, 3, and 4.
6. Noise contours – we welcome N60 contour but it still does not address lack of ambient noise at night nor the far-reaching impact PRNAV routes have on those below, reference CAP 1498.

Once again we raise objection to ‘respite’ as this is a word used by aviation with no definition as it means something different to specific routings and communities. It may work at Heathrow but communities surrounding Gatwick would like to see a reduction in noise at night from reduced ATMs.

## **Annex A: Description of the 2013 trial**

CAGNE would make the following observations:

*‘predictable respite’* we would ask fresh research be undertaken on this outside of GATCOM and NMB members giving communities the option of a night ban or a quiet night period detailing the ramifications of such on shoulder periods and daytime movements.

*‘overflight below 6,000ft from agreed areas of population’* – we raise the issue of rural areas vs urban areas and the difference of noise impact. We also raise the point that is missing which is ground noise impact.

The 2013 research seems to ignore the issue of ground noise and now PRNAV routes landing closer to the runway increases the noise endured by those that suffer planes at very low heights and multiple routes during the day and night.

*'Avoid all areas of population as much as possible'* CAGNE fundamentally disagrees with this statement of the 2013 trial. If Gatwick seeks to increase ATMs then urban and rural areas must share the noise FnE and not play the number game, as detailed previously.

It is detailed that the trial took place over 6 weeks; CAGNE would enquire at what time of the year did this trial take place, eg summer, winter?

*Areas not to be impacted* – Please quantify how these particular areas were selected over other areas and were all areas to be impacted consulted?

*'There had been an improvement in CDA performance due to the removal of an altitude step to avoid outbound Heathrow traffic which does not operate the hours of the trial period. No negative comments had been received, fewer complaints were received in comparison to the previous year, and positive feedback had been received from some communities.'*

In view of the above statement made post 2013 trial, CAGNE would ask the following:

1. What time of year did the trial take place?
2. Where are the positive feedback details and what areas did they come from?
3. *'Fewer complaints'*, was this investigated to whether this was due to not flying over urban areas compared to those impacted in rural areas that have lesser number of residents to complain? How was the noise complaint system operated during the trial eg was it one complaint per day per household?
4. Was the noise impact on rural vs urban investigated?
5. As we have seen from NMB data CDA is not a magic wand in removing aircraft noise, but a combination of LDLG and CDA could reduce noise further. We would ask that factors of joining point to the ILS, height of aircraft, volume of ATMS on this routing, lack of stabilisation, be examined alongside any findings over improvements in CDA.

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

[www.cagne.org](http://www.cagne.org)  
[cagnetatwick@gmail.com](mailto:cagnetatwick@gmail.com)  
[www.facebook.com/gatwickcagne](http://www.facebook.com/gatwickcagne)  
Twitter @cagne\_gatwick