

Reduced Night Noise - Community Pre-Conditions

NMB/9 - Information Paper

Date: 8th January 2018

Introduction

At NMB/6, it was agreed that opportunities for a night initiative should be explored and, to do this, an industry workshop was held on 31 July 2017. The workshop outcomes are summarised in NMB-7 IP09. In addition to the workshop, Community Noise Groups (CNG) have submitted their proposals on Quiet Night Arrivals (QNA). These have been circulated to the NMB as information within NMB-7 IP10 and NMB-7 IP22 along with Flimsy submissions NMB-7 FL01, FL02 and FL03.

NMB/7 WP05 provided an initial proposal to progress the then named, QNA initiative. Ahead of NMB/8 the NMB along with CNG were briefed on the Reduced Night Noise initiative (RNN), renamed from QNA. Following this briefing and the discussion at NMB/8, Action 4 was taken for Helios to revise the RNN activity based upon the feedback received. This has led to a revised RNN proposal (NMB/9 WP03) and this paper which identifies how the Community Noise Group (CNG) pre-conditions, noted in NMB/7 IP10 and IP22, have been considered.

This paper should be reviewed in conjunction with the ‘NMB-9 WP03 RNN Next Steps’ which provides further details for the proposed trial.

CNG pre-conditions and their inclusion

CNG have provided trial pre-conditions in NMB/7 IP10 and NMB/7 IP22. A detailed breakdown of these pre-conditions was included in NMB/7 IP10 and the following section notes how these have been incorporated as part of the revised RNN trial. Due to the overlap of some of the conditions, the points raised have been grouped into relevant sections.

Focus Area	CNG Concerns and comments
<p>Route design and optimisation</p>	<p>CNG pre-conditions:</p> <ul style="list-style-type: none"> ▪ The route or routes to be trialled should be derived from thorough consideration of a wide range of options. These options should include a single route, a route with respite and multiple routes. For each of these we would like to understand the expected benefits and dis-benefits of the option in terms of the number of people likely to be impacted and the severity of impact, as compared to the status quo, based on modelling and simulation. ▪ We are keen to understand what an ideal case scenario for communities would look like, with minimal constraints. We have two specific points on this. First, the reference point for “current swathes” and “areas currently not affected” should be the historical disposition of night flights and not just the present pattern. If it is the case that areas were overflowed prior to the 2013 changes but are not now, we believe it is fair that they be included in the options analysis described above. Secondly, we would like the current regulation preventing aircraft joining the ILS at less than 10nm to be disregarded for the purposes of the options analysis and, if applicable, any trial. This should not be taken to be a preference or predisposition for flights to join between 8 and 10 nm at night, let alone to be concentrated in those areas. But we do not currently feel there is any fair or reasonable reason to exclude these areas from consideration, in the same objective way that other areas should be considered. ▪ To the extent that the options to be considered might be constrained by technical considerations (for example in relation to the number of routes), we (together with our technical consultants) would like to be briefed on those considerations so that we understand and have confidence in them. We suggest a technical seminar might be a good way to do this. ▪ The full swathe should be used at all times during both the quiet night periods and busy ones to spread the load and to be Fair and Equitable to all that suffer night movements. ▪ Also historic movements pre 2013 LAMP 1 could be used to ease the numbers of aircraft over particular areas. ▪ The full picture of ATMs must be incorporated in the work; ▪ Research into interaction of lowering landing gear too soon and the impact on noise levels from of flaps and gear.

	<p>Inclusion in the RNN trial:</p> <ul style="list-style-type: none"> ▪ To provide a fair comparison and to allow the RNN trial to commence in a suitable timescale, no changes to the DfT imposed night time minimum joining point are proposed¹. In addition, it is proposed that the RNN route/(s) are not moved outside of the lateral extents of the night time arrivals swathe as defined in NMB/9 WP03. <p>Although these restrictions have been applied, this only affects the outer extents of the design area and the NMB will be able to provide input to the initial design, e.g. by proposing the use of single or multiple routes, how these routes may be used, and where they are located within the outer extents of the night time arrivals swathe.</p> <p>The NMB input to the design phase will be gathered in, or shortly after the RNN workshops. Information on traffic flows, RNAV technology and route design will be provided to the workshop attendees to assist this process and to allow a full understanding of the airspace. Industry are currently considering high-level options for dispersal by design to manage the issue of route concentration and this learning will also be shared in the workshop.</p> <ul style="list-style-type: none"> ▪ Design considerations have been introduced to provide guidance to the design process. The initial list is presented in NMB/09 WP03 and was developed from feedback gathered from the NMB. This list is not complete, and it is understood that additional points may arise as the concepts and design progresses. As a result, it is proposed that the list is periodically reviewed and updated as required. ▪ The routes used in the initial design phase will be subject to an options and feasibility analysis along with high level safety and operational assessments. The analysis will be used to review the initial designs and identify what design points could be taken forwards into a final design. This analysis may include an assessment against the design considerations. <p>In addition, the CAA guidance on Airspace trials, CAP1616, notes that comparative analysis of the trial noise footprint, and overflight analysis between the baseline and proposed trial route/(s) may be required, and this will take place as part of this initial analysis.</p> <ul style="list-style-type: none"> ▪ The NMB will be provided with the results of this initial analysis along with the proposed final design to gather further feedback and comment for a go/no go decision.
<p>Trial analysis and metrics</p>	<p>CNG pre-condition:</p> <ul style="list-style-type: none"> ▪ We believe this analysis needs to include objective, quantitative, metrics that take account of the number of people impacted, the level of noise they suffer and the amount of time for which they are impacted. ▪ We would like the evaluation of any trial to be done on an objective basis – that is by monitoring changes in noise impact and not solely by relying on community complaints and feedback although those are also important. <p>Inclusion in the RNN trial:</p> <ul style="list-style-type: none"> ▪ As outlined above, the RNN design phase will be subject to an options and feasibility analysis. The NMB will be provided with the results of this analysis along with the proposed final design. Comments and additional feedback will be sought on the final design as part of the go/no go decision. ▪ Before, during and after the trial, overflight analysis using the Gatwick ATC radar will be complimented by data collected using mobile noise monitors. This will provide the baseline, trial and post-trial operational and noise environment for comparative analysis. ▪ Feedback provided through the NMB and the complaints system will be considered alongside the objective scientific data gathered, assessed and reported within the monthly and post-trial data analysis. The post-trial review will consider all data collected in the trial and determine if the RNN routes, or some form of the RNN routes, should be implemented as an airspace change.
<p>Trial process, communication and input</p>	<p>CNG pre-condition:</p> <ul style="list-style-type: none"> ▪ We would like to have the opportunity to review the results of these options and the impact analysis before committing, even in principle, to the idea of a night flight trial ▪ All communities to be impacted should be informed of the work being undertaken by the NMB now

	<p>Inclusion in the RNN trial:</p> <ul style="list-style-type: none"> ▪ As outlined above and within in the trial and engagement plan within NMB/09 WP03, the NMB will be involved in the initial design and throughout the RNN trial through: <ul style="list-style-type: none"> ▪ Attendance at the RNN workshop where the NMB will be able to provide input to the initial design, e.g. by proposing the use of single or multiple routes, how these routes may be used, and where they are located within the outer extents of the night time arrivals swathe. To support this process, the NMB will be briefed on traffic flows, RNAV technology and route design. ▪ The provision of the report on the initial feasibility and options analysis, the design points taken forwards and the proposed final design. ▪ Invitation to provide comment on the initial feasibility and options analysis along with the proposed final design as part of the input to the go/no go decision. ▪ Being provided with updates on the trial preparations, this includes providing comment on the proposed engagement plan and assisting with the dissemination of trial information. Note, no engagement is proposed beyond the NMB until after the initial design phase has been completed. ▪ Being provided with trial data analysis on a regular basis whilst the trial is in effect. ▪ Being involved in the post-trial review and invited to provide comment on if/how the RNN routes could/should be taken forwards.
<p>Compensation</p>	<p>CNG pre-condition:</p> <ul style="list-style-type: none"> ▪ We believe that a pre-condition for a trial should be that any person more seriously impacted as a result of any permanent redistribution of night flights should be comprehensively compensated, on a basis to be agreed with community groups. We would like GAL to set out its policy on this in advance of any trial. <p>Inclusion in the RNN trial:</p> <ul style="list-style-type: none"> ▪ RNN is a fixed 6-month trial program. Upon completion of this period, the RNN trial routes may be withdrawn and normal operations will resume, unless the RNN routes show a material noise benefit in which case the routes may be maintained. ▪ GAL currently has an established noise insulation scheme which is similar to, but extends further than those offered by Heathrow and Stansted. The scheme is applicable to homes located close to the extended centreline of the runway at Gatwick, based on measured noise contours. ▪ RNN will seek to reduce the noise impact in areas further afield, the current insulation scheme would not be applicable outside the contour boundaries already defined for the purpose. It is anticipated that the development and establishment of additional schemes, such as compensation proposed by CNG, would require further detailed analysis and consultation. The implementation of RNN evaluation, which may deliver meaningful noise benefits, should not be deferred to permit such analysis and consultation.

¹ The requirement for a 10NM night time minimum ILS joining point was introduced prior to 2004 for noise abatement purposes. In NMB/7 WP05 the DfT confirmed that for a trial this restriction could be changed without a formal consultation however it would require a consensus agreement between all relevant community noise groups.

Additional comments	<p>CNG pre-condition:</p> <ul style="list-style-type: none">▪ Night ban between 23.30 and 6am should be investigated and the ramification on communities during shoulder periods and daytime researched. 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.▪ Better scheduling of flights should be investigated.▪ Once again we raise objection to 'respite' as this is a word used by aviation with no definition as to it's meaning - perhaps a different definition for some specific routings and communities. It may work at Heathrow where the surrounding communities have little hope of a break from aircraft noise, but communities surrounding Gatwick would like to see a reduction in noise at night from reduced ATMs. No such problem exists at Heathrow. <p>Inclusion in the RNN trial:</p> <ul style="list-style-type: none">• These comments are ancillary to the RNN trial program. But, where appropriate, these comments will be taken into consideration within the relevant NMB 2017/2018 workplan activities.
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