**NIGHT FLYING RESTRICTIONS AT HEATHROW, GATWICK AND STANSTED**
**Stage 2 Consultation on Restrictions**

# STAGE 2 RESPONSE OF AIRPORT COORDINATION LIMITED

## 1. INTRODUCTION

This is the response of Airport Coordination Limited (ACL) to the Stage 2 Consultation on Night Restrictions to apply from October 2005.

ACL is the appointed coordinator of Heathrow, Gatwick and Stansted airports, responsible for the allocation of airport slots and night quota.

ACL is not a policy-making organisation. Its comments on the consultation paper will, therefore, focus on administrative issues and the practicalities of the proposed regime.

## 2. AREAS OF SUPPORT

There are a number of proposals and decisions in the DfT's Stage 2 consultation paper that ACL welcomes and supports. These are:

- The decision to retain the existing QC system as part of a system of common arrangements across the designated airports
- The decision to retain the 9 EPNdB adjustment for arrivals
- The decision to introduce a QC 0.25 band without a weight limit on jet aircraft
- The decisions to introduce a QC 4 scheduling ban during the current night quota period 2330 – 0600, but **not** an operating ban
- The proposal to continue the existing provisions for the airport operator to disregard movements under certain circumstances
- The proposal to remove the rule relating to movements scheduled after 0630 that land before 0600
- The proposal to continue the present carryover / overrun arrangements, but keep the flexibility at 10% regardless of season length or the timing of Easter

## 3. DEFINTIITON OF THE NIGHT PERIOD AND NIGHT QUOTA PERIOD

ACL is **opposed in principle** to extending the night quota period (NQP) to cover the whole night period 2300 – 0700, even if limits were set to accommodate current levels of flying. It presented its detailed arguments against the idea in its response to the Stage 1 consultation, which were in summary:

- At Heathrow, that an extended period is unnecessary as there is no scope for growth in 0600 hour arrival capacity, which was the chief concern of the T5 Inspector, due to the already-high levels of airborne holding delay in the mornings.

- At Gatwick and Stansted, that an extended NQP would unnecessarily constrain the development of short-haul services that require early morning departures and late evening arrivals, and of long-haul services that require early morning arrivals.

- That the much larger number of flights operating in an extended NQP would be very complicated to administer and control.

- That it would not be possible to recreate the existing 'scheduling buffers', whereby unplanned use of night quota is minimised by not scheduling flights close to the 2330 and 0600 boundaries.

- At Heathrow in particular, that there is likely to be a large increases in the amount of airborne holding if flights scheduled just after 0700 were to avoid landing early within the extended NQP.

*Q: Would operators currently flying in the shoulder period switch to slots in the core night quota period 2330-0600?*

In ACL's view, extending the NQP is likely to increase the number of movements (and use of noise quota) in the core night period 2330 – 0600 for two reasons.

Firstly, there is likely to be some substitution of slots between the shoulder and core night periods. In particular, at Heathrow one would expect to see short-haul departures in the 0600 – 0700 hour converted into higher value pre-0600 long-haul arrivals.

Secondly, there would be more off-schedule operations within the core night period. Flights in the shoulder periods would be classified as 'night flights' with an allocation of night quota and could operate off-schedule in the core night period. Daytime flights delayed past 2300 may be more likely to operate after 2330 if there is no additional penalty for doing so. Since the night quota limits would be very much higher for an extended NQP, a larger pool (in absolute terms) would be retained to cater for such off-schedule operations.

*Q: Would extending the night quota period make the pattern of night flights less predictable from year to year?*

One of ACL's main arguments against extending the NQP, provided in response to Stage 1, was that night quota use would be more variable and complex to administer. The reasons for this are as follows:

- Many more flights would fall within the NQP, so a small *percent* variation in use is a large *absolute* amount.

- There would be many more flights scheduled close to the boundaries of the NQP so minor variations and disruptions in airline operations would lead to large fluctuations in the actual use of night quota.

- There would be many more airlines with flights within the NQP, making it more difficult to ensure that each had the necessary controls in place to manage their night quota use effectively.

These factors mean that night quota use over an extended NQP is likely to be much more variable. Before considering extending the NQP, the DfT would need to collect accurate data on actual numbers of movements and noise points used over a number of seasons.

It is not possible to compile this data retrospectively because determining QC values requires detailed knowledge each individual aircraft visiting the airport. This data has not been collected systematically for flights outside of the 2330 – 0600 core NQP. It is ACL's view that data for the shoulder periods is simply not of sufficient accuracy for the DfT to set appropriate limits.

*Q: Do you agree that the QC 4 scheduling ban should continue to apply only between 2330 – 0600?*

ACL agrees that, even if the NQP were extended, the QC 4 scheduling ban should only apply during the 2330 – 0600 core night period.

## 4. NEW QC 0.25 BAND

ACL supports the principle of introducing a new QC 0.25 band.

The DfT is aware that the new band means that a number of currently-exempt business jets will be classified as QC 0.25 and become subject to the night restrictions. This will have significant implications for the operators of these aircraft. Night quota will not be ring-fenced for their use and alternative airports such as Northolt, Farnborough, London City and Biggin Hill are all closed at night.

The precise effects of the new band are difficult to assess. The DfT has not published definitive data on historic QC use adjusted for the new QC 0.25 band.

ACL's best estimate of the effects is as follows:

*Heathrow*
No planned night flights will be reclassified as QC 0.25. BMI previously operated a mail service using an A321 aircraft, but this has since been replaced by Bombay and Riyadh services using an A330 aircraft rated at QC 0.5 on arrival.

*Gatwick*
The savings from the new QC 0.25 band is estimated at between 5-8%. Given the large variations in night quota use at Gatwick since September 11, this level of potential savings is within the margin of error of any projections of future quota requirements.

*Stansted*
The QC 0.25 savings are also estimated at roughly 8%, but movement use is expected to be about 6% higher due to the currently-exempt aircraft types that would count against the night movement limits.

Overall, the effect of introducing a QC 0.25 band is small and should not have a material effect on the noise quota limits set for the 2006 – 2012 period.

## 5. DISREGARDS

ACL supports the proposal to continue the existing provisions to disregard movements and quota in certain circumstances. The possibility to disregard these movements is essential for the smooth operation of the airports and to their ability to recover from disruption.

Managing the night restrictions is a complex process. The restrictions apply to the aircraft movements that <u>actually</u> occur during the night quota period. Administration requires controls over both the allocation of quota to planned night flights and the unplanned use of night quota by off-schedule operations.

To cater for these off-schedule operations, a pool of unallocated night quota is retained to cater for *'expected'* levels of unplanned use. However, there are exceptional circumstances that cannot be anticipated, such as:

- An unserviceable runway
- An ATC system failure
- Severe weather such as snow or thunderstorm activity
- Wildcat industrial action

These events are too unpredictable to incorporate into the pool provisions. For example, the London airports suffered disruption due snow on only 6 occasions in the past 10 years (according to ACL's records).

It should be noted that widespread and prolonged disruption to air traffic can result from a localised event lasting a relatively short period of time. For example, if one of the Heathrow runways is blocked for an hour in the morning then the entire days' operation will be severely impacted.

When severe disruption occurs, large volumes of flights will be delayed or cancelled. A key objective of the airline operators is to ensure that aircraft and crew are in position to resume normal operations as soon as possible. This means that it may be necessary to run late, encroaching on the night quota period, in order to prevent the disruption rolling into the following days.

It is therefore essential that the night restrictions regime retain provisions for the airport operator to disregard night movements (and quota) in such exceptional circumstances. The guidelines relating to the disregard provisions should reflect these operational realities.

It is also essential that the DfT take account of the fact that prudent pools of night quota are reserved for expected levels off-schedule operations. The DfT should not set movement and noise quota limits so close to outturn historic use that they confiscate this pool.

## 6. CARRYOVER AND OVERRUN ARRANGEMENTS

ACL welcomes the DfT's proposal to standardise the end-of-season flexibility arrangements at 10%. This level of flexibility should be sufficient to cater for variable factors such as the length of the seasons.

End-of-season flexibility is strength of the existing night restrictions regime. It creates strong incentives to manage the use of quota within the available limits, because any overuse must be paid back the next season (on a 2-for-1 basis in the case of an excessive overrun). It also allows for prudent planning to balance the use of quota in summer and winter seasons, especially when season lengths vary.

## 7. PROPOSED MOVEMENT AND QUOTA CONTROLS

### 7.1 Summary

ACL's views on the proposed limits for the current 2330 – 0600 night quota period are:

*Heathrow*

- The proposed cut in noise quota from Winter 2006/07 results in insufficient quota to sustain existing operations
- The proposed increase in the movements limit is welcomed. Allocation efficiency and incentives to reduce QC per movement would be maximised by permitting a step-increase in 2008 (with the opening of T5) rather than a phased increase

*Gatwick*

- The proposed movement and noise quota limits are insufficient to sustain existing operations
- The proposed year-on-year decrease in noise quota limits from 2006-2012 appears excessive and unsustainable
- The large decrease in winter limits would entrench current patterns of use and preclude the development of year-round services at the airport

*Stansted*

- The proposed year-on-year decrease in noise quota limits from 2006-2012 does not cater for planned growth of the airport and appears inconsistent with the White Paper plans for development of Stansted.

## 7.2 General Comments

Before presenting detailed arguments for its views, ACL wishes to make some general comments on setting appropriate movement and noise quota controls.

***The Use-it-or-Lose-it principle and incentives to use quieter aircraft***

One of the objectives of the night restrictions regime is to encourage airlines to invest in quieter aircraft. This incentive exists when airlines believe that they will be able to operate more night flights with the quieter aircraft as a return on their investment.

The DfT's proposed limits appear to 'shrink wrap' the limits around recent use and send a strong use-it-or-lose-it signal to the industry. This approach risks undermining the incentive properties of the scheme.

The 1999 decision to reduce Heathrow's noise quota limits sent such a message, and Heathrow has since used its full allotment of noise quota.

Gatwick and Stansted have reduced average QC per movement by 15% since 1999 through investment in newer, quieter aircraft. The DfT's current proposals claw back the benefit of this investment before a return can be realised.

The DfT should, therefore, consider the impact of its proposals on incentives and the message they send about the value of future investment in quieter aircraft.

***The principle of Grandfather Rights***

A basic principle of slot allocation is the concept of 'grandfather rights'. This entitles an airline to the continued operation of its slots, subject to an 80% usage requirement. The EU Slot Regulation(*) defines a slot as a permission to use the full range of airport infrastructure necessary to operate an air service. Clearly an adequate allocation of night quota is a necessary part of a 'slot' at night.

The DfT's proposals for Heathrow and Gatwick do not provide sufficient night quota for airlines to continue to exercise their existing grandfather rights. There is no established mechanism for apportioning such reductions amongst operators, nor is it obvious to ACL what such a mechanism might be or how it could be enforced.

***Variability in use***

The DfT's proposals are based mainly on data from the Winter 2002/03 and Summer 2003 seasons. This is not a robust approach. In setting appropriate limits, the DfT must consider use over a broader period.

(*) *Article 2(a) of Council Regulation (EEC) 95/93 as amended by Regulation (EC) 793/2004*

The 2002/03 year was probably the least representative period of the past six years. It was severely affected by the post-September 11 restructuring in the airline industry, the Iraq War and SARS, and the takeover of KLMuk/Buzz by Ryanair and GO by easyJet at Stansted.

***Managing actual use of night quota***

It is deceptive to look at the end-of-season outturn use of the movement limits and noise quota and conclude that the airport has 'spare' quota. Managing the use of night quota use is not so exact.

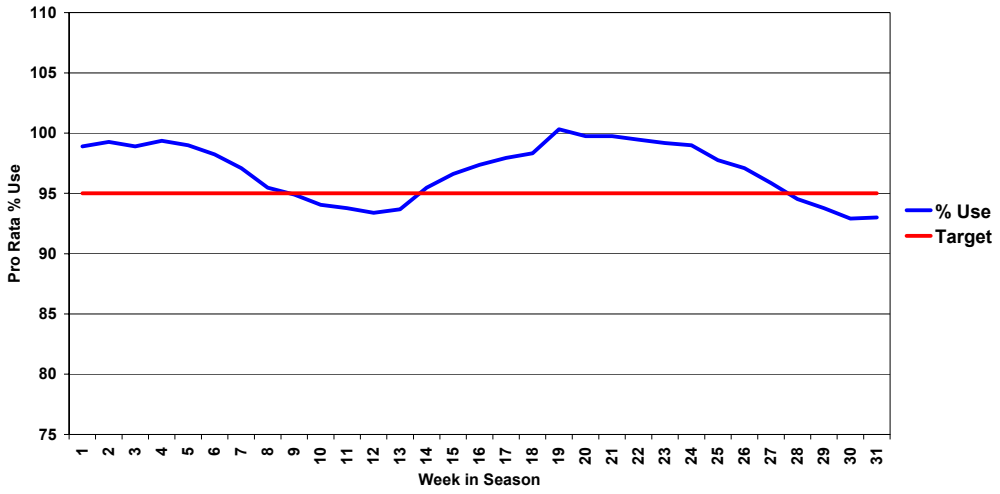
For example, during Summer 2004 Heathrow appeared to only use 93% of the available noise quota, but Heathrow plans to under use its summer quota by 5% to retain a carryover for the following winter season. Therefore, use was actually 98% of the airport's target.

The 98% use figure still understates the scarcity of noise quota at the airport, however. Figure 1 illustrates the pro rata use of noise quota during the season. Use was above target at the start of the season and corrective measures were implemented after only the fourth week. These included the rescheduling and tactical delay of early morning arrivals, and strict controls on late-running services that resulted in departures being delayed to the next day and the diversion of inbound aircraft to other airports.

The measures were effective and use of quota was on target by week 10. However, pro rata use rose again from late June (week 13) due to a variety of factors, including a 2% jump in the first week of August (week 19) following severe thunderstorm activity. Further corrective measures were implemented, which included the downgrading of a service from a B747-400 to B777-200 aircraft (QC 2 to QC 0.5), but the airport did not recover to its target level of quota use until the end of September.

Clearly such corrective measures have costs in terms of disruption to passengers, costs to airlines, and environmental disbenefits such as an increase in early morning airborne holding. No-one should conclude that an airport is operating with 'spare' quota in such circumstances.

Figure 1: Heathrow Summer 2004 Noise Quota Use




***Maximum practical use of quota***

In managing use of night quota, the industry is prudent and averse to exceeding the permitted limits. Each airport retains a pool of unallocated night quota for ad hoc or unplanned use. Given this prudence, the limits will be under used on average.

It is ACL's view that it is not practical to use more than about 95% of the quota limits on a consistent basis. Heathrow has operated at about 98% use of noise quota, but this followed the severe cut in quota imposed by the Government in 1999 when it became necessary to operate with less contingency than is ideal.

Therefore, the DfT should allow at least a 5% contingency factor when setting the limits for the future.

## 7.3 HEATHROW LIMITS

### Noise Quota

It is ACL's view that the DfT's proposed cut in noise quota from the Winter 2006/07 season is not feasible.

Noise quota, rather than movements, has been the limiting constraint on night flying at Heathrow since 2002. The available noise quota is fully allocated, so the DfT's proposal implies a cut in overall night flying at the airport. There is no mechanism to apportion such a cut amongst night operators.

The noise abatement objective for Heathrow is to avoid allowing an increase in noise above what was permitted in 2002-03. ACL believes that this objective would be met by maintaining noise quota at current levels throughout the 2006 – 2012 regime.

*Apportioning a Quota Cut:*

The issue of how the proposed cut in noise quota might be apportioned is an immediate practical problem. About 55% of Heathrow's quota is currently allocated to British Airways. The remainder is distributed amongst a number of other airlines, typically operating one daily service each. The DfT's proposal represents 6% cut in the annual noise quota available.

Should this cut be apportioned pro rata amongst all night operators? How does an airline with one flight per day save 6% of its quota? If these small carriers are exempt from the cuts, would BA accept shouldering the full quota reduction – a cut equivalent to 11% of its allocation?

ACL does not believe that a practical mechanism exists for apportioning a cut in quota of this kind.

*Planned use of Carry-over:*

The apparent under use of the summer noise quota limit arises from the fact that Heathrow *plans* to carry-over 5% of its summer quota into following winter. This use of carry-over is necessary because there are proportionately more night flights in winter than summer due to the effects of daylight savings time.

Annex 1 shows that Heathrow's use of the 9750 noise points available per year is in excess of 98% which, as discussed above, is the maximum practical use.

*Effect of the QC 0.25 band:*

The DfT estimates that the QC 0.25 band permits a 2% reduction in noise quota. This is no longer the case. The 5-times-weekly night mail service previously operated by BMI using an A321 aircraft has been discontinued and replaced by A330 long-haul arrivals. Therefore, no planned night flights are now operated by aircraft that will be classified as QC 0.25.

*Airline Fleet Changes:*

All planned night flights at Heathrow are arrivals. About 80% are operated by QC 2 B747-400 aircraft. The rest are B777 or A330/340 aircraft rated at QC 0.5 or QC 1.

The only significant fleet change expected during the 2006 – 2012 period is the introduction of the A380. It will replace B747-400s operated by Singapore, Malaysian and Qantas, and an A340-600 operated by Virgin Atlantic.

If the A380 is certified as QC 1 on arrival, then there will be an overall noise quota savings of about a 10% by 2008. If the A380 is certified as QC 2 on arrival then it provides no noise benefit over the B747-400, and creates a requirement for 365 *additional* QC per annum to accommodate Virgin Atlantic.

**Movement Limits**

ACL welcomes the proposed 10% increase in night movements.

However, if the DfT proceeds with its proposed cut in noise quota then it is very unlikely that the additional movements can be used. Heathrow is already slightly under using its available night movements due to a shortage of noise quota.

Even with current levels of noise quota are maintained, utilisation of the extra movements will require an 11% improvement in QC per movement over 2004-05 levels. An improvement of this magnitude becomes feasible if the A380 is certified as QC 1 on arrival.

Efficient allocation of the additional movements would be facilitated if they were made available in one step. ACL recommends that the increase occur in 2008 to coincide with the opening of T5 (providing necessary terminal and stand capacity) and the entry into service of A380s in significant numbers.

**Alternative Proposal**

The table below gives ACL's view of the movements and noise quota required at Heathrow for the period 2006 – 2012. Noise quota limits are maintained at existing levels – the minimum necessary to continue current levels of night flying. The 10% increase in movements is made available in from Summer 2008.

**Table 1: Heathrow Movement Limits and Noise Quota Recommendation**

| | 2004-05 existing | 2005-06 rollover | 2006-07 | 2007-08 | 2008-09 | 2009-10 | 2010-11 | 2011-12 |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | **movement limits** | |
| Winter | 2550 | 2550 | 2550 | 2550 | 2820 | 2820 | 2820 | 2820 |
| Summer | 3250 | 3250 | 3250 | 3600 | 3600 | 3600 | 3600 | 3600 |
| | | | | | | | | **noise quota** |
| Winter | 4140 | 4140 | 4140 | 4140 | 4140 | 4140 | 4140 | 4140 |
| Summer | 5610 | 5610 | 5610 | 5610 | 5610 | 5610 | 5610 | 5610 |

## 7.4 GATWICK LIMITS

### Environmental Objective

The proposed environmental objective for Gatwick seeks to avoid increases in aircraft noise during the night quota period above 2002/03 levels. In contrast, the corresponding objective for Heathrow relates to the levels permitted in 2002/03, and for Stansted envisages permitting expansion of the airport's overall traffic in line with the White Paper objectives.

The year 2002/03 is arbitrary – it was the most recent year of data available when the DfT wrote its Stage 1 consultation paper. It was also a highly unrepresentative year, particularly at Gatwick.

Gatwick underwent a major upheaval following the events of September 11, 2001. British Airways adopted a strategy of consolidation on Heathrow as far as possible, reducing numbers of long-haul arrivals in the night quota period. EasyJet began to grow rapidly at the airport, and competition from low cost carriers generally led to structural changes in the leisure market and for charter carriers.

The year 2002/03 was the nadir of Gatwick's transition. Since then, overall traffic and use of night quota at the airport has recovered robustly.

Night movements grew by 14% in Summer 2004 (versus 2003) to 10,249. Growth in Summer 2005 is a further 6%, so Gatwick is expected to match is pre-September 11th high of about 10,900 movements by the end of the season. This represents 97.3% use of the airport's summer season movement limit of 11,200 – a percentage that ACL considers to be the maximum achievable use.

ACL's view is that Gatwick's environmental objective should be in line with the Heathrow objective and relate to the levels of night noise permitted under the current regime.

### Movement Limit and Noise Quota

*Demand for night flying:*

Night flying has long been essential to the viability of charter carriers that rely on operating three aircraft rotations each day to achieve high aircraft utilisation. The low cost carrier model achieves high aircraft utilisation by flying long operating with the final arrival landing just before midnight.

Under both of these business models, the viable utilisation of airport slots throughout the day is dependent upon the possibility of operating during the night quota period.

Gatwick has also begun to develop new long haul services as carriers from India, Africa and the Middle East see it as an alternative to Heathrow. The availability of night quota has facilitated the entry of these carriers and furthered the UK Government's efforts to liberalise air service agreements with such countries.

*Summer season requirements:*

The above analysis shows that Gatwick is once again fully utilising its summer movement limit of 11,200.

Currently, the average summer QC per movement is 0.77, which is 13% quieter than in Summer 2000. Adjusting for the new QC 0.25 band (a 5-8% savings) gives an average QC per movement in a summer season of about 0.73.

Therefore, the minimum number of noise points required to support an 11,200 movement limit is 8200. This is a 9% less than the 9000 noise points available under the current regime.

A limit of 11,200 movements makes no allowance for currently-exempt aircraft that will be classified as QC 0.25. Such movements would be effectively barred from the airport at night under a constraining regime of night restrictions, as at Heathrow.

*Winter season requirements:*

The current regime apportions the noise quota between seasons roughly in proportion to number of months in each season, giving a summer-to-winter ratio of 7:5. The movement limit is somewhat skewed towards the summer season with a ratio close to 2:1. This summer skew was a compromise reached during the consultations leading up to the 1999 decision on the current night restrictions. The Government's original proposal had been to apportion both movements and noise quota according to season length.

The DfT's current proposal, calling for deeper cuts in the winter season, is a radical departure from this balanced approach and would instead 'shrink wrap' the limits around recent outturn use. These proposals would ossify Gatwick in its current pattern of summer and winter traffic and preclude the development year-round services.

ACL recommends that the DfT maintain the 7:5 ratio of noise quota between seasons, so that its counter proposal of 8200 summer noise points equates to 5900 points in a winter season. This represents an 11% cut in noise quota compared with the current noise quota of 6640 points.

Gatwick's average QC per movement is slightly higher in winter than summer seasons (0.87 versus 0.77 in 2004). This is because there is a smaller proportion of quieter short-haul aircraft in the winter fleet. Adjusting for the effect of the QC 0.25 band, the winter average QC per movements is about 0.83. A noise quota of 5900 points would, therefore, equate to about 7100 movements. This is somewhat higher than the current winter movement limit of 5250, and ACL recognises that such an increase may not be considered acceptable.

ACL is not arguing that a winter noise quota of 5900 is currently required. Rather it would be a continuation of the balanced approach adopted by the Government previously, and one that leaves scope for Gatwick to develop more year-round services.

**Alternative Proposal**

The table below gives ACL's view of the movements and noise quota required for the period 2006 – 2012. Movement limits are unchanged from the current regime. The noise quota is based on the minimum necessary to sustain existing summer operations. Winter noise quota maintains the current 7:5 ratio between summer and winter limits.

**Table 1: Gatwick Movement Limits and Noise Quota Recommendation**

| | 2004-05 existing | 2005-06 rollover | 2006-07 | 2007-08 | 2008-09 | 2009-10 | 2010-11 | 2011-12 |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | **movement limits** |
| Winter | 5250 | 5250 | 5250 | 5250 | 5250 | 5250 | 5250 | 5250 |
| Summer | 11200 | 11200 | 11200 | 11200 | 11200 | 11200 | 11200 | 11200 |
| | | | | | | | | **noise quota** |
| Winter | 6640 | 6640 | 5900 | 5900 | 5900 | 5900 | 5900 | 5900 |
| Summer | 9000 | 9000 | 8200 | 8200 | 8200 | 8200 | 8200 | 8200 |

## ANNEX 1: HEATHROW MOVEMENT AND NOISE QUOTA USE

**WINTER**

| Season | Mvt Limit | Mvt Target | Mvt Use | Mvt % of Limit | Mvt % of Target | QC Limit | QC Target | QC Use | QC % of Limit | QC % of Target | QC/Mvt Used |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1999/00 | 2550 | 2662 | 2529 | 99% | **95%** | 4140 | 4420 | 3972 | 96% | 90% | 1.57 |
| 2000/01 | 2550 | 2712 | 2615 | 103% | **96%** | 4140 | 4420 | 4118 | 99% | 93% | 1.57 |
| 2001/02 | 2550 | 2712 | 2684 | 105% | **99%** | 4140 | 4420 | 4257 | 103% | 96% | 1.59 |
| 2002/03 | 2550 | 2712 | 2620 | 103% | 97% | 4140 | 4420 | 4316 | 104% | **98%** | 1.65 |
| 2003/04 | 2550 | 2712 | 2683 | 105% | 99% | 4140 | 4420 | 4425 | 107% | **100%** | 1.65 |
| 2004/05 | 2550 | 2712 | 2591 | 102% | 96% | 4140 | 4420 | 4361 | 105% | **99%** | 1.68 |

**SUMMER**

| Season | Mvt Limit | Mvt Target | Mvt Use | Mvt % of Limit | Mvt % of Target | QC Limit | QC Target | QC Use | QC % of Limit | QC % of Target | QC/Mvt Used |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 2000 | 3250 | 3088 | 3028 | 93.2% | **98.1%** | 5610 | 5330 | 4967.5 | 88.5% | 93.2% | 1.64 |
| 2001 | 3250 | 3088 | 2939 | 90.4% | **95.2%** | 5610 | 5330 | 4694 | 83.7% | 88.1% | 1.60 |
| 2002 | 3250 | 3088 | 2937 | 90.4% | **95.1%** | 5610 | 5330 | 5051 | 90.0% | 94.8% | 1.72 |
| 2003 | 3250 | 3088 | 2889 | 88.9% | 93.6% | 5610 | 5330 | 5156.5 | 91.9% | **96.7%** | 1.78 |
| 2004 | 3250 | 3088 | 2993 | 92.1% | 96.9% | 5610 | 5330 | 5215.5 | 93.0% | **97.9%** | 1.74 |

**SUMMER + WINTER**

| Season | Mvt Limit | Mvt Target | Mvt Use | Mvt % of Limit | Mvt % of Target | QC Limit | QC Target | QC Use | QC % of Limit | QC % of Target | QC/Mvt Used |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 2000/01 | 5800 | 5800 | 5643 | **97.3%** | **97.3%** | 9750 | 9750 | 9085.5 | 93.2% | 93.2% | 1.61 |
| 2001/02 | 5800 | 5800 | 5623 | **96.9%** | **96.9%** | 9750 | 9750 | 8951 | 91.8% | 91.8% | 1.59 |
| 2002/03 | 5800 | 5800 | 5557 | 95.8% | 95.8% | 9750 | 9750 | 9367 | **96.1%** | **96.1%** | 1.69 |
| 2003/04 | 5800 | 5800 | 5572 | 96.1% | 96.1% | 9750 | 9750 | 9581.5 | **98.3%** | **98.3%** | 1.72 |
| 2004/05 | 5800 | 5800 | 5584 | 96.3% | 96.3% | 9750 | 9750 | 9576.5 | **98.2%** | **98.2%** | 1.71 |

## ANNEX 2: GATWICK MOVEMENT AND NOISE QUOTA USE

| WINTER Season | Mvt Limit | Mvt Use | Mvt % of Limit | QC Limit | QC Use | QC % of Limit | QC/Mvt |
|---|---|---|---|---|---|---|---|
| 1999/00 | 5250 | 2854 | **54%** | 6820 | 3189.5 | 47% | 1.12 |
| 2000/01 | 5250 | 3431 | **65%** | 6820 | 3689 | 54% | 1.08 |
| 2001/02 | 5250 | 2864 | **55%** | 6680 | 2582 | 39% | 0.90 |
| 2002/03 | 5250 | 2976 | **57%** | 6660 | 2358.5 | 35% | 0.79 |
| 2003/04 | 5250 | 2730 | **52%** | 6640 | 2468 | 37% | 0.90 |
| 2004/05 | 5250 | 3000 | **57%** | 6640 | 2614.5 | 39% | 0.87 |

| SUMMER Season | Mvt Limit | Mvt Use | Mvt % of Limit | QC Limit | QC Use | QC % of Limit | QC/Mvt |
|---|---|---|---|---|---|---|---|
| 2000 | 11200 | 9967 | 89.0% | 9550 | 8809.5 | **92.2%** | 0.88 |
| 2001 | 11200 | 10890 | **97.2%** | 9550 | 8938 | 93.6% | 0.82 |
| 2002 | 11200 | 9358 | **83.6%** | 9060 | 6905 | 76.2% | 0.74 |
| 2003 | 11200 | 8978 | **80.2%** | 9030 | 6357.5 | 70.4% | 0.71 |
| 2004 | 11200 | 10249 | **91.5%** | 9000 | 7863 | 87.4% | 0.77 |

| SUMMER + WINTER Season | Mvt Limit | Mvt Use | Mvt % of Limit | QC Limit | QC Use | QC % of Limit | QC/Mvt |
|---|---|---|---|---|---|---|---|
| 2000/01 | 16450 | 13398 | **81.4%** | 16370 | 12498.5 | 76.4% | 0.93 |
| 2001/02 | 16450 | 13754 | **83.6%** | 16230 | 11520 | 71.0% | 0.84 |
| 2002/03 | 16450 | 12334 | **75.0%** | 15720 | 9263.5 | 58.9% | 0.75 |
| 2003/04 | 16450 | 11708 | **71.2%** | 15670 | 8825.5 | 56.3% | 0.75 |
| 2004/05 | 16450 | 13249 | **80.5%** | 15640 | 10477.5 | 67.0% | 0.79 |

## ANNEX 3: STANSTED MOVEMENT AND NOISE QUOTA USE

| WINTER Season | Mvt Limit | Mvt Use | Mvt % of Limit | QC Limit | QC Use | QC % of Limit | QC/Mvt |
|---|---|---|---|---|---|---|---|
| 1999/00 | 5000 | 1625 | 33% | 3110 | 1628 | **52%** | 1.00 |
| 2000/01 | 5000 | 2190 | 44% | 3220 | 2182.5 | **68%** | 1.00 |
| 2001/02 | 5000 | 2445 | 49% | 3330 | 2313 | **69%** | 0.95 |
| 2002/03 | 5000 | 2862 | 57% | 3440 | 2462 | **72%** | 0.86 |
| 2003/04 | 5000 | 2543 | 51% | 3550 | 2402.5 | **68%** | 0.94 |
| 2004/05 | 5000 | 3112 | 62% | 3550 | 2568 | **72%** | 0.83 |

| SUMMER Season | Mvt Limit | Mvt Use | Mvt % of Limit | QC Limit | QC Use | QC % of Limit | QC/Mvt |
|---|---|---|---|---|---|---|---|
| 2000 | 7000 | 4659 | 66.6% | 4350 | 4541.5 | **104.4%** | 0.97 |
| 2001 | 7000 | 5035 | 71.9% | 4500 | 4541.5 | **100.9%** | 0.90 |
| 2002 | 7000 | 5297 | 75.7% | 4650 | 4284 | **92.1%** | 0.81 |
| 2003 | 7000 | 4832 | 69.0% | 4800 | 4042.5 | **84.2%** | 0.84 |
| 2004 | 7000 | 5390 | 77.0% | 4950 | 4420 | **89.3%** | 0.82 |

| SUMMER + WINTER Season | Mvt Limit | Mvt Use | Mvt % of Limit | QC Limit | QC Use | QC % of Limit | QC/Mvt |
|---|---|---|---|---|---|---|---|
| 2000/01 | 12000 | 6849 | 57.1% | 7570 | 6724 | **88.8%** | 0.98 |
| 2001/02 | 12000 | 7480 | 62.3% | 7830 | 6854.5 | **87.5%** | 0.92 |
| 2002/03 | 12000 | 8159 | 68.0% | 8090 | 6746 | **83.4%** | 0.83 |
| 2003/04 | 12000 | 7375 | 61.5% | 8350 | 6445 | **77.2%** | 0.87 |
| 2004/05 | 12000 | 8502 | 70.9% | 8500 | 6988 | **82.2%** | 0.82 |