

Manston Airport – Proposed Night-time Flying Policy

Submitted to Thanet District Council 27 October 2011

Background

1. In 2009, following the potential start of dedicated cargo operations by British Airways World Cargo, Thanet District Council (TDC) requested Manston Airport (MSE) to develop and submit to the council a Night-time Flying Policy (NTFP) pursuant to clauses 1.2 and 1.3 of the Second Schedule to the Section 106 agreement dated 26 September 2000 between TDC and MSE. An initial outline was presented on 17 August 2009, which was subsequently further developed, with a full submission being made on 28 September 2010.
2. TDC considered this proposal and commissioned a technical review from Bureau Veritas. As a result TDC have asked the airport to reconsider and provide further information on various aspects of the proposal. This has now been undertaken and the proposal contained herein is now submitted for the Council's consideration.
3. For airports to prosper and fulfil their potential in stimulating economic activity, they must be in a position to serve the needs of the markets in which they operate. Equally important, the operation and development of an airport must be acceptable to the resident and business communities within which they are located.
4. Clearly the issue of night-time noise is significant for residents in close proximity to the airport. This is the reason that many airports have specific policies governing, and sometimes limiting, their night-time activity.

Section 106 Agreement

5. The agreement between TDC and the airport which governs the permitted activity of the airport was entered into in 2000. In respect of night-time flying it sets out the limitations on such operations until a "Night-time Flying Noise Policy" is in place. Clause 1.1 of the Second Schedule states:

"The Owner agrees not to cause suffer or permit any Regular Night Flying Operations at any time (subject to Paragraph 1.4 below) before a Night-time Flying Noise Policy shall have been prepared and a copy lodged with the Council."

6. Further, it defines:

"Regular Night Flying Operation means Flight movements which are scheduled or programmed and which occur frequently or regularly to the same or similar patterns for the same operator during Night-time"

Master Plan

7. National Aviation Policy is set out in the Future of Air Transport White Paper (FATWP) published in 2003. The key strategic policy established was that most effective use should be made of existing runways, in order to delay or remove the need to construct new runways, or indeed airports. On taking office in 2010 the Coalition Government stated that new runways would not be built at any of the three major London airports – Heathrow, Gatwick or Stansted. This decision has strengthened the case to make best use of existing runway capacity as growing demand for air travel and transport will need to be accommodated within existing runway capacity. This national policy further increases the prospects for future demand at Manston.
8. Amongst the requirements contained in the FATWP was that for airports to produce Master Plans for their development over the following 25 years. These are to be used by local and regional planning authorities to inform the development of planning policy. Manston Airport, then trading as Kent International Airport, published its draft Master Plan for consultation in October 2008. Following a wide-ranging public debate, with comments received from many interested parties, notably TDC, the final Master Plan was published in November 2009, taking account of the points raised.
9. TDC has, at full council, received the Master Plan and resolved that in due course officers will prepare supplementary planning guidance regarding the airport.
10. The Master Plan lays out the prospects for traffic growth at Manston Airport, together with the potential land use developments needed to accommodate this increase in activity. It also identifies the economic impacts that such growth may be expected to bring.

	2010	2018	2033
Passengers	<50,000	2,286,000	4,752,000
Freight	31,600	167,500	401,200

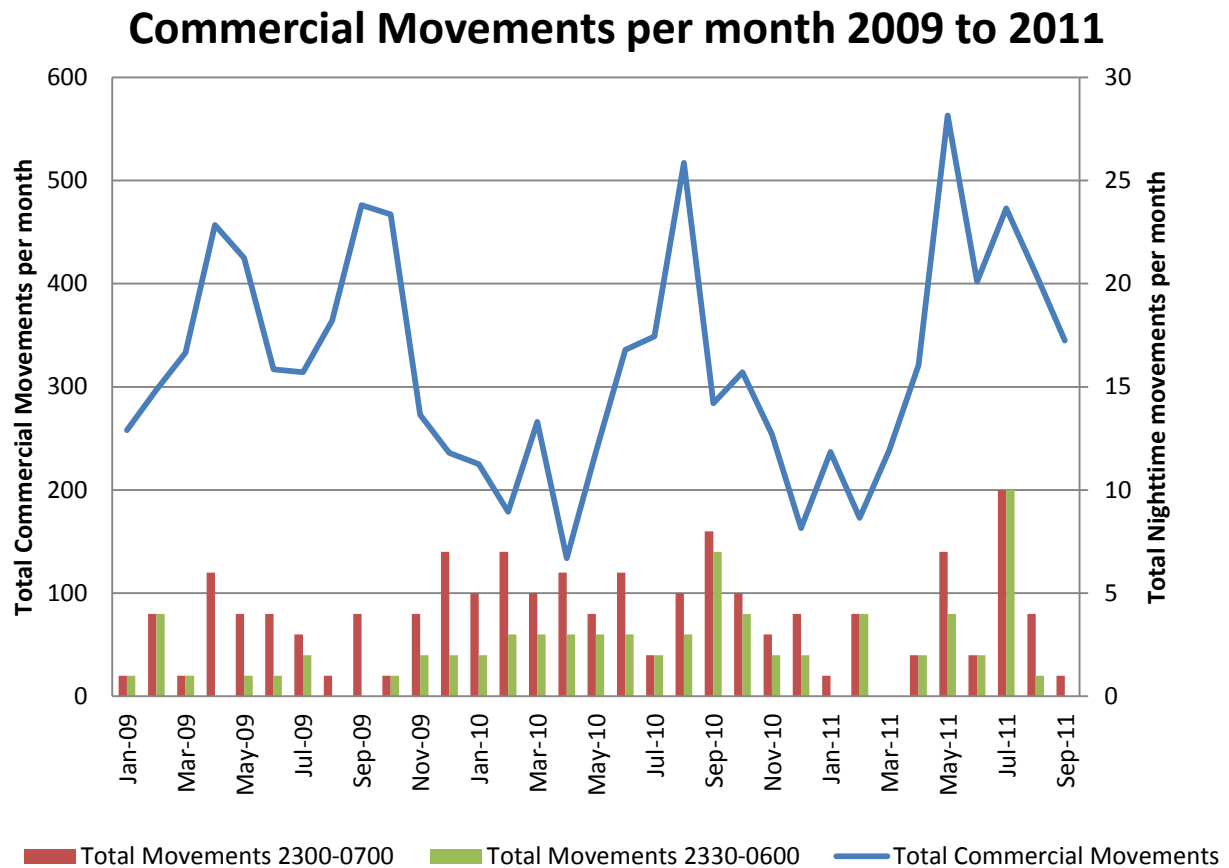
The actual traffic levels achieved in 2010 were 26,300 passengers and 28,374 tonnes of freight, broadly in line with the forecast. Total aircraft movements in 2010 were slightly below the Master Plan forecast, being 15,015 against a forecast of 18,084.

11. It is expected that the majority, but a declining proportion of aircraft movements will be made by light aircraft. Of the current commercial flights, approximately half are passenger related. Passenger traffic is forecast to grow at a substantially faster rate over the Master Plan period, accounting for almost 90% of commercial movements by 2018.

Manston Airport today

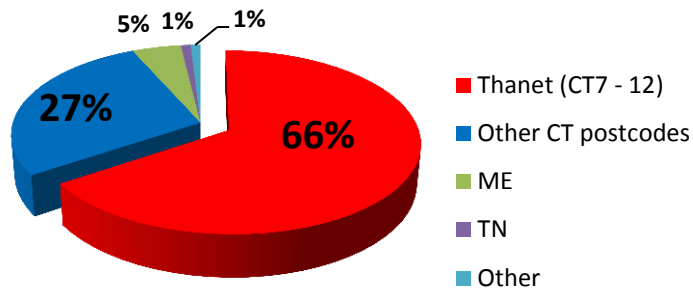
12. Consistent with the Section 106 agreement with TDC, there are no Regular Night Flying Operations at Manston. Such activity as there exists is unplanned and ad hoc, not operating to a planned schedule. The current level of movements during night-time varies from month to month. There is no direct correlation to the overall level of business, nor the level of commercial traffic. The need for unplanned night movements is driven by operational disruption to airlines' schedules caused by a variety of factors including technical faults, weather impacts and logistic delays.

13. The graph below shows the monthly record of movements from January 2009 to September 2011, compared with the level of night-time activity between 2300 and 0700, and between 2330 and 0600. In the 12 months to September 2011, a total of 43 aircraft movements were recorded between 2300 and 0700, of which 31 occurred between 2330 and 0600.



14. Today some 110 staff are employed by the airport, with approximately a further 40 employed in servicing the operation of the airport in areas such as aircraft engineering, flying schools and catering to passengers. In addition another 100 people are employed in aviation related businesses and with airport tenants.
15. Of the airport’s direct employees the majority live in Thanet, with the reminder living mostly in East Kent. This is a usual feature of airport employment, where shift working is the norm and main employment is for semi-skilled labour. The annual payroll for the airport’s employees is in excess of £2.2m pa, two thirds of which is paid to residents of Thanet. In itself, this makes a substantial contribution to the local economy.

Manston Airport Employees August 2011 by postcode



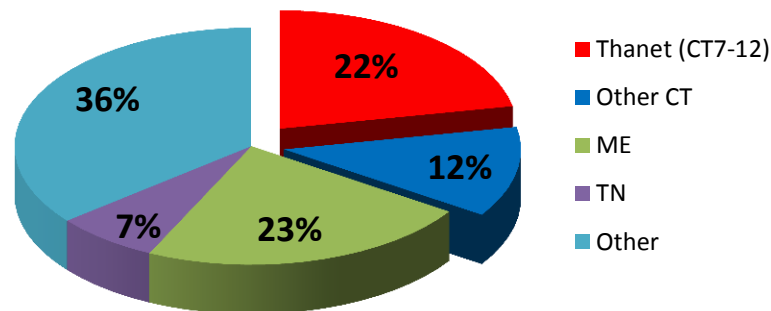
16. The distribution of employment within Thanet is shown on the map below (by postcode). This demonstrates that the key employment areas are CT12, CT9 and CT11. Given that the growth of employment as the airport develops will be of the same broad characteristics, it is reasonable to predict that these areas too will provide the bulk of the new employees.



17. The airport is committed as far as possible to recruiting from the local labour market. It already places all external vacancy notices with JobCentre Plus. For future development, it has contacted with Christ Church University, Thanet College and Employ Thanet with a view to establishing a programme that identifies the skills needs for the newly created job opportunities, and delivers suitable training to local people allowing them to access these posts as they become available. It is fundamental to the success of Manston, as with other airports, to have a local and flexible labour force able to respond to the changing needs of airlines and passengers.

18. Procurement policies at Manston seek, wherever possible to source goods and services from local suppliers. Excluding fuel purchases, over 12 months in 2010 and 2011 external procurement amounted to over £1m. Of this more than 64% was sourced within Kent, with 22% locally in Thanet.

Manston Airport Procurement 2010/11 by postcode



Economic Value of Manston Airport

19. Manston Airport has commissioned a study of the economic impact of the airport within the local economy – “Manston Airport, Economic Impact of Night Flying Policy, August 2011”. This report, carried out by York Aviation LLP, recognised authorities in the economic assessment of aviation, identified the operational activity of the airport currently generated £4.5m GVA (Gross Added Value) of which some £3.8m is within the Thanet economy. A copy of this report is supplied with this submission.
20. The study further assessed the impact of development in line with the published Master Plan, showing that, at the 2018 traffic levels, the airport’s operation would support direct employment of over 2000 jobs, with a further 1000 indirect and induced in the wider economy. This level of employment would generate £65m GVA.
21. The substantial growth in airport activity and through this in economic benefit in employment and GVA will come from attracting airlines to base aircraft to operate from Manston. Such aircraft will offer multiple services each day to a variety of destinations, serving a range of different market needs. With this activity will come a wider range of employment opportunities, including flight crew (pilots), cabin crew, aircraft engineering support, station and general management.
22. Also assessed in the report was the impact of the imposition of a ban on scheduled traffic between 2300 and 0700. The report assessed the impact that such an imposition would have on the ability of the airport to attract new business and in particular to secure an airline to base aircraft at Manston. It considered that, given the likely impact on the flexibility of operation, such a ban would have a severe restraint on the ability of the airport

to develop both in the passenger and the cargo sectors. The consequent loss of economic activity generated by the airport would amount to £30m GVA and some 1450 jobs lost.

23. The report also commented on the impact that this limit on night-time operations would have on the financial viability of the airport. It noted that

“if the Airport cannot be made profitable with the restricted operations, then its long term future may be put in jeopardy, along with all the jobs and GVA created by it locally.” (Paragraph 5.4)

24. The management and shareholders of the airport take a more robust position, viewing that the level of profitability likely to be able to be generated with these restrictions on the development of the business would be unlikely to support the on-going operation of the airport, together with the replacement of its aging assets. Without the confidence that the airport is able to develop to its full potential, and at the same time maximising the economic benefits for the area, the shareholders will have to consider their investment.

Market need for Night-time Flying

25. For the airport to grow in line with its Master Plan development, and to realise the full potential of its beneficial social and economic impact in the local area, the operation and service it offer has to be attractive to airlines. This requires the airport to be economically viable in the medium term, allowing airlines to choose to locate their operations at Manston with confidence that they will be able to develop their business there over many years. The flexibility of the airport in meeting the needs of its airline customers is key to attracting and developing operations.
26. The commercial success of the airport can only flow from increasing the business and traffic that is handled, and doing so efficiently and cost effectively for airlines and users (both passenger and freight). In particular, at the levels of business currently handled at Manston, the substantial fixed establishment costs (Security, Fire Service, Air Traffic Control, Infrastructure maintenance) associated with operating an airport at low volumes are not covered by the revenue generated. The airport is operating at a current loss in the region of £3m pa.
27. The financial viability of both any particular route an airline operates, and, indeed, the airline as a whole is dependent on maximising the passengers and/or cargo carried. This is a function of both the market area it seeks to serve, and maximising the flying time that can be achieved in any operating period. Evidence of this is shown in the constant pressure of low fare airlines to reduce their turn around times at all airports, seeking to get the aircraft back into the air and earning a return as quickly as possible. This basic principle of airline operations necessarily leads to a desire to maximise the flying times at the airports served.
28. It is a common feature of airports that satisfying this customer need requires operations between 2300 and 0700. The table below sets out the scheduled passenger arrivals at a range of airports over the night of 12/13 October 2011. It should be noted that this date is not at the height of the holiday season and so could be seen as an unexceptional day.

Scheduled Passenger Arrivals – 12/13 October 2011

London Gatwick		Stansted		Birmingham International		Bristol		East Midlands		Leeds Bradford	
Lisbon	23:00	Shannon	23:00	Kos	23:25	Glasgow	23:00	Fuerteventura	23:30	Malta - Luqa	23:40
Alicante	23:20	Seville	23:00	Rzeszow	23:30	Edinburgh	23:00	Palma	23:35	Malaga	23:55
Funchal	23:20	Dublin	23:05	Palma	23:40	Tenerife	23:10	Berlin	23:40	Arrecife	00:05
Malaga	23:35	Ibiza	23:05	Fuerteventura	23:50	Wroclaw	23:15	Murcia	23:50	Tenerife (South)	01:50
Pisa	23:40	Jerez	23:10	Malaga	23:55	Fuerteventura	23:30	Fuerteventura	00:25		
Malaga	23:45	Barcelona	23:15	Fuerteventura	00:30	Malaga	23:45				
Rhodes	23:45	Krakow	23:15	Tenerife	00:30	Palma	23:55				
Chania	23:50	Girona Barcelon	23:15	Larnaca	01:05	Herahlion	00:00				
Fuerteventura	23:50	Pescara	23:20	Fuerteventura	01:10	Paphos	00:00				
Arrecife	23:55	Milan Bergamo	23:30			Malaga	00:55				
Catania	00:05	Pisa	23:30			Alicante	01:20				
Dalaman	00:05	Venice M Polo	23:30			Paphos	01:55				
Faro	00:05	Zaragoza	23:35			Rhodes	02:55				
Venice	00:15	Agadir	23:45								
Venice	00:15	Rome Ciampino	23:45								
Larnaca	00:20	Las Palmas	23:45								
Tenerife	00:30	Wroclaw	23:55								
Las Palmas	01:05	Larnaca	01:15								
Fuerteventura	01:10	Rhodes	06:05								
Paphos	01:10										
Luxor	01:25										
Faro	01:35										
Sharm el Sheikh	01:40										
Paphos	02:15										
Izmir	02:40										
Dalaman	03:00										
Dalaman	04:15										
Las Palmas	04:40										

29. On occasions flights are delayed for a variety of causes (aircraft technical problems, airport congestion, weather etc.). Given the intensive nature of aircraft utilisation on both passenger and cargo services, such disruption can take many subsequent operations to recover. In the case of passenger services, where there is often a night-time cleaning and maintenance period, time lost on the first service of the day is frequently not recovered until the end of that day's schedule. For cargo operations, which do not operate to the same 24 hour cycle, and where disruption can regularly be many hours, disruption to scheduled services can take days to recoup.
30. It is vital to the airline's customers that flights are completed, albeit late, so that passengers are delivered on holiday or returned home, and that cargos are transported to the ultimate destinations. Failure to meet these commitments damages the reputation of airlines and their position in the market.
31. Where an airline is not able to recover incurred delays, and indeed will suffer further lost time due to airport closure or curfews, this further disrupts the scheduled operation and has a severe impact on customers. Airlines have established contingency plans for such delays to occur and require flexibility from their airports to assist in re-establishing the scheduled pattern through accommodating off-schedule operations. An airport that cannot offer such flexibility is at a distinct disadvantage in attracting scheduled business and certainly the based aircraft that are the key to unlocking the potential of the airport as an economic engine.

Proposed Night-time Flying Policy

32. In order to regulate Night-time Flying at Manston Airport, it is proposed to adapt the Noise Quota system in regular and successful use at other airports (Bristol, Birmingham, Gatwick, Heathrow, Liverpool, Doncaster, Manchester and Stansted).
33. This system allocates a Quota Count (QC) to each arrival or departure, based on the aircraft manufacturer's certification operating at maximum weight. The total of these QC's as set out below, gives the Annual Quota Count.
34. In line with the comments received during the Master Plan consultation period from, amongst others, TDC's Airport Working Party and the Airport Consultative Committee, the proposed system has been devised to be simple and easy to apply, straight forward to monitor and to provide clarity and certainty for the local community, the Council and the airport operator.
35. The proposed Quota Count System for Manston Airport is as follows:
 - a. Night-time Period will be 2300 to 0700 local time.
 - b. Night-time Quota Period will be 2330 to 0600 local time.
 - c. Annual Quota Count will be the sum of the individual Quota Counts (QC) of all flights arriving or departing during the Night-time Quota Period within a calendar year (January to December).
 - d. Aircraft movements greater than QC4 will be prohibited during the Night-time Period.
 - e. Annual Quota Count not to exceed 1,593.
 - f. The total annual number of aircraft movements during the Night-time Quota Period will not exceed 659.
 - g. Preferred Departure Runway and Noise Abatement Routes as set out in clauses 4 and 5 respectively of the Second Schedule to S106 dated 26 September 2000 (runway 10 for arrivals and runway 28 for departures), to be used whenever possible during the Night-time Period consistent with safe operations.
36. To improve the current monitoring and reporting of night flights, each flight that operates during the Night-time Period will be reported monthly to Thanet District Council and the Airport Consultative Committee.
37. The airport will publish monthly noise data on its website to ensure that this is accessible to members of the public.

Impact Assessment

38. In conjunction with this proposal, the airport has commissioned and impact assessment of the potential noise that this level of activity may generate. A copy of this report – Aircraft Night Noise Assessment Report, October 2011 – is provided with this proposal. The report has been carried out by Bickerdike Allen Partners, leading experts in the assessment of noise surrounding airports. This study has assessed the extent of the noise contours that are predicted to result from the proposed level of activity, together with the dwelling and population counts within each contour. Further it considers the likely perception of the community exposed to these levels, in line with UK standard practice.

39. This study has been based on the activity level forecast in the Master Plan for 2018 combined with an internal assessment of the likely distribution of business through the day. The table below displays the estimated distribution of aircraft movements for 2018.

Estimated Average Daily Movement Profile	0700-2300	2300-2330	2330-0600	0600-0700
Passenger	49.6	2.8	0.6	2.8
Freight	5.1	0.4	1.2	0.4
Total	54.6	3.2	1.8	3.2

This indicates an average of less than two movements per night during the Night-time Quota Count Period, and demonstrates that less than 3% of the airport’s overall activity is expected to take place during this time.

40. Additionally, the Aircraft Night Noise Assessment Report has researched the night flying policies adopted at other airports in the UK. These demonstrate that, while there is no standard approach across all airports, many have based their controls on a similar scheme as proposed here.
41. Bickerdike Allen Partners have also recommended the performance characteristics of a sound insulation programme, including trigger points and installation acoustic performance. As part of this proposal, the airport intends to accept these recommendations and formulate a programme, in conjunction with Thanet District Council, which is targeted at providing these levels of sound insulation to properties exposed to trigger levels of night-time noise. Details of these recommendations are set out in the attached document “Sound Insulation Scheme – Key Proposals”.
42. This recommendation is that properties lying within the 57 dB $L_{Aeq,8hr}$ contour, which have not been constructed to suitable building standards and do not already possess suitable sound insulation, be provided with sound insulation to habitable rooms used as bedrooms. Over time and in a phased manner, the airport is committed to the same being applied to dwellings with the 55 dB $L_{Aeq,8hr}$ contour. In addition, those properties that are exposed to a level of 95dB(A) SEL on average once per night over a year will also become eligible for this treatment.
43. The assessment in the report shows that currently no dwellings fall within the trigger level contours and that, by 2018, some 72 dwellings lie within the 57 dB $L_{Aeq,8hr}$ contour and 512 within the 55 dB $L_{Aeq,8hr}$ contour that may become entitled to sound insulation. The programme to be agreed is proposed to comprise:
- Annual calculation of the previous year’s actual night-time noise 55 and 57 dB $L_{Aeq,8hr}$ contour
 - Forecast for the following annual night-time noise 55 and 57 dB $L_{Aeq,8hr}$ contour
 - Identification of properties exposed to 95dB(A) SEL on average once per night during the past year
 - Agreed eligibility criteria – covering construction date, existing acoustic performance, eligible rooms
 - Proposed treatments and target acoustic performance

Summary

44. This proposed policy for the management of night-time flying activity seeks to respond to the requirements of the existing Section 106 agreement in particular clauses 1.1, 1.2.1, 1.2.2 and 1.2.3 of the Second Schedule through:
- Establishing this policy in advance of any Regular Night Flying Operations
 - Not accepting movements of aircraft greater than QC4 between 2300 and 0700
 - By proposing to publish data related to night-time activity monthly on the airport's website
 - Adopting operating principles that are appropriate to the scale of operation of the airport and local conditions.
45. This proposal develops on the existing agreements and working practices and provides enhanced controls over the operation of the airport at night. The table below summarises these enhancements.

	Current Position	Proposal	Section 106 reference
Individual aircraft noise	Aircraft over QC4 between 2300 and 0700 pay Environmental Improvement Fund Contribution	No aircraft over QC4 may operate between 2300 and 0700	2 nd Schedule 1.2.1
Number of movements permitted	No limit	Limit of 659 movements between 2330 and 0600	
Overall Noise Exposure	No limit	Maximum of 1593 QC point per annum	
Preferred departure runway	Use Runway 28 as preferred departure runway subject at all times to safety, air traffic and weather requirements	Maintain this position	2 nd Schedule 4.1
Noise abatement routes	As set out in S106	Maintain this agreement	2 nd Schedule 5.1
Sound insulation scheme	None specified in relation to night-time flying	Provide sound insulation to properties within the night noise 57 dB $L_{Aeq,8hr}$ contour, the 95 dB(A) SEL contour (for regular nightly events) and ultimately the 55 dB $L_{Aeq,8hr}$ contour.	
Data availability	Night-time flying operations notified to Consultative Committee and TDC	Monthly publication on airport website of details of flights taking place between 2300 and 0700	2 nd Schedule 1.2.2