



Department for Transport,  
Great Minster House (1/26),  
33 Horseferry Road,  
London,  
SW1P 4DR

Direct line: (01732) 227315  
Ask for: Steve Craddock  
My ref:  
Your ref:  
Email: [steve.craddock@sevenoaks.gov.uk](mailto:steve.craddock@sevenoaks.gov.uk)

Date: 17 January 2014

Dear Sir / Madam,

## **NIGHT FLYING RESTRICTIONS AT HEATHROW, GATWICK AND STANSTED CONSULTATION DOCUMENT**

Sevenoaks District Council responded to the first stage of the Night Flying Restrictions consultation in April 2013.

The Council's response welcomed and concurred with the Government's recognition that 'noise from aircraft operations at night remains widely regarded as the least acceptable aspect of aviation noise'. It noted that the south west of Sevenoaks District, near Edenbridge, suffers disturbance as a result of night flights into and out of Gatwick airport.

The response expressed the Council's desire that the current position, where Gatwick airport has significantly higher permitted summer night movements and noise quota points limits than Heathrow and Stansted, should not be allowed to continue in the next round of regulations. It argued that a more equitable position should be achieved, especially with Stansted, and that this should be through a reduction in permitted night movements and/or noise limits at Gatwick.

Sevenoaks District Council does not propose to respond to each individual consultation question. However, it wishes to specifically respond to question 6:

*Do you agree that we should maintain the existing movement and noise quota limits until October 2017? If not, please set out your preferred options and reasons – this could include the noise and economic impact of any alternatives.*

Sevenoaks District Council strongly opposes the proposal to simply extend the current limits until October 2017. As the 'first stage' consultation noted, night flights are widely regarded as the least acceptable aspect of aviation noise. As such, they require periodic

Chief Executive: Dr. Pav Ramewal  
Council Offices, Argyle Road, Sevenoaks, Kent TN13 1HG  
Telephone: 01732 227000 DX 30006 Sevenoaks  
Email: [information@sevenoaks.gov.uk](mailto:information@sevenoaks.gov.uk)  
[www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)



review. The proposal to extend the current limits for 3.5 years follows a previous extension of the same limits for 2 years from March 2012. The lack of Government willingness to address these issues runs counter to its stated recognition that night flights are regarded as the least acceptable aspect of aviation noise. Without a comprehensive review in advance of the Davies Commission Report or sooner after its publication in 2015, the current inequitable situation where Gatwick has significantly higher permitted summer night movements and noise quota points limits than Heathrow and Stansted will be allowed to continue to the detriment of residents in Sevenoaks District.

In addition to these comments, SDC would like its 'first round' response (attached at appendix A) to be taken into account in this consultation, where relevant. In particular, the Council would request that Government has regard to the argument that strict limits above which landing aircraft should approach Gatwick airport should be adopted, especially at night, with meaningful penalties for non-compliance. The Council would also request that consideration is given to the introduction of meaningful night-time respite periods even if the current limits are extended to October 2017.

Yours faithfully

Cllr Ian Bosley  
Portfolio Holder for Local Planning and Environment

## **Appendix A: Sevenoaks District Council Response to the 1<sup>st</sup> Stage Consultation on Night Flight Restrictions**

### **NIGHT FLYING RESTRICTIONS AT HEATHROW, GATWICK AND STANSTED CONSULTATION DOCUMENT**

Sevenoaks District Council welcomes and concurs with Government's recognition that 'noise from aircraft operations at night remains widely regarded as the least acceptable aspect of aviation noise'. The south west of Sevenoaks District suffers disturbance as a result of night flights into and out of Gatwick airport.

It is noted that specific proposals for the next regime, such as the number of permitted night flights, will form the Government's second stage consultation on this issue. This consultation will be accompanied by a full impact assessment. Sevenoaks District Council has little specific evidence that it wishes to submit against the majority of the questions proposed by Government. However, it does wish to express at this early stage its desire that the current position, where Gatwick airport has significantly higher permitted summer night movements and noise quota points limits than Heathrow and Stansted, should not be allowed to continue in the next round of regulations. It is considered that a more equitable position should be achieved, especially with Stansted, and that this should be through a reduction in permitted night movements and/or noise limits at Gatwick. SDC has some specific comments that relate to a number of the consultation questions, as set out below.

**Q3: Do you have any views on how these objectives should change in the next night noise regime?**

**Q24: Do you have any views on the relative disturbance caused by the noise of an individual aircraft movement against the overall number of movements in the night quota period?**

**Q25: What are your views on the feasibility of a QC/8 and QC/16 operational ban in the night period? Please set out the likely implications of such a ban and, where possible, the associated costs and benefits.**

**Q27: What are your views on the feasibility of a QC/4 operational ban in the night quota period at any or all of the three airports? Please set out the likely implications of such a ban and, where possible, the associated costs and benefits.**

**Q28: Are there more cost-effective alternative measures (such as penalties) to reduce the number of QC/4 operations during the night quota period? p51**

**Q29: What are your views on the feasibility of an operational ban of QC/4 aircraft at any or all of the three airports during the shoulder periods? Please set out the likely implications of such a ban and, where possible, the associated costs and benefits.**

**Q40: Do you have any proposals for new or improved economic incentives that could be deployed to incentivise the use of quieter aircraft during the night period.**

As a headline target SDC considers that a reduction in the area of the 57 dB(A) daytime noise contour and 48 dB(A) night time noise contour by 10% should be achieved. However, it should also be recognised that this target is based on a metric which averages the noise energy over a period of many hours. It is noted that section 3 of the consultation document sets out how targets for the average noise levels over the period 2330 – 0600 have been met in recent years. Whilst average noise levels can be used as an indicator of annoyance, many individuals will react not to an average level but to the number of flights and those individual flights that stand out as being more noisy. This is a particularly important issue at night as an individual may find it difficult to return to sleep, or at least the most recuperative forms of sleep, once woken by a particularly noisy aircraft.

Disturbance may be related to the type of aircraft, which is considered by the night flights limits through the use of noise quota points. The proposal to impose an operational night-time ban on those noisier aircraft that are currently able to operate, as has been the case in previous reviews of the restrictions, is supported. Based on the very low levels of existing movements of aircraft with a QC/4 rating at Gatwick, there appears to be no reason why an operational ban on this type of aircraft could not be imposed in the 'night-time' (2330 – 0600) and 'shoulder' (2300 – 2330 & 0600 – 0700) periods. Increased fees during the night period for QC/4 operations, with lower fees for quieter aircraft, will reduce the number of flights and could be considered if the case for an outright ban is not accepted. In addition, new targets should be set to restrict the numbers or percentages of QC2 aircraft operating, even if it is not considered that a complete ban is desirable or achievable. These targets could be made progressively more challenging over the period.

The noise of an individual aircraft may also be related to the height of the aircraft. Strict limits above which landing aircraft should approach Gatwick airport should be adopted, especially at night, with meaningful penalties for non-compliance.

**Q4: Do you have any views on whether noise quotas and movement limits should apply only to the existing night quota period or to a different period?**

**Q31: What is the scope for introducing a respite period at Gatwick or Stansted? Please set out the associated costs and benefits.**

SDC considers that the night quota period should be extended to cover the period 23:00 to 07:00.

Given that, on average, less than 3 flights per hour operate between 0200 and 0500 at Gatwick, there appears to be a definite opportunity for introducing a respite period

between these times at the very least. It is noted that the shortest respite period of those airports at the other major cities quoted in the consultation document runs from 0000 to 0500. It must be ensured that any respite period, especially one as short as 0200 to 0500, does not lead to an increase in movements before and after the respite period.

**Q6: Do you have any views on the optimum length of the next regime and how this should align with the work of the Airports Commission?**

A five year review period appears sufficient.

**Q17: Do you have any views on the costs and benefits of a night-time runway direction preference scheme at Gatwick or Stansted?**

Future noise limits should consider the likely direction of aircraft movements. The consultation document reports that around 90% of night movements at Gatwick are arrivals. It is understood that, because of the prevailing winds, the result of this is that movements disproportionately impact upon communities to the east of the airport, as it is over these areas that landing aircraft most commonly approach the airport. Maintaining the current numbers of total movements but imposing limits on the numbers of arrivals and departures or setting out a runway direction preference scheme could have a substantial beneficial impact on communities to the east of the airport, including the south western parts of Sevenoaks District.

**Q20: Do you have any comments to make on the figures relating to movement limits and usage?**

**Q22: Do you have any comments to make on the figures relating to noise quota limits and usage?**

The current position, where Gatwick airport has significantly higher permitted summer night movements and noise quota points limits than Heathrow and Stansted, should not be allowed to continue in the next round of regulations. It is considered that a more equitable position should be achieved, especially with Stansted, and that this should be through a reduction in permitted movements and noise limits at Gatwick.

**Q39: Do you have any suggestions for changes to current compensation schemes or for new compensation schemes that might offset the impact of night noise on those exposed to it? For new schemes, please explain the parameters that you would suggest for the scheme and the rationale for choosing those parameters.**

A lower qualifying threshold for compensation schemes should be introduced paid for by a levy for night flights with QC/4 and above.

