

**By email only**

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My Ref:  
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Date: 27th August 2021

Dear Sir/Madam,

**Department for Transport Consultation: Night Flight Restrictions at Heathrow, Gatwick and Stansted airports beyond 2024, plus national night flight policy**

**Introduction**

Sevenoaks District Council (SDC) is a primarily rural local authority situated in West Kent. The Southern part of the district is impacted by flights arriving and departing from Gatwick as it is within Gatwick's flight paths. In light of this, the consultation questions are answered with an emphasis on Gatwick airport.

It is acknowledged that aviation is a significant sector to support business and leisure and also has benefits to the economy such as employment. However, the Council maintains its concerns regarding noise disturbance and its impact on local communities.

We have also chosen to respond to those questions most relevant to us as a local authority.

Please see our consultation response as below:

**Night flight dispensation review & revising night flight dispensation guidance**

**Q7 to Q24: Night flight dispensation review & revising night flight dispensation guidance**

Communities need to be reassured night flight dispensations occur minimally and should have access to information on flight dispensations. We hope the proposal for

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clarifying guidance on dispensations should ensure a fair and similar approach by all airports. A more transparent and accountable process with periodic reviews would be welcomed.

It is noted that throughout periods of the COVID-19 pandemic and associated lockdowns, there were not as many night flights and residents living within the vicinity of flight routes were able to have an appreciated respite from night-time airplane noise. It is crucial now that air operators are returning to a more robust flight schedule, including an increase of night flights, residents can be assured that the correct procedures are in place and followed for dispensations in order to maintain some degree of much required respite in the night period. Furthermore, it is understood Gatwick airport has had an increase of dispensations in the last few years. Whilst it is encouraging to see that there were less flight dispensations at all airports in 2019, it is necessary that this increasing pattern does not continue and so the guidance should be unequivocal regarding the criteria dispensation is allowed.

In our view, in light of the disturbance night flight dispensations cause communities, they should have reassurance that dispensations occur only in exceptional or emergency situations.

It should be noted that Gatwick Airport has an annual allowance of 14,450 night-time movements whereas Heathrow is permitted 5800 night flights. The busiest periods for Gatwick airport are between the early morning (05:00-07:00) and the late evening (21:00-22:00). It is acknowledged there is different operators and needs within the airports. It is also acknowledged that Gatwick Airport is a key employer for some areas within the district and contributes to the West Kent economy, albeit with less impact in comparison to local authorities closer to the airport. However, Gatwick's economic contribution and significance should not be to the disadvantage of residents rest and health. In comparison to Heathrow, there is a quieter surrounding baseline noise around Gatwick and so the quiet surrounding areas are greatly impacted by the flight noise. This is particularly applicable to the south of Sevenoaks District which is rural in nature and consists of villages and hamlets. The noise impact on these settings is considered more significant than in urban areas because of the relative low levels of background noise. More specifically, the difference between ambient noise and the peak level when being overflowed is greater than that experienced in urban areas. Furthermore, by virtue of the low background levels, the approach and subsequent withdrawal of an aircraft can be heard for a much longer period of time than in built up areas.

### **Night Flights Regime beyond 2024**

**Q25. What length should the night flight regime beyond 2024 be?**

3 years

**Provide evidence to support your view.**

A 3-year period is considered an appropriate length after 2024. By then there will be further work toward Heathrow's third runway and Gatwick's second runway proposals. There is also a concern that the proposed ban on night flights on Heathrow's third

runway will increase the number of night flights on other London airports, including Gatwick. In light of this, it is imperative that any upcoming night flight regime does not permit unfavourable impacts on the other London airports due to the proposed night flight ban on Heathrow's third runway.

### **Banning the noisiest aircraft**

**Q42. What would be the impact on you if QC4 rated aircraft movements were banned between 23:00 and 07:00 after October 2024?**

SDC are supportive of a ban of QC4 rated aircraft movements between 23:00 and 07:00. There do not appear to be many QC4 aircrafts used at Gatwick in the last few years but it is understood that the ones in use cause disturbance to communities.

**Q43. What would be the impact on you if a scheduling ban was placed on QC2 rated aircraft movements between 23:30 and 06:00 after October 2024?**

Please see answer below

**Q44. What would be the impact on you or your business if a scheduling ban was placed on QC2 rated aircraft movements between 23:00 and 07:00 after October 2024?**

We are supportive of a ban of QC2 rated aircraft movements between 23:00 and 07:00. This time period is preferred to the night time quota period of 23:30-06:00 to help enable residents avoid disturbance between periods of 23:00-23:30 and 06:00-07:00. It is considered the ban of QC2 aircrafts would encourage the use of quieter aircrafts during the night period.

### **Managing night noise through QC limits only**

**Q49. Should we remove the movement limit and manage night flights through a QC limit only?**

No

**Q50. Provide evidence to support your view.**

There will still be some degree of disturbance from airplanes regardless of what QC category they fall in. The removal of the movement limit could theoretically result in more lower QC aircrafts operating throughout the night period with no restriction which would be undesirable. The movement limit is a pragmatic way to capture airplane movements in a transparent manner for affected communities.

### **Unused allocation during seasons**

**Q53: Should an airline be able to use unused allowances later in the season?**

No

**Q54. If the government decided that unused allowances should be returned to the airport's pool, what would be the impacts on: Communities?**

The return of unused allowances to the airport's pool may lead to additional flights and therefore exacerbate the existing noise disturbance of residents. The existing movement limits already cause noise pollution and disturbance for residents living within typically quiet locations throughout the day. An increase of disturbance from additional flights would not be looked upon favourably.

**Carry-over of limits between seasons**

**Q55. Do you agree or disagree that the current carry-over process benefits you?**

Disagree

**Q56. Provide evidence to support your view.**

It is not agreed that the current carry-over process is beneficial. There is a significantly larger allowance of Summer night time flights at Gatwick compared to Winter night time flights. It is noted the impact of Summer night flights can have a larger impact on residents in comparison to the Winter period as many people wish to sleep with their windows open. However, this is not always feasible for those living within the vicinity of airplane flight paths due to the noise disturbance. Furthermore, this appears to be counteractive to the government's current policy statement of limiting and reducing airplane noise.

**Q57. What changes, if any, would you like to see to the carry-over process and how would this impact you?**

SDC believes the transfer of movements between winter and summer seasons should be removed. This currently results in a higher summer limit where the impacts of noise disturbance are significantly felt within the District.

**Health impacts and economic value of night flights**

**Q58. How fair a balance between health and economic objectives do you think our current night flight approach is?**

Unfair

**Provide evidence to support your view.**

It is acknowledged that night flights have some economic benefits and that aviation will contribute to the UK's economic recovery. Nevertheless, SDC do not agree with the preservation of existing movement limits, in particular night movements, or noise quota limits at Gatwick. It is urged that night movements be reduced to allow affected communities under flight paths some respite through the night period.

**Q59. What are your views on the health impacts of aviation noise at night, including potential impacts on different groups in society (provide evidence to support your**

view)?

We are greatly concerned for the impact of noise disturbance on our residents' health. It is understood that continuous sleep disturbance can have a severe impact on individuals' health and that it leads to being prone to medical conditions ranging from risk of cardiovascular disease to diabetes. There can also be a mental effect of sleep disturbance causing a lack of productivity and difficulty to concentrate. Further to this, the COVID-19 pandemic has caused a national risk of children's progress and development which can only be exacerbated from sleep disturbance.

**Q61. What are your views on changes to aircraft noise at night as result of the COVID-19 pandemic (provide evidence to support your view)?**

The COVID-19 pandemic granted residents a reprieve from flight related disturbance and allowed welcomed periods of tranquillity that has been particularly noticed in the night-time. As a result of this, the increased night flight movements are more noticeable leading to adverse impacts on local communities. As expressed in Q59, sleep disturbance correlates with significant and harmful impacts on individuals' physical and mental health.

**Airport designation**

**Q65. Should the government set criteria for airport designation?**

Yes

**Q66. What do you think are the:  
Advantages to the government setting criteria for airport designation?**

This would ensure that airports are treated equally and held to the same standards for night flights. Gatwick has 4 times the number of night flights compared with Heathrow and Stansted. It is unfair that Gatwick does not need to have similar night flight restrictions to Heathrow. Although SDC maintain a position that there should be a set time period where no night flights take place at Gatwick, it is hoped that a set criteria for airports could help to restrict night flights to an acceptable level and so ensure that all communities are treated in an equally fair manner.

**Q67. What factors, if any, do you think we should consider when setting criteria for designation?**

There should be consideration of the airport's size, overall number of airplane movements and type of airplanes. It would not be favourable to have fewer total movements but from noisier airplanes. Furthermore, criteria should be sensitive but not penalise airports based on their geographical setting and surrounding areas. It is noted that Heathrow has stricter night flight constraints due to its built up urban setting. However, Gatwick is not subject to the same constraints and has many more night flights. There is a mixture of urban and rural surroundings by Gatwick and it should be noted that residents of rural locations are greatly impacted by the disturbance of night flights because of the existing low levels of background noise.

**Q68. How should any criteria for designation be agreed?**

The criteria for designation should include consultation with local authorities and other appropriate bodies. The criteria also needs to be sensitive to an individual airport's circumstances and the impacted communities.

**Q69. What impact, if any, do you think the designation of an airport have on: Communities?**

The designation of airports would enable the effects of night flights to be monitored and assist mitigations for affected communities. The designation of airports should ensure an appropriately low level of night flight restrictions are arranged to enable residents ability to rest peacefully in the night period. Further to this, communities would need to be assured that restrictions are monitored and if not adhered to, airports would be liable.

**Q70. What impact, if any, do you think the de-designation of an already designated airport (Heathrow, Gatwick, Stansted) will have on: Communities?**

The de-designation of an already designated airport would be a calamity for communities. The existing night restrictions at Gatwick airport have not been acceptable for residents within the flight paths and de-designation of the airport would effectively remove controls of noise mitigation and residents already limited ability to peacefully rest in the night time.

**Q71. Any other comments?**

SDC takes the opportunity to reiterate that noise disturbance is a significant concern to residents, especially within the southern villages and hamlets of the district which have an extremely low level of background noise. As expressed in previous consultation responses, SDC believe there should be a ban on flights within a set time period in the entire night-time period (23:00 – 07:00) rather than just the night time quota period (23:30 – 06:00) to give residents reassurance of a duration of respite.

Yours faithfully,

Infrastructure Delivery Officer  
Planning Policy