

By email:

Lord Ahmad of Wimbledon  
Minister for Aviation

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1 February 2017

Dear Lord Ahmad

### **Consultation on night flight restrictions**

Thank you for your consultation on night flight restrictions for the next 5 years (2017-2022). Our interest lies with how those restrictions work at Gatwick Airport.

Mole Valley lies immediately to the west and north west of Gatwick Airport. Although the airport itself is located within a neighbouring authority, the western final approach path and many departing flight paths overfly land in the District. As a largely rural area with low background noise levels, aircraft flights, and in particular night flights, already cause significant disturbance. Recent airspace changes have demonstrated all too clearly that noise caused by aircraft flights is a key concern of local residents, and that reducing that disturbance should be a priority for all concerned.

#### **Q1a, 1b, 5a, 5b**

We believe the long term aim should be to reduce night time noise levels to a point where night flights no longer cause sleep disturbance. For the summer period, this needs to take into account the likelihood of people sleeping with windows partly open. Therefore, while supporting the proposed environmental objective of encouraging the use of quieter aircraft to limit or reduce the number of people significantly affected by aircraft noise at night, we believe that objective needs to go further by setting measurable reductions in night time noise disturbance, and achieving those reductions if necessary by reducing the number of night flights.

#### **Q8a, 8b**

It has long been an issue at Gatwick that the noise quota was set too high to act as a restraint on noise or to encourage the use of quieter aircraft. In practice, night time aircraft movements have been capped only by the movement limit. We therefore strongly support a reduction in Gatwick Airport's noise quota to reflect the level of current usage. This should include both the summer and winter noise quota limits. We also strongly support a phased reduction in noise quota over the regime period (up to 2022). If these changes are made the quota should start to have the effect it was intended to achieve, which is to encourage the use of quieter aircraft

during the night time period. In our view a reduction of 20% in the night time quota over the regime period is the minimum necessary to encourage the continued adoption of quieter aircraft.

**Q3a, 3b**

For similar reasons, we also support the introduction of a new QC/0.125 category; and that all operations by aircraft are counted towards the airport's movement limit. These will help the overall objective of limiting night time flights and encouraging the use of quieter aircraft.

**Q10**

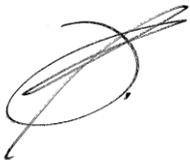
We are aware that Heathrow Airport is working towards a ban on night flights, possibly before the introduction of a new runway if certain changes are agreed to its movement limit and the use of airspace. We are concerned that the night flights currently at Heathrow are not displaced to Gatwick Airport, and wish to make clear now that any proposal to increase the cap on the number of night time movements would be strongly resisted. Gatwick Airport already has higher night time movement and noise quota limits than either Stansted or Heathrow and any move to increase this inequality would be unfair and harmful to residents who already suffer from night time disturbance.

We would also like to support calls for a longer night quota period. At present, the night time period is defined as 11.30pm – 6.00am whereas in almost all other regulatory regimes it is 11.00pm – 7.00am. This latter range is more reasonable, reflecting the sleep patterns of the majority of people. It also accords with the World Health Organisation guidelines on community noise.

Lastly, we would like to see the ability to carry over unused night noise quota from one season to another removed. In the case of Gatwick this results in unused winter quota being carried over into the summer season. It makes no sense to set a quota only to allow it to be breached for reasons that have no bearing on it.

I would be grateful if you would take these views into account when setting night time flight restrictions for the next five years.

Yours sincerely

A handwritten signature in black ink, consisting of a stylized, cursive 'D' followed by a horizontal line and a vertical stroke.

Councillor Duncan Irvine  
Executive Member for Planning and Chairman of the Aviation Working Group