

By email:

Airspace.policy@dft.gsi.gov.uk

If telephoning please ask for: Deborah Miles

Email: Deborah.miles@molevalley.gov.uk

Dear Sir/Madam

Draft UK Airspace Policy

Thank you for the opportunity to respond to the above. I represent Mole Valley District Council (MVDC) which borders Gatwick Airport.

Changes to Airspace (Chapter 4)

MVDC generally supports the three tiers of airspace related changes and the broadening of compensation available to residents affected by aircraft noise. We support the change in point 2 of paragraph 4.45 regarding the 63dB LAeq contour. However we also consider that compensation should extend wider to include those who suffer significant noise disturbance as a result of airspace change. Residents in Mole Valley, the majority of whom are further away from the airport than this, have recently experienced increased noise levels from concentrated departure routes (specifically Route 4) and we ask that these impacts be taken in to account when finalising the changes to the compensation policy.

Assessing Noise in Airspace Decisions (chapter 5)

Options analysis for a variety of routes would allow greater transparency and community engagement when assessing noise in airspace decisions. MVDC also encourage the policy of considering multiple flight paths rather than a single, concentrated route in cases where local circumstances point to that being the best solution.

MVDC agrees that the 57dB LAeq measurement of noise should be supplemented by other metrics that take in to account frequency of noise and the loudness of individual noise events. We would like to see more clarity on how these additional metrics will be used to assess airspace changes and what weight will be given to each. We also raise concerns that these metrics do not appear to consider ambient noise, and that the same level of noise can potentially cause greater disturbance in quiet rural areas than in busy urban areas.

Independent Commission on Civil Aviation Authority (Chapter 6)

MVDC generally supports the creation of ICCAN and its role in providing specialist guidance/research to the aviation industry and local communities regarding noise management. However, we would question if ICCAN will be sufficiently distinguished from the CAA, and

therefore whether it would be seen as a truly independent body. It is also disappointing that ICCAN would have no enforcement powers that would enable it to reduce noise where appropriate or to independently manage complaints.

Ongoing Noise Management (Chapter 7)

MVDC have significant concerns regarding this part of the proposed changes. Local planning authorities generally do not have the expertise required to assess specialist issues relating to ongoing noise management or the operational procedures associated with the use of airspace. While in the future ICCAN may be able to provide advice on the noise aspect of airspace change, it would seem more sensible to retain oversight of local airspace changes with the CAA, subject to improved consultation arrangements with local communities.

The planning process affixes conditions and Section 106 agreements at the time a planning permission is granted making them unsuitable mechanisms for reviewing regulatory controls where there is no such development taking place. Planning conditions and Section 106 Agreements must be used in accordance with the National Planning Policy Framework and Town and Country Planning Act 1990 respectively. This limits the way they could effectively be applied to control operational restrictions.

As the local planning authority for Gatwick Airport, Crawley Borough Council would be the competent authority for the purpose of planning control. However, changes to airspace around Gatwick Airport have the potential to impact residents in Mole Valley and other neighbouring authorities, and we would seek clarification of how the consultation process between the competent authority and its neighbours would be expected to work in the context of ongoing noise management.

MVDC do not support the proposal that responsibility for the setting of 'other types of noise controls' and noise preferential routes be transferred to the controlled airports (paras. 7.31-7.37). MVDC is aware that there is an existing lack of trust between local communities and Gatwick Airport, and that this arrangement has the potential to exacerbate this problem. It is also considered that the airports cannot be considered impartial in this matter. We would strongly encourage the involvement of an independent regulator to oversee these matters.

I would be grateful if you could bear these points in mind when considering the proposed policy changes to the management of airspace in the UK.

Yours faithfully

A handwritten signature in blue ink that reads "Vivienne Michael". The signature is written in a cursive style with a long horizontal stroke extending from the first name.

Councillor Vivienne Michael
Leader of the Council