



4 September 2013

Dear Sirs

Discussion Paper 05 Aviation Noise, Airports Commission

I comment as follows on your discussion paper. With regard to Chapter 2, this largely seems to be something for the scientists to answer, but I do think it is worth noting point 2.36, that 91% of respondents felt that quiet areas need protecting. I also note point 1.3 in an earlier chapter: “the Government’s primary objective is to limit and where possible reduce the number of people significantly affected by aircraft noise”. This statement does not specifically state what scenario those people are in, ie are they residents or do they happen to be in that place affected by noise? Certainly Hever Castle would argue that, on the basis that we get the best part of 300,000 visitors per year, they all have the potential to be affected by aircraft noise. This is for 70% of the time, as I understand this is roughly the amount of time that aeroplanes fly low over Hever Castle with a west wind.

Noting 2.36 and with 1.3 in mind, surely an important heritage attraction like Hever Castle, within an Area of Outstanding Natural Beauty, should be one of those specially protected areas. When there is an east wind, there are no aeroplanes flying overhead, and the area is utterly silent, however when there is a west wind and the flight path directly over Hever Castle is used, the aircraft noise is all the more disturbing. Hever Castle is in a truly remarkable position, being so close to the centre of London (21 miles from Marble Arch as the crow flies, 31 miles by road), yet entirely rural and there are few visitor attractions which are so far away from any ‘B’ roads, let alone any ‘A’ roads or motorways so close to London.

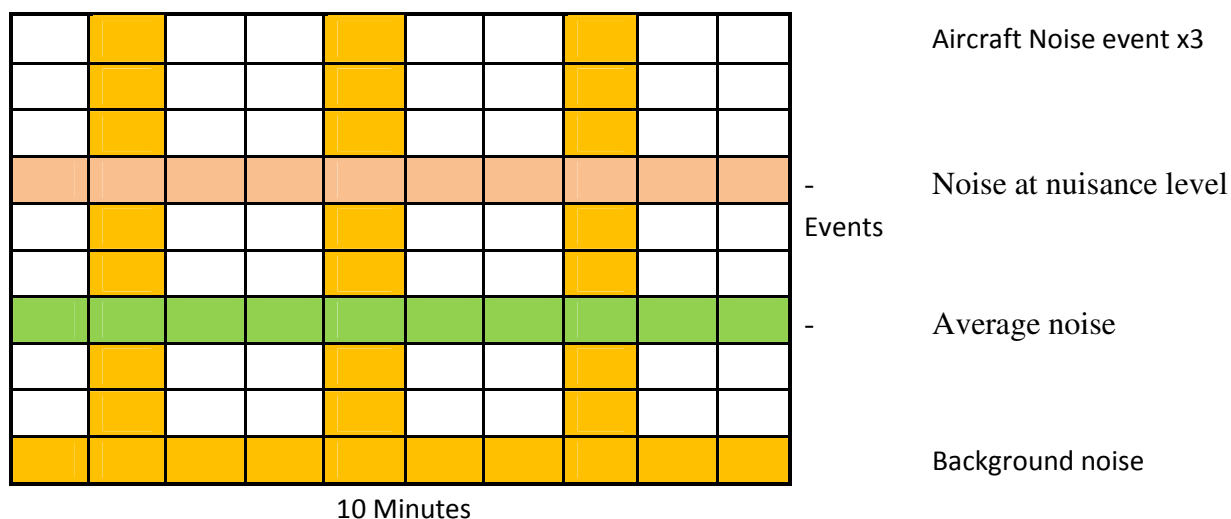
Chapter 3, average noise contours do seem to be slightly ridiculous, as living beside a motorway might well have a high noise contour when averaged, but the expectation is that people who live near a motorway have become accustomed to noise as it is constant and it is easier live with than intermittent noise.

My apologies for raising Hever Castle again, but we know that it is a particularly frequent point for aircraft to turn into and rise up into the ILS. We do now have a noise meter which was erected on part of our ground. Unfortunately there was no suitable place directly underneath the flight path to put it, which would not be affected by other regular noises. This noise meter was installed much earlier this summer and so far we have not received any results from it, although I assume that Gatwick does have these results as it is checked on a regular basis. They do not seem to be forthcoming in providing the results, despite assuring

us we would receive them sooner than this. Our expectation is that there will be many regular noise events, which by anyone's standards would be considered a nuisance.

I am not certain if it would be acceptable, but I could send you a video recording of an open air theatre production made on 29th August 2013. The theatre company has been operating at Hever Castle for 31 years. I decided to record part of the second half of the play, as the aircraft noise was truly horrendous. On more than a couple of occasions the aeroplanes flew over every minute. Essentially it means that there is no break from the noise, whereas when I previously measured aircraft movements it was rare for them to be more often than one aeroplane every two minutes. With two minute passings, we are lucky to get five or six seconds of silence before the next aeroplane. From the recording, which was taken with my I-Phone 5, there are seven planes over a period of ten minutes and it does make the play difficult to listen to. Fortunately this part of the play was a noisy section, but earlier sections were much quieter and it was very difficult to hear, particularly for those hard of hearing, with the roar of aircraft overhead. It seems ridiculous that Hever Castle is so far away from the 'noise contour map' when clearly there is a major disturbance and nuisance here.

I support the suggestion of the Australian example that a new map could be made that does not just measure, for instance, N70, but maybe N70, N80 and N90 events. I also wonder whether there is a better way of measuring the difference between background noise and aircraft noise. When we had discussions with Gatwick Airport last year, we were surprised to learn that noise is averaged. Clearly using this type of measurement is very deceiving as the huge impact of a low flying plane is apparently reduced because of there being virtually no background noise. Put in very simplistic terms if a loud plane is 10 out of 10 for noise and the background noise (when no plane is in the sky) is 1 then the average noise if the plane peaks at 10 for 1 minute three times over a period of 10 minutes (with the remaining 7 minutes at 1) means the average noise would be 3.7 out of 10! See chart below.



Each square represents 1 unit of noise or 1%.

Average is 37% or 3.7 out of 10.

Noise nuisance is for this purpose recorded at levels of 7 out of 10 or above. To suggest noise levels are not a nuisance because the average noise over 10 minutes is just 3.7 is clearly misleading. In reality there probably is more background noise than 1, but most of that is wind and bird song, neither of which would be classed as a nuisance for rural dwellers. There is also the noise of the plane approaching and leaving, which in Hever's case makes up the vast majority of the rest of the background noise.

I understand that Windsor Castle experiences a lot of aircraft noise, however it is within hearing distance of a large motorway and is situated within a town and as such will always be subjected to a certain amount of background noise. Again Hever Castle, in contrast, has virtually no background noise and with very little arable land nearby, we do not even hear tractors that often.

I do think we should have some measurement to show the difference between the background noise and aircraft noise, which should be easy for a computer or noise meter to read, especially as we know what time the aeroplanes fly overhead and indeed where exactly they are. The only difficulty would be if there is a lot of wind or bird song as I am not aware if there is a way to remove these non-invasive sounds. Presumably someone clever can find a way though. As said, if the noise of an aeroplane is no worse than the background noise, it has no impact. The expectation is that if the aeroplane is 10 decibels more than the background noise, it is not likely to be particularly disturbing, as the background noise is already quite loud. However, if an aeroplane makes a large noise and the background noise is significantly less, the impact of the nuisance is clearly significant.

The impact of noise in this document seems to be focused on residential areas. Some consideration ought to be given to businesses as well. Regarding Point 2.36, noise impact should be considered as being of a particular nuisance in Areas of Outstanding Natural Beauty, especially for hotels and rural businesses that depend on tourism, as clearly the impact of noise on those businesses is far more serious than it would be for an individual resident. With the majority of individual residents, they have moved to their homes after the airport was built, so had the opportunity of at least researching the impact of aircraft noise. Tourists on the other hand, when visiting a rural heritage tourist attraction in particular, would usually expect there to be peace and tranquillity and if their night's stay is disrupted by aircraft noise, they will not recommend it as a great place to stay. I hope the Commission will give some consideration to this and please do not hesitate to come back to me for further information.

Hever Castle, indeed any other heritage attraction of similar age, was clearly built long before any airports and if we do value our heritage, consideration needs to be given that, unlike virtually any other business or indeed residential property, there is no opportunity to relocate. Therefore, I hope that the Commission will be able to advise that greater efforts will be made to look at avoiding significant rural heritage tourist attractions, as I do believe they warrant special consideration.

Chapter 4.40 – I have already covered earlier how we could at least examine better ways of monitoring nuisance noise impacts. I think monitoring effects is very difficult because there are so many other factors involved which could impair an individual's performance, or

indeed a business's. Monetising noise impacts would be very difficult and costly, but it does however seem somewhat unfair that if a motorway crosses your land, you are entitled to considerable compensation, despite the fact that one has the ability to mitigate the impact of said noise. There is no way of mitigating the impact of an aeroplane other than soundproofing one's house, which of course does not help at all when trying to enjoy one's garden. In the case of listed buildings, it is not always feasible or permissible to put secondary glazing etc on Grade I listed leaded light windows, so in theory one should be given compensation for having a new flight path created overhead. However, the majority of people currently affected by plane noise, at least in the South East of England, probably moved after the airport was built and the current flight paths adopted.

If a flight path is moved then that is unfair on those houses newly affected whose values would be reduced. One only needs to ask any rural estate agent and they will assure you that a house with road noise, or any other form of noise, is definitely worth a lot less.

Should Hever Castle for instance, be due compensation? It has been in existence for 700 years and open to the public for 50 years. The ILS was narrowed on the approach to the airport approximately 15 years ago without any consultation, which clearly did have a big impact on Hever Castle and the Hever Festival Theatre which performs here throughout the summer. In the Castle's case and indeed the Theatre's, greater recognition should be given to the fact that people are disturbed, not just at home, but also while enjoying past-times and a Grade I listed Castle with the important history that Hever has, combined with the AONB status, surely is enough reason to move the approach to the airport, as clearly the Castle cannot be moved and the business cannot be relocated.

The best solution would be to try and find routes that would affect fewer people and, more to the point, create minimum disturbance. Reintroducing a wider approach, effectively dispersing the noise over a wider area and opening opportunities for respite would be fairer. The narrowing of the approach has been particularly unfair for those directly underneath and it seems fair that the noise should be shared amongst the previous people. Of course, people who have since moved into the area would rightly feel this was grossly unfair to them, so there is no easy answer to this.

Noise compensation schemes are far from ideal. I think it would be horribly bureaucratic and money spent on such things would be better spent on trying to reduce the number of people affected by aircraft noise, whether that be speeding up regulations, insisting on quieter aeroplanes or possibly relocating the majority of the traffic to areas where fewer people will be affected, especially if a new area has a lower amenity status.

Yours faithfully

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