

## A note to the Airports Commission

### Discussion Paper on Aircraft Noise

GACC will be responding in detail in due course to the Discussion Paper but we are submitting this initial response because we have discovered one major omission.

The Paper fails to recognise that aircraft noise tends to be more annoying in rural areas than in urban areas. This is because

- the background noise is lower; and
- the expectation of peace and quiet is higher.

This factor has for many years been acknowledged in the noise regulations for factories used by local authorities and contained in British Standard 4142.

It is also recognised by the International Standards Organisation:

#### ISO Recommendations for Community Noise Limits

District Type	Daytime Limit	Evening Limit 7-11pm	Night Limit 11pm-7am
Rural	35dB	30dB	25dB
Suburban	40dB	35dB	30dB
Urban residential	45dB	40dB	35dB
Urban mixed	50dB	45db	40dB

It will be seen that there is a 10 decibel differential between rural areas and urban residential areas. At Gatwick most, if not all, those affected by aircraft noise live in rural areas.

That factor totally vitiates the comparisons of the number of people affected by noise at various airports as given in the Airports Commission Discussion Paper for example in Table 2.1.

The ISO figures mean that the number of people included in the 57 leq contour at Gatwick should not be compared to the number at Heathrow within the 57 leq contour but to the number within the 67 leq contour.<sup>1</sup> The figures are shown in the table below.

### Number of people seriously affected by noise at Gatwick and Heathrow

	Gatwick 2011	Gatwick with new runway	Heathrow 2011 <sup>2</sup>
57 leq	3,050 <sup>3</sup>	13,200 <sup>4</sup>	238,000
67 leq			9,500 <sup>5</sup>

Thus using a comparison based on the ISO recommendations, it can be seen that - surprisingly - more people (13,200) would be annoyed by a new runway at Gatwick than are annoyed at present at Heathrow (9,500).

We would not claim that this figure is entirely accurate. For instance by no means all those likely to be affected by the noise from a new Gatwick runway live in rural areas. Nevertheless it does show that the simple comparison used by the Airports Commission, and the figures used by Gatwick Airport, are misleading.

**It must be emphasised that GACC does not support a new runway at Heathrow. We stand shoulder to shoulder with HACAN (our sister organisation at Heathrow) in opposing any new runway in the South East.<sup>6</sup>**

**What this remarkable result does show, however, is that the oft-repeated claim by Gatwick Airport Ltd that comparatively few people would be affected by noise at Gatwick is fallacious.**

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<sup>1</sup> Calculation confirmed by a local government expert on noise.

<sup>2</sup> ERCD Report 1201

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/3934/gatwick-2011-report.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3934/gatwick-2011-report.pdf)

<sup>3</sup> ERCD Report 1202

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<sup>4</sup> Gatwick Airport Master Plan July 2012 page 125.

<sup>5</sup> The official figures published by the Civil Aviation Authority show the number within the 66 contour (12,750) and the number within the 69 contour (3,100), but it is possible to interpolate an approximate number for the 67 leq contour.

<sup>6</sup> We believe that the trend towards larger aircraft will mean that the existing runways will provide sufficient capacity until 2050. See [www.gacc.org.uk/latest-news](http://www.gacc.org.uk/latest-news) Airport Models