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Our Ref: JLP/PT/MOV

Your Ref:

Date: 4 September 2013

Dear Sir/Madam,

Response to Aviation Noise Discussion Paper 05
Submission of Views and Evidence from Tandridge District Council

I refer to the above Discussion Paper and have set out below Tandridge District Council's views and evidence in response to the Aviation Noise Discussion Paper:

1 Tandridge District is situated to the east of Gatwick Airport and the southern part of the District lies underneath the flight path. As the prevailing wind is from the southwest for an average of 70% of the time, the communities in Tandridge District are mainly affected by the noise from aircraft landing. The joining point for the Airport's Instrument Landing System is close to the Surrey/Kent border. The opportunities to provide Tandridge District residents underneath the flight path with respite from noise as a result of aircraft landing at Gatwick Airport are very limited.

2 As has been noted in paragraph 5.11, more noise improvements to aircraft have been achieved during take-off, while noise mitigation of landing aircraft has proven harder to achieve. While the engine noise has reduced, the airframe noise contributes as much noise as the engines, and the distance between the aircraft and noise receptors on the ground has not changed over time.

3 The current method of describing noise using the equivalent continuous noise level, LAeq, tries to equate aircraft noise with a fan emitting a steady state noise over a 16 hour period during the day. Unfortunately, aircraft noise is not continuous but comprises serial one-off events. The LAeq does not, therefore, adequately represent the noise climate in the communities affected by aircraft noise, as described in paragraph 3.46.

4 As the number of disturbances is as important, or even more so, than the actual noise level, the LAeq needs to be supplemented by another metric to reflect the frequency of significant noise events. In paragraph 3.29, the Australian policy makers use N70 contours as a

supplementary method to LAeq and it is said that this is also the position of the CAA in the UK. The N70 figures are not normally published in the UK and so are not generally available. If they are available, they should be published so that the noise level and frequency of significant noise disturbance for locations affected by aircraft over flight can be seen. Residents would then be able to compare locations by the relative number of significant noise disturbances as well as a descriptor of the average noise level.

5 Government policy is to reduce the total number of persons affected by aircraft noise through concentration, so that fewer people are affected, but those that remain affected are affected more heavily. In principle, this approach is recognised as benefiting the greatest number, but society should recognise the sacrifice that the affected people are making through being subjected to aircraft noise. In the case of communities close to Gatwick Airport and under the landing flight path, the aircraft have to fly a narrow path in line with the runway and so the discussion over concentration or dispersal is largely academic for these residents. The overall noise levels are not likely to improve for these residents for the foreseeable future as any improvements in aircraft technology will be swallowed up by the effect of an increase in aircraft numbers. The affected communities should be provided with improved and significantly more generous sound insulation schemes than has been offered to date.

6 Noise disturbance is particularly significant at night and the sound insulation scheme should extend to include the sleeping rooms in all noise sensitive premises within the Lnight 50dBA contour. Introducing noise at a previously unaffected area is likely to have a more severe impact than on an area that is already affected. The residents in the unaffected area would have chosen to live there and are likely to be aggrieved at the introduction of a new noise source. Residents already under existing flight paths and noise preferential routes would already be aware of the aircraft noise and made their decision to live there. The situation is similar to the effect of changes in road traffic noise from a major road. The residents who are already affected by significant noise disturbance e.g. within the Lnight 50dBA contour should be offered sound insulation.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'P. W. Mason', written in a cursive style.

P. W. Mason
Chief Planning Officer
Planning Department