

**Gatwick Airport Northern Runway Project
Development Consent Order
Planning Inspectorate's Reference: TR020005**

**Deadline 6 Representation from Rusper Parish Council
Re Noise Contours & Proposed Revised Noise Insulation Scheme**

Rusper Parish is immediately to the west of the existing runways at Gatwick Airport and is thus directly under the flight paths for both arriving and departing flights.

Our residents' ability to access both the existing and the proposed noise insulation scheme is, at present, determined by Gatwick's defined Noise Contours. Gatwick has published its proposals for a revised scheme in May 2024 and its latest version has been published under REP4-017/018.

In that document (and as hitherto adopted as the availability criteria), Gatwick states that the method of assessing exposure to noise is the use of an Leq metric. In particular, Gatwick assesses the present ability of residents to benefit from the scheme is if they are within the noise contour expressed as Leq 16hr 60dB. In plain English, Leq is a time averaged equivalent sound level and is measured by recording actual noise levels over the 16-hour daytime period and then reducing this to an average decibel level.

While it is stated by Gatwick that this form of measurement of the impact of aircraft noise on residents is Government policy, it is a very 'blunt instrument' given that aircraft noise is disturbing by being relatively sudden and is by no means constant (as the Leq system measures).

The Planning Inspectorate are invited to consider what was discussed when the Government's Airport Commission were reviewing the expansion of London's airports in 2014/15 and which resulted in the decision not to support a Second Runway at Gatwick. The Inspectorate is invited to read the report commissioned by Mid-Sussex District Council from Southdowns Environmental Consultants Ltd which is as relevant today as it was in 2015. This Report can be accessed at <https://www.midsussex.gov.uk/media/1404/noise-impact-analysis-of-gatwick-airport-second-runway.pdf>

As mentioned at the hearing, there are alternative and additional methods of determining the noise occurrences which disturb residents overflown. The Southdowns Report at page 14 (Para 4.1.2) states (for example here but also referred to elsewhere in their Report) that a single metric would be unlikely to provide a rounded view of the potential impacts of the options and that a 'noise scorecard' with a range of noise metrics should be used.

We believe that the single measure of noise impact on the community is simply inadequate and that the 'noise scorecard' approach should be required with metrics for day and night noise levels, and that the frequency with which higher thresholds are breached are identified and brought into account in the Noise Insulation Scheme assessment process (and also generally in assessing the impact of the Northern Runway scheme on the communities overflown or otherwise impacted by aircraft and related ground noise).

We would also wish that the Noise Contour maps be materially upgraded since it is extremely difficult to ascertain precisely where the contours are. It is not made clear when these contour maps were compiled nor the data used in their compilation. It is thought they may simply have been prepared at the time of the Second Runway proposals in 2014.

More particularly, since detailed interpretation of the proposed contours is problematic, Gatwick should set out their proposed contours using Google maps (or similar) so that the position of roads and individual houses are made much clearer.

Also, it should be noted that the Interactive Map used on the Gatwick website (which is the required link in their revised proposals) requires the use of a postcode or address in order to be accessed. For example, although I think I personally live within the proposed outer boundary, I noted that my postcode was returned as 'out of coverage' and I was thus unable to view the map.

We are therefore of the view that Gatwick needs to revisit their whole analysis of the impact of noise on the community and should revisit the methodology whereby they identify, using their noise contours, those materially impacted by noise, taking into account both daytime and night-time noise levels and their frequency. They need to present this in an easy to understand format with maps that can be easily read.

Turning to the proposed revised scheme itself, Gatwick have suggested that they have consulted with those impacted by noise. We, at Rusper Parish Council, recently invited representatives to attend a Parish Council meeting in order for there to be an exchange of information and views on the proposed new scheme which we considered would be of mutual benefit. Gatwick refused to attend stating '*We do very much welcome engagement from parish councils more generally, however we are not able to attend individual parish council meetings...*'.

One issue which needs clarification is that Gatwick states their present scheme operates within a boundary of 60dB daytime Leq, whereas it would seem that their proposals now revert to 63dB daytime Leq. Since this effectively reduces the size of the noise contour and thus the eligibility of residents who were within the 60dB contour but not within the 63dB contour, the change is not explained nor justified.

Gatwick does also now use a 55dB Leq night period assessment but there is nothing that I have seen which justifies this particular figure nor what impact it actually has. It is understood that the WHO, back in 2015, considered that 54dB Leq resulted in 'significant community annoyance' (Southdowns Para 5.3.2) and indeed (Para 5.3.7) set a Night Noise Guidance level of 40dB as a long-term aim. There needs to be further explanation as to why Gatwick is justified in setting higher levels of noise impact before they will offer any respite through its Noise Insulation Scheme.

There seems little or no account being taken in regard to the impact of ground noise, and here we are not simply concerned with engine testing and land-based vehicles and equipment, both of which may have minimal impact on Rusper. Our Parish concerns primarily relate to the frequent impact in certain weather conditions of the very sudden loud noise of maximum engine thrust of aircraft taking-off to the east.

All of the above (and not an exclusive list) are the reasons why it is considered important that Gatwick management representatives should attend a Parish Council meeting so as to fully explain their rationale and the impact of their revised scheme and to listen to and properly take account of representations before the Scheme is finalised. At present, proper consultation with those adversely affected has been minimal.

The proposals also need properly to take into account the variety of properties within Rusper Parish (and elsewhere) where a 'one size fits all' approach is inappropriate. Part of Rusper Parish is in a Conservation area where there are likely to be constraints as to the measures which can be used to reduce noise impacts.

Under the existing scheme, which it is understood was delegated to Anglian Double Glazing, we have received a number of complaints that the quality of what was on offer was to a fairly basic standard and inappropriate to the actual status of the houses involved. It is unclear whether this contractor will continue to be the only contractor used or whether Gatwick will appoint a panel or, indeed, enable residents to appoint their own contractor.

It is noted that Gatwick are proposing cost caps on individual properties which, while an increase on existing levels, does enable the appointed contractor to unfairly exploit the system by, for example, quoting at a higher price level than might otherwise apply and thus restricting what might be a more effective system for the residents.

There is also provision being made to offer acoustic ventilators and other equipment to enable double/triple glazing units to be effective, particularly in the summer months, but no mention is given as to any form of compensation to take account of their energy costs. Crawley Borough Council, in their Local Plan Evidence Base of December 2023 stated "*Noise is often considered in isolation. However, exposure to noise is also influenced by other factors such as overheating in properties, the need to ventilate to maintain good indoor air quality, and financial costs associated with the operation and maintenance of mechanical ventilation systems intended to replace the reliance on openable windows.*"

<https://crawley.gov.uk/sites/default/files/2023-12/Topic%20Paper%207%20Development%20and%20Noise%20Technical%20Appendix%20December%202023.pdf>

It is unclear from Para 4.3.8 of Gatwick's revised scheme if the qualified surveyor is to be a truly independent consultant appointed who could assess any property affected by noise and identify the most appropriate noise attenuation process best suited to that property rather than a surveyor from or connected to the installer.

Lastly, with regard to the Schools Insulation Scheme (Para 5), it is entirely unclear why the process has to be delayed until after the Northern Runway is operational. In respect of Rusper School, which is currently impacted by noise from the existing runway, the noise levels are clearly capable of being assessed and there seems no reason why the appropriate Scheme cannot be implemented forthwith.

There is no specific mention of the scheme also encompassing community buildings. Rusper School has the ancillary and regular use of Rusper Village Hall and this is also in use for other community functions, including Parish Council meetings. Meetings and school lessons are currently regularly interrupted by the noise of aircraft overhead. The revised Noise Insulation Scheme should thus include community properties as well as schools.

Again, these are further reasons why we would wish for early discussions and consultations and that they should not be delayed and Gatwick must be required to take all such considerations into account before finalising the Scheme.

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