

Airports Commission

Discussion Paper 05: Aviation Noise

Response from Kent County Council

Kent County Council (KCC) welcomes this opportunity to respond to this discussion paper on aviation noise. KCC's responses follow on from our previous submission on 'proposals for providing additional airport capacity in the longer term' and, in particular, expand upon our statement in that previous response relating to our support for growth at regional airports, i.e. Manston Airport and a second runway at Gatwick. We stated support for the Government's objective to limit and, where possible reduce the number of people in the UK significantly affected by aircraft noise. However, we acknowledged that inevitably a new runway will mean that more people are affected by noise or the same people who are affected now will be subjected to more noise or more frequent noise. It is therefore imperative that measures are taken to minimise and mitigate this impact. Where this is not possible, compensation should be given to those affected and this must be applicable to noise impacts generated by both arriving and departing aircraft.

Q1: What is the most appropriate methodology to assess and compare different airport noise footprints? For example:

(a) What metrics of assessment methods would an appropriate 'scorecard' be based on?

Further information on the proposed 'scorecard' approach is needed before comment on the metrics of assessment methods that it would be appropriate to base it on can be made.

(b) To what extent is it appropriate to use multiple metrics, and would there be any issues of contradiction if this were to occur?

The use of multiple metrics seems to have aided the assessment of the noise impacts of Sydney Airport's third runway as described in the discussion paper; therefore it could also be appropriate for UK airports.

A metric based on the number of noise events (aircraft movements) that reach or exceed a certain decibel A-weighted (dB(A)) threshold within a given time period, called the Number Above or N contours (Frequency contours), could be used alongside the existing metric of Equivalent Continuous Sound Level (L_{Aeq}) contours. This comparison has also been useful at airports in other parts of Europe. The N contours show how often aircraft over-flight occurs that exceeds a specified noise threshold; and when used in comparison with L_{Aeq}

contours, would show the average sound level experienced within these areas over a specified time period, i.e. 0700-2300 for L_{Aeq16h} . It is agreed that N contours more accurately portray the reality of living under a flight path with the likelihood of hearing noise that exceeds specified dB(A) levels occurring a number of times a day, rather than the L_{Aeq} contours that show a level of noise averaged out over a certain number of hours.

As stated in the discussion paper, in Australia the use of N contours are a supplementary method to L_{Aeq} , and as this is also the position of the Civil Aviation Authority (CAA) in the UK, it seems reasonable that these multiple metrics could be more widely used at airports in the UK. This is providing that one was subservient to the other so that there would be no issues of contradiction. Whether Equivalent Continuous Sound Level (L_{Aeq}) should continue be the principal metric for measuring aviation noise is the subject of much debate, as shown from the analysis in this discussion paper and in the draft Aviation Policy Framework consultation in 2012. Conclusive evidence either way needs to be sought and the use of multiple metrics alongside one another could help to establish the best system.

In order to continue to assess the number of people affected by aviation noise, as is currently achieved by estimating the population within the L_{Aeq} contours; and to work towards the objective in the Aviation Policy Framework, that is to limit, and where possible, reduce the number of people significantly affected by aircraft noise; as described in the discussion paper, building on N contours, the Person Events Index (PEI) and Average Exposure Indicator (AIE) could be a way forward.

The Persons Events Index (PEI) turns the measure of the number of events (frequency) above a specified noise level at a given location (N contours) to a measure of impact on population by estimating how many houses and therefore how many residents are exposed to the number (frequency) of events above a specified noise level. Reducing the PEI reduces the number of people affected by noise events. The PEI can also be divided by the number of residents exposed above the threshold level to give a measure of the average number of events per person within a defined area, or the Average Individual Exposure (AIE).

These metrics (N contours, PEI and AIE) could be used alongside the current L_{Aeq} system. This would give a greater range of methods to measure the extent of aviation noise. This would help to address the issue that people hear in short bursts of intense noise (the noise level of single events and the frequency or number of those events) rather than as a constant sound. It would also acknowledge that the frequency of aircraft movements can be a source of annoyance for some people living in areas exposed to lower than average levels of noise across the whole day.

Wider use of the L_{den} system would provide consistency with the EU and the European Environmental Noise Directive (END). The added weighting for night movements over day movements also reflects the greater intrusion presented at night. It could be argued that summer night weighting should be

even higher, given that people tend to sleep with windows open at night during this warmer period.

(c) Are there additional relevant metrics to those discussed in Chapter 3 which the Commission should be aware of?

No comment. Chapter 3 appears to be a comprehensive summary of all relevant metrics.

(d) What baseline should any noise assessment be based on? Should an assessment be based on absolute noise levels, or on changes relative to the existing noise environment?

Noise assessment should be based on changes relative to the existing noise environment rather than absolute noise levels. Urban environments already have high levels of background noise, whereas in tranquil rural environments with lower levels of background noise, aviation noise is much more pronounced. Some research argues that the noise differential in rural areas could be as high as 10 decibels because the background noise is lower.

The Government's Draft Aviation Policy Framework which went out to consultation in 2012, stated that aircraft noise in the countryside is relatively more annoying than in urban areas, due to lower background noise levels. KCC is aware of many complaints from residents to the east of Gatwick, outside of the 57 dB $L_{Aeq,16h}$ contour, who are affected by aircraft noise. The current system of noise contours does not appear to correctly represent the actual and perceived noise levels experienced by communities under the Gatwick Airport flight path.

Single Event Noise exposure, and the frequency (number of incidences) of that exposure, can cause significant community annoyance even if it does not exceed the 'average level of daytime aircraft noise' due to the tranquillity of rural areas.

On the ground noise measurements are not being taken in areas further away from airports, but these are the places which in recent years claim to have experienced a considerable upsurge in aircraft noise. The spread of noise monitors need to reflect the aircraft noise footprint. Their distribution is, at present, sparse in the outer areas.

KCC in its response to the consultation on the draft Aviation Policy Framework stressed that there must be adequate consideration of noise impacts on sensitive receptors or areas designated for high environmental value. Over-flying is likely to reduce the tranquillity of the countryside and coast, notably in the South East in Areas of Outstanding Natural Beauty (AONB) which include heritage buildings and designated Heritage Coastline, which are important for recreation and tourism. The final Aviation Policy Framework (March 2013)

states that the CAA has legal duties to have regard to the purposes of National Parks and AONB and must take these into account when assessing airspace changes. This is relevant to the current Department for Transport (DfT) consultation on Guidance to the Civil Aviation Authority (CAA) on Environmental Objectives relating to the Exercise of its Air Navigation Functions, to which KCC will respond. KCC will also respond to the National Air Traffic Services (NATS) consultation in Autumn 2013 on airspace changes in the London Airspace Management Programme (LAMP), as it is essential that rural areas are given adequate protection from aircraft noise. The Airports Commission must also consider noise impacts on rural areas when assessing options for new airport capacity.

(e) How should we characterise a noise environment currently unaffected by aircraft noise?

A noise environment currently unaffected by aircraft noise is characterised by an absence of overflying aircraft at an altitude that creates noise which causes disturbance.

Q2: How could the assessment methods described in Chapter 4 be improved to better reflect noise impacts and effects?

The discussion paper presents a simple noise and social survey, as opposed to a laboratory study, as one method of identifying people's reaction to whether there is a noise problem. The dose-response derives the likely response by a selected population to noise exposure.

The two methods outlined in the discussion paper – simple social surveys or laboratory tested programmes – would require a level of sophistication and a greater knowledge of the volumes and precise route plans. In principle, this approach is supported, conditional upon the full participation and involvement of the communities likely to be affected in the formulation of the survey and the openness of its interpretation.

The approach in the discussion paper enumerates a number of conclusions drawn from various studies. The use of average noise levels (favoured in early studies) provides an appropriate method of establishing a realistic measurement of disturbance. The impact of one noisy aircraft, particularly at night, can have knock-on effects on sleep disruption and deprivation, even though subsequent aircraft movements are made by quieter aircraft, on the saying that 'once awake, always awake.'

Consideration has also been given to the mention in the discussion paper of more recent attempts to categorise noise disturbance and, in particular, ANIS (1982) and ANASE (2007). From ANIS the measure of $57L_{Aeq16h}$ was derived and remains the preferred Government metric, even though the later work has stated (and is generally accepted) that "more people are annoyed by a given level of aircraft noise exposure than they were when ANIS was

conducted.” The paper includes the observation that local issues may have distorted the results of the ANASE study which would appear to support the Government’s reluctance to change the criteria.

Local issues must surely be taken into account because a national standard, which does not reflect local realities, is unlikely to produce a result which is ‘fit for purpose’. For example, the unique combination of circumstances which blight the communities beneath the Gatwick flight-path may not be experienced around other airports and vice versa, i.e. Heathrow problems may also not be applicable to Gatwick’s communities. To that statement could have been added the observation that a single runway operation at Gatwick offers less opportunity for respite than is possible at Heathrow, emphasising that local factors must be accommodated in any proposed evaluation process, and the statistics adjusted in the light of those circumstances.

In regards to **night noise**, this is perhaps the most unpopular aspect for the local communities to the east of Gatwick in Kent, specifically in the districts of Sevenoaks and Tunbridge Wells, as well as for residents impacted by Manston Airport in East Kent.

There is disappointment at the Government’s approach to night noise due to separating consideration of this aspect from the overall noise objectives in the Aviation Policy Framework. The Aviation Policy Framework devotes only two paragraphs to the subject, stressing the value of voluntary schemes such as the night curfew scheme operated at Heathrow.

It is therefore appreciated that the Airports Commission has included this topic in its overall consideration of noise and its impacts. This does, at least, provide the opportunity for the consideration of trade-offs for those communities which are blighted by a combination of factors of which night noise is but one.

We recognise that maintaining the existing freedom of night operation enjoyed by Gatwick is crucial to the airport and the economy as a whole. However, if a second runway at Gatwick is given the go-ahead, it must be subject to restrictions on night flying. The same would apply in terms of significant growth at regional airports such as Manston.

At the height of summer schedules, the frequency of landings at Gatwick through the sleeping hours can be as high as one every 6 minutes, for example on 8 July 2011 (source the Gatwick website). The night quota Air Transport Movement (ATM) limit averages at 61 ATMs per night in the summer, or one aircraft movement every 6.4 minutes. There is the potential to increase the number of night flights to increase the overall capacity of the airport; and with the increasingly long haul nature of operations, Gatwick has a high propensity to capture new early morning (night time) throughput. Local communities must be protected from further increases in night flying. It is also not unreasonable for communities living alongside airports to seek a reduction in the number of night flights.

Night flights, in particular, are tabled as a key area for greater regulatory control. In principle, there is a common belief by local communities, that night flights at Gatwick Airport are excessive, and that many residents are therefore denied the possibility “of a decent night’s sleep”. The situation is exacerbated by the absence of minimum height controls and noise controls for landing aircraft. Operational restrictions should not be considered as matters of last resort, but merely one of a number of possibilities to ensure compliance.

Although the faster phase-out of noisier categories of aircraft is sensible, the number of Quota Count 4 (QC4) aircraft now being operated at night is, apparently, relatively small. More attention therefore should be given to the height and manner in which the aircraft are flown on their landing approach.

The differential between night and day landing charges, which heavily incentivise airlines to operate at night, and tourists (predominantly) to travel at night, should be challenged and discouraged. It is proposed that operators should be prevented from reducing or discounting landing fees during quiet periods, i.e. during the night. There is a general understanding that night landing fees are very much lower than daytime charges (due to greater available slots at these times), and that zero fees apply at certain times (due to excess capacity during the night), which is encouraging more discount night arrivals than is desirable. Night fees should be higher than daytime fees to discourage night flights.

In the context of **health issues** and night flight disturbance, it is proposed that this should not be regarded as a cost benefit exercise but, rather, a concern in its own right which should certainly deserve more attention in the next phase of DfT’s and Airports Commission’s work.

It is perhaps worth recording that in the Gatwick Noise Action Plan (NAP), voluntary action number 55 contains the statement that it will merely continue to monitor Government research and only “where applicable and appropriate” adopt the guidelines of the World Health Organisation (WHO). More proactive leadership is needed from within the aviation industry.

The linkages which have been made between sleep disturbance and health impairment, and the impact on productivity, are of real concern. This is particularly relevant during the summer when people tend to sleep with their windows open. Greater recognition must be given to the negative impact of noise on the health profile of communities who will be affected by the concentration of flights.

Q3: Is monetising noise impacts and effects a sensible approach? If so, which monetisation methods described here hold the most credibility, or are the most pertinent to noise and its various effects?

The focus on the concept of monetisation is disliked in principle as it removes the onus of responsibility away from the aviation industry to reduce its noise impact by direct means.

Given that the adverse impact of aviation noise is highly specific, in terms of both individuals and location, i.e. proximity to flight paths; it is debateable whether this complexity can be reduced to a questionnaire survey as proposed in the discussion paper. The very idea posed by the questionnaire in the paper that impacts on health can be compensated this way, runs the risk of losing that crucial individuality. It would be preferable to remove the source of the problem, for example, by reducing the impact of noise through respite or by technological improvements.

Q4: Are there any specific thresholds that significantly alter the nature of any noise assessment, e.g. a level of intermittency of noise beyond which the impact or effect significantly changes in nature?

No comment.

Q5: To what extent does introducing noise at a previously unaffected area represent more or less of an impact than increasing noise in already affected areas?

Introducing aviation noise at a previously unaffected area represents more of an impact than increasing noise in already affected areas. Already affected areas will be used to the impacts of noise and local land values and property prices will already reflect this. Whereas introducing noise at a previously unaffected area will cause drastic change to a locality.

The Government's overall objective on noise in the Aviation Policy Framework is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise. Clearly this indicates that it would not be acceptable for new populations not previously affected by aviation noise to be exposed to significant levels of aircraft noise. This would arise if a new nationally significant hub airport is developed in a location previously unaffected by aviation noise. Even potential locations around the Thames Estuary with flight paths over the sea, would result in populations not previously affected by aviation noise, to be subjected to noise impacts. These areas would include the large urban and rural populations in Medway, North Kent, South Essex, Southend and Thurrock.

Q6: To what extent is the use of a noise envelope approach appropriate, and which metrics could be used effectively in this regard?

Kent County Council welcomed the proposed principles in the Aviation Policy Framework to which the Government would have regard to when setting a noise envelope at any new national hub airport, or any other airport development which is a nationally significant infrastructure project and would require a National Policy Statement (NPS). This should also be incorporated within the environmental framework for any airport in the UK that is designated under the European Noise Directive (END).

The key factor in determining the noise envelope in the NPS is the Government's overall noise policy to limit and, where possible, reduce the number of people significantly affected by aircraft noise. As previously stated, this infers that new populations will not be brought within noise contours by building a new nationally significant airport or airport development.

However, it is clear from the Aviation Policy Framework and this discussion document that further evidence is required on how exactly a noise envelope is to be defined. A simple cap on movements or passenger numbers is a blunt instrument and does not really reflect the level of exposure to noise. By contrast, measuring the area of exposure will create a dividing line between those regarded as being affected and those who are not, which in practice would seem arbitrary. It would seem, therefore, that defining a noise envelope requires a combination of metrics involving the level of exposure, based on whatever new noise threshold is adopted, and air transport movements probably based on a form of quotient count. This would allow airports to expand but with an incentive to encourage airlines to use quieter aircraft and should reassure local communities that the impact of the airport would remain within a set limit.

However, in developing a noise envelope for Gatwick for example, if the rural communities to the east of the airport within Kent were situated within a noise envelope then, in the absence of any other improvements such as respite, they would remain blighted and reliant solely on technology changes which take years to feed through; meanwhile, traffic levels would be increasing. The rights of rural communities must also be considered along with the interests of the wider economy.

Q7: To what extent should noise concentration and noise dispersal be used in the UK? Where and how could these techniques be deployed most effectively?

As stated in KCC's response to the consultation on the draft Aviation Policy Framework, it is our view that the issue of noise and respite, which is also an operational issue, should be dealt with through consultation with the local community. However, in response to that consultation, KCC did agree with the Government's proposed initiative to vary the point where aircraft join final approach before landing. This could address the problem of approach noise, for which there are no preferential routes (unlike with departures), and where the problem is as much about frequency (number) of noise events as it is about overall noise levels.

The issue of respite or noise dispersal is complex and difficult to resolve. The merits of either concentrating noise along a few specified routes, or spreading the burden to give respite to those most affected, but in doing so exposing more people to noise, and so conflicting with the overall policy objective to limit, or if possible reduce, the number of people affected by aircraft noise, are difficult to balance.

KCC previously stated a view that noise impacts should be dealt with by each airport in consultation with the local community. This will inevitably mean a trade-off between communities around the airport, for example, the provision of respite to an urban area that would result in noise impacts on a rural area instead, would have specific local issues as the perception of the noise impact could be significantly different between the two communities.

Respite is, in essence, an operational issue for airports that could be incorporated within the concept of establishing noise envelopes and balancing the wider environmental issues.

Gatwick Airport is currently in the process of implementing a trial of night time noise arrivals respite. KCC welcomes this effort to provide some form of respite to those affected by night time arrivals. However KCC also acknowledges that respite will bring benefits to some at the expense of others, and so there needs to be a clear justification for the areas that will benefit, to the detriment of others, from the alternation of flight arrival paths.

The Government's decision to maintain flight concentration represents the continuation of policy. It is believed by some that this policy was introduced without proper consultation of the communities it now increasingly affects. The trialling of Precision Area Navigation (P-RNAV) at Gatwick will permit a heavier concentration of aircraft over narrow corridors, meaning that even more flights than before will be directed over the rural communities in this part of Kent. The only prospect for respite comes from a change in wind direction.

By removing flight concentration as an item for further deliberation, Government's approach has prevented a discussion on trade-offs. This should be reconsidered as discussed in the Scoping Paper for the Aviation Policy Framework back in March 2011. This topic, i.e. dispersal versus concentration, should not be overlooked as a natural candidate for an overall trade-off determination because, clearly, the interests of the minority are being overridden for the wider benefit, without any form of practical acknowledgement. It is hoped that the Airports Commission will adopt a proactive approach to the application of trade-offs to resolve this, and other such matters.

In regards to **steeper angle approaches**, the discussion paper stated that this may be prevented by the new technologies under development to improve fuel efficiency. However, in practice, there are observed major discrepancies in the heights with which individual aircraft approach Gatwick Airport for example, on a regular daily basis. Secondly, it is noticeable that not only do

lower flying aircraft increase the quantum of noise overhead, but there is a further impact – the length of time over which the noise disturbance lasts is extended the lower the aircraft flies. To summarise, the higher the planes pass overhead, the greater the benefit for the community. This could be delivered through steeper angle descents.

The **manner in which aircraft are operated** is relevant in other ways. The discussion paper mentions the trade-off between fuel efficiency and lower noise through technological improvement. Local observations from reliable sources confirm that there are considerable economies which could be made without raising safety issues. The manner in which individual aircraft are flown, has implications for unnecessary noise and fuel economy as referenced in the discussion paper with the 'Fly Clean Fly Quiet' initiative.

The noise problem is not only about the type of aircraft and the numbers of movements; it is also about the culture of noise mitigation itself which should reach into the cockpit and the mindset of the crews who are operating the aircraft. The manner in which an individual aircraft is flown can have noise reduction and fuel consumption implications which would benefit both operator and community alike.

It is noticeable that different aircraft engage engine manoeuvres at least 12 miles out from Gatwick; some lower their landing gear early and fly at lower levels compared with other aircraft. Such operational behaviours can have a negative impact not only on noise but also on the rate of fuel consumption.

A culture change at flight deck level would be a distinct improvement for airport operator, airline and the local community. Examples of what top US airports have been doing for years in terms of flight deck behaviour and monitoring, makes it clear that much more could be done in the UK for the benefit of all groups.

A proactive regulatory approach to these “cultural issues” has much to commend it given that it could provide a win/win for all concerned. This could be achieved by the introduction of steeper angles of descent so that all aircraft maintain higher (and quieter) heights of approach for longer (as some aircraft are already achieving voluntarily). There should also be noise restrictions for aircraft landing as is already applied to departing aircraft.

Earlier notification and more information from the operators on their flight planning would also be appreciated. Examples would be to those operating major tourist venues around Gatwick such as Hever Castle, Penshurst Place, Chartwell and Chiddingstone Castle, in the Eden Valley area.

From the daily experiences of the residents in the communities to the east of Gatwick, the magnitude of the noise is and will remain characterised by the technical configuration /age of the aircraft and, also, by the height and manner at which it is flown. Offering further detail at the appropriate point, it is suffice to say that there is a wide and visible variation between the observed heights of aircraft approaching Gatwick. It is also fair to point out that even small

adjustments in height can make a considerable difference to the noise impact for people on the ground.

Equally, it is noticeable that the relatively small adjustments in the route of approach taken by individual aircraft can make a profound difference to noise experiences on the ground. These differences (of height and route) are observed very frequently and could, if managed on a consistent basis, provide a form of respite.

Turning to the actual duration of the noise experience, it is also noticeable that certain newer generation of aircraft generate a particularly intrusive whining/screech noise which can be heard a longer distance away than other aircraft. Whether this is a technical issue or the manner in which different airlines/pilots operate their aircraft is not known, but is a possible example of a cultural issue described previously.

It is equally difficult for these communities around airports to understand the argument that the new, wide body jets are “quieter” simply because they embody the best of new technology. The local experience in Kent is that they are actually noisier than smaller aircraft, perhaps because they appear to approach Gatwick, for example, at much lower altitudes than smaller aircraft. Certainly the impact of the larger jets frequently provides the most disturbance and with the growth of long haul routes, which tend to use the larger aircraft and arrive early in the morning, this can only get worse.

Q8: What constitutes best practice for noise compensation schemes abroad and how do these compare to current UK practice? What noise assessments could be effectively utilised when constructing compensation arrangements?

It is essential that where aviation noise adversely affects people, adequate compensation is given and measures to mitigate the impacts are paid for by the aviation industry. Compensation and mitigation measures must be applicable to noise impacts generated by both arriving and departing aircraft.

The UK Government can learn from best practice of noise compensation schemes abroad, but it is essential that there is a clear policy on noise assessment and compensation arrangements, that is acceptable to both the aviation industry and affected residents, before any expansion of the UK’s aviation capacity takes place.

However, it is doubtful whether an adequate unit of compensation can be devised and whether or not the intention would be to financially compensate those who are directly affected, i.e. over-flown, if, as part of an overall trade-off arrangement, compensation was introduced.

Should a scheme to compensate those adversely affected by aviation noise be introduced, it is proposed that the metrics should recognise the scale of disturbance (by decibel count), frequency of movement, and be time related

(day versus night). The compensation fund should be supported by the revenues received from those airlines penalised for breaches of the noise regulations and paid directly to the affected parties in cash.

There is also a general belief that penalties for breach of noise regulations are derisory and do not exist for landing infringements. As part of a package of regulatory changes these measures should be updated and the proceeds directed to the benefit of those individuals/communities directly affected by the breaches caused.

There are sound arguments against financial compensation in favour of agreement on acceptable levels of noise management. There is concern that the debate on airports expansion has been ongoing for more than a decade during which time house owners in certain locations have effectively been blighted for this whole period. This uncertainty for house owners is unreasonable. Therefore the principle of compensation should not be ruled out as part of a trade-off measure of last resort where it has not been possible to agree a fair selection of measures to balance the needs of the few against the wider economic interest.

Other comments:

Reduction of noise at source through technological improvement and differential landing fees:

There is unanimity with the idea that airports should incentivise their clients by the use of favoured tariffs for quieter planes. Present policies may also encourage the use of old, inefficient and noisy aircraft without penalty in off-peak daytime operations. It is considered that fees should be directly linked to a fee per measured dBA approach.

Regulation:

There is currently a lot of industry self regulation through Airport Master Plans and Noise Action Plans (NAPs), and the Government places considerable importance on these entities. Master Plans and NAPs are self-monitored and have no regulatory mechanism or measurement targets with real “consequences” for failure to meet such plans, although they are approved by the DfT.

This structure is not conducive to the building of public trust. Therefore, while these compliance aspects may not be part of the Airports Commission’s direct remit, it is strongly believed that given the complexity of the issues around noise, the absence of an effective partnership based on trust and openness between the airport and the local community unnecessarily complicates the Commission’s ability to deliver workable outcomes.

Therefore a system, in which NAPs and airport Master Plans are not enforced by regulation or penalties for missed targets, is not a credible way to proceed.

More emphasis is required to create a culture within the industry which recognises the need for noise amelioration as part of its corporate and individual day-to-day performance plans.

An independent system of regulation or group is needed to provide the checks and balances required for the management of the expansion of the aviation industry.

Independent Noise Regulator:

There is a need for a truly Independent Noise Regulator (INR) appointed for each main airport and whose costs should be met from penalties extracted from airlines who breach noise regulations.

The discussion paper sought views on the pros and cons of independent noise regulation. Accepting the widespread lack of trust in the present system, and the misplaced emphasis on self-regulation, some form of INR is essential.

This will require more work and definition of the role of independent regulation and must be considered as a separate consultation.

Transparency and information sharing:

The collection of noise monitoring data needs to be handled by independent agencies in order to ensure its integrity, and then made widely available for transparency purposes. Airports should also be required to post regular website updates of the interpreted data from individual meters for individual flights with information about airlines/aircraft breaching their operating standards for noise. Each plot should provide details of the height of approach/departure of each aircraft being measured.

Paul Crick
Director of Planning and Environment

Kent County Council

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