

**Doc. No. SSE/12/b
Case Ref. 2032278**

Appeal by BAA Ltd and Stansted Airport Ltd following the refusal by Uttlesford District Council of planning application UTT/0717/06/FUL

Summary Proof of Evidence on behalf of Stop Stansted Expansion

Ground Noise Issues

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1 INTRODUCTION

1.1 Personal details

- 1.1.1 My name is Martin Peachey and I appear at the Public Inquiry on behalf of Stop Stansted Expansion ('SSE'). I have been assisted in the preparation of this proof of evidence by other members of the SSE Noise Group, particularly Chris Bennett.

1.2 Qualifications and experience

Martin Peachey

- 1.2.1 MA Cantab Mechanical Sciences.
- 1.2.2 Now retired after 35 years in business development and management for commercial companies in airport systems, facilities management and air traffic management following 11 years in the Royal Navy as an engineer officer.

Chris Bennett

- 1.2.3 BA Oxon in Modern Languages.
- 1.2.4 SSE Executive Committee member and Chairman of SSE Noise Group from inception (2003) until 2007.
- 1.2.5 For the last 11 years I have lived approximately 13 miles from the airport under one of the Runway 23 approach routes.

2 SCOPE OF EVIDENCE

2.1 Core evidence

- 2.1.1 Our evidence relating to ground noise impacts was originally set down in Chapter 9 of Volume 1 of SSE's submission to UDC, July 2006 [CD/201] which addressed the information provided by BAA in Volume 8 of its Environmental Statement ('ES') [CD/11].
- 2.1.2 Further evidence on ground noise issues was included in Volume 3 of SSE's submission to UDC, November 2006¹ dealing with the additional information provided by BAA in response to a Regulation 19 Notice from UDC [CD/22].
- 2.1.3 That evidence is superseded by SSE/12/a which incorporates more recent data now available and further analysis carried out. This is a summary of SSE/12/a.

¹ CD/203, para 2.7.

3 SUMMARY OF GROUND NOISE IMPACTS AND SHORTCOMINGS IN THE BAA ENVIRONMENTAL STATEMENT

- 3.1 The analysis of the impact of ground noise presented in support of BAA's planning application as contained in ES Volume 8 [CD11] is incomplete and unreliable. There are numerous shortcomings in BAA's analysis and this results in an underestimation of the scale of the adverse ground noise impacts that would arise from the proposed development.
- 3.2 BAA compares ground noise sound levels for its 25mppa and 35mppa scenarios. The way in which the information is presented does not make it possible for people who would be affected to get an impression of the increase in impacts compared to today (i.e. 24 mppa). In addition BAA's benchmark for the 25 mppa scenario in 2014 seems to be as close as possible to the limits of its current planning application and in many respects appears to be an implausible 'worst case' scenario.
- 3.3 Ground noise and air noise have been assessed separately and no information is provided on the cumulative impacts. But it is the cumulative impacts that matter.
- 3.4 BAA also excludes the provision of combined contours for airport activity and noise generated by surface access activity.² Road traffic noise is not assessed for specific locations and it appears the focus has only been on the morning peak.³ In addition, BAA states [CD/11] that 'there is no further consideration of airport related rail traffic noise in this assessment' but there would be increased rail noise.⁴
- 3.5 There is no proper description by BAA of the methodology claimed to be 'best practice' but we do know that it incorporates only 'the main sources of ground noise', defined as aircraft taxiing and auxiliary power unit ('APU') sound levels.⁵ Other sources of noise have been excluded.⁶ Figures for 2004 or present day taxiing and APU noise versus benchmarks and background noise together with current noise versus 2014 noise are also omitted. In addition, the methodology for assessing acceptable night noise seeks to downplay its significance.⁷
- 3.6 The terms 'minor, moderate and major adverse impact' are used in a different sense from other parts of the ES and in a way which significantly downgrades the scale of the impacts. The arbitrary and complicated methodology of calculating the noise impact assessment at the chosen locations seriously understates the noise disturbance impacts.⁸
- 3.7 BAA does not provide baseline background sound levels or the corresponding number of ATMs for the 1999 and 2004 measurements⁹ and so we are left to rely upon BAA's advice that the background noise has increased in many areas and that this 'could be attributed to increased road traffic'.¹⁰ (Irrespective of the source, it is the overall impact

² CD/11, para 3.1.2.

³ Ibid, para 5.2.11.

⁴ Ibid, para 5.2.12.

⁵ Ibid, paras 10.1.17 and 10.1.18.

⁶ Ibid, para 5.1.1.

⁷ Ibid, 5.3.25 and 5.3.26.

⁸ Ibid, para 5.3.27.

⁹ Ibid, para 5.3.20.

¹⁰ Ibid, para 8.1.5.

that matters.) Supporting figures are not produced for the comparison of the 1999 and 2004 survey results. These and other more recent data should have been produced.

- 3.8 BAA quotes benchmark figures for LAeq and LMax which are higher than the referenced WHO Guidelines for Community Noise¹¹ and wrongly asserts that *'The WHO Guidelines'... represent observation thresholds below which defined noise effects can be assumed to be less significant or unimportant'*.¹²
- 3.9 It is not clear why <5dBA exceedance is considered to be 'of marginal significance'.¹³ Very significant increases in ground noise impacts arise and these are downplayed by benchmarking against what might otherwise happen using BAA's hypothetical 2014 baseline and presenting the differential as the projected impact.
- 3.10 BAA excludes the tonality of aircraft noise when assessing the disturbance impacts and also excludes the effect of the prevailing wind as shown by the evidence provided to UDC by Bureau Veritas. The conclusion reached by BAA that the sensitivity test *'... has not shown any major differences as compared to the original assessment which was reported in ES Volume 8'* is at variance with the information provided by Bureau Veritas and considerably underestimates the adverse impact.¹⁴
- 3.11 Ground noise is particularly disturbing at night against the generally lower background noise levels. The effective nightly respite from airport-related activity, including road traffic noise, is less than four hours. No assessment is provided for the impact of such a short nightly respite period or of the forecast increase in airport-related activity during the night. There must be a concern that a more than doubling of cargo flights would have a significant impact upon night noise. It is noted however that BAA incorporates that doubling in its 25mppa baseline.
- 3.12 There is no attempt to explain the apparent conflict between the proposals and the promise given in the Air Transport White Paper [CD/87] that the Government would 'bear down' on night noise.

4 CONCLUSIONS

- 4.1 CD/11 provides inadequate information, omits significant noise sources and uses impaired assessments. This unsatisfactory situation does not allow a proper judgement to be made on the ground noise impacts of the proposed development. It is however common ground that the volume of activity both on the airport and from surface access movements would increase significantly if the proposed development were to be approved and that such increases would occur 24 hours a day. This will increase the amount of disturbance and annoyance experienced by the airport's neighbouring community generally and, at night, when a greater number of people suffer disturbance, the level of intensity will increase.
- 4.2 Noise is a material consideration for this planning application. The relevant planning policies will be set out in other evidence presented by SSE and will not be repeated here. What is important here is to establish the level of the impacts from ground noise. Unfortunately, we cannot fully do that due to the lack of information from BAA. We can, however decipher enough of the truth from the raw data included in CD/11 to

¹¹ Ibid, para 5.3.22.

¹² Ibid, para 5.3.23.

¹³ Ibid, para 10.1.12.

¹⁴ Ibid, para 2.4.16.

demonstrate that the ground noise impacts would be far greater than portrayed by BAA. This is the case even though BAA has excluded many impacts; it is the case even at 35mppa and it is the case even when comparing 35mppa to a more reasonable baseline scenario for 25mppa, closer to today's 24mppa.

- 4.3 If the exclusions were also assessed the ground noise impacts of the proposed development would become even more pronounced for the people living in the villages closest to the airport. And if the passenger throughput were to increase to levels much higher than 35mppa, as we believe it would if the application were to be approved, the impacts would be greater still because this would mean larger and noisier aircraft and it would mean more road traffic and other airport-related noise.
- 4.4 Finally, noise impacts needs to be looked at in the round – the combination of air noise, ground noise and surface access noise – in order to fully assess and understand their scale. BAA has declined to provide the information that would enable us to do that. Nevertheless, there is enough information to indicate that the overall noise impacts of the proposed development would be wholly unacceptable.