

**Doc. No. SSE/6/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

Air 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 air noise impacts was originally set down in Chapter 5 of Volume 1 of SSE's submission to UDC, July 2006 [CD/201] which addressed the information provided by BAA in Volume 2 of its Environmental Statement [CD/11].
- 2.1.2 Further evidence on air noise issues was included in Volume 3 of SSE's submission to UDC, November 2006,¹ 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- 2.1.3 That evidence is superseded by SSE/6/a which incorporates more recent data now available and further analysis carried out. This is a summary of SSE/6/a.

¹ CD/203, paras 2.3 to 2.6 and 4.1.

3 AIR NOISE IMPACTS

3.1 Background

- 3.1.1 The analysis of the impact of air noise presented in support of BAA's planning application as contained in Volume 2 of the BAA Environmental Statement [CD/5] is incomplete and selective.
- 3.1.2 Even from the supplied information, it is clear that increased noise at 35mppa would have considerable impact. There would be over 50% more households in the 57 dBA Leq area when compared to the projected 25mppa scenario in 2014.
- 3.1.3 The May 2003 planning permission limited the 57 dBA Leq land area to 43.6 sq km which represented a massive overprovision. This conceals the true impact of the future noise disturbance for the community.
- 3.1.4 The incomplete information and the shortcomings of the selective and flawed analysis underestimate the implications for adverse noise disturbance for the community.

3.2 Inadequate, missing or misleading information

- 3.2.1 Supplementary air noise analyses were not provided and important environmental information is lacking.
- 3.2.2 Noise contours showing the effects of an all-westerly day and all-easterly day were inadequately addressed.
- 3.2.3 Noise contours at 50 and 54 dBA Leq were inadequately addressed.
- 3.2.4 Noise contours below the level of 50 dBA Leq were not provided.
- 3.2.5 The omission of noise contours below 57 dBA Leq in the case of the maps relating to the sensitivity tests is unhelpful.
- 3.2.6 No information was provided on helicopter noise.
- 3.2.7 We consider the provision of LAmax levels for only six locations to be inadequate.
- 3.2.8 The comparative lack of LAmax information is exacerbated by the fact that there are no separate indicators for LAmax night levels.
- 3.2.9 The lack of CDAs on approaches to Runway 05 is of extreme concern to the residents of Ware, Harlow and surrounding areas.
- 3.2.10 The impact of the increases in ATMs in the sensitive morning shoulder period of 0600-0700 appears to be glossed over.
- 3.2.11 The implication that the relevance of two noise sensitive premises located in contours greater than 60 dBA Leq is discounted because one is aviation-related, and the other 'is supported by STAL is not accepted.

3.3 Noise metrics

Lden and dBA Leq

- 3.3.1 SSE believes that the comparison provided for Lden noise contours with Leq contours is highly misleading.

Problems of the Leq metric concept

- 3.3.2 We contend that the Leq metric in general, and the 57 dBA Leq contour in particular is an inadequate indicator of likely annoyance from aircraft noise.
- 3.3.3 The main drawbacks of the dBA Leq are given in more detail in SSE/6/a.
- 3.3.4 The lack of intuitiveness of the Leq metric leads to assessment difficulties and confusion.

57 dBA Leq as an indicator of annoyance

- 3.3.5 With regard to the choice of the 57 dBA Leq level as an indicator of annoyance, the WHO Guidelines for Community Noise, 1999² para 4.3.1 states that *'to protect the majority of people from being moderately annoyed during the daytime, the sound pressure level should not exceed 50 dBA Leq... indeed the lower sound level [40 dBA Leq] should be considered the maximum sound pressure level for all new developments whenever feasible'*.
- 3.3.6 Our reservations concerning the 57 dBA Leq contour are supported by the Inspector at the Heathrow T5 Public Inquiry.³
- 3.3.7 The inappropriateness of the 57 dBA Leq contour is given in more detail in our proof of evidence SSE/6/a.
- 3.3.8 We believe that BAA misquotes the WHO Guidelines for Community Noise for the onset of community annoyance.
- 3.3.9 The lack of provision of noise contours at lower levels is unhelpful with particular regard to noise impacts on schools.
- 3.3.10 Although BAA has refused to provide 16 hour noise contours below 54 dBA Leq, the 54 contour considerably increases the affected area when compared to the 57 contour. The 50 dBA Leq contour would represent a further significant increase in the land area affected.

3.4 Noise control and mitigation: general

- 3.4.1 We completely refute the entire statement in CD/5, para 13.1.1 since we believe that the claims are unsubstantiated.
- 3.4.2 Our concerns over the use of the 57 dBA Leq land area cap of 43.6 sq km imposed in the 2003 planning permission are discussed in detail in our proof of evidence SSE/6/a. We suggest that an alternative method is used for measurement and capping of noise impacts.

² CD/286.

³ Report of the Inspector at the Heathrow Terminal 5 Inquiry, Dec 2000 (published 2001).

- 3.4.3 For households which will suffer increased noise, with reference to insulation eligibility assessment, a baseline of 2004 is used instead of 2002 as stated by the ATWP.⁴

3.5 Noise control and mitigation: night flights

- 3.5.1 We believe that the night quota system referred to in CD/5, para 10.5.2 offers considerable headroom over actual utilisation and therefore is not, in practice, a rigorous cap.
- 3.5.2 Reference to the DfT night quota limits is in part not relevant, because 2014/15 (the date chosen for BAA's illustrative scenarios) is three years after the end of the new DfT night flights regime (NFR).
- 3.5.3 Although BAA's projections indicate compliance with the NFR regime as applied to a 6.5 hour night period, this is not the case with the DfT's mooted 8 hour period.
- 3.5.4 Cargo movements' share of night traffic in the 35mppa scenario is seen to increase by 9.5% and this will increase sleep disturbance.

4 CONCLUSIONS

- 4.1 Even allowing for the partial and questionable information supplied, BAA acknowledges that 35mppa will lead to more noise. A proper analysis of the noise impacts of 35mppa and associated movements taking full account of the points we have raised would show a totally unacceptable amount of noise nuisance.
- 4.2 Under UDC Policy ENV11⁵ we believe that this development should not be permitted due to the associated increased noise impact that would be generated.
- 4.3 If planning permission were to be granted, the noise impacts of BAA's proposal would be considerable and would have severe implications in terms of noise disturbance for the community. BAA relies on the cloak of its planned increases not exceeding the 2003 planning permission's Condition AN1 noise cap to conceal the true impacts of its proposals.
- 4.4 This over-high noise cap would be unlikely to have been breached by 2014 even if there were to have been no improvements in aircraft noise technology between 2003 and 2014.
- 4.5 Under BAA's proposals it plans to keep to itself the potential benefits of improvements in aircraft noise technology in order to facilitate ever-higher numbers of ATMs. Noise levels would rise dramatically if permission were granted to expand beyond 25 mppa.
- 4.6 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.

⁴ ATWP [CD/87] paras 3.24 - 3.25.

⁵ Uttlesford District Local Plan Adopted 2005 [CD/57].