



FELSTED

PARISH COUNCIL

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Dear Mr Clews

RE: NORTH ESSEX AUTHORITIES STRATEGIC (SECTION 1) PLAN

I am writing to you on behalf of Felsted Parish Council in response to your invitation to reply to the additional information supplied by MAG in relation to the noise impact on the area designated for the WoB development.

The additional submission from MAG suggests that, under future expansion, the numbers of people experiencing significant noise disturbance will fall. Whilst this analysis (against the 57dB LAeq16hr now reduced to 54dB LAeq16hr), has never been claimed by opponents of WoB as producing an impact on the WoB area, the submission is inaccurate:

- The UDC Decision Notice against the MAG application for expansion dated 29 January 2020 is quite clear. One of the reasons for refusal - in fact the first reason is "*The applicant has failed to demonstrate that the additional flights would not result in an increased detrimental effect from aircraft noise, contrary to Uttlesford Local Plan Policy ENV11 and the NPPF*".
- The MAG ES which supported the 2008 permission granted for 35 million passengers per annum (mppa) is out of date. Since then when the level for the onset of significant community annoyance was 57dB LAeq16hr it has now been reduced to 54dB LAeq16hr. This means that had the growth to 43mppa been granted, whilst the equivalent extent of the previous 57dB LAeq 16hr contour would have been 28.7sq km, the contour extent of the new 54dB LAeq16hr level would be 53.0sq km (MAG's own figure in its ES for its 43mppa planning application). 53.0sq km is much larger than 33.9sq km the previous condition set by UDC. The result being that more, not fewer, people would be subject to the revised level for significant community noise, known as the Significant Observed Adverse effect Level (SOAEL). The result is clear that more people would be adversely affected by noise.
- A key issue is that the averaging LAeq method used to calculate 16 hour day and 8 hour night contours is inadequate to assess noise annoyance and adverse health impacts. What people actually hear is the number of overflights and the noise of each against the low background or ambient noise levels at the WoB site. Nobody hears an averaged 16 hour or 8 hour constant noise level. The

L_{Aeq} average noise methodology being used as the sole noise assessment by MAG has this major shortcoming as it is very insensitive to the number of aircraft noise events. A doubling of like-for-like aircraft movements increases the L_{Aeq} by only 3dB. Barely perceptibly less noisy aircraft would technically permit more aircraft movements for the same average sound pressure level L_{Aeq}. To illustrate the folly of this approach and the poor logic it introduces, if all aircraft were to reduce their noise emissions by 3dB and at the same time the number of movements were to double with the same fleet mix, the size of the L_{Aeq} contour would stay the same. The reduction in noise of each aircraft would barely be perceptible as a change of 3dB is the minimum perceptible under normal conditions. But the doubling of air traffic movements would be very noticeable. The only way to correct this erroneous approach is to look at the immediate and separate impact of each individual aircraft movement.

Having said this, as previously stated, and repeated at all Plan consultations and reviews, we are not challenging the extent of the 57dB or 54db contours, since they do not extend to WoB. The challenge is the noise of overflights due to the proximity of the NPR flight paths to the area designated for high density housing as a part of the WoB development.

It is also misleading for MAG to claim in the covering email that *“there are no extra aircraft movements forecast in the modelling work between the current and proposed developments (274k per year) and aircraft are becoming quieter”*. Firstly it is incorrect there are no extra flight movements. MAG’s own ES submitted with is 43mppa planning application states that the effect of the proposed development would be to increase the number of aircraft movements by 25,180 (10%) from 248,820 to 274,000. And it is the number of flights under 7,000ft over WoB which is the objection to the proposed development from the issue of aircraft noise harms.

- Noise reduction has now become a priority up to 7,000ft – raised from 4,000ft since 2008. And WoB is overflowed by aircraft below this height as per CAA CAP 1498 Definition of Overflight and the CAP 1521 draft airspace design guidance which has now become CAP 1616 dated 20 January 2020.
- In October 2018, the World Health Organisation published its revised Guidelines for Environmental Noise and significantly reduced the threshold for the avoidance of adverse health impacts from aircraft noise. The revised noise limits are reduced to 45dB Lden during the day and 40dB Lnight at night compared with the previous levels of 55dB and 45dB respectively. A 10dB reduction during the day is equivalent to a halving of the loudness of aircraft noise.

The additional documentation supplied by MAG relating to noise contours, noise impact etc, is therefore out of date.

None of it makes reference to new or emerging government guidance, or to the latest WHO guidance on noise nuisance.

Therefore, for any of these documents submitted by MAG to be relevant to the topic of evaluating noise nuisance over the WoB area they first need updating.

Yours sincerely

Diane Smith
Clerk to Felsted Parish Council