

**Town and Country Planning Act 1990  
Applications by London Ashford Airport Ltd  
APP/L2250/V/10/2131934 & APP/L2250/V/10/2131936  
Site at London Ashford Airport Limited, Lydd, Romney Marsh, TN29 9QL  
CPRE/10/D – Comments to Shepway District Council on draft S106  
by Paul Black on behalf of Greatstone Primary School**

Now that we have had the opportunity to look at the report prepared on behalf of LAA by Parsons Brinckerhoff (“Greatstone Primary School – Sound Insulation Performance Review”) and now put before the inspector as CPRE/10/C.

We understand that this has now become new evidence at the inquiry and as such we should be allowed, through CPRE - Protect Kent, to cross examine the evidence presented to the inquiry. It is apparent that there are serious shortcomings in the provisions in the current draft of the S106 agreement which relate to noise mitigation provisions for Greatstone Primary school.

We note the report’s conclusion that no noise mitigation will be possible for the outside play or teaching areas. This is not a happy prospect for us at Greatstone School and we are very concerned that the report identifies that the outside teaching areas will be in jeopardy should the runway extension be granted.

The S106 conditions contained in Schedule 1 (section 16) of the draft S106 refer largely to the funding and the phasing of the works which are described in the ‘Definitions and Interpretation’ clause under ‘Mitigation Measures’.

It is clearly apparent that we are ill-equipped at the school to cope with external noise disturbance. What is not apparent, given the sketchy nature of the data that are currently available, is whether the proposed mitigation measures would be adequate, nor that the funding offered by LAA would be sufficient to implement adequate mitigation.

The initial report itself acknowledges that a further study is to be implemented before options for ventilation and noise mitigation can be costed, or their implementation prioritised, to maximise the benefit and limit the disruption of the work.

Until this further study can provide the necessary information, the Governors and Staff of Greatstone Primary School cannot agree to be bound by these conditions.

The financial “carrot” that LAA have offered is totally inadequate, given the extensive building works that would need to take place to complete the mitigation measures will require the relocation of the children in school to mobile buildings whilst the works are completed, the cost of importing and the hire of the temporary accommodation alone would use up most of the £45K that is offered !

That said, we still retain further significant reservations about the detail of the S106 as currently drafted. We do not consider it acceptable that LAA would only be required to contribute anything towards the cost of noise mitigation measures once larger/more heavily laden aircraft are able to use the expanded facilities, nor that the second threshold level of passenger throughput at the airport should be reached before triggering the balance of their contribution. We also note, and endorse, LAAG’s recent comments to you that the threshold weight limit of 45 tonnes is far too high.

Since LAA clearly accept that there will be a need for improvements to noise control within the school, it is unacceptable that effective noise mitigation is not provided in advance of the noise causing an unacceptable problem to such vulnerable receptors. Moreover, the conditions which allow LAA’s financial contribution to the cost of mitigation to be split into two phases will only double the disruption to the school caused by carrying out these works.

We have read the Report (Parsons Brinckerhoff) and have to say we are not surprised by its content. We are very concerned about some of the suggested mitigation options, particularly that which suggests permanently closed windows and forced ventilation. We believe there could be a considerable on going cost implication here because of the continued use of power to any ventilation system.

Alterations to the walls of the building to provide insulation will benefit the school in more ways than just noise reduction but we would not really like to see the look of the school altered so care will be needed here. Also a complete structural survey will be required as we doubt due to the construction of the existing school that foundations will accommodate brick block walls.

The real questions arise (in our minds) when we consider (a) how much it will all cost and (b) the timetable for the work. We realise the works are likely to be determined after some sort of schedule of aircraft movements is proposed but this could change.

At what point will it become too late to begin work?

Is there a time limit?

What happens if works done at school become insufficient because of increased aircraft movement?

This is all before we consider the limitations of timetabling major works to the school within school holiday periods.

Finally, We are disappointed that there has been no suggestion of an earth bank between the school and the runway, particularly at the point where aircraft are increasing engine speeds prior to take off. It is possible that spoil from creating the new runway could be used for this. Working outside as identified, will be difficult during aircraft landing as the raised noise level is brief but the noise level while building up engine speed lasts for considerably longer and teaching and learning outside could not take place during these times.

The DC levels etc mean nothing to us other than the report uses these models to assimilate noise levels at the school we view this as a simple paperwork exercise which bare no resemblance to the conditions that will exist at our particular school.

It seems to us the options are to improve insulation in areas such as the roof space, double glazed windows and skylights, brick up plastic upvc wall inserts and raise window heights and keep windows closed. This means we will need air conditioning.

Our concerns remain as they were. However, with reference to the above, we are very concerned about the ideas of not doing anything to the play areas

The report suggests double glazing to protect the library and corridor.

What about the play room itself – will it be discarded?

Block work to replace upvc and making windows higher. How high?

Closing windows ? Some of our teaching staff have worked in air conditioned buildings before. Not good for the throat for anyone who needs to talk a lot. Of course, nothing beats fresh air and having doors and windows open makes for a good healthy teaching and learning environment for both children and staff so the blocking up of windows and keeping them

shut is not an option for us at Greatstone. As we have said at the enquiry we only wish to maintain our present teaching and learning conditions.

This is the response of some of the governing body at Greatstone School to the Parsons Brinckerhoff report on (Greatstone Primary School Sound Insulation Performance review FSE 3511006A). The report was received by us on 3<sup>rd</sup> August 2011 well into the school summer holidays, and it has not been possible to get a meeting arranged to discuss the report with all governors given the very short timeframe imposed on us by Shepway district council and the inquiry. the demand is that we respond by 17<sup>th</sup> August !

We would also like to point out that no further visits to Greatstone School have taken place by LAA or Parsons Brinckerhoff during the preparation of this report, so all evidence is based strictly on paperwork models and the previous visit which was just to show people the schools position relative to the proposed runway extension.

As mentioned earlier we look forward to being invited back to the inquiry when it resumes in September so that cross examination on this new evidence can take place. This report should have been presented to us much earlier to allow us to research and get our own costing's for the mitigation measures proposed.

As a governing body we still have major concerns about this extension to the runway and its effect on the children at the school. It appears that to the inquiry the future of the children at Greatstone is not an important issue.

Best Regards

Mr Paul M Black  
Chairman of Greatstone School Governing Body.