

APP/L2250/V/10/2131934 &  
APP/L2250/V/10/2131936

SECTION 77 TOWN & COUNTRY PLANNING ACT  
1990 – REFERENCE OF APPLICATIONS TO THE  
SECRETARY OF STATE FOR COMMUNITIES AND  
LOCAL GOVERNMENT

TOWN AND COUNTRY PLANNING (INQUIRIES  
PROCEDURE) (ENGLAND) RULES 2000

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**REBUTTAL PROOF OF EVIDENCE  
OF RICHARD PERKINS NOISE**

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**PLANNING APPLICATION REFERENCE:  
Y06/1647/SH (New Terminal Building)**

**PLANNING APPLICATION REFERENCE:  
Y06/1648/SH (Runway Extension)**

relating to land at London Ashford Airport, Lydd,  
Romney Marsh, TN29 9QL

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# **1 INTRODUCTION**

## **1.1 Qualifications and Experience**

1.1.1 My name is Richard Perkins, and I am a Chartered Engineer and a Member of the Institute of Acoustics. I have a Bachelor of Engineering Degree in ElectroAcoustics from Salford University and I have 16 years' experience in the field of noise and vibration. I am a Technical Director in the Environment Business Unit of Parsons Brinckerhoff Ltd at Queen Victoria House, Redland Hill, Bristol.

1.1.2 Full details of my qualifications and experience are contained in my main proof of evidence.

## **1.2 Scope of Evidence**

1.2.1 I set out by way of assisting the Inquiry some points of rebuttal to the proofs of evidence of Mr Brian Lloyd in CPRE/01/A, Mr Graeme Willis in CPRE/02/A, Mrs Valerie Loseby in CPRE/04/A, Mr Roger Joynes in CPRE/04/B and Mr Paul Black in CPRE/04/C all on behalf of CPRE, Ms Louise Barton on behalf of LAAG in LAAG/8/A, and Dr John Underhill - Day on behalf of the RSPB in RSPB/4/A. This is not intended to be an exhaustive rebuttal and my rebuttal proof of evidence only deals with selected points where it is considered appropriate to respond in writing. Where a specific point has not been dealt with, this does not mean that these points are accepted and these other points will be addressed at the Inquiry.

1.2.2 This evidence refers mainly back to my original evidence, supporting Appendices and Inquiry Core Documents.

## 2 RESPONSE TO RULE 6 PARTIES PROOF OF EVIDENCE

### 2.1 CPRE/01/A – Planning Policy

#### Introduction

- 2.1.1 The Planning Policy Proof of Evidence from CPRE provides comments on the Applications and their compliance with relevant planning policy. In this section I respond to only noise related assertions.
- 2.1.2 CPRE have reviewed the various planning policies and relevant supporting documents, and stated that noise must be taken into account, quoting from PPG 24 Planning and Noise (**CD 6.13**). I would agree that this is the guidance that I have used in preparing my evidence.
- 2.1.3 Mr Brian Lloyd goes on to summarise specific noise issues, which I will pick up where they occur in the proofs of Mr Graeme Willis, Mrs Valerie Loseby and Mr Roger Joynes respectively below.

### 2.2 CPRE/02/A

- 2.2.1 Mr Graeme Willis has presented evidence to the Inquiry on the subject of tranquillity, with noise being a contributing factor. In this section I respond to only noise related assertions.
- 2.2.2 It is suggested by Mr Willis (paragraph 4.9) that vibrations from aircraft taking off and landing can cause structural damage to buildings. There are in fact no recorded instances, so far as I am aware, of any aircraft taking off and landing at an airport ever having caused damage to buildings from vibration. Vibration levels reduce quickly with increased distance from the source, and I would expect no discernible vibration from an aircraft at distances over 50m. Vibration effects would therefore not be observed outside the airport boundary.
- 2.2.3 It is asserted by Mr Willis (paragraph 4.7) that Shepway District Council have misinterpreted the methodology used to determine tranquillity leading to their statement that “*the proposals would not have any significant noise impacts on the local community and wider area and the tranquillity of the North Downs Area of Outstanding Natural Beauty to warrant refusal of planning permission on noise grounds alone.*” I do not believe this to be case. Tranquillity has been stated separately to noise in their statement, which I read as being separate but related factors that the council have considered in reaching their conclusions.

## **2.3 CPRE/04/A**

- 2.3.1 In this proof, Mrs Valerie Loseby has suggested that the Airport would cause adverse effects on the residents of the community from noise.
- 2.3.2 Firstly, Mrs Loseby has suggested that noise will be harmful to children's learning at Greatstone Primary School (paragraphs 2.3 and 2.4). In my proof of evidence at paragraph 3.3.8, I have reviewed the current research on the effects of aircraft noise on children's learning, which recommends that a noise level of 55 dB(A) is suitable for an outdoor area of a school to avoid adverse health effects. This 55 dB(A) figure is consistent with the recommendations of the 1999 World Health Organisation's 'Guidelines for Community Noise' document . Aircraft noise of 50.9 dB(A) is predicted in the Higher Growth Annual Average 500,000 PAX scenario which is significantly below the 55 dB(A) level, and therefore adverse health effects would not occur.
- 2.3.3 With regards to the outside spaces in the school used for teaching, noise from aircraft movements could lead to occasions when teachers may have to raise their voices when using the outside spaces, albeit no higher than that to be heard over noisy playing, or a dustcart passing on the road adjacent to the school. Given that these instances would be few in number, and occur for very short periods of time, the impact would not be significant.
- 2.3.4 Secondly, Mrs Loseby has also suggested that noise will be harmful to the elderly, particularly those who could be traumatised by unexpected loud noise (paragraphs 2.3 to 26). There is no evidence to suggest that the elderly are any more susceptible to sudden peak noise events than other age groups. The nature of aircraft noise is a high level of noise, but this usually occurs over a longer period of time than say gunfire from the military ranges which are more instantaneous. I do not accept therefore that there would be any "startle" effect from an aircraft movement.
- 2.3.5 The majority of people are believed to habituate to the peak noise events from aircraft fly-overs. I myself live under the flight path of a regional airport with significantly more movements of identical aircraft to those that would be used at the Airport, and I rarely notice the aircraft movements.
- 2.3.6 Mrs Loseby also makes reference to data from an EEA report in her Table 1 on noise exposure and health effects, and suggests that the incidence of health effects from noise could increase. This data has been taken out of context as comparison has been made using Lden thresholds, which is not the same descriptor as that presented in the

noise evidence before the Inquiry. Also, the EEA document has the following legal notice “The contents of this publication do not necessarily reflect the official opinions of the European Commission or other institutions of the European Union.” The document does not therefore have any official or legislative status in the UK.

2.3.7 In rank order of severity, a feeling of discomfort is considered to be the lowest health effect, which includes disturbance and annoyance. I have shown in my proof that only three properties are predicted to be exposed to noise levels where the onset of significant annoyance is reached. This is an extremely small number of people, and will not, in my opinion, lead to a significant increase in the incidence of health effects.

## **2.4 CPRE/04/B**

2.4.1 In this statement, Mr Roger Joynes has suggested that the Airport would cause adverse effects on the residents of the community from noise (paragraphs 2.3 to 2.6). Mr Joynes has suggested that the applicants do not take account of jet aircraft taxiing along the runway (paragraph 2.3). I would note that Taxiing noise is explained in the Supplementary Information **CD1.41a** and **CD1.41b**, which superseded all previous information submitted prior to that point. The calculations included taxiing noise of aircraft travelling from the terminal to the end of the runway and from the runway to the terminal. Therefore noise from taxiing activities has been properly calculated.

## **2.5 CPRE/04/C**

2.5.1 In this statement, Mr Paul Black has suggested that the Airport would cause adverse effects on Greatstone Primary School, which I have covered earlier in this proof. He also asserts that the noise impact has not been ascertained at Greatstone Primary School (paragraph 3.4).

2.5.2 Noise monitoring for the purposes of validating the baseline scenario noise contours were undertaken using a proxy site adjacent to the school, which is standard best practice. The predicted noise impacts are undertaken by calculation, which again is standard best practice, and the monitoring results are used to validate the prediction model. The noise models have also been validated by Shepway Council’s noise consultants, Bureau Veritas. Therefore the noise impact at Greatstone Primary School has been correctly ascertained.

## **2.6 LAAG /8/A**

Ms Louise Barton has asserted that noise will alienate visitors to Romney Marsh (paragraph 8.1). In considering the noise changes at the Airport, I have given consideration to the incremental noise changes over the course of a day, as well as the changes that individual movements will have. Movement numbers would be capped at 40,000 per annum. Furthermore, there would be on average only 16 scheduled aircraft movements per day, i.e. 8 landings and 8 take offs, all taking place at an existing airport where numbers of movements in the past have far outstripped these modest increases.

2.6.1 It is important to note that although aircraft noise is expressed in terms of daily averages, each individual noise event last for a short period of time. Therefore for the large majority of the time, visitors to the area would be unaffected by aircraft noise. Conversely anyone seeking quiet would likely notice each movement, but not at levels which are prejudicial to their enjoyment of the area.

## **2.7 RSPB/4/A**

2.7.1 This proof of evidence by Dr John Underhill-Day considers the effects of the applications on birds. Dr Underhill-Day complains of a lack of lack of  $L_{Amax}$  contours for the flight paths over the DO44 danger area.

2.7.2 In the March 2009 SEI, the results of the B737-300 flight trial are reported. These quote an SEL level of 91 dB(A) at the cemetery. This is much higher than would be expected from the anticipated B737-800 that will be using the Airport, which would be at least 3 dB quieter, partly due to its higher rate of climb. A B737-800 movement following flight path FP15 would in fact be the mirror image of Figure NV17 centred on the middle of the runway.

2.7.3 It should, however, be noted that the DO44 military ranges will be subject to  $L_{Amax}$  noise levels from gun fire of the same order as values from aircraft flyovers.

## **2.8 Summary**

2.8.1 In this rebuttal proof, I have set out my responses to the noise concerns raised in the evidence of the Rule 6 parties. To summarise the issues, I note the following points:

2.8.1.1 Vibration from aircraft taking off and landing at the Airport will not cause any damage to buildings;

- 2.8.1.2 Shepway District Council correctly considered noise and tranquillity as separate issues;
- 2.8.1.3 Noise from the proposed runway extension and new terminal would not be prejudicial to children's learning or to the health of the elderly;
- 2.8.1.4 Recently published EU guidance does not have a material bearing on this case;
- 2.8.1.5 The noise from taxiing activities have been calculated correctly;
- 2.8.1.6 Monitoring of background noise at Greatstone Primary School has been undertaken in accordance with best practice, and aircraft noise in the teaching spaces will not significantly interfere with teaching activities;
- 2.8.1.7 Noise will not alienate visitors to Romney Marsh;
- 2.8.1.8 Noise contours have not considered the situation of the maximum noise levels for a flight path over the DO44 area, although this area is already subject to peak noise from the existing firing range in the same order of magnitude as the aircraft flyovers.

### **3 CONCLUSION**

- 3.1.1 The evidence provided in the Rule 6 party proofs does not change the conclusions of my evidence to the Inquiry.