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The Rt Hon Hazel Blears MP
Secretary of State for Communities and Local Government
Eland House
Bressenden Place
London
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Dear Secretary of State

**Town and Country Planning Act 1990 - Section 78:
Appeal by BAA Plc and Stansted Airport Ltd against the decision of Uttlesford District
Council; land at Stansted Airport, Stansted, Essex CM24 1QW**

You will be aware that Stop Stansted Expansion (SSE) was a Rule 6 Party to this Public Inquiry. We understand that you are currently considering the report and recommendations of Inspector Alan Boyland.

After the Inquiry closed on 19 October 2007, the Department for Transport published the Attitudes to Noise from Aviation Sources in England (ANASE) study on 2 November 2007. The ANASE study, commissioned in 2001, was clearly a major and important study. The timing of the publication of the study report was unfortunate in that it precluded offering its results as evidence during the Inquiry. However, we believe that the ANASE study is material to your consideration of Inspector Boyland's report. We request that you take the following points into account in coming to your decision and we are copying this letter to the Secretary of State for Transport, the Rt Hon Ruth Kelly MP.

The last major survey of attitudes to aircraft noise that was undertaken in the UK was the ANIS study. It was carried out in 1982 and it established the benchmarks against which levels of annoyance have been subsequently assessed. During the Inquiry many witnesses provided evidence which criticised the inadequacy of the ANIS-derived approach and now it is clear that the ANASE six year study confirms this inadequacy. Based upon the surveys carried out in 2005, the headline conclusion of the ANASE study is that *'people are more annoyed in 2005 than they were in 1982'*.¹

At the outset of the Public Inquiry, the Inspector identified ten main issues to be considered and two of them concerned the effects of aircraft noise. In our evidence, we stressed that aircraft noise impacts should be assessed within the context that Stansted Airport is located in a predominantly rural location.

The ANASE survey site that was chosen for Stansted Airport was located in Harlow, some 19km approximately south west of the airport. This site is neither close to any of the Noise Preferential Routes for departing aircraft nor is it over flown by the majority of arriving air traffic. The survey results for the Harlow site show a high level of annoyance in that 64% of Harlow

¹ ANASE para 9.5.16

respondents were at least “very annoyed” with LAeq greater than 57 dB.² Harlow is the closest large town to Stansted Airport with a population of about 80,000 and ANASE suggests that this population would be greatly annoyed by the proposed airport expansion. Furthermore, since Harlow is a large town, it is unrepresentative of the relatively tranquil rural surroundings of the airport. We therefore argue that, had a survey been undertaken 19km away from the airport in a more typical setting of a small country town or village with lower background noise levels, the level of annoyance would have been even greater. The increased annoyance within a rural setting was borne out by the considerable volume of evidence, in addition to our own, that was presented to the Inquiry from a wide area around the airport.

The ANASE conclusion that there has been a change in attitudes to aircraft noise is, in our view, consistent with similar evidence throughout Europe where people are now less tolerant of noise intrusions, particularly aircraft noise. The ANASE results show that the level of annoyance is consistently higher than it was in 1982 for comparable ANIS levels with the same LAeq.³ The modelled mean annoyance level of 50 which occurred at 63 dB for ANIS now occurs at the lower level of 55 dB for ANASE; a difference of 8 dB.⁴ This finding reinforces our evidence to the Inquiry where we showed that the ANIS-derived 57dB LAeq 16-hour measure for the onset of significant community annoyance understates the true level of annoyance.

Furthermore, ANASE showed that there has been a shift in emphasis in the relative importance of the two components of annoyance; which are the sound level of the aircraft and the number of events. This bears out one of our fundamental criticisms of the LAeq metric for aircraft noise assessments. The LAeq metric does not adequately reflect the annoyance caused by a series of noisy events separated by relatively quiet periods particularly when the frequency of these noisy events increases. ANASE found that *‘annoyance is not determined solely by the amount of aircraft noise as measured by LAeq’*.⁵

In addition, ANASE showed that *‘the relative importance of the number of aircraft has increased over time’*⁶ and that *‘the contribution of aircraft numbers to annoyance has increased quite markedly’*.⁷ This directly accords with our own evidence to the Inquiry that, because aircraft are intrinsically very noisy (albeit individually less noisy than they used to be), the fact remains that the number of aircraft movements at Stansted Airport has increased substantially in recent years which has led to increased annoyance levels. This same point was amply supported by the Inspector at the Heathrow Terminal 5 Inquiry. In his summary report he said *‘...[the LAeq 16-hour index] was the subject of severe criticism much of which I consider to be well founded.....I believe that it fails to give adequate weight to the number of aircraft movements’*.⁸ This shift in emphasis confirmed by ANASE has a consequent effect on the application of the widely used PPG 24 guidance which states that *‘a change of 3 dB(A) is the minimum perceptible under normal conditions’*.⁹ As we made clear in our evidence to the Inquiry, this guidance relates to single noise events and not to noise levels averaged over a period of time as calculated by the LAeq metric. As now confirmed by ANASE, by failing to sufficiently weight the number of aircraft events, we contend that the LAeq metric is an inadequate indicator of aircraft noise annoyance.

One of the ANASE study tasks was to distinguish the annoyance from aircraft noise at different times of the day and night. The results showed that people are much more sensitive to aircraft

² ANASE Table 7.1

³ ANASE para 9.4.8

⁴ ANASE para 9.4.9

⁵ ANASE para 7.4

⁶ ANASE para 9.8.21

⁷ ANASE para 9.10

⁸ Report of the Inspector at the Heathrow Terminal 5 Inquiry, Dec 2000 (published 2001), para 21.3.34

⁹ PPG24, Planning and Noise, Glossary

noise at night and particularly around midnight and the early hours thereafter. This finding is entirely consistent with our evidence to the Inquiry and the ANASE study found that respondents consider the same noise at night to be 84% more annoying than the same noise during the day.¹⁰

We believe that the results of the ANASE study have thoroughly endorsed and supported several important aspects of the evidence given by SSE to the Inspector during the course of the Public Inquiry in respect of noise issues.

Yours sincerely

A handwritten signature in cursive script that reads "Peter Sanders". The signature is written in black ink and is positioned above the printed name and title.

Peter Sanders
Chairman

cc The Rt Hon Ruth Kelly MP, Secretary of State for Transport
Mr Michael Taylor, Department for Communities and Local Government

¹⁰ ANASE para 10.6.3