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Sent: 25 May 2023 16:14

To: Section 62A Applications <section62a@planninginspectorate.gov.uk>

Subject: Section 62A Planning Application: S62A/2023/0017 - Land at Tilekiln Green, Start Hill, Great Hallingbury

Section 62A of the Town and Country Planning Act 1990.

Reference: Planning Application S62A/2023/0017 - Land at Tilekiln Green, Start Hill, Great Hallingbury

General

I strongly object to this proposed development. The application will result in commercial vehicles operating on roads immediately adjacent to Junction 8 of the M11. I submit that Junction 8 cannot cope with any more traffic. It is already carrying a large number of vehicles travelling on the B1256 and through Junction 8. Often traffic is at a standstill on the Junction 8 roundabout due to vehicles (cars and HGVs) queuing to access the Welcome Break service station from the A120 and the M11.

Local Takeley residents have experienced a large number of housing developments over recent years. It is pertinent that the Planning Inspectorate recently dismissed an appeal (APP/C1570/W/22/3291524) for more mixed development including 38 dwellings in Takeley.

Noise impacts

The proposed Tilekiln Green site lies immediately at the southern end of Runway 22 (south westerly direction) for Stansted Airport and the predominant noise sources are aircraft in flight during take-off and landing cycles (known as air noise) and when taxiing on the airfield (known as ground noise). As a 20-year long term average, Runway 22 is used 73% of the time according to figures published by the Civil Aviation Authority. This means that the site is more exposed to aircraft air noise than an equivalent site located at the north easterly end of the opposite runway direction of Runway 04.

The following detailed analysis concentrates on the adverse impacts of aircraft noise at the proposed Tilekiln Green site. There will also be additional noise associated with road traffic on the B1256. It should be noted that Stansted Airport is a 24/7 operation and road traffic associated with the airport starts in the early morning from 4am and lasts until after midnight.

Aircraft Noise standards

The Government has adopted the following noise levels from World Health Organisation (WHO) definitions to describe the effects of noise and it builds on the levels outlined in the Department for Environment, Food and Rural Affairs 'Noise Policy Statement for England'.

- **NOEL – No Observed Effect Level** – this is the level below which no effect can be detected.
- **LOAEL – Lowest Observed Adverse Effect Level** – this is the level above which adverse effects on health and quality of life can be detected.
- **SOAEL – Significant Observed Adverse Effect Level** – this is the level above which significant adverse effects on health and quality of life occur.

In 2014, the Department for Transport (DfT) commissioned a research paper 'Survey of Noise Attitudes' for aviation noise. This was published in February 2017 and set 51dB LAeq for 16 hour daytime and 45dB LAeq for 8 hour night time as the LOAEL average thresholds. It set 54dB LAeq for the daytime SOAEL average threshold which is the level for the onset of significant community annoyance.

The WHO guidelines say that to protect against sleep disturbance the critical values for night noise measured outdoors for bedrooms are an averaged value over 8 hours of 45dB LAeq and a maximum value of 60dB LA_Fmax for each noisy event. Additionally, the WHO

recommends that a lower figure of 40dB Lnight should be *“the target of the night noise guideline to protect the public, including the most vulnerable groups such as children, the chronically ill and the elderly”*.

Aircraft noise assessment

Prior to Covid-19, the site was within the following average aircraft noise contours:

- 66 to 69dB LAeq,16hr (daytime)
- 57 to 60dB LAeq,8hr (night)

These are the aircraft noise exposure contours for Stansted Airport published by the Civil Aviation Authority for 2019, the last year before Covid-19.

It can be seen immediately that these noise levels significantly exceed the Government's daytime and night time LOAEL average thresholds for aviation noise - the level above which adverse effects on health and quality of life can be detected.

These levels also considerably exceed the SOAEL level of 54dB LAeq in the daytime set by Government – the level above which significant adverse effects on health and quality of life occur. As a general rule, an increase of 10dB in noise level is equivalent to a doubling of the loudness.

Aircraft flight movements at Stansted Airport in 2019 prior to Covid-19 were around 200,000 flights per annum. The Civil Aviation Authority has published its airport statistics for 2022, showing that Stansted Airport has recovered and handled 23.3m passengers last year, which is 83% of its pre-Covid throughput. The airport has permission to expand to 274,000 flights per annum. As the aviation industry continues to recover, aircraft noise levels will increase.

The noise monitoring unattended results at two positions U1 and U2 on the site are given by the applicant in paragraph 3.5.3 of its noise report CLI0237/R1/Rev.C for the day and night periods during June and July 2021. This was the period when the number of flights at Stansted Airport was around 65,000 per annum - about one third of pre-pandemic traffic levels [my emphasis]. This must be borne in mind when assessing noise impacts. During the applicant's monitoring period in June and July 2021, with much less flights, the measured noise results at the site all exceeded the DfT values by a considerable margin. In the case of the averaged daytime measured levels at the U1 and U2 positions, they are 5dB and 9dB respectively higher than the DfT significant community noise levels (SOAEL). At night the averaged levels are 11dB and 14dB respectively above WHO guidelines. Specifically for ground noise, Stansted Airport as part of its approved planning application to expand to 43 million passengers per annum provided modelled aircraft ground noise contours (taxiing) for 2028 and the site is shown within the 70dB Lden noise contour at that time. This is the contour for a 24 hour day/evening/night measurement of aircraft noise. Again this is well above WHO guideline levels for health and well-being. Additionally, these monitored noise levels are higher than the background or ambient noise levels measured at the site by between 10 and 12dB in the day and 13 and 16dB at night. As a general rule an increase of 10dB in noise level is equivalent to a doubling of the loudness.

Aircraft noise is not only loud; it also has a large low frequency content. Low frequency noise encounters less absorption than higher frequencies as it travels through the air, so it persists for longer distances and contains a not insignificant vibration characteristic. Additionally, the amount of noise transmitted from the outside to the inside of buildings is greater at lower frequencies than at higher frequencies. Furthermore, modern high ratio bypass turbofan aircraft engines are characterised by a tonal (whine) feature which increases the likelihood of annoyance.

Purely on the basis of aircraft noise at the Tilekiln Green site, the measurements clearly demonstrate that the site is adversely affected by aircraft noise during the day and night. Furthermore, these noise levels exceed Government standards and World Health Organisation guidelines.

Conclusion

From the standpoint of worsened traffic congestion at Junction 8 of the M11 and the considerable adverse aircraft noise impacts, the Planning Inspectorate is strongly urged to refuse this application.

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