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Written summary of (planned but not read out) oral submission to the ISH on Compulsory Acquisition – 4th June 2019

There's no compelling case in the public interest for a CPO. RSP consistently underestimates the damage this proposal will inflict on the health and quality of life of local people:

- The flight paths cover 23km from Ramsgate to Hampton plus some departure “swathes”. All will be overflown at low height. Tens of thousands of residents and workers, plus businesses, open spaces and heritage assets will be affected by aircraft noise¹
- The UK Airspace Policy² says that adverse effects on health and quality of life can be detected at 51dB LAeq and above. The noise contours produced for NNF by the CAA show that, in an average day of operations to the east, almost 38,000 people would suffer average noise levels above this. For western operations it's 21,800 people³
- The World Health Organisation says aircraft noise above 40dB Lnight, outside has adverse effects on sleep and health. The UK Airspace policy sets a LOAEL⁴ for night noise of 45dB LAeq. The CAA calculates that nearly 29,000 people to the east and 22,450 to the west of the reopened airport will experience average night noise in any one night of over 45dB – that's a level of night noise that will adversely affect health⁵
- The WHO says that sleep disturbance is caused at 45dB LASmax and under. 22,050 people to the east will be exposed to night noise of 80dB LASmax when a 747 departs and 15,100 would hear that plane arrive late. RSP offers no mitigation for this negative impact on health and sleep of tens of thousands of people⁶
- RSP says 18 flights a night of 80dB (described in decibel charts as an alarm clock going off close to the sleeper) will not wake people. The reality is that a single night flight over the local population previously produced complaints about

¹ NNF09, NNF14 and NNF16

² Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace – October 2017

³ NNF will submit the CAA's report as soon as we possibly can. We are currently writing our accompanying document which explains the brief we gave the CAA and the rationale for that brief

⁴ UK Airspace Policy: A framework for balanced decisions on the design and use of airspace - Feb 2017. Para 5.39 – “The LOAEL can therefore be regarded as the point at which adverse effects begin to be seen on a community basis. At any noise level above the LOAEL, there will be a proportion of the population adversely affected. As noise increases further above the LOAEL, there will be an increased risk that someone will suffer significant adverse effects. In line with this increase in risk, the proportion of the population likely to be significantly affected can be expected to grow as the noise level increases over the LOAEL. The SOAEL is the point at which the average person would be expected to begin to experience significant adverse impacts on health and quality of life.”

⁵ NNF09, NNF14, NNF16 and NNF17

⁶ Ibid

being woken. RSP also ignores the health damage caused by night noise even if people do not wake⁷

- The DfT says⁸ airspace decisions should be made in line with the latest evidence and consistent with the WHO's guidance.⁹ RSP has ignored this and ignored the 2018 WHO guidance. Given this, we cannot see how the ExA can approve RSP's plans¹⁰
- In 2009, TDC insisted on noise mitigation for a new dwelling in central Ramsgate because of aircraft noise. The CAA contours show that RSP's plans will have a worse impact on central Ramsgate¹¹ yet RSP seeks only to mitigate the negative effects of its proposal for a couple of hundred people

RSP's proposals will inflict significant negative impacts – almost all unmitigated - on tens of thousands of local people, on our health, our quality of life and on our economy and our local environment. The potential benefits RSP claims for its proposal lack credibility and are vastly outweighed by the negatives. There is no compelling case in the public interest for this CPO.

⁷ NNF09, NNF14, NNF15 and NNF16

⁸ Consultation response on UK Airspace Policy – October 2017. Previously submitted by NNF

⁹ UK Airspace Policy: A framework for balanced decisions on the design and use of airspace - Feb 2017. Para 5.49 "So that the potential adverse effects of any airspace change can be properly assessed, we propose that 51 dB LAeq 16hr should be regarded as the LOAEL for daytime noise. We also propose that a LOAEL of 45 dB Lnight should be set for assessing the impact of aviation noise during the night, in line with current webTAG methodology and consistent with the WHO 'Methodological guidance for estimating the burden of disease from environmental noise'."

¹⁰ NNF16 and NNF17

¹¹ NNF16 and NNF17