

## Written Submission by Dr. R. John Pritchard responding to Five10Twelve Noise Contours

I rather think the noise contours commissioned from the CAA by Five10Twelve Ltd. have offered up a glass that is, for their purposes, more empty than full.

These contours confirm that for the vast majority of people who reside in Thanet and surrounding districts including the greater part of Thanet, the whole of Dover District Council and nearly all of Canterbury & District Council, all served by the benefits of Manston Airport, no one will be highly affected by aircraft noise in their localities. I am pleased that they have confirmed what supporters of the airport have said from the start.

According to the information received from the CAA, at **year 20**, long after the airport reopens:

- ✓ 11 out of 12 people (91%) will **not** be highly affected by noise at the 51 dB(L<sub>Aeq16Hr</sub>) contour
- ✓ 7 out of 8 people (86%) will **not** be highly affected by noise at the 54 dB(L<sub>Aeq16Hr</sub>) contour
- ✓ 5 out of 6 people (83%) will **not** be highly affected by noise at the 57 dB(L<sub>Aeq16Hr</sub>) contour
- ✓ 4 out of 5 people (80%) will **not** be highly affected by noise at the 60 dB(L<sub>Aeq16Hr</sub>) contour
- ✓ 3 out of 4 people (75%) will **not** be highly affected by noise at the 63 dB(L<sub>Aeq16Hr</sub>) contour
- ✓ 1 out of 3 people (67%) will **not** be highly affected by noise at the 66 dB(L<sub>Aeq16Hr</sub>) contour
- ✓ 1 out of 2 people (50%) will **not** be highly affected by noise at the 69 dB(L<sub>Aeq16Hr</sub>) contour

It is the Applicant's position that the percentages of people who are 'highly annoyed' (as defined by SoNA 2014) in the same respective categories would be 7%, 9%, 13%, 17%, 23%, 31% and 39%. That suggests that "highly affected" and "highly annoyed" are more or less similar: the differences between the 20 year calculations projected by the CAA and by RiverOak actually appear to be quite small. Indeed, given the fact that there will be very few flights initially and that they will build up over a period of many years, the application of Year 20 calculations and the agreed likelihood that over the next 20 years aircraft engines will become far more efficient and far more quiet than at present does make it seem that the degree of concern expressed now is grossly disproportionate to the level of actual annoyance or percentage of people likely to be highly affected twenty years from now that are projected in these 2019 figures.

For other reasons that I will come onto below, even those figures are grossly exaggerated.

The interactive map that Five10Twelve have circulated on social media [[http://ramsgatevoice.com/?fbclid=IwAR02Swm\\_tKsP-ixkKdISeOuk1LyE1uuJ0kMe3sDkI5lEfTB8oXVEZOstTMk](http://ramsgatevoice.com/?fbclid=IwAR02Swm_tKsP-ixkKdISeOuk1LyE1uuJ0kMe3sDkI5lEfTB8oXVEZOstTMk)], still on-line as at this date] overlays the contour lines across a map of the whole of East Kent. On enlarging it, what becomes absolutely clear is that no-one lives within the 69 dB(L<sub>Aeq16Hr</sub>) contour: it falls **completely** within the airport estate and the redline DCO boundaries.

No-one lives within the 66 dB(L<sub>Aeq16Hr</sub>) contour line, either. That's interesting because internationally there is a great deal of evidence that noise levels of 66 dB(L<sub>Aeq16Hr</sub>) are considered "designated the threshold value of permissible noise for a typical residential urban area – 'multi-family building development and collective residential development'" [Polish] *Journal of Laws* of 2012, Item 1109 – Regulation of the Minister of the Natural Environment, dated 1<sup>st</sup> October 2012, amending the Regulation on admissible noise levels in the natural environment, cited by Jarosław Kubiak & Radzym Ławniczak (2016) "The propagation of noise in a built-up area (on the example of a housing estate in Poznan)," *Journal of Maps*, 12:2, 231-236, DOI: 1080/17445647.2014.1--1801 <https://www.tandfonline.com/doi/pdf/10.1080/17445647.2014.1001801> (2016) as at 13 June 2019. In the USA, the corresponding figure appears to be <65 dB(L<sub>Aeq16Hr</sub>). It seems reasonable to conclude that everyone wants and expects noise levels to come down but there are significant differences of opinion as to what really is significant or insignificant.

The 63 dB(L<sub>Aeq16</sub>) contour area described in Five10Twelve's CAA indicative contours for Manston includes 28 homes in Cliffsend (all thought to be airport supporters); 11 in Smuggler's Leap (mostly pro-airport and strongly opposed to the encroachment of a vast number of additional housing upon their secluded location) and 147 homes in Nethercourt: namely, 26 homes in Kentmore Avenue; 15 homes in Kirkstone Avenue, 12 homes in Drybeck Avenue, 7 homes in Whinfell Avenue, 7 homes

in Windermere Avenue, 26 homes in Derwent Avenue, 18 homes in Borrowdale Avenue, and 6 homes in Grasere Avenue. That comes to a total of 186 homes which, given Five10Twelve's premises, the CAA predicted would fall within the 63 dB(L<sub>Aeq16</sub>) contour line.

Considering that there are approximately 25,000 homes within Ramsgate (CT11 & CT12), the number and percentage of those who are described as likely to be highly affected by high levels noise at present calculations for twenty years hence (is actually quite low there, much of the rest of Ramsgate is slightly affected or unaffected at all, and as a proportion of the total population of Thanet or of its neighbouring authorities the noise issues are comparatively insignificant. Herne Bay & Beltinge, too, are almost completely unaffected: only the lowest, 51dB(L<sub>Aeq16</sub>) contour reaches anywhere even remotely near there: about 250m SSW of where the River Wantsum crosses the A299 Thanet Way, and that's 2km from Beltinge! The 51dB(L<sub>Aeq16</sub>) contour that they selected as their minimum impact contour scarcely touches ANY place within the boundaries of Canterbury & District Council other than agricultural fields and solar farms. What Mr. and Mrs. Jones-Hall of Five10Twelve Ltd. have conclusively proved by the work that they have commissioned from the CAA as independent experts is that the alleged impact of the airport on those areas is a myth, hysterical nonsense.

The predominant noises in the villages, towns and larger conurbations of East Kent will continue to come from nearby road traffic (including buses, lorries, emergency vehicles and mopeds), trains, dogs barking, birdsong, dustcarts, road works, children playing, pubs playing music or showing football matches, and other people just going about their private lives and businesses, just as they will do when Manston Airport re-opens. Aircraft noise will never be more than a fraction of the burden of environmental noise levels experienced by most people in London or most urban townscapes, and the frequency of aircraft movements will be only a tiny fraction of what occurs near major passenger airports. Any comparison of the projected ATMs for Manston Airport with the ATMs of the larger airports in Britain will make that point conclusively.

Even when looking at Ramsgate, as can be seen, the CAA study confirms that only a tiny percentage of land, dwellings and residents will be badly or adversely affected. Anyone affected will likely become habituated to it not least because the number of flights will only increase gradually and at the commencement of its reopening Manston Airport will have **very little** air traffic. For seventeen years before we were married, my wife, her son and four dogs lived only 30 feet from the centre of the line running from the centre of the airport across Ramsgate to the sea. My son lives 410 feet from that same line. They did not experience high levels of annoyance or disturbance from the airport when it was in full operation, even when Concorde flew over: the dogs barked but wagged their tails as aircraft passed overhead and disappeared within seconds: it appeared that the dogs took credit for the rapid disappearance of every approaching aircraft!

Long-term residents of Thanet overwhelmingly want the airport to return. Those who don't may in some cases wish to move but for the remainder, Manston Airport was here for almost 100 years before it closed. Its historic buildings and the that are so much admired were here and scarcely affected if at all by that. And because the CAA contours commissioned by Five10Twelve Ltd. make **zero** allowance for progressive changes of aircraft noise through evolution of aero engines and aircraft design specifications over the next two decades, including the move to electrically powered engine designs which are expected to become commonplace, these figures actually support the Applicant's case.

I wrote, supra, that there were reasons to believe that the CAA forecast based upon historic data was likely to be very conservative as indeed RiverOak's calculations have been. I have already enumerated some of them. Here is yet another. It is widely acknowledged that the practice of "stacking" aircraft that are queued up waiting for their turns to land at busy airports (often at intervals that amount to seconds rather than minutes), increases noise and other forms of pollution. Those are taken into account in determining dB(L<sub>Aeq16</sub>) levels. Manston, due to its fortunate position and the far smaller number of ATMs that will be permitted to occur here, simply won't have that

problem, and that will greatly reduce its actual noise levels not only now but throughout the next twenty years and more.

One final point. Airshows, too, have always been highly popular, remembered fondly, not regarded as nuisances: they don't drive people away. They are far more noisy than the airport will be as RiverOak seek to develop it, but visitors did used to come in their tens of thousands from far and wide to see them! On the last such occasion there were so many cars that the whole of the Northern Grass was insufficient to provide parking for them. Those days, alas, will be gone, but I have little doubt that aircraft involved with those events over the sea off Herne Bay will find a re-opened Manston of great help.

Dr. R. John Pritchard