

## Submission Relating to Information Regarding Stansted Flights & WOB (EXD087)

Matthew O'Connell, March 2020

The information provided by Mr Andrew of MAG (Stansted owners), both in EXD087 and at the EiP, aids a summary of why aircraft noise IS a relevant issue for the WOB site and therefore SHOULD have been reflected in the SA (and potentially other areas of the evidence base).

The following points have been made in submissions and / or discussed at one or both of the EiPs. I believe it is correct to say that they are not disputed by any of the parties:

- There are flight paths over the WOB site at heights in the 3000-5000ft range (arrivals) and 4000-7000ft range (departures)
- Government guidance is that flights paths below 7000ft should avoid densely populated areas where possible due to the potential health impacts of aircraft noise (some of the adverse health effects relate specifically to children)
- The Inspector commented in his June 2018 letter, after these two points were raised at the first EiP, that *"If WoBGC is included [in a revised spatial strategy], account should be taken of the effects on it of overflying aircraft to and from Stansted airport"*
- The noise contours for Stansted - regardless of the increase in passengers - do not cover WOB as the relevant flight paths are only used ~30% of the time and noise contours are an average measurement
- Noise contours are used for statutory noise monitoring, rather than being a reflection of the noise experienced in locations at certain points in time
- Mr Andrew confirmed that he would expect the houses at WOB to be marketed on the basis of being under flight paths

The confirmatory information from Mr Andrew does not change any of the above.

**I assert that it is clear that the key question the Inspector must consider here is: if there are flight paths over WOB at health-impacting heights for around 30% of the time - and no or potentially only one other site has such flight paths - then can it be correct that the SA has not recognised this as having a material impact on health?**

The answer is, I believe, similarly clear: **the SA's approach is an error. Indeed it is one which cannot be written off as an appropriate high level use of data given the strategic stage of planning:** the specific issue had been highlighted at the original EiP and the matter highlighted by the Inspector as important. As such, simply writing off the problem using irrelevant or misleading information was never going to be acceptable. **It did not necessarily have to be a "showstopper" but it did have to be recognised and taken into account.**

In the context of an SA where the methodologies and assessments have been engineered to produce results where all sites are effectively the same, then this omission is potentially all the more meaningful. (Note my point from the EiP on the mathematical probability of such results under meaningful methodologies and assessments, driving grave concerns over a lack of objectivity; and also it having been shown at the EiP that there is clear evidence of irrationally favourable scores for the three "original" GCs vs. other sites - Transport was the example I discussed but there are numerous others, of course).

For completeness, see Appendix A for the Stage 1c SA results and note how the more homes that are built under these low flightpaths at WOB (i.e. the larger the size of NEGC1), and therefore the larger the population that is exposed to the adverse health impacts of aircraft noise, the more positive the Health (SA3) assessment becomes.....

Finally, note that there are other areas which this impacts: Viability – if houses need to be marketed as under a flight path, then is it realistic that they would be sold consistently at "on-market" prices and at a high delivery rate?; Employment – might businesses prefer locations where there is no aircraft noise? There may be merit in considering why these have not been addressed in the new evidence base despite it being a known point after the first EiP.

Appendix A – Stage 1c results from ASA

Site	Dwelling capacity	SA objective														
		SA1 Community cohesion	SA2 Housing provision	SA3 Health	SA4 Vitality and viability of centres	SA5 Economy	SA6 Biodiversity and geological diversity	SA7 Sustainable travel	SA8 Accessibility & infrastructure provision	SA9 Historic environment and townscape	SA10 Energy efficiency and climate change	SA11 Water resources and quality	SA12 Flood risk	SA13 Air quality	SA14 Landscape	SA15 Soil and mineral resource
C1 b	2,000	--?/++	++	++/0	+	+	--?	+?/+??	++	--?/?	+	0/?	0	0/0	--?	--?/--
C1 c	2,500	--?/++	++	++/0	+	+	--?	+?/+??	++	--?/?	+	0/?	0	0/0	--?	--?/--
C2 a	700	--?/+	++	++/0	+	+	-?	+?/+??	++	--?/?	+	-?/0?	-?	0/0	--?	--?/--
C2 b	2,000	--?/++	++	++/0	+	+	-?	+?/+??	++	--?/?	+	-?/?	-?	0/0	--?	--?/--
C2 c	2,500	--?/++	++	++/0	+	+	-?	+?/+??	++	--?/?	+	-?/?	-?	0/0	--?	--?/--
C3 a	700	--?/+	++	+?/0	+	+	--?	+?/+??	++	--?/?	+	0/?	0	0/0	--?	-?/-
C3 b	2,000	--?/++	++	+?/0	+	+	--?	+?/+??	++	--?/?	+	0/?	0	0/0	--?	-?/-
C3 c	2,500	--?/++	++	+?/0	+	+	--?	+?/+??	++	--?/?	+	0/?	0	0/0	--?	-?/-
C4 a	700	--?/+	++	+?/0	+	++	--?	+?/+??	++	--?/?	+	0/?	-?	0/0	--?	-?/-
C4 b	2,000	--?/++	++	+?/0	+	++	--?	+?/+??	++	--?/?	+	0/?	-?	0/0	--?	-?/-
C4 c	2,500	--?/++	++	+?/0	+	++	--?	+?/+??	++	--?/?	+	0/?	-?	0/0	--?	-?/-
NEAGC1 a	2,000	--?/++	++	+/-?	+	+	--?	+?/-?	++	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC1 b	2,500	--?/++	++	+/-?	+	+	--?	+?/-?	++	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC1 c	5,500	--?/++	+++	++/-?	+	++	--?	++?/-?	++	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC1 d	7,500	--?/++	+++	++/-?	+	++	--?	++?/-?	++	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC1 e	10,000	--?/++	+++	++/-?	+	++	--?	++?/-?	++	--?/0	+	0/0?	0	0/0	--?	--?/--
NEAGC2 a	2,500	--?/++	++	+/-?	+	+	-?	+?/-?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC2 b	5,500	--?/++	+++	++/-?	+	+	-?	+?/-?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC2 c	15,000	--?/++	+++	++/-?	+	++	-?	++?/-?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC2 d	21,000	--?/++	+++	++/-?	+	++	-?	++?/-?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC2 e	27,000	--?/++	+++	++/-?	+	++	-?	++?/-?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC3 a	2,000	--?/++	++	+/-	+	+	-?	+?/-?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC3 b	2,500	--?/++	++	+/-	+	+	-?	+?/-?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC3 c	7,500	--?/++	+++	++/-	+	++	-?	++?/-?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
NEAGC3 d	8,000	--?/++	+++	++/-	+	++	-?	++?/-?	++	--?/?	+	0/0?	0	0/-?	--?	--?/--
SUE1 a	2,000	--?/++	++	+/0	+	+	-?	+?/-?	++	--?/?	+	0/?	0	0/0	--?	--?/-
SUE1 b	2,500	--?/++	++	+/0	+	+	-?	++?/-?	++	--?/?	+	0/?	0	0/0	--?	--?/-
SUE1 c	6,000	--?/++	++	++/0	+	+	-?	++?/-?	++	--?/?	+	0/?	0	0/0	--?	--?/-
SUE1 d	8,500	--?/++	++	++/0	+	+	-?	++?/-?	++	--?/?	+	0/?	0	0/0	--?	--?/-
SUE2 a	2,000	--?/++	++	+/-	+	+	-?	+?/-?	++	--?/0	+	0/0?	0	0/0?	--?	--?/--