

Wendy Strangeway

From: Andy Wyatt
Sent: 09 January 2017 15:23
To: Wendy Strangeway; Hilary Saunders; Planning
Subject: NYM/2016/0817/FL - South Moor farm airfield
Attachments: Objection letter.doc

Good afternoon.

Please find attached our objection to the above application.

Sorry to send it to so many people but I want to make sure it gets through.

Could someone please e mail me back to confirm successful receipt.

Many thanks and if you would like clarification on any of the points I raise don't hesitate to get in touch.

Kind regards.

Andy Wyatt.



Deepdale Farm
Bickley
Langdale End
Scarborough
YO13 0LL
9th January 2017

Re: Planning application NYM/2016/0817/FL

Dear Hilary.

I write to object to the above application.

I'm sure the numerous objectors will explain in length what a peaceful area this part of the world is and how this tranquillity will be shattered by this airfield and I am fully in agreement.

In fact even the applicant states on his website for his B&B business that people visiting can:

“Enjoy a relaxing stay in a quiet rural location”¹

However rather than further echo those sentiments I'd like to concentrate on some errors I have found in the information provided with the application. These are that the noise levels presented by the applicant are not accurate, that not all the important bird species present in the area have been taken into account, especially the schedule 1 species, that the area affected has not been calculated correctly, and that the economic benefit has been overstated and may in fact be negative.

Noise levels

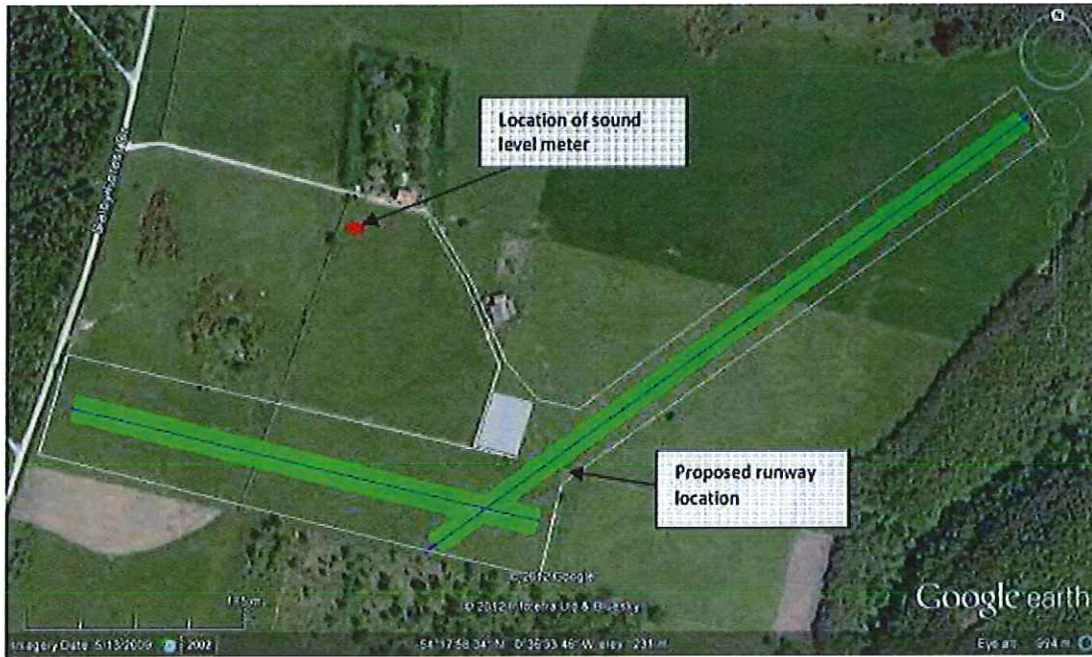
Here I will challenge the data from MAS Environmental submitted by the applicant.

Firstly the background noise in the area has been overstated. The point chosen was NW of the proposed airfield close to the busiest, and one of very few, roads in the area. A more representative reading would have been obtained by taking a reading towards the SE of the proposed runway.

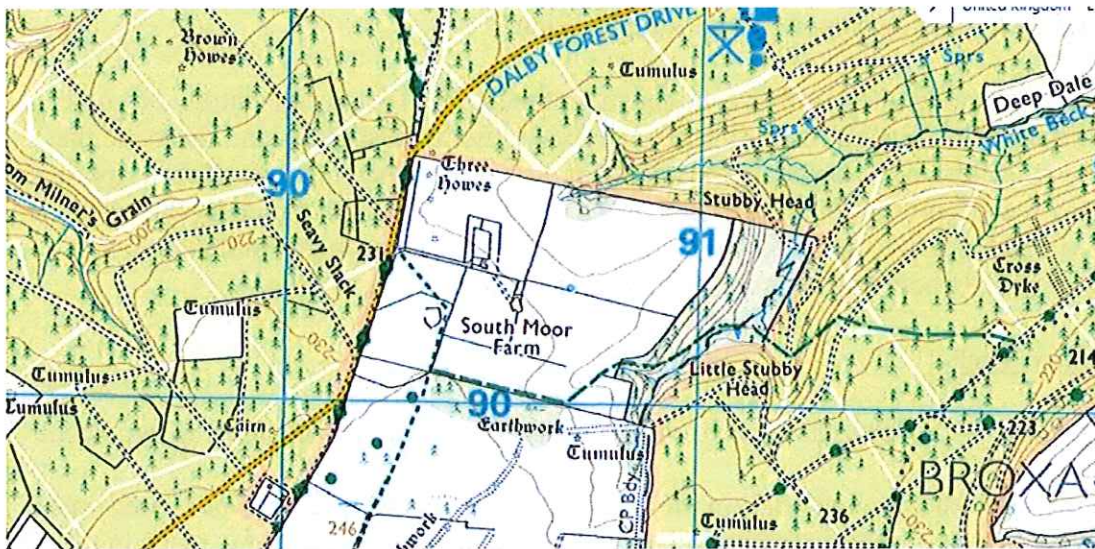
See Figure 1 below from the MAS report. The sound level meter is to the North West of South Moor Farm.



¹ <http://www.southmoorfarm.co.uk/index.html>



Below is a map of the area surrounding South Moor Farm Figure 2



You can see from figure 2 that the area to the South East is much more rural and typical of the area.

Now turning to the noise made by aircraft.

Section 6.2 of the MAS report states that “ sound levels vary with engine throttle (setting) and height above the ground”

The throttle setting required depends on a number of factors including the loading of the aircraft and how aggressively it is being flown. A lightly loaded aircraft flown smoothly and gently will produce a much lower sound level than a heavily loaded aircraft being flown at full throttle. The MAS report does not state throttle settings or loadings or any of the conditions under which the noise survey was carried out.

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However noise data collected under carefully controlled conditions in order to provide representative readings is available. All aircraft have to be certified by certain authorities and part of this certification is noise levels. These noise levels are measured under carefully controlled conditions and are freely available. For instance data from the European Aviation Safety Agency (EASA) is available for aircraft as part of the type-certificate data sheet for noise (TCDSN)² The US Federal Aviation Administration (FAA) also publish noise data for aircraft³

The data on the MAS report where the applicant was flying was not obtained under controlled conditions. I think it can be safely assumed that the applicant flew the aircraft in such a manner as to generate as little noise as possible and consequently these readings should be used as the minimum noise levels to be expected. Please see figure 3 below.

Figure 3 comparison of noise level readings

Manoeuvre	Aircraft	L ^{Amax} from MAS (dB)	EASA official reading (dB)	Notes
Take off	SOCATA Rallye	64	68.1	EASA results are much noisier
Fly past @ 600ft	SOCATA Rallye	64	70.3*	
Fly past @ 800ft (higher rpm)	SOCATA Rallye	70	70.3*	A massive difference at the higher rpm even though the aircraft is higher up
Fly past @ 1700ft	SOCATA Rallye	58	70.3*	
Take off	Piper Cadet	70	68.7 – 74.8	EASA lists lots of results according to the specific model of Piper Cadet
Take off	SOCATA Trinidad	71	82.5	Sound pressure level is nearly 4X higher on the EASA reading

* EASA record noise levels for “overflight” under one controlled set of conditions (throttle settings, altitude etc) not numerous variations

² <https://www.easa.europa.eu/document-library/noise-type-certificates-approved-noise-levels>

³ https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC%2036-1H.pdf

It may be sensible here to define noise and how it is measured. For the purposes above noise is measured in Decibels (dB) on a logarithmic scale. This means a doubling of the reading does not mean a doubling of the noise.

For Psycho acoustic sensing (how humans and animals perceive noise) a 10 dB increase in the reading at any level means a doubling of the noise. In terms of Sound Pressure Level a 6 dB increase in noise at any level means a doubling of the noise. Also worthy of note for the Take off recordings is that a halving of the distance results in a 10 dB increase in the noise level. So for a human this is a doubling of the noise.

The MAS results were taken at 200m but the EASA and FAA are taken at 400m or 450m so you would expect the MAS readings to be much higher than the official EASA readings and they are not. The reason this is important is because the MAS readings have been assumed by the appeals inspectors to accurately represent likely noise levels and we can see from figure 3 comparing them to standardised EASA readings that they do not.

Additionally data from only 3 aircraft was presented by MAS. It was stated at the appeals hearing that single engined propeller driven aircraft and also helicopters would use the airstrip. In table 4 I have contrasted the Piper Cadet (as used above by MAS) with various other single engined propeller driven aircraft and helicopters. I have used the FAA data this time as this lists the number of engines on an aircraft so I can restrict it to single engined aircraft only which the applicant stated at the recent appeal would be the only type capable of using the airfield, although this is not stated in his application.

Table 4 take off noise readings for aircraft that will be able to use the airfield.

Aircraft	L^{Amax} from MAS at 200m (dB)	Federal Aviation Authority official reading at 400m (dB)	Increase in noise level to the human ear for MAS Piper Cadet reading against FAA reading when adjusted for distance
Piper Cadet	70	72.0	FAA noise level over 2X higher
Piper Cherokee	-	79.3	FAA noise level 4X higher
Beech Bonanza	-	79.2	FAA noise level 4X higher
Cessna Centurion	-	79.9	FAA noise level 4X higher
Cessna Stationair	-	79.8	FAA noise level 4X higher
Augusta A109E helicopter	-	91.8	FAA noise level over 8X higher
Bell 412 SP helicopter	-	93.2	FAA noise level over 8X higher
Eurocopter AS 350 BA	-	91.1	FAA noise level over 8X higher

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There are 21 different single engined Piper models listed in the FAA data (including the Cadet). Of these 4 are quieter than the Cadet but 16 are noisier. That is 4 times as many Piper aircraft are noisier than the model chosen by the applicant for the noise test than are quieter.

No noise data was provided by the applicant for helicopters (which are included in the planning application) and according to the FAA official data these are 8 times noisier than the Piper Cadet data submitted by the applicant.

In the last appeal the planning inspector was told that planes were no noisier than tractors.

This is an extract from a Health and Safety Executive publication HSE - AS8 - Noise in agriculture.

For new tractors, manufacturers are legally required to meet specific noise limits inside the cab, even when the windows are open (86 dB for normal conditions or 90 dB under heavy load). Most modern tractors are now fitted with approved 'Q' cabs (with a 'Q' plate inside the cab), so the levels are likely to be below 80 dB. In older cabs and tractors with roll bars, levels may be as high as 85 dB.

On a tractor you sit right next to the engine. The highest level quoted above is 90 dB. This is still lower than a helicopter that is 400m away. So to say that the noise levels produced will be similar to a tractor are ridiculous.

Bird species to be taken into account

The bird assessment from Quants Environmental is severely flawed as it does not take into account all of the important bird species present in the area. The report merely covers the Nightjar and Goshawk. I appreciate that a lot of Raptor records are kept secret but even a small amount of desktop investigation of the area would tell you that there are other Raptors present.

3.3 km away as the crow (or plane) flies is the Wykeham Forest Raptor viewpoint provided by the Forestry Commission. On the official North York Moors Park Authority website⁴ it states for everyone to see:

There's a permanent [Raptor Viewpoint](#) in Wykeham Forest where you may see merlin, goshawks, honey buzzards, common buzzards, red kite, peregrine, and sparrowhawks

In the Quants report in section 3.1 it states:

SNH guidance⁵ (The use of helicopters and aircraft in relation to disturbance risks to Schedule 1 & 1A raptors and wider Schedule 1 species) provides Safe Working Distances (both lateral and altitudinal) for 6 raptor species with recommended lateral distances ranging from 300m for red kite to 1000m for golden eagle and recommended altitudinal distances ranging from 500m for red kite, golden eagle, hen harrier, osprey and peregrine to 1000m for white-tailed eagle.

⁴ <http://www.northyorkmoors.org.uk/visiting/enjoy-outdoors/wildlife-watching>

⁵ <http://www.snh.gov.uk/docs/A1617360.pdf>

When calculating the affected area Quants seem to have allowed for the 500m lateral separation but not the 500m altitudinal separation. Whilst it could be argued that the goshawk is not specifically mentioned on the SNH guidance it is caled as part of the report by virtue of the fact it is a Schedule 1 raptor. In any event we can see from the mention of red kites and peregrines at the nearby Wykeham Forest raptor Viewpoint that the 500m altitudinal separation should be used as well as the lateral separation.

For additional confirmation of red kites in the area I have contacted Yorkshire red kites⁶ and they have on record a sighting of a red kite between Langdale End and Hackness 4.3 km to the East of the proposed airfield in 2015.

In appendix 2 of the Quants report "Information provided by the NEYEDC" of the 8 entries the newest 2 are from "Ecological Consultant Survey data: Wold ecology R.B. Ltd" This is information from an ecologist employed to compile reports on bird distribution.

I managed to contact the above Richard Baines (R.B.) of Wold Ecology by phone. I took notes during our conversation and Richard has given me permission to submit details of our conversation as he will not have time to object himself before the deadline for submissions due to pressure of work. Richard conducts nature tourism holidays and is fully booked currently.

Richard states – "I have great concerns over the application as there are important bird populations present. There are 20 breeding pairs of honey buzzards in the UK 2 of these pairs are in the Dalby area. Goshawks also nest all over that area and move their nest sites all the time. South Moor farm is right in the centre of the Goshawk population. Both the Goshawk and Honey Buzzard are protected under schedule 1 of the Wildlife and Countryside act 1981 and it is illegal to disturb them while nesting. If you do you will be committing a criminal offence."

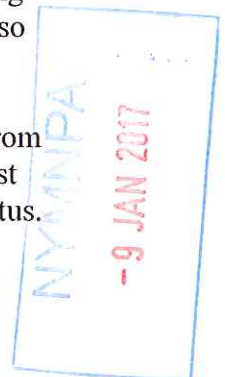
Richard continues "there is also a large population of nightjars in the area and the largest population of turtle doves in Northern England. Both of these populations are classed as being of national importance"

Personally I have been told that there are 35 goshawk nests in Dalby forest and the surrounding area and that the schedule of forestry operations is regularly changed as certain areas cannot be worked in at certain times. I subsequently spoke to a senior employee of the forestry commission who confirmed this. These areas are constantly changing as the goshawks move their nest sites and consequently merely restricting aircraft permanently to one route will not work as the goshawks move their nests so often.

The conservation and protection status of the birds listed above can be obtained from the RSPB website⁷ but to summarise the merlin and turtle doves have a red (highest concern) conservation status and honey buzzards and nightjars are both amber status.

⁶ <http://www.yorkshiredkites.net/>

⁷ <https://www.rspb.org.uk>



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Other people will be able to explain in far more detail than me the implications of the above species being proven to be present in the area. The red kite is of particular interest as the SNH document⁵ states “species listed on Schedule 1A receive enhanced protection against harassment at any time”. The red kite is listed on Schedule 1A and certainly aircraft flying around constantly would harass the red kites. The RSPB website states:

The red kite is afforded the highest degree of legal protection under the Schedule 1 of the Wildlife and Countryside Act 1981.

The Quants report states that Deepdale is an area that will be affected. There is an important nature reserve in Deepdale that ajoines the applicants land and will be severely affected by the proposed airfield. Here is how the area is described on a local tourism website⁸

Every year Dalby attracts nearly 400,000 visitors and is rated as a top mountain bike venue.

But it's also a prime spot for wildlife watching and rambling, whilst tranquil Deepdale, a majestic 60 hectare (150 acre) Forest Nature Reserve, offers a unique 'back to nature' experience with springs, meadows and trees.

There is also a buzzards nest right on the flightline of the proposed runway around 1500m away to the North East.

The size of the area affected.

Here I will once again challenge the data from Quants Environmental submitted by the applicant.

I have obtained data from both a pilot and a flying instructor. They have provided me with the following rate of climb and speed in climb data typical for the type of single engined propeller driven aircraft that are likely to use the airfield. I have not included data for helicopters but this should also be taken into account. I have calculated the other data provided from the above information – see table 5.

Table 5 take off information for typical single engined propeller driven aircraft during climb out leg.

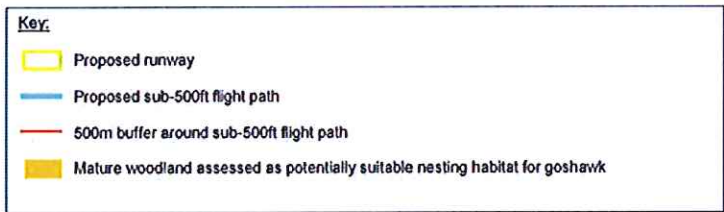
Description	Value
Rate of climb	500 feet / 152 metres per minute
Speed in climb	70 knots / 130 Kilometres per hour
Lowest height after take off that a turn might be made	300 feet
Distance taken to reach 300 feet	1.30 Km
Distance taken to reach 500 feet	2.17 Km
Distance taken to reach 500 metres	7.13 Km

⁸ <http://www.helmsley.info/wild-free-dalby-puts-out-welcome-mat/>

The above data seems reasonable as the Piper Cadet for instance has a best rate of climb of 670 feet per minute at sea level and at maximum throttle⁹. So on a hot summers day high up on the moors 500' per minute would seem to be a reasonable figure for other aircraft.

There are serious shortfalls in the Quants report. There is no mention of any supporting data to prove how long it would take an aircraft using the runway to climb to 500' and there is no scale on appendix 4 with which to work it out. Below is appendix 4 from the Quants report.

Appendix 4. Distribution of Suitable Goshawk Habitat



Although there is no scale provided the scale can be calculated by looking at features on the map.

The proposed sub-500ft flight path shown by Quants in appendix 4 above is just over 1 km in each direction from near the end of the runway where planes would be up to speed and leaving the ground. As can be seen from table 5 above a typical aircraft that would use this airfield climbs at a rate of 500 feet per minute so it would need to be airbourne for 1 minute to reach 500'. The typical speed in climb is 130 kph. So the calculation for distance covered to reach 500' is as follows.

Distance = speed in kph divided 60 to give distance in one minute
 Distance = 130 kph / 60
 Distance = 2.17 km

The Quants report has used a distance of half this to provide the limits of the area to be studied. It is very doubtful if any aircraft of the type that has been stated by the applicant that will use the airfield will be at 500' in that distance. The truth is the distance that could reasonably be expected is double that stated.

⁹ <http://sats.aeroengineer.net/data/cadet.html>

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Quants have also assumed that aircraft will fly in a straight line. There is nothing in the applicants documents to suggest this will be the case. The earliest in a climb that you could safely perform a turn is at 300' and once at 300' altitude you could turn in any direction.

As has been mentioned by Quants there are raptors present in the area. I have provided evidence of many more raptor species being present in the area than the one considered by Quants and Quants have said that the SNH guidance states for aircraft that "recommended altitudinal distances ranging from 500m for red kite, golden eagle, hen harrier, osprey and peregrine" be observed. We know from the Wykeham forest raptor viewpoint that red kites and peregrines are in the area so actually the area that should be investigated is anywhere within a sub-500m flight path. Please see table 5 below.

I have assumed that a straight line will be flown until 300' is reached. At this point a pilot can turn in any direction but will need to continue climbing until a total distance of 7.13 km has been reached at which point they will be at 500m altitude and will cease to interfere with any raptors (well ones at ground level anyway). I have marked on table 5 the size of each sub 500m altitude area allowing for taking off in either direction.

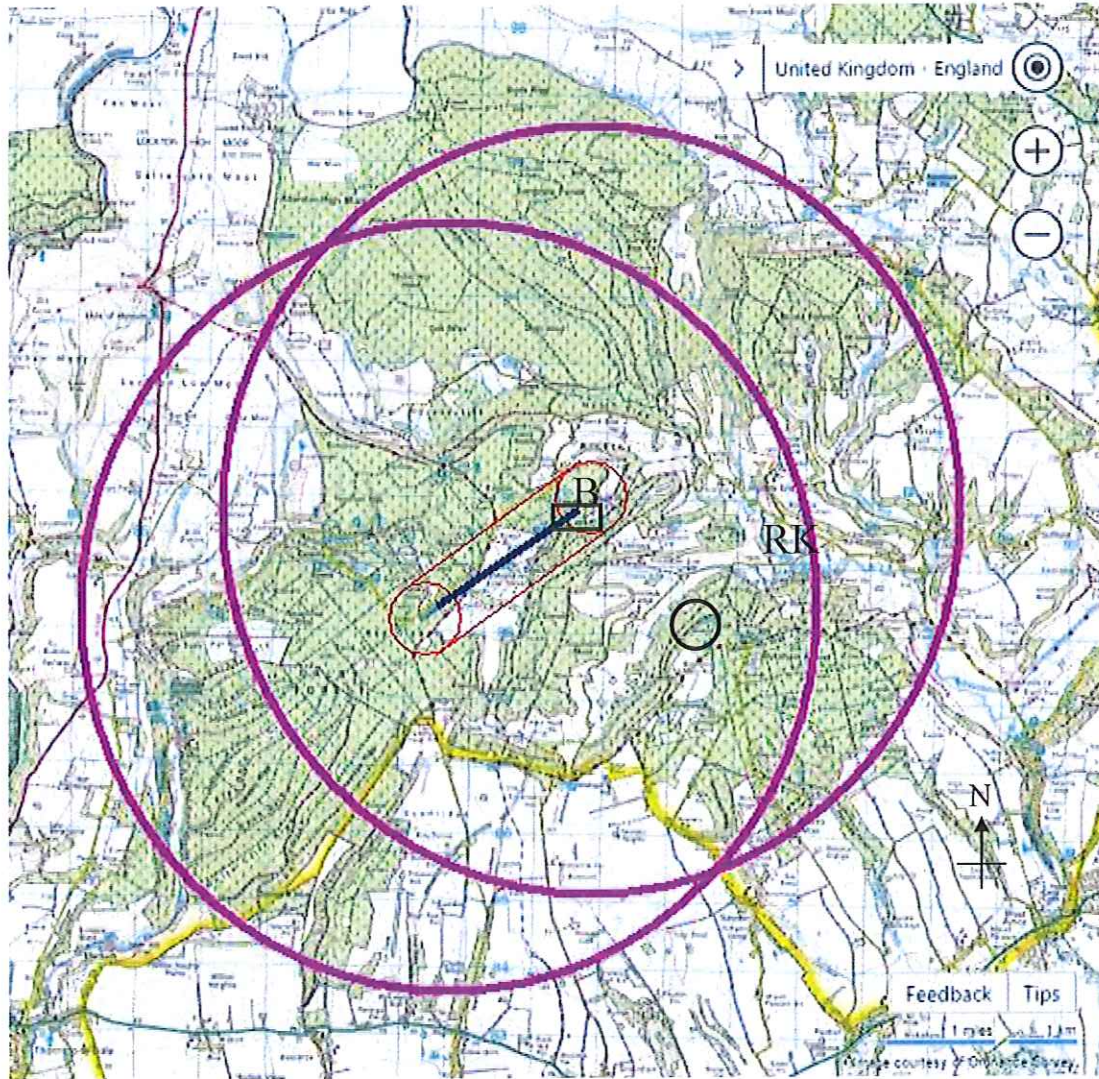
You will note that unfortunately the sub 500m altitude area covers the buzzard nest site, the Wykeham forest raptor viewpoint, the point where a red kite was sighted and Deepdale nature reserve.

It is worthy of note that Quants have said nearly all the woodland in the area they investigated was suitable for goshawks. The majority of the extra land included in the sub-500m flight area is similar woodland so would also be suitable habitat. The suitability of this habitat probably explains why there are 35 breeding pairs in the area.








The area that should have been assessed is many many times larger than the area that was assessed which I have also marked on table 5.



Table 5 sub 500m flight area



Key:

-  Original area investigated by Quants
-  Sub 300 feet flight path
-  Sub 500m area after turn at either end of sub 300 feet flight path
-  Wykeham forest raptor viewpoint
-  B Buzzard nest
-  RK Red kite sighting
-  Deepdale nature reserve

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Economic benefit

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I have read some of the letters of support from flyers. The first was from Dr Spencer which I found particularly interesting.

I live at Deepdale farm just over a mile as the crow (or plane) flies from South Moor farm. I work from home and the company I work for is based in Dr Spencer's place of residence – Bury St Edmunds. In fact very near to where Dr Spencer lives. I have made the journey by car to Bury St Edmunds hundreds of times so feel able to comment with some authority.

The roads are actually quite good, the A14 dual carriageway runs right on the outskirts of Bury St Edmunds, this links to the A1 and A1M and then onto the A64 – all dual carriageway or bigger with no roundabouts etc to contend with. It is only the last part from Malton where the roads are not dual carriageway. I can comfortably do the trip in under 4 hours, sometimes a long way under.

Dr Spencer would have to drive to his aircraft from home which is around 40 minutes, untie it or get it out of the hanger, take all his things out of the car and put them into the plane do his pre flight checks and then take off probably another 30 minutes at least. Flying up would take around 2 hours and he would arrive at South Moor and have to park his aircraft, tie it down and remove all his things say 15 minutes. So a total of 3 hours 25 minutes. So not the huge time saving being quoted. However he states he would like to visit Whitby. Well this is a little tricky as he has left his car in Bury St Edmunds. Assuming Dr Spencer can obtain a car Whitby is a 50 minute drive from South Moor farm. So a total journey time of 4 hours 15 minutes. Bury St Edmunds to Whitby direct is an easy 4 hour drive. So if time is as important as Dr Spencer states he would be better to drive direct to Whitby from Bury St Edmunds and leave his plane behind.

So the time savings people are talking about are a myth unless you are travelling from a very long distance away.

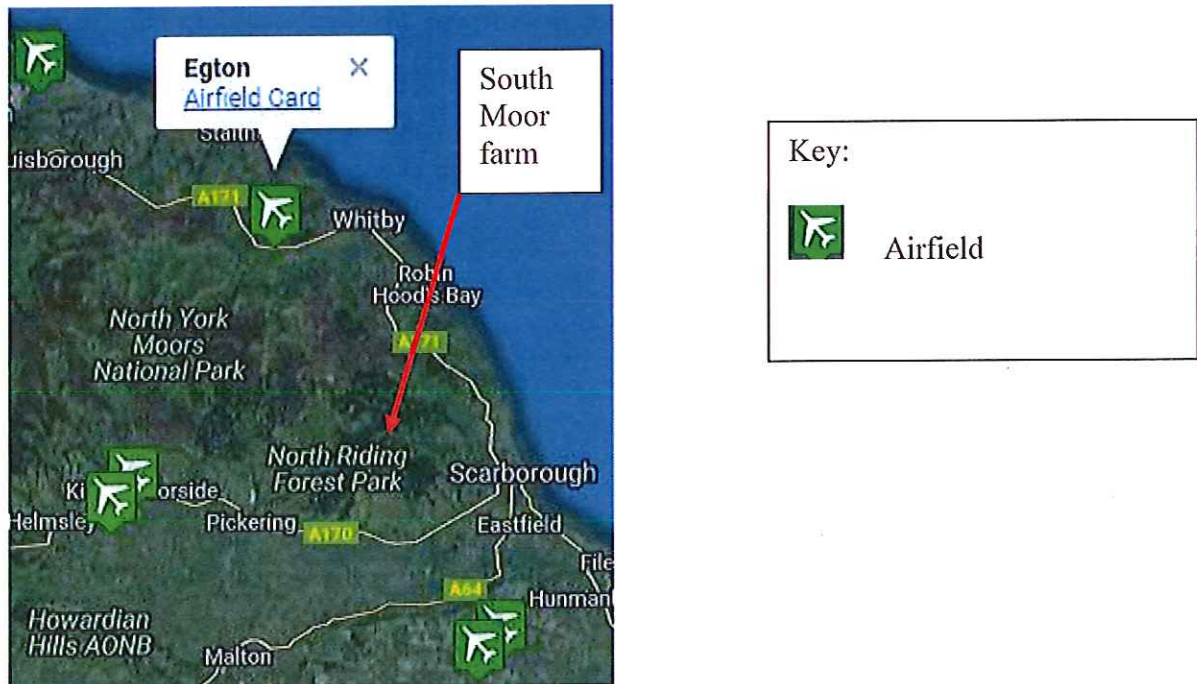
I do have another suggestion for Dr Spencer and others interested in flying into the area. It was stated at the last appeal by one of the applicants team that there are 6 airfields already operating in the North York Moors National Park. I have looked this up although I cannot find any of the 6 I feel a more suitable airfield for Dr Spencer's needs is Egton airfield (also known as Whitby). This is much nearer to Whitby than South Moor farm – see table 6 below¹⁰

In table 6 you can also see other official airfields surrounding South Moor farm that can be used.

If there are indeed 6 airfields operating in the North York Moors National Park is there really a need for a seventh? Especially with all the other airfields that there are reasonably nearby (see table 6). It doesn't seem to me that Mr Walker will be filling a need by providing another airfield and I cannot see this new airfield will add to the number of visitors.

¹⁰ <http://www.airfieldcards.com/index.php/maptopmenu>

Table 6 – location of Egton (Whitby) airfield and other airfields



Indeed the area around South Moor farm is valued for its peace and tranquillity as the applicant states on his B & B website:

“Enjoy a relaxing stay in a quiet rural location”¹

The reason people visit the area is for this peace and tranquillity and the wildlife. A lot of people in the local area depend on these visitors for an income. There are lots of holiday lets in the area, hotels, B&B’s, glamping pods, shepherds huts etc People will be much less inclined to visit the area if there are aircraft constantly flying about and the net result will actually be a decrease in the economy in the area as people decide not to visit and seek out quieter areas.

Summary

Hopefully what I have presented above is largely new information.

The noise levels stated in the MAS Environmental report are not typical of the noise levels that can be expected for similar aircraft flown under normal conditions and take no account of helicopters which form a part of this planning application. Helicopters being much noisier with FAA certified data showing that noise levels are 8X higher than the levels recorded by MAS for propeller driven aircraft.

It was stated at the last appeal that propeller driven aircraft are only as noisy as a tractor. This has been proven above not to be the case and tractor noise is further reduced by any obstructions, trees for instance.

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The bird assessment from Quants Environmental is severely flawed in that it does not take into account all of the species present, one of which (the red kite) is afforded the highest level of protection possible by law. It also does not cover a big enough area with climb rates being used that are too high and using the area sub 500 feet (152m), when, according to Quants own report a sub 500m altitude area per SNH (Scottish National Heritage) data should have been used. Consequently the damage to wildlife has been severely under-reported in the Quants report.

It was stated at the previous appeal that there would be an economic benefit as people would fly into the area. By the applicants teams own admission there are 6 airfields in the North York Moors National Park and from data I have provided there are yet more not too far away. Thus the economic benefits from increased tourism will not materialise and in fact the extra noise is likely to result in a net decrease in tourism in the area as people seek to go elsewhere for peace and quiet.

Conclusion

In rejecting the applicants most recent appeal the planning inspector stated

“I take into account the conservation of wildlife is explicit in the statutory purposes of the national park, and that having regard to the Sandford principle, this harm must carry greater weight than the stated benefits”

It has been clearly demonstrated above that the economic benefits may well in fact be negative for the area as a whole (not positive) and that there is much more wildlife in the area than had previously been stated. Also that the aircraft will be much noisier than the data supplied by MAS suggests.

As the latest appeal was deemed worthy of refusal even before all the above was known it is obvious that it should be once again refused.

Additionally I feel that as so much potential harm may be caused to protected species that the applicants permitted development rights for aircraft should also be removed.

Yours sincerely.

Andrew Wyatt.

Coral Bignell.

