

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
Date: 11 January 2023 13:56:58

Application Reference No. : SMD/2022/0577 Site Address: Land At Blythe Park Sandon Road Cresswell
Staffordshire Comments by: Paul Bushell Property Owner

From:

The Shippons
Cresswell Road
Cresswell
Cresswell
Staffordshire
ST11 9QY

Phone:

Email:

Submission: Objection

Comments:

Further to my email to the planning department on 31st December 2022 I am uploading the said information to the planning portal due to it not currently being listed on the site. See below:

Paul Bushell

The Shippons

Off Cresswell Road

Cresswell

ST11 9QY

31st December 2022

I am writing to inform the planning department of my strong objections to planning application SMD/2022/0577 by Hill Helicopters for the change of use and provision of hardstanding, helipads, balancing pond, visitor car park, security fencing, landscaping and additional tree planting in connection with the proposed helicopter manufacturing plant to facilitate testing, training, servicing and sales flights (associated application reference SMD/2022/0275).

I would like to make the following objections and views as follows:

I question the assumptions made in the Noise impact assessment regarding external noise impact from take offs and landings from the proposed aerodrome.

From information obtained in application SMD/2022/0275 which details the requirements for the proposed helicopter manufacturing facility.

Item 4.36 from the report (see attached) state „As each aircraft is manufactured, it is necessary to carry out ground runs, hover test and full flight test. It is anticipated that these tests will be broken down into the following phases:

Ground running: 1 hours per aircraft manufactured

Hover testing: 2 hours per aircraft

Flight testing: 2 hours

Item 4.37 states:

During this program of testing, we estimate an average of 10 arrivals or departures from the site per aircraft.

Item 4.38 states:

Customers will routinely arrive at the site by helicopter and return their aircraft for service once per year. Furthermore, each aircraft is sold with a 5 hour „type rating“ course to add to their existing pilots licence . The type rating course will involve approximately 10 arrivals and 10 departures to and from the site per aircraft sold.

It appears to me that the noise report has been produced merely to satisfy the noise issues associated with the manufacturing plant only as it only takes into account internal noise when relating to helicopter noise disturbance. Section 5.17 of the RPS Noise Impact Assessment states that it does not consider the take off and landing frequent enough to warrant noise disturbance modelling despite the following figures worked out using Hill Helicopters own projections which I have illustrated below:

Ground running: 1 hour per aircraft - not modelled despite this meaning 4hrs external Ground Running per working day of external noise (at full production, not including servicing and training)

No allowance was made for reflection of noise from the 14m tall production facility which would reflect the noise made towards a westerly direction presumably potentially doubling the sound level effect.

Hover testing: This was modelled for internal testing although I would like to know the margin for error considering how close it is to the limit and with insufficient building material data and its ability to contain sound.

Flight testing: not modelled despite being 2,500 rising to 10,000 take offs and landings per year (40 per working day) This type of sound is moving and would require multiple sound receptors next to sensitive residential areas and individual properties and how it would affect local residents ability to enjoy reasonable quiet use of outdoor spaces not to mention indoor spaces where windows would have to be kept closed from 7am to 11pm daily during the week.

Training for type rating - 2,500 rising to 10,000 take off and landings (additional 40 per working day)

Sales -demo flights: It's not mentioned about this but I would assume that each sale would be preceded by a sales demo flight potentially adding a further 250 rising to 1,000 take offs and landings per year (4 per day)

Servicing: in/out flights : By the company's own information each helicopter sold will come back yearly for a service which will involve an in out flight plus any testing before the aircraft is returned to its owner. This list will increase by 1000 each additional year of production increasing exponentially.

In summary I would suggest that the above take off and landings more than warrants consideration in any noise pollution report and I predict that it would indeed be concluded as 'Present and Disruptive' where the noise causes a material change to behaviour, attitude or other physical response and that our quality of life would be diminished due to the change in the acoustic character of the area. For my own property it would mean I could no longer experience the quiet enjoyment of my external areas which amount to approximately 1.75 acres of garden and private entertaining space and for my very elderly parents (my father suffers with COPD) who live with us to enjoy a peaceful and tranquil environment with clean air. In addition to this, like a number of elderly people they retire to bed early in the evening and the continuation of flight operations into the evening and sometimes even through the night would cause them problems with sleep deprivation. I suggest that the operation of approximately 4 hours of external ground running procedures per day combined with a minimum of 84 take off and landing fly by's of our property per day with the fly by's being the worst disruption with take offs and landings of a 100 decibel engine literally 50 metres from our property and even closer for Lease house farmhouse. That means on average a helicopter could be passing over or to the side of ours and local residents properties 7-8 times per hour or in other words every 7 - 8 minutes with more added every time another unit is sold.

ii) Impact on local wildlife

The proposed security fencing would inhibit animal and mammal movement within the area. The environmental report alludes to the existence of Greater Crested Newts in the immediate area and I can bear witness to this existence (see photo below from October 2021 taken in my garden)

We also currently enjoy a wide variety of birds in and around our gardens which we promote wherever possible. We have regular sightings of buzzards, kestrels, sparrows, great tits, blackbirds, robins, wren, chaffinch as well as ducks and geese. These could easily be scared away by the frequent noisy fly by's and the associated danger of collision with the aircraft.

iii) Health, the local environment and amenity.

Policy SD4 excerpt taken from the noise pollution document states:

„The council will protect people and the environment unsafe, unhealthy and polluted environments by ensuring proposals avoid potential adverse effects; and only permitting proposals that are deemed (individually or cumulatively) to result in pollution (including air/water/noise /vibration/light/ground contamination) if after mitigation, potential adverse effects are deemed acceptable. This may be achieved by the imposition of planning conditions through a planning obligation.“

The mitigation the applicant proposes falls well short of what would be necessary and I propose would be impossible to comply with due to the areas needing mitigation being beyond the applicants control (other land owners permissions etc.). By excluding the inbound and outbound flights which are substantial they have failed to take account of pollution from noise, air and vibration being experienced outside of their land ownership and to the wider local population. A moving, noise, air and vibration pollution will have a much larger effect than the simple „hovering“ operation carried out indoors and this indoor hovering barely meets the guidelines for noise pollution and its detrimental effects.

iv) Sustainability

The councils local development plan promotes sustainable development and I do not see how at a very conservative estimate of a minimum of 1000 helicopter flights, 4,000 hours of helicopter ground testing and 4,000 hours hovering tests can be regarded as sustainable. The fossil fuel use and resultant air pollution must be horrendous and I cannot see any figures to justify such a blatant abuse of the environment. No mention has been made of the smell that turbine engines produce as can be evidenced at airports where jet turbines use kerosene. Had the developer been proposing to develop a 0% carbon propulsion method as a ground breaking technology that could at least have negated the effects on local wildlife, inhabitants and worldwide carbon emissions.

The UK and European governments are proposing all new cars and vans be fully zero emission at the tailpipe from 2035. These plans also include details on the sales of new cars between 2030 and 2035 „where they can only be bought if they are able to partially drive with zero emissions. How can a newly designed aircraft be allowed to be put into production when surely the licensing for any new aircraft design should only be based on a sustainable non fossil fuel use to power it and that the research should be put into this and not outdated and highly polluting old technology such as a turbine engine.

On an employment basis it is also my opinion that this proposed development will barely benefit the local community through employment as most of the quality, high paid jobs will be imported from outside the local area and I suspect not many local people will benefit from the ability to buy a locally built £500,000 helicopter.

v) Danger to life

Furthermore, I can find no evidence of any risk assessments for the frequent take offs and landing for 'testing' purposes. The proposed take off and landing routes have not been clearly marked on the maps but from local topography one can make an accurate assumption based on the fact the aircraft apparently needs to reach 52mph in a forward direction before taking off and climbing and require a runway of 500m x 50m wide. From my rough measurements this cannot be achieved with the boundary of the development site as it appears to be only 300 metres from the point of the access road we use daily. On this westerly boundary of the flight path is the access lane that we and several other properties at ST11 9QY use to access our properties. This lane is narrow and poorly maintained and the application proposes to line the boundary with security mesh fencing. Residents use this lane several times per day to access local amenities and therefore these helicopter 'test flights' would be flying at low level over the heads of local residents every 7-8 minutes during operational hours.

In conclusion I would request that this application is withdrawn as it fails to satisfy on a number of levels and should never have been validated considering the negative effects on sustainability, safety, health and the environment. If this application is not withdrawn I will be recommending a Judicial Review to be entered into forthwith.

Yours sincerely

Paul Bushell BA(hons)

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