

## Report for Resolution

**Report to** Planning Applications Committee  
**Date** 13 May 2010  
**Report of** Head of Planning Services  
**Subject** 09/00679/F Norwich Airport Amsterdam Way Norwich NR6  
6JA

**Item**  
**5(1)**

### SUMMARY

<b>Description:</b>	Relocation of existing engine testing facility from its approved location on the eastern apron to the former fire training site and associated noise mitigation works.	
<b>Reason for consideration at Committee:</b>	Objections	
<b>Recommendation:</b>	Approve	
<b>Ward:</b>	Catton Grove	
<b>Contact Officer:</b>	Ms Anne Napier	Planning Development Team Leader 01603 212502
<b>Valid date:</b>	24th December 2009	
<b>Applicant:</b>	Norwich Airport Limited	
<b>Agent:</b>	Parsons Brinckerhoff Ltd	

### INTRODUCTION

1. Following the deferral of the application from the meeting of this committee on 18 March 2010, this supplementary report provides additional information to that contained in previous report for that meeting. For ease of reference, the previous report is attached as Appendix 1 to this report and the minutes of the meeting on 18 March are attached as Appendix 2.
2. In preparing this supplementary report, which should be read in conjunction with the original report, the aim is to provide clarity on matters raised by members at the last meeting and provide updates on additional information obtained and comments received since that meeting.
3. The main issues to be covered within this report will be: additional representations received since 18 March; whether the proposed construction of a dedicated engine testing site can be considered to be 'operational' in relation to the operation of the airport; relevance of the extent of use on the authorised sites; publicity for engine testing; results obtained from noise monitoring carried out during tests; and recommended conditions and reasons.
4. In addition to these matters, the applicants have also submitted additional information regarding their proposal by way of a report received on 14 April 2010 (amended versions received 27 April and 30 April 2010), which largely consolidates information previously provided as a result of exchange of emails between the council, the applicant and

consultees.

5. It is not considered that this information results in any significant changes to the application proposals but provides clarification and confirmation on several queries raised. The information contained within the report was available prior to the last meeting on 18 March and was used to inform the written report and the discussion that took place. However this information was contained in a variety of different documents, mainly emails. The report seeks to provide the information in a more accessible format.

## Representations Received

6. 5 additional letters of representation from local residents have been received since 18 March 2010 plus an additional representation from Spixworth PC. In addition to these, a letter from Keith Simpson MP was received, forwarding a copy of a letter which had also been received direct. New issues not previously raised are summarised in the table below.
- 7.

Issues Raised	Response
<p>Spixworth PC:</p> <ol style="list-style-type: none"> <li>1. Request to be informed of the date of the committee meeting due to reconsider the application;</li> <li>2. Ask that a temporary 2 year permission be granted to allow for a review of the conditions;</li> <li>3. Wish to raise the issue of air pollution associated with the use in relation to the air quality assessment carried out by Broadland DC which does not indicate any significant cause for concern from the bi-products of kerosene combustion in tested areas and wish that all data on this subject is made available to committee members when reaching their decision</li> </ol>	<ol style="list-style-type: none"> <li>1. All those making representations on an application are informed of the date of the meeting at the time the report is finalised for inclusion in the agenda (i.e. the week before the date of the committee meeting);</li> <li>2. It is not considered appropriate to grant a temporary permission for the use of the proposed site due to the outlay required to enable the site to be used;</li> <li>3. Noted and members were made aware of this issue via the previous report and presentation and did not request further details on this matter</li> </ol>
Lack of alternative site assessment and mitigation measures regarding wind direction	The local planning authority is required to determine the application that is before it and consideration of wind direction is contained in paragraphs 30-39
Wind direction has a significant impact on noise impact	See paragraphs 30-39
Wished to be informed of the testing dates which would be monitored	Information was provided and proposed new testing dates are now publicised
Concerns regarding the complexity and wording of the conditions proposed	The reasoning and explanation for the conditions proposed are contained in paragraphs 44-55
Extent of restrictions proposed are not sufficient to mitigate against the impact and much more onerous restrictions should be imposed	See paragraphs 11-55
Noise levels concerned would be in excess of those considered acceptable by the World Health Organization and the Council has a	The site is within an operational airport. No noise restrictions currently exist in relation to the operation of that airport. Aircraft are

duty of care to protect residents from unacceptable levels of exposure to noise	inherently noisy and noise from aircraft, even on the ground, is exempt from action under nuisance legislation. Conditions are recommended to be imposed which would provide some mitigation to local residents
Other airports operate with more restrictive conditions (e.g. Southampton)	The recommended conditions reflect the extent of restriction that your officers consider to be appropriate to meet the six 'tests' for conditions, based on the information available
The engine testing carried out on 6 April was not representative of the amount of noise and disturbance experienced by local residents and was far lower than normal	It is recognised that any one individual test will not be able to be representative of the full range of testing that takes place. The impact of engine testing will depend on the a number of variables, including the type of aircraft being tested and the engine power level used as well as weather conditions, for example. This was fully acknowledged and understood when the decision to defer was made
Request from local resident to defer the application from 13 May meeting to enable Keith Simpson MP to chair a meeting between the City Council, Omniport, KLM, St Faiths and Spixworth PCs and local objectors	The suggested representatives are all members of the Airport Consultative Committee, however, it is for the members of the Council's planning application committee to decide whether you wish to defer the application again

8. In addition to the above, the following comments have also been received:

**9. Norfolk County Council – Assistant Director Economic Development and Strategy:**

The County Council supports the application.

KLM Engineering employs 450 people in high quality engineering jobs which are clearly of prime importance to Norfolk's economy. It is widely recognised that knowledge based jobs are essential to future growth and prosperity and KLM play an important role in delivering this agenda. As well as the number of high quality jobs it provides, the company also makes a strong commitment to the workforce through investment into training and skills.

Norfolk is widely recognised for its engineering capability and hosts a number of world class companies, including KLM. Its presence at Norwich Airport site provides an important focus for the development of other airport related business around it and we are very keen to see this cluster of expertise grow.

We are aware of the threat by the company to relocate if the decision by the Committee is not favourable. We believe this is a threat that needs to be taken seriously and we believe that this is not one the company would have made lightly. The testing facility is a vital element of the company's activity and without it, its operations are clearly not viable. Whilst we acknowledge the concerns local people have about noise pollution, we strongly feel that the loss of KLM would have much more wide reaching consequences. Without KLM, we fear Norfolk's engineering credentials would be diminished and the remaining cluster of businesses could also be weakened, such is the interdependence between them.

It is extremely easy to lose jobs from a local economy, but very difficult to attract them. We

have worked closely with colleagues in the City council to attract jobs to the Greater Norwich area and to support companies within it. At a time when the economy is experiencing such turbulence and uncertainty I am sure the City Council will wish to sustain this approach and do all it can to support Norfolk's world class engineering sector and key companies such as KLM within it.

#### **10. Shaping Norfolk's Future – Chief Executive:**

Supports the planning application.

As the economic development partnership for Norfolk and Norwich, our role is to work with partners to grow the country's economy, creating more and better paid jobs for its residents.

KLM Engineering is a critically important employer in Norwich, employing 450 people in high quality engineering jobs. The company has invested significantly in its Norwich base, because it has found the city a great place in which to be located. In deed the company has increased the number and range of planes which it services in Norwich. It also continues to invest heavily in its people, running its own training academy in the city. However, ere the company unable to test engines, it would not be possible to continue its operations in the city and 450 jobs would be lost to Norwich.

Whilst we respect the concerns of residents about the noise from the site, we believe the loss of KLM Engineering would have significant consequences for the economy of the city. Norfolk is recognised for its engineering expertise and KLM Engineering is a world class example of this. KLM Engineering's presence at Norwich International also supports directly and indirectly a number of other airport relate activities. It is a cluster that has the potential to grow in the coming years, which will help create much-needed jobs for Norwich residents.

The Greater Norwich economic strategy, developed by partners including Norwich City council and Shaping Norfolk's Future, has identified advanced engineering as a key sector for the local economy. The loss of KLM Engineering to Norwich would be a very significant blow to the city, particularly at a time of such fragility in the local economy.

## **SUPPLEMENTARY ASSESSMENT OF PLANNING CONSIDERATIONS**

### **Principle of Development**

#### **'Operational'**

11. The term 'aerodrome' is defined within the Town and Country Planning (General Permitted Development) Order 1995 and includes specific reference to it being a place 'at which the manufacture, repair or maintenance of aircraft is carried out by a person carrying on business as a manufacturer or repairer of aircraft' as well as being a place which is 'used by aircraft engaged in the public transport of passengers or cargo or in aerial work'.
12. It would therefore appear that the use carried on by KLM Engineering at Norwich Airport is one which would fall within the above definition and, as such, could be considered to be operational with regards to the use of the site as an airport.
13. The application site is within the boundary of Norwich Airport and on land which is accepted to be 'operational land' in terms of the application of Part 18 of the above Order (which relates to aviation development). The application proposal would appear to be development which is required for the provision of services and facilities at the airport.

14. Consequently, it is considered that, had engine testing at the airport not been previously restricted by the imposition of a planning condition, the provision of the proposed facility which is the subject of this application may have been able to be constructed by virtue of the airport's permitted development rights.
15. Due to the restrictions imposed previously, it is necessary for a specific permission to be granted for the development proposed. However, taking into account the above considerations and the policy matters set out in the previous report, it is considered that the principle of providing a facility to test engines at the airport in connection with the repair and maintenance of aircraft can be regarded as acceptable and would enable this appropriate use of the airport to continue to operate.

#### **Extent of engine testing use**

16. Analysis of the records provided by the airport and held by the Council with respect to engine testing has been carried out. Data from 2005 has been assessed. The method of recording the tests carried out has changed over time, with the figures initially being provided weekly and then, more recently, monthly. However, the data has been collated and the figures provided below are on the basis of the numbers of engines tests carried out per month:

Year	Average number of tests per month	Average duration of tests (mins)	Total number of tests per year
2005	60.25	n/k	723
2006	41	n/k	492
2007	13.25	90	106 (8 mths)
2008	11.5	83	126
2009	6.5	108	78
2010 to end March	15.6	84	47

17. It should be noted that, with regard to the current year, more tests on average tend to be carried out during the winter months than the summer months as the aircraft operators will try to schedule the routine maintenance of aircraft during their less busy times where possible. The average figures for this year, therefore, should be read taking this into account. The eventual monthly average for the year as a whole may be lower.
18. The method of recording the tests changed with effect from May 2007. The figures immediately preceding this change (January – May 2007) are not complete and so the figures given for 2007 represent an average for the number of tests carried out for the 8 month period May- December.
19. In terms of the figures from 2008 and 2009, it should be remembered that the current period of economic down-turn began to take effect from the autumn of 2008. Therefore, the lower average figures for those 2 years should be read in that context.
20. Conversely, the data supplied does not currently provide details of the level of engine power used during the tests. Therefore, it is possible that the earlier data from 2005 and 2006, which shows a much higher average number of tests per month and total per year, includes details of lower powered tests carried out at the airport, whereas it is understood that the more recent figures relate to high-powered engine testing only.

#### **Intensification of use**

21. It has been queried whether the use of the proposed engine testing site would be materially different to the use of the authorised site and whether, as such, it could be argued that a material change in use would occur as a result, which would prevent the possible resumption of use of the authorised site from occurring.

22. The questions arose following the drafting of the previous report and the inclusion of recommended conditions, the effect of which would be to 'cap' the use of the facility in terms of the number and extent of tests undertaken, their duration, frequency and timing. It was seen by some that the proposed 'cap' on the use of the site would allow for an increase in engine testing compared to that recently carried out in the past and, as such, the use of the proposed facility should not be compared to the previous use of the authorised facility in terms of relative impact or as a material 'fall-back' option for the airport.
23. It is considered that the reversion of engine testing to the authorised site would have a reasonable prospect of occurring should the airport have no other option and, as such, the possibility of this taking place can be regarded as a real, rather than a theoretical, possibility. It is then relevant to consider the possible use of the authorised site as a fall-back option for the airport.
24. Moreover, in planning terms, the intensification of a use such that the activity is considered to have materially changed in terms of the use carried out, requires the change to be more than 'doing more of the same thing'. In broad terms, the character of the use or the nature or character of the site needs to have changed materially in order for a material change of use to have occurred.
25. As detailed in the previous report, it is understood that the activities carried out by KLM have been undertaken at the airport for some 35 years, first by Air Anglia, then Air UK and now by KLM. In addition to that, engine testing will also have been carried out at the airport since the first use of the site as an aerodrome.
26. Aircraft routinely require a variety of different tests to be carried out which require the ground running of engines. For that reason, it has proved difficult to draft conditions which seek to restrict the activities with the greatest impact (the high-powered engine testing primarily undertaken by KLM) whilst enabling the other activities with lesser impacts to operate elsewhere within the airport site.
27. However, in terms of the current proposal and whether it represents a significant and material change to the operation of the airport, it is considered that it would not. Rather, it is considered to represent a continuation of an activity which has been undertaken since the use of the site as an aerodrome commenced and which has been undertaken for 35 years in connection with the MRO use carried out for aircraft operators.
28. Consequently, it is considered that, in planning terms, there would be nothing to prevent the resumption of use of the authorised site for engine testing. Therefore, it is considered appropriate to consider the authorised site as a material 'fall-back' alternative site for the engine testing.
29. Furthermore, the planning restrictions on the use of the currently authorised site limit the hours of use in very broad terms and do not limit the number, duration or frequency of testing carried out. It would therefore follow that the current application can be regarded not as an intensification of the use but as an opportunity, in planning terms, to regulate the activity in a way which currently doesn't exist. Accordingly, a significant amount of weight has been attached by your officers to this conclusion in forming the recommendation on the application.

## **Impact on Living Conditions**

### **Noise and Disturbance**

30. Following the committee meeting on 18 March, further clarification has been provided to indicate that the values in the applicant's submitted noise report in tables 4, 7, 8 and 9 (which formed the basis of the tables in paragraphs 28 and 31 of the previous committee report attached as Appendix 1) are still considered appropriate by the applicant to be used as representative of 'worst-case' scenario in terms of noise propagation (i.e. optimum

downwind conditions were used) for the noisiest and quietest aircraft noise levels used during the June 2009 survey. However, noise tests have demonstrated that in practice there is a significant amount of variability between noise tests as a result of wind direction and aircraft orientation, which the noise calculations did not consider.

31. Three engine tests have been monitored by the Council's Environmental Health Officers to assess the noise impact of the engine testing from the current (unauthorised) site. It is not possible to monitor from the proposed site as that site is not currently suitably hard surfaced such as to accommodate aircraft. The monitoring point that was used was crash gate 5 on the airport's eastern boundary and is the location of the proposed monitoring location specified in the recommended condition 20 below.
32. The tests that were monitored were carried out at about 13:30 on 29 March, 17:00 on 6 April and 16:30 on 9 April. The aircraft tested were a Fokker 70 at up to 100% power, a Boeing 737 (700 variant) at up to 70% power and a Fokker 100 at up to 100% power. It was possible to accurately monitor noise levels for the first and third of these tests, but unfortunately, it was not possible to obtain reliable data from the second test on 6 April, due to the blustery wind conditions creating high ambient noise levels. The noise levels monitored at crash gate 5 were 62dBA LAeq and 72dBA LAeq respectively. The wind speed was 2-3 knots for the first test and 1-2 knots for the third. The wind direction was from the south-east and south-west respectively.
33. Following the monitoring carried out it is considered that a noise level limit of 78dB averaged over a ten minute period would be an appropriate figure for the purposes of condition 20. This figure has been arrived at through using the higher noise level experienced above (72dB), increasing it by 3 dB to make an allowance for both engines to be tested at full power at the same time (75dB) and including an appropriate figure additional 3dB to account for the variables in wind direction and speed (78dB LAeq(10 minutes)).
34. The equipment used for the monitoring is only designed to work accurately in relatively low wind speeds (otherwise the wind conditions create high ambient noise levels as referred to above). The 78dB LAeq(10 minutes) figure is therefore specified to be as measured in a wind of no more than an average of 5 metres per second. By reference to three separate sources of information, it would appear that the annual average wind speed in this location is 5 metres per second.
35. It is important to emphasise that the purpose of this limit is to seek to ensure that aircraft which are noisier than those currently tested are not tested at Norwich Airport. The limit seeks to accurately reflect the noise level which is currently generated by aircraft when wind conditions are relatively still. The applicant's modelling predicts that there would be some decrease in the amount of noise and disturbance experienced by local residents if the testing location relocates to the proposed site compared to the currently authorised site.
36. However, it is not possible to guarantee that the above figure of 78dB would be an absolute limit that would not be exceeded in any conditions. There may be occasions where, due to weather conditions, especially wind speed and direction, the noise experienced by local residents may be greater than at other times. However, the imposition of such a condition, together with the requirements to carry out permanent monitoring, provide the data on request and publicly record details of testing carried out, will enable concerns raised about noise disturbance experienced to be fully investigated.
37. In such cases, for example, it will be possible to investigate whether, with wind speeds at an average of no more than 5 metres per second, the aircraft being tested would have breached the noise level limit imposed and, if so, it may be possible to take action against the testing carried out and prevent the further testing of that aircraft on the site, if it was held to be a breach of that condition.
38. Although it would be possible to impose an absolute level on the boundary that should not be exceeded, to be able to do so, a greater allowance would need to be made for stronger

wind speeds in certain directions and, as such, the limit is likely to need to be in the order of 90dB. This would accord with the 'worst case' predictive modelling suggested by the applicant's noise report. However, setting a limit of this level would also allow for the testing of much noisier engines at other times, in conditions with slower wind speeds.

39. Therefore, although an absolute limit is not proposed, the recommended conditions as drafted enable controls to exist for the use of this site that would prevent the testing of aircraft which would be noisier than the current aircraft tested at the airport.

#### **Advanced publicity of testing**

40. Committee members will be aware that with effect from 9 April 2010, KLM Engineering's website has included details of proposed engine testing. The specific address for this is: <http://www.klmukengineering.com/content/MoreInfo.asp?mid=177>
41. This has enabled members of the committee to visit sites around the airport, should they wish to do so, during the planned testing that has occurred in addition to the testing referred to above.
42. The publicity provided on KLM's website has also enabled others, for example local residents, to have more information about the likely timings and duration of testing due to take place. It is hoped that this information will have been useful and it is recommended that the requirement to make such arrangements is conditioned as part of any permission granted so that this publicity can be continued.
43. It is further recommended that these publicity requirements are enhanced by the requirements to maintain a publicly viewable log of testing that has been carried out.

#### **Recommended conditions**

##### **Explanation**

44. The imposition of conditions on planning permissions is an extremely important part of the development management process and is a matter which is controlled and guided by legislation as interpreted by government advice and case law. In this instance, due to the nature of the application and the desire to limit the impact of the use on local residents as far as is reasonable without affecting the operation of the use to such an extent as to prevent the use from operating, a large number of conditions are recommended to be imposed.
45. In drafting these conditions, it has been necessary to be mindful of the requirements for planning conditions to meet the six 'tests' for conditions: to be necessary, relevant to planning, relevant to the development to be permitted, reasonable, precise and enforceable.
46. Members should also be aware that specific legal advice has been taken in respect of the conditions proposed and that the advice received has informed the nature and drafting of the conditions recommended to you.
47. Following the previous meeting it became apparent that it would not be possible to define the type of engine testing required to be carried out from the proposed site with reference to a noise level limit on the remainder of the airport site. To set a reasonable limit of this type, which allowed for the normal operation of the site as an airport, would be very difficult to do without enabling short periods of noisier engine testing to take place from different locations around the airport.
48. The purpose of requiring the noisier high-powered engine testing to take place from the testing site proposed would not be to concentrate the testing per se (although that may have some benefits in terms of impact for some residents around the site) but to enable reasonable restrictions to be imposed on that activity. Consequently it has been necessary to use a different method of defining the type of engine testing that would be covered and restricted by the permission granted and this is reflected in the condition 4 below.
49. In addition to this change, references to the cessation of use of the unauthorised site have been removed, as separate measures exist to control this through the planning



enforcement regime. The other conditions largely remain as previously proposed and tabled to members at the meeting on 18 March. However, in drafting the conditions in full, the format of those conditions and the numbering has altered to some extent.

### **Reasons for conditions**

50. The application is not a retrospective application as the proposed engine testing site is not currently in use; therefore it is appropriate to impose a time limit on the permission granted. Condition 3 seeks to ensure that the details of the works necessary to enable the use of the proposed site are submitted promptly and the informative related to this condition clarifies that the implementation of the scheme is expected to follow swiftly from any approval.
51. Condition 4 prevents the use of the proposed site from occurring until a scheme to cease the use of the existing authorised site has been approved. It is anticipated that this could be by way of a legal undertaking by the airport. Condition 5 defines the term 'engine testing' for the purposes of this permission and controls the operation of the use. Condition 6 controls the operation of the proposed site following the commencement of the use of the site. Condition 7 relates to surface water drainage of the site and is as recommended by the Environment Agency. Conditions 8, 9 and 10 require the submission of details to be agreed for hard-standing, lighting and fixed plant and machinery and prevent the use of the site unless in accordance with those agreed details.
52. Condition 11 requires the provision of a publicly viewable log and the prior public notification of all high powered engine testing to be carried out within a defined timescale, to contain certain information.
53. Conditions 12, 13, 14, 15, 16, 17 and 18 limit the number of tests to be carried out from the proposed site, the timing of the testing, the duration of the tests, the proportion of tests to be carried out in the evenings or at weekends and the number of aircraft that can be tested at any one time.
54. Condition 19 provides for exceptions to be made to these restrictions in defined 'critical' situations, which would be the subject of specific authorisation by a Director of the Airport in accordance with procedures to be agreed and which would then be the subject of a specific report on the publicly viewable log.
55. Condition 20 limits the noise produced from engine testing at a specified point on the boundary of the airport to a figure of 78dB LAeq(10minutes) as measured in a wind of no more than an average of 5 metres per second. The condition also requires permanent and continual monitoring of the noise levels and wind speed and direction from that specified point and the provision of data from the monitoring to the local planning authority on request.

### **Conclusions**

56. Following the monitoring of the testing undertaken, it is considered that an appropriate and reasonable boundary noise level condition can be imposed on the operation of the use from the proposed site which would prevent the testing of noisier aircraft taking place from the airport. Therefore, the conclusions reached on the relative merits of the application remain as previously reported to members.
57. It is considered that the relocation of the engine testing as proposed is acceptable in principle, would enable the continuation of this activity without serious disruption to the other operations of the airport and would support the continued use and potential growth of the airport, in accordance with the relevant policies regarding the use of the airport.
58. However, engine testing is inherently noisy and, despite the mitigation measures proposed, it is considered that the relocation of the use will result in a materially detrimental effect on a relatively limited number of residents, in comparison with the use of

the approved site.

59. Furthermore, it is considered that the impact of the use on residential living conditions is such that the extent and frequency of the use should be limited by conditions which will be of benefit to all those affected. Subject to the imposition of these conditions, the proposal is considered acceptable in terms of design, transportation, emissions, water quality and drainage, visual impact, the re-use of materials and energy efficiency and therefore is considered to meet the relevant policy requirements and all material considerations.

## **RECOMMENDATIONS**

To approve Application No 09/00679/F Norwich Airport Amsterdam Way Norwich NR6 6JA and grant planning permission, subject to the following conditions:-

1. The development must be begun within three years of the date of this permission.
2. The development hereby approved shall be carried out in accordance with the plans and details as specified on this decision notice.
3. Within 1 month of the date of this permission a scheme specifying the details of the hard-standing and a timetable for the construction and implementation of the engine testing site, including the provision of the bund, shall be submitted in writing to the local planning authority for approval and the development shall be carried out in accordance with the details as approved.
4. No use of the engine testing site shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission hereby approved shall take place until a scheme for the cessation of engine testing, as defined in condition 5 below, at the currently authorised site (as shown on Plan no. AAA attached to planning permission ref. no. 4980733/F and as detailed in condition 9 of permission 05/0697/F) has been submitted to and approved in writing by the local planning authority.
5. High powered engine testing shall be defined as the ground running of fixed wing aircraft which
  - (i) generate noise of more than 67dB on take off; or
  - (ii) which weigh more than 50 TOGW;as categorised in the FAA March 2010 database, or subsequent amendments to that list, where the ground running of the aircraft engine is at 70% of full power or above, with the exception of testing immediately prior to take-off. For the purposes of this permission only, high powered engine testing as so defined shall be considered to define the term 'engine testing' or 'engine tests' for the purposes of conditions 4, 6 and 11 to 21 of this permission hereby granted.
6. Notwithstanding the provisions of Part 18 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order) (with or without modification), on the commencement of the use (in accordance with the details and timetable to be approved in condition 3 above) of the engine testing site shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission hereby approved:
  - (i) all ground running of engines or the testing of engines on the ground within the airport site shall be carried out in strict accordance with the Norwich Airport Operating Framework Agreement dated 10 August 2009 (or as amended by a later version of that document submitted to and approved in

- writing by the local planning authority) and the conditions as specified in this permission; and
- (ii) all high powered engine testing shall take place from the engine testing site hereby approved and shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission and no other site within the airport shall be used for that purpose; and
  - (iii) details of all engine testing undertaken at the airport shall be recorded and retained in a publicly viewable log in accordance with the requirements of condition 11 below and verifiable details of the power levels used during the tests undertaken (e.g. bona fide copies of service documentation from the operator carrying out the test) shall be made available within a maximum period of seven days to the local planning authority on request at no less than 24 hour's notice.
7. The surface water drainage infiltration system shall be sized to accommodate the surface water volume of 558 cubic metres shown to be generated by the site during the 1 in 100 year (including 30% climate change (microdrainage)) calculations as specified in the submitted Flood Risk Assessment.
8. Notwithstanding the provisions of Part 18 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order) (with or without modification), no development shall take place on the development site hereby approved (shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission) until details of the extent and construction of the hard-standing have been submitted to and approved in writing by the local planning authority in accordance with condition 3 above and the construction of the hard-standing shall be carried out in accordance with the approved details and retained as such thereafter.
9. Notwithstanding the provisions of Part 18 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order) (with or without modification), no development shall take place on the development site hereby approved (shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission) until details of the external lighting for the engine testing site, including any security lighting and lighting operating schedule, have been submitted to and approved in writing by the local planning authority and the installation or use of lighting on the site shall be carried out in accordance with the approved details and retained and operated as such thereafter.
10. Notwithstanding the provisions of Part 18 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order) (with or without modification), no development shall take place on the development site hereby approved (shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission) until details of any fixed plant and machinery proposed to be installed, erected or used on the site have been submitted to and approved in writing by the local planning authority and the installation, erection and use of all plant and machinery on the site shall be in accordance with the approved details and retained as such thereafter.
11. No use of the engine test site hereby approved (shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission) shall

take place until a scheme for the provision of:

- (i) a publicly viewable log of all high powered engine testing carried out; and
- (ii) the prior public notification of high powered engine testing proposed to be carried out;

has been submitted in writing to the local planning authority for approval. The scheme shall make provision for:

- (i) the log to include details of: the date and time of the start of the test; the aircraft type; the reason for the test; the duration of the test; the maximum engine power levels used during the test; and the wind direction during the test; and
- (ii) the prior public notification to include details of: the expected date and time of testing, type of aircraft to be tested, anticipated maximum engine power levels during the testing and anticipated duration of the test.

Following the approval of the scheme, all engine testing shall take place in accordance with the approved scheme and any variation to the approved scheme shall be subject to further written approval by the local planning authority.

12. The number of engine tests carried out per calendar year shall not exceed 200.
13. The number of engine tests carried out per calendar month shall not exceed 20.
14. No engine testing shall take place outside the hours of 0800-2000 Monday-Saturday and 0900-1800 Sunday and public or bank holidays, unless the engine test is required to be carried out in a critical situation, with critical defined in accordance with condition 19 below and with all such occurrences to be made the matter of a report in accordance with condition 11 above
15. In any calendar year no more than 15% of engine test hours, as specified in condition 14 above, shall be carried out between the hours of 1800 - 2000 Monday to Saturday, 1600 -1800 Sunday and public or bank holidays.
16. No more than 6 hours of engine testing shall be carried out on any one day.
17. No more than one aircraft shall be tested at any one time.
18. In any calendar year no more than 30% of engine tests shall be carried out at weekends or public or bank holidays.
19. For the purposes of this permission, the above restrictions in conditions 6 and 11 -18 above shall not apply to a 'critical' situation where:
  - (i) the ground running or testing of engines is required urgently and could not have been foreseen; and
  - (ii) is necessary as a matter of public or aircraft safety; and
  - (iii) whereby the delay of the test or ground run of the engines would endanger public safety; or
  - (iv) cause severe and unacceptable logistical disruption to aircraft passengers or the aircraft operator.In such cases, the testing or ground running of engines in a critical situation outwith the restrictions contained in conditions 6 and 11-18 above shall be subject to the control and agreement of a Director of Norwich Airport Limited in accordance with an agreed set of procedures. No use of the engine testing site hereby approved (shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission) shall take place until the procedures have been submitted to and approved in writing by the local planning authority. Any subsequent

variance to these agreed procedures shall be the subject of further prior agreement. All such critical situations shall be recorded on the publicly viewable log and shall be made the matter of a report in accordance with condition 11 above.

20. In respect of the site at the boundary of the airport with Quaker Lane (Ordnance Survey grid ref. 622970/314362):

- (i) the noise level from engine testing recorded at the site (grid ref. 622970/314362) shall not exceed 78dB LAeq(10 minutes) as measured during any ten minute period for the duration of the testing when average wind speeds are no more than 5 metres per second; and
- (ii) prior to the first use of the engine testing site hereby approved (shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission), provision shall be made for the permanent and continual monitoring of the noise levels and wind speed and direction at the point on the boundary of the airport site specified above, in accordance with details which shall have been submitted to and approved in writing by the local planning authority prior to the installation of the monitoring provision; and
- (iii) no engine testing at the site hereby approved (shown outlined in red on site location plan ref FIGURE A received on 23 December 2009 attached to this permission) shall take place unless and until the monitoring provisions have been installed and provision has been made for the retention of the data resulting from the monitoring for a minimum period of one calendar year in accordance with the scheme to be agreed and these provisions shall be permanently retained in place thereafter; and
- (iv) the data resulting from the monitoring shall be made available within a maximum period of seven days to the local planning authority on request at no less than 24 hours notice.

#### **Informatives:**

1. The airport be advised that, without prejudice to the determination of a future application, the level of testing as set out above is considered to be the maximum reasonable level of use of the site taking into account the impact on neighbouring living conditions and that any proposed increase in the level or extent or timing of testing proposed would be expected to make provision for substantial noise mitigation measures.

2. The airport is advised that the requirements of conditions 11, for the provision of a publicly viewable log of engine testing carried out and the prior public notification of proposed testing due to be carried out, should enable the public viewing of that information as easily as possible and should include provision for the information to be accessed electronically as well as in person.

3. The airport is advised that, without prejudice to the ability of the local planning authority to take appropriate enforcement action, the use of the unauthorised site for engine testing is in breach of a condition of a planning permission and it is anticipated that, following the grant of this permission, the use of the unauthorised site shall cease as soon as is practicable and the time table for the implementation of the permission referred to in condition 3 above should reflect this position accordingly.

#### **Reasons for conditions:**

1. Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990 and Section 51 of the Planning and Compensation Act 2004.
2. For the avoidance of doubt and in the interests of proper planning.

3. In order for the local planning authority to control of the details referred to and the timetable for construction and implementation in the interests of the amenities of the surrounding area and the living conditions of local residents
4. To prevent the concurrent use of more than one high-powered engine testing site from operating at the airport
5. To define the use of the engine testing site hereby approved and for the avoidance of doubt
6. To ensure that the use of high-powered engine testing at the airport takes place from the site hereby approved and in accordance with appropriate controls and restrictions in the interests of the amenities of the surrounding area and the living conditions of local residents
7. To ensure a satisfactory means of surface water drainage is provided for the approved site in the interests of the prevention of flooding and the avoidance of pollution
8. For the avoidance of doubt and to enable the local planning authority to control the details referred to and avoid the potential of a piecemeal development of the engine testing site from occurring
9. For the avoidance of doubt and to enable the local planning authority to control the details referred to and avoid the potential of a piecemeal development of the engine testing site from occurring
10. For the avoidance of doubt and to enable the local planning authority to control the details referred to and avoid the potential of a piecemeal development of the engine testing site from occurring
11. To ensure appropriate monitoring of the use and notification of the testing occurs in the interests of the amenities of the area and the living conditions of local residents.
12. To restrict the level of use of the site hereby approved in the interests of the amenities of the area and the living conditions of local residents.
13. To restrict the level of use of the site hereby approved in the interests of the amenities of the area and the living conditions of local residents.
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18. To restrict the level of use of the site hereby approved in the interests of the amenities of the area and the living conditions of local residents.
19. To restrict the level of use of the site hereby approved in the interests of the amenities of the area and the living conditions of local residents.
20. To ensure appropriate monitoring of the use and to restrict the level of use of the site hereby approved, to prevent the use of the engine testing site for the testing of aircraft which would produce more noise than those aircraft currently tested at the airport, in the interests of the amenities of the area and the living conditions of local residents.

**(Reasons for approval:** It is considered that the relocation of the engine testing as proposed is acceptable in principle and would be in accordance with the relevant policies regarding the use of the airport. However, it is considered that the relocation of the use will result in a materially detrimental effect on a relatively limited number of residents in comparison with the use of the approved site and that the impact of the use on residential living conditions is such that the extent and frequency of the use should be limited by condition which will be of benefit to all those affected. Subject to the imposition of these conditions, the proposal is considered acceptable in terms of design, transportation, emissions, water quality and drainage, visual

impact, the re-use of materials and energy efficiency and therefore is considered to meet the relevant policy requirements of PPS1, PPS23, PPS23 Annex 1, PPG 24 and PPS25, EEP policies E7, ENG 1, T15, H1, NR1, saved RLP policies TRA1, TRA2, EP5, EP8, EP16, EP17, EP20, EP22, EMP2, HBE12 and all material considerations.)

## Report for Resolution

**Report to** Planning Applications Committee  
**Date** 18 March 2010  
**Report of** Head of Planning Services  
**Subject** 09/00679/F Norwich Airport Amsterdam Way Norwich NR6  
 6JA

**Item**  
**6(1)**

## SUMMARY

<b>Description:</b>	Relocation of existing engine testing facility from its approved location on the eastern apron to the former fire training site and associated noise mitigation works.	
<b>Reason for consideration at Committee:</b>	Objections	
<b>Recommendation:</b>	Approve	
<b>Ward:</b>	Catton Grove	
<b>Contact Officer:</b>	Ms Anne Napier	Planning Development Team Leader 01603 212502
<b>Valid date:</b>	24th December 2009	
<b>Applicant:</b>	Norwich Airport Limited	
<b>Agent:</b>	Mr Marcus Wood	

## INTRODUCTION

### The Site

#### Location and Context

1. Norwich International Airport is located to the north of the city, accessed off the A140 Norwich - Cromer road. The airport site straddles the boundary between the City Council and Broadland District Council administrative areas. The application site itself forms a relatively small part of the airport site and is wholly within the City Council area, although very close to the boundary with Broadland DC.
2. The airport is of a size that, to the south it is seen within the context of the built up urban area of the city, whereas to north the surrounding context is predominantly rural countryside and village settlements. Beyond the airport to the south, existing development is predominantly industrial/commercial, with urban or suburban residential development to the south-west (Hellesdon) and south-east (Old Catton). Land to the east and west of the airport is currently largely undeveloped and predominantly agricultural, with some isolated dwellings and smaller settlements. To the north and north-west of the airport are the villages of Horsham St Faith and Horsford, with Spixworth being located to the north-east.
3. The majority of development that exists within the airport site is situated towards the south of the site, with the passenger terminal located at the southern end of the now disused second runway. To the south of the airport site and on the eastern apron, there are a



number of aviation related businesses which operate from the airport (e.g. KLM, Air Livery, Bristows Helicopters) together with a number of businesses which operate from the western apron (e.g. Sterling Helicopters, SaxonAir). The new fire training facility is situated to the north of the site, relatively close to the air traffic control tower.

4. The site which has been identified, through conditions on previous planning permissions, as being the only site on the airfield at which engine testing can occur is located on the eastern apron, in close proximity to the buildings and activities that take place towards the southern part of the airfield. However, for operational reasons, this site is no longer considered suitable in health and safety terms to be used for engine testing. Consequently, the airport relocated the engine testing activity to another site at the north of the disused second runway some 4/5 years ago. This area of the airport is known as the northern apron.
5. The airport now operates with only one runway and this is orientated west-east. All aircraft traffic, with the exception of the police helicopter and air ambulance, is understood to take off and land from the runway.
6. The application site is an area of land approximately 23,000sq.m. situated adjacent to the north-east boundary of the airport site. As far as is known, the site has not previously been specifically used for engine testing. Until recently this area of the site was used as the fire training facility until its relocation following the grant of permission by Broadland DC in 2008. Some concrete hard-standing remains from the World War II use of the site as a dispersal area, as do three blast walls thought to date from the pre-1960s cold war period and some earth bunding.
7. Immediately adjacent to the north-east of the site is a relatively small area of trees and shrubs which provides some visual screening of the site from that direction. The closest public road to the site is to the east and is separated from the application site by a field, bordered by trees and hedges, and is lower than the proposed testing site. Views of the testing site are therefore not readily available from the adjoining road to the east.
8. The proposed site is located on land which is level. However, beyond the airport site, the land slopes down away to the east, reaching a low point at the junction of St Faiths Road with Quaker Lane, before rising again to the east towards Spixworth, past Quaker Farm. Within the airport, land to the north and north-west is higher than the application site, with the current (unauthorised) engine testing site being located on the highest point of the site.
9. Views towards the testing site are possible from public viewpoints from the north and north-west. However, due to the topography of the land, these public views are not achieved until at the boundary of the airport site. In one instance, adjacent to the entrance to the fire training facility and, in the other, adjacent to the air traffic control access point and Horsham Air Museum. Thus the proposed site is relatively well-screened from long distance views in most directions.
10. In addition to the current situation, it should also be noted that the proposed route of the proposed Northern Distributor Road (NDR) would pass the airport site in very close proximity to the proposed facility, passing between the boundary of the site and Quaker Farm. However, it should also be borne in mind that the NDR has not yet received final approval nor does it have the benefit of a planning permission and, therefore, it is not possible to give certainty at this stage to the either the road going ahead or its precise alignment.

### Constraints

11. Although engine testing has been carried out at the airport from its first use as an airfield and can be considered an essential element of the established use of the site, it is nonetheless a noisy activity which causes disturbance to others. The noise generated by engine testing has a different impact to that experienced by other activities at the airport (e.g. aircraft landing and taking-off) due to the length of time the engines are run and the noise impact associated with high-powered engine running close to ground level. Therefore the most significant constraint that is considered to exist in respect of the site proposed is its proximity to other land uses, especially residential uses, and the impact of the proposed use on the amenities of the area.

### Planning History

As indicated above, the airport site has been used as an airfield since the Second World War. It ceased military operations in 1963 and was bought by the City Council in 1967. It was commercially operational as an airport by December 1968. No permission was required for the operation of the site as an airport at that time due to the established nature of the use of the site as an airfield. Engine testing has, as far as is known, always been carried out in association with the use of the site as an airfield.

There have been a number of applications granted on the site since the 1960's. However, the most relevant of these are considered to be those which include reference to engine testing. The earliest known reference was in the form of a condition attached to a permission granted in 1984 (ref. 4841269/SU) which restricts the engine testing to a particular site within the airfield and refers to the use and the site concerned as 'existing'.

Various subsequent permissions granted since then re-imposed this condition, the most recent being:

**05/00697/F** - Refurbishment and extension to existing terminal building to provide improved passenger facilities. (Approved - 19/09/2006)

The condition states:

'Aircraft engine testing shall only take place in the area presently approved for such testing, (as shown on Plan No. AAA attached to Planning Permission No.4980733/F), or in any such area that may be granted planning permission for that purpose, and shall be limited to between the hours of 0600 and 2300. Exceptionally, aircraft engine testing may take place outside these hours providing it is an emergency, which is defined for these purposes as any sudden or unforeseen event needing prompt attention and is authorised by a Norwich Airport Executive Director and does not involve the testing of Turbo Jet Engines.'

Following the increased helicopter activity on the eastern apron, the Airport concluded that there would be a conflict between the engine testing activity continuing to operate at its authorised location and the operations associated with the movements, servicing and access to Bristow's Helicopters. The engine testing was therefore relocated to an unauthorised site to the northern end of the disused second runway (the northern apron).

Following this relocation, a number of complaints associated with the noise impact of the engine testing in relation to properties to the north of the site were received. It would appear that the number of complaints recorded was lower than may otherwise been the case due to a number of factors including the cross-boundary nature of the application site and the exemption from 'nuisance' legislation of noise from an aircraft. Nonetheless, following complaints, the Council's Planning Enforcement Officer advised the airport of the unauthorised nature of the use of the northern site and the need to resolve the issue.

Repeated assurances were provided by the airport in relation to this matter and it was understood for sometime that an application for a new facility was in the process of being prepared. After considerable delay, an application was received in August of last year. However, there were various inadequacies with the application submission which meant that it was considered an invalid application on receipt.

In consequence of this and mindful of the delays involved, the Council served a Breach of Condition Notice on 24 November 2009, requiring the airport to cease engine testing unless carried out in accordance with the relevant appropriate condition. The time period for compliance with this Notice was 210 days, with the effect that the airport's use of the current unauthorised site should cease by 22 June 2010. This time period was considered, at the time, sufficient to enable the consideration of a new application and, if considered acceptable, to construct the new facility.

However, there was then a further delay in the submission of the additional material required to validate the application, with the result that the application currently under consideration was validated on 24 December 2009.

### **The Proposal**

12. The application seeks to provide a new purpose built engine testing facility for the airport and comprises improved areas of existing hard-standing and 6m high bunds to three sides of the site by using, enhancing and supplementing the existing bunds on site. A new drainage system is proposed and lighting is proposed to be provided on portable lighting columns as at present.
13. To access the facility, the aircraft would be towed or taxi under low power to the site from the hangar workshops on the southern part of the airfield. It is proposed that the facility would be the only location on the airport site for high-powered engine runs, such as is required to be done following maintenance, repair or overhaul before the aircraft can resume flying. Notwithstanding the conditions imposed on previous permissions, it is understood that other types of low-powered engine tests or 'idle' runs are carried out at various locations around the airport site by various operators on a frequent basis and the current application does not seek to alter this. Low power is considered to be 60-70% load and high is 70-100% load or full thrust.

### **Summary of applicants' submissions in support of the proposed development:**

14. High powered engine testing is carried out at the airport for a number of reasons. In part, this relates to the routine servicing and maintenance of aircraft operating from the site. In addition, one of the businesses operating from the airport (KLM Engineering UK) undertakes maintenance repair and overhaul (MRO) of aircraft. This is not limited to aircraft flying in or out of the airport with passengers or freight, but also comprises aircraft visiting the airport to benefit from the MRO services available.
15. It is understood from the applicant that the MRO operations at the airport represent an essential part of the airport's economy and the engine testing undertaken by KLM (predominantly) is a fundamental part of this business activity and complements the MRO activity undertaken by other businesses also on the site (e.g. Air Livery). Without the ability to test engines at the airport, the applicant claims that it would not be possible for KLM to continue to operate at Norwich. This could have significant implications for the local economy as well as the airport itself. Some 450 engineering staff are employed directly by

KLM, with 80 specifically licensed to undertake engine testing. These represent highly skilled engineering jobs. The loss of KLM would also potentially have an impact on the other businesses located at the airport as well as threatening the viability of the airport itself.

### **Applicants' comparison with the types of testing facility used elsewhere:**

16. All airfields need to make provision for engines to be tested as this is an activity essential for the safe operation of the aircraft and is required to be carried out at various points of an aircraft's use. Depending upon the scale of the airport and the activities carried out on the site, the testing facilities can vary. Some national airports (e.g. Heathrow and Stansted) which deal with much greater volumes of air traffic (and larger aircraft) have purpose made facilities ('ground run pens') which comprise three walls of high sided acoustic barriers. However, the cost of these facilities is several million pounds and not all national airports have this type of facility (e.g. it would appear that the requirement to provide one at Gatwick airport would be triggered by a growth in testing). Most smaller regional airports do not have purpose built facilities, but will tend to test engines in the open on an area of concrete hard-standing (a taxiway or apron). There are exceptions. Cardiff Airport (which is relatively small) does have a ground run pen facility due to the activities carried out on the site – it services the larger aircraft such as 747s and the ground run pen was established in connection with this use of the site.

### **Applicants' assessment of the constraints associated with ground run pens:**

17. During testing, the aircraft nose is required to point into the wind. Any testing location therefore needs to provide sufficient space to enable the largest aircraft to manoeuvre into the required wind direction. Ground run pens occupy a smaller footprint than the facility proposed here. Although this assists with sound attenuation, it has the consequence that if the wind is in the wrong direction, they can't be used. It is understood, although not verified, that in this type of situation testing will sometimes take place outside the pen on the adjoining taxiway.

### **Current testing levels of use:**

18. The aircraft currently tested at the Airport by KLM are Boeing 737, Fokker 70 & 100 and BAE146. Of these the BAE and the Boeing are noisier than the Fokker. A gradual change from BAE to Boeing is predicted over the next 5 years. The duration of testing may vary between 15 minutes and 5 hours, with a mean average of approximately 90 minutes and a modal average of 2.5 hours.
19. A review of high-powered testing carried out at the airport in the period October 2008 – March 2009 indicates that during this period, the average number of tests per month was 9, with approx 13 and a half hours of testing per month, with the testing lasting just over 90 minutes on average. It is understood that insufficient data is available to be able to easily verify the extent of other lower powered testing during this time.
20. The current authorised engine testing site limits the hours of testing to 0600-2300 and the recently revised and agreed Airport Operating Framework limits this further to 0800-2000 (Monday-Saturday) and 0900-2000 (Sunday). The Operating Framework limits the numbers of aircraft permitted to use the high-powered testing area at any one time to two.

### **Applicants' proposed testing restrictions:**

21. The application submission suggests further limitations on the extent of the engine testing

use. The level proposed takes into account recent levels of testing, possible future increases required and the operational requirements of KLM. The Airport has indicated that it would be prepared to accept restrictions on the following:

- Up to 240 tests per year and not exceeding 30 tests in any one month
- Testing to be restricted to 0800-2000 (Monday-Saturday) 0900-2000 (Sunday)
- No more than two aircraft to be tested at any one time
- On average (over 6 months) no more than 25 high powered engine tests per month
- On average (over 6 months) no more than 60 hours of high powered engine testing per month

### **Noise impact assessment:**

22. Engine testing is an essential part of the operation of an airport. In this case, it is also fundamental to the MRO activity undertaken by one of the businesses located at the airport. The level of noise generated during a high powered test is significant and will cause disturbance to those around the site. As with any noise source, generally, the further you are from the source, the less noise impact you experience as not only does the volume of the noise decrease over distance, but other noise generators may also 'interrupt' or 'mask' the noise source concerned. However, the perception of noise will also be influenced by other factors such as the type of noise frequency generated and the location of the receptor. Low frequency noise is more difficult to mitigate against. If background noise levels are low, then additional noise may be more noticeable.
23. Guidance is provided in Planning Policy Guidance Note 24 in relation to noise and development. For new dwellings, noise exposure categories (NECs) indicate acceptable levels of noise for proposed residential occupiers and provide guidance on where mitigation should be required or permission for the new homes refused.
24. The guidance also explains why the NECs cannot work in reverse and why they should not be applied to new noise sources on existing dwellings. Instead, it indicates that an approach using the BS4142:1997 methodology is appropriate. This has been the noise impact assessment technique used in respect of the current proposal.
25. Briefly, this measures the typical background noise level at a given location and then, using data about the noise source, calculates the increase in noise that would occur at the given location as a direct result of the proposed development. The amount of increase in noise over the background level is then used to assess whether the proposal is likely to cause detriment to local amenities or give rise to complaints, for example.

### **Applicants' noise impact assessment:**

26. The noise model used assumed a worst case assessment and compared the impact of the engine testing at the three sites within the airport (authorised site, current site and proposed site) on five different points around the airport, representative of the locations of the closest sensitive receptors.
27. When comparing the impact of relocating the engine testing site, the area that would receive the greatest benefit is Hellesdon, due to the increased distance away from the site and the existence of screening at the proposed location in comparison with the authorised

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site. However, Horsham and Quaker Farm would experience an increase in noise, with the largest increase being at Quaker Farm which is significantly closer to the proposed location than the authorised location.

28. In respect of the five sites referred to above, the worst case noise levels would be as follows, where LAeq is the equivalent continuous sound level as would be experienced during an engine test:

Location	Noise level from the permitted site LAeq, dB	Noise level from the current site LAeq, dB (change from permitted location)	Noise level from the proposed site LAeq, dB (change from permitted location)
Bush Road, Hellesdon	73	68 (-5)	68 (-5)
Old Norwich Rd, Horsham	74	78 (+4)	76 (+2)
Park Road, Spixworth	67	72 (+5)	67 (0)
Quaker Farm	73	81 (+8)	78 (+5)
St Faiths Rd, Catton	72	69 (-3)	72 (0)

29. The proposed mitigation works to improve and extend the existing bunding at the site would have some benefit to some sensitive receptor locations, but only very marginally, with the largest benefit being to Quaker Farm, with a 1.2dB(A) improvement.
30. Advice provided in PPG24 indicates that, when measured in dB(A) a change of 3dB(A) is the minimum perceptible under normal conditions. A change in 10dB(A) corresponds roughly to the halving or doubling the loudness of a sound.
31. In respect of the five sites concerned, it is also relevant to consider the worst case change to back ground noise levels in respect of the three testing sites, where LA90, 1 hr is the frequency weighted noise level exceeded for 90% of the 1 hour measurement period and is used in BS4142 to define background noise levels:

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Location	Background noise level (weekend, LA90,1hr)	Permitted site, excess of rating over background level, dB	Current site, excess of rating over background level, dB (change)	Proposed site, excess of rating over background level, dB (change)
Bush Road, Hellesdon	50	28	23 (-5)	23 (-5)
Old Norwich Rd, Horsham	29	43	47 (+4)	45 (+2)
Park Road, Spixworth	39	34	39 (+5)	34 (0)
Quaker Farm	31	47	55 (+7)	52 (+5)
St Faiths Rd, Catton	33	39	36 (-3)	39 (0)

32. The BS4142:1997 standard states, in assessing noise impact, that: 'A difference of around 10dB or higher indicates that complaints are likely. A difference of around 5 dB is of marginal significance.'

33. The applicants have noted that a difference of more than 10dB over background noise levels is experienced at all five receptor sites, whichever testing site is chosen. As such, the engine testing activity carried on at any of the three testing sites identified would be likely to give rise to complaints from any of the five representative sensitive receptor locations.

## Representations Received

34. Advertised on site and in the press. Five Parish Councils and the three closest individual properties to the site have been notified in writing. Seven letters of representation have been received to date, together with two specialist reports prepared on behalf of a neighbouring resident, one relating to planning and the other noise. The letters and reports received include reference to the issues as summarised in the table below. Full details of the representations received can be viewed at:

[http://www.norwich.gov.uk/webapps/planning\\_portal/termsandconditions.html](http://www.norwich.gov.uk/webapps/planning_portal/termsandconditions.html)

35.

Parish Council	Response
Hellesdon PC	Support
Old Catton PC	Support
Horsham & Newton St Faiths PC	Unhappy with noise impact and minimal reduction likely to be given by the proposed barrier; use of a sound reduction barrier equal to or better than the one at Stansted is

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	required; unhappy with noise monitoring points chosen; no mention of increase in maintenance work proposed at airport and its likely impact; fully supports the moving of the engine testing site but must be carried out in the interests of all concerned,
Spixworth PC	Endorses response of local residents; accepts proposed siting has advantages over any other available area at the airport but recommends that bund is increased to 9m in height with additional attenuating measures in place and trees planted; permanent noise monitor should be installed at Quaker Farm and levels monitored by EHOs and made available to residents and PC; sound levels to conform to those in PPG24 or further noise attenuation measures put in place; hours of operation limited to 0800-2000 Monday-Saturday and 0800-1300 Sundays and Bank Holidays.
Horsford	No reply to date
<b>Issues raised by local residents</b>	<b>Response</b>
Engine testing use is not an 'operational' use of the airport	See paragraphs 14-15, 48, 56 & 88
Noise amelioration measures are inadequate and the level of noise exceeds the margin of acceptability to such an extent that a form of enclosure or ground run pen is needed to reduce the harm	See paragraph 57-69 and 75-78
Full assessment of impact not been carried out, monitoring not carried out at 'correct' locations	The quality of the noise assessments undertaken is considered acceptable and sufficient to assess the impact of the proposal on surrounding land uses and residents and to enable a view to be reached as to the overall acceptability of the proposals
Alternatives to mitigation proposed have not been thoroughly assessed and evaluated; comparable sites, e.g. Stansted Airport, enjoy far greater protection from noise pollution than is proposed at Norwich. Airport should be investing in more effective sound attenuation methods	The local planning authority is required to determine the scheme that has been applied for. Whilst other physical methods of noise attenuation are available, these do not form the basis of the current application. The applicants have explained their reasoning for not proposing the use of a ground run pen in this instance and these reasons are summarised in paragraphs 16-17.
Measures proposed have not been subject to pre-submission public consultation	The relocation of the engine testing site and the possible mitigation works have previously been the subject of discussion at the Norwich Airport Limited Consultative Committee, the membership of which is made up of representatives from, amongst others, the



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	Airport, the Airport Operator Companies, 10 fringe Parish Councils, CPRE, Friends of the Earth, the City Council and Broadland DC.
Level of noise intrusion very high and will not be materially improved by the relocation of the facility	See paragraphs 26-33 and 57-69
Impact on amenity and living conditions is unacceptable	See paragraphs 57-69
Impact on other local businesses, (e.g. holiday cottages, livery and riding stables) is unacceptable	See paragraphs 57-69 and 75-78
No other industry would be permitted to generate such extreme levels of noise	Aircraft activity is inherently noisy and engine testing is an essential part of that activity. It is understood that, for that reason, it is exempt from control under the separate 'nuisance' legislation and guidance in PPG24 recognises the nature of the impact of the use.
Allowing this facility here would give Norwich Airport an unfair commercial competitive advantage over other airports	The acceptability or otherwise of engine testing facilities at other airports would be a matter for the local planning authorities concerned. Engine testing is carried out at other airfields and has been operating at this site for many years.
Current engine testing is limited to 9 hours per month and the proposal represents a substantial increase in hours of use which cannot be justified	There are no limits on the extent or frequency or duration of engine tests permitted to be undertaken from the approved site, although the hours of use (0800-2000 Mon-Sat, 0900-2000 Sunday) are limited through the NAL Operating Framework and conditioned 0600-2300 by planning permission ref 05/00697/F
Noise impact is extreme, due to its volume, low frequency characteristics and duration and so is very disruptive, exacerbated by an inability to plan for the avoidance of the impact	The extent and nature of impact is acknowledged. See paragraphs 57-69 and 75-78
Engine testing has a different impact to noise generated by take off and landing, due to the limited duration of high volume noise interspersed with greater periods of respite	This is acknowledged
The resulting noise levels are up to levels in excess of five times the point where complaints are positively predicted to occur	See paragraphs 32-33
No analysis of internal noise impact inside buildings where low frequency noise will dominate. The screening proposed will increase the low frequency dominance of the noise, which will more readily penetrate walls and structures	The extent and nature of the impact is considered able to be sufficiently appreciated from the submitted details
Cumulative impact of this noise with other	The applicant has provided noise contour

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types of noise associated with the airport not been fully assessed	plans which show the noise associated with the engine testing activity in relation to the noise impact from the use of the runway
If testing is permitted, conditions are required to control the activity and protect important amenity periods.	See recommendation
The restrictions imposed should reduce the level of activity from that which currently occurs and limits suggested (no testing in the evenings, at night, weekends or public holidays, no testing to last longer than 90 minutes in duration, no testing on consecutive days, testing limited to e.g. 10:00-16:00, prior notification to be provided, noise mitigation scheme to be implemented, restriction on total weekly, monthly and annual hours of testing, emergency exceptions)	See paragraphs 51-52
Need to consider what is acceptable not just what is authorised	See paragraphs 57-69
No evidence that re-use of authorised site would occur	In planning terms there are no restrictions on the airport that would prevent the re-use of the authorised site. Although operational reasons may prevent the airport from doing so at the moment, it is considered that the possible re-use of the authorised site does represent a potentially feasible 'fall-back' position for the airport and, as such, is a material consideration
Level of emissions	See paragraph 79
Considers that the operation of the unauthorised site for five years at considerable discomfort and without attempt at mitigation means that NAL have forfeit the right to any good will in this matter	The use of the unauthorised site should not be a consideration which detrimentally affects the consideration of the merits of this case; each planning application needs to be considered on its own merits
Accept commercial and social importance of the airport	Noted
Submissions imply that, as Quaker Farm would be the only location with a worse impact from the relocation of the engine testing, planning permission should be granted but the planning authority has a duty to protect residents from unreasonable nuisance arising from the development by not granting permission or by including appropriate conditions	See paragraphs 50 – 52
Reports refer to Quaker Farm but there are three habitable properties at Quaker Farm that will be adversely affected	Noted
If KLM are to continue to do business in this region, then it should not be at the expense of the local environment and lifestyle of local	Engine testing is an established activity which has occurred for many years at the airport. The continuation of the airport and

residents. KLM should produce a business plan which does not conflict with other local interests	airport related activities is supported by the Development Plan, subject to criteria. See paragraphs 44-49
Noise levels experienced in the last 5 years are unacceptable, since the engine testing moved from the authorised site	See paragraphs 26-33

### Consultation Responses

Full details of the responses received can be viewed at:

[http://www.norwich.gov.uk/webapps/planning\\_portal/termsandconditions.html](http://www.norwich.gov.uk/webapps/planning_portal/termsandconditions.html)

**36. Norwich City Council Economic Development:** Economic Development is supportive of this application. Engine testing is essential to KLM's business and their operations are unlikely to be viable in Norwich without this facility.

**37. Environment Agency:** No objection. Recommend the imposition of a condition relating to the size of the infiltration system for surface water drainage as shown in the submitted Flood Risk Assessment.

**38. Transportation:** This is clearly a necessary function to support the significant repair and maintenance operation that takes place at the Airport. As it is primarily a replacement for facilities which have existed at the airport for many years, it is unlikely that this proposal in itself would have any significant transport impact in terms of surface movement to and from the airport. I would, however, like to encourage KLM to implement a Travel Plan, if they have not done so already, but I do not think that this proposal is in itself sufficient for this to be a requirement.

**39. Environmental Health:**

Noise:

In comparing the figures for all 3 sites it is apparent that no one site holds a major advantage over another, in that each site provides positives and negatives regarding the projected noise levels at the various points. When comparing the proposed site with the current permitted site, of the 5 measurement points, 3 of them see either a reduction in levels or remain the same. Of the 2 sites that see an increase in levels, Quaker Farm (position L4) sees a significant increase and Horsham (position L2) sees a marginal increase. In some ways the increase at these 2 points could be considered less significant as the Quaker Farm area is not densely populated and also the measurement point at Horsham is the closest possible point to the noise source and the majority of properties are further away, meaning that the noise may be less significant for many properties in that area.

The proposal indicates that an upper limit of 240 tests a year and no more than 30 in each month would be acceptable in operational terms. Assuming that this is used to its fullest extent, then this would mean a more than doubling of the current exposure of noise to the residents, with testing taking place on 2 out of every 3 days. This increase would greatly increase the significance of the BS4142 assessment.

If permission is granted for the proposed location it will be important to ensure that the proposed screening is made as high and as encompassing as possible, as far as the operational limits will allow. Also it would be useful from a sound absorption point of view to minimise the amount of concrete hard standing in the area surrounding the test area.

What is likely to be of greater significance in the proposal are the maximum limits offered as it is these things combined that will have a major effect on all the surrounding areas.

### Emissions:

We do not have any relevant exposure at positions likely to be affected by emissions from operations at the airport. Despite this we have monitored air quality at the airport on two extended occasions using our mobile automatic unit - one in 2001 and one in 2005. We did not have any exceedences of the AQ objectives at the time. It is extremely unlikely there would be any significant exposure at the nearest residential premises therefore, as concentrations fall off rapidly as you move from the source.

Also, as part of our Updating and Screening Assessments we have to consider the airport as a 'source'. However, there are certain criteria to be met in order to include a particular airport in the assessment. Basically the site has to have either a total passenger throughput of more than 10 million passengers per annum (or freight equivalent). Norwich airport does not meet these criteria. A detailed assessment is therefore not required.

It is also my understanding that Broadland have carried out their own monitoring at the residential premises around the airport (where they have relevant receptors) but have not identified any exceedences either. Considering that this has been done during the period whilst the engine testing has been carried out already, one would not expect there to be any significant variation under the proposed arrangements.

40. **East of England Development Agency:** EEDA's principal role is to improve the East of England region's economic performance. The Regional Economic Strategy (RES), identifies a series of headline targets for the region that reflect the overall ambition of the RES to ensure that the region is internationally competitive with a global reputation for innovation and business growth which effectively equates to a further 424,000 jobs in the region. The specific goals of the RES also reflect ambitions of direct relevance to this application. Goal 7 – Transport, identifies the importance of the region's international gateways to the regional economy. In addition, Goal 8 – The Spatial Economy, identifies the importance of Norwich International Airport as a direct economic driver and connecting the sub-region to international markets. EEDA supports Norwich Airport as both a direct employer and as an economic driver for the Greater Norwich area and the regional economy. The proposals as set out through this application for the relocation of the engine testing facility are driven by operational issues. The expansion of the airport's business to serve commercial helicopters requiring additional space necessitates the relocation of the engine testing operations. The planning application does not propose any change to the restrictions over testing activity currently in place, but would appear to be proposing an increase in the number of tests carried out within approved hours. The supporting information also identifies that there will an improvement in the noise environment for sensitive receptors over and above the current location. EEDA therefore supports this application. It is in line with national and regional aspirations for the airport and is supported by local policy in the form of TRA2 in the adopted local plan and emerging policy through the Joint Core Strategy. We do, however, recognise that there may be local planning in terms of noise issues and would urge the Council to ensure that these can be adequately addressed.
41. **Norfolk Landscape Archaeology:** Have considered the site and have indicated that, given the photographic record of the site and the proposed retention of the existing blast walls in situ, the scheme is considered acceptable in archaeological terms

**42. Broadland DC (Comments taken from officer report to Broadland DC Planning Committee – formal comments will be reported verbally):**

Recommend Objection:

Although the application has been submitted by Norwich Airport the references in the supporting documents are to the engine testing carried out by KLM UK Engineering. No case is put forward for the need for testing in association with the actual operation of the airport. There is no pre-requisite for an airport to have the facility to carry out non operational testing and many operate successfully without such a facility. Where significant testing is carried out in sensitive locations on a regular basis it would be expected that this would be within a ground run pen or similar.

[Broadland DC's] Head of Environmental Services has stated that significant disturbance will occur from use of the proposed site and in terms of BS4142 this would be unacceptable. The noise testing in the proposed location will affect the amenities of residents and the operation of businesses in the surrounding settlements. What is not clear from the evidence provided is what the level and frequency of this noise will be in particular locations as well as its level when combined with noise resulting from the take-off and landing of aircraft. The existing testing operations have clearly been giving rise to a detrimental impact on the amenities of nearby residents for the City Council to have considered it expedient to take enforcement action by serving a Breach of Condition notice. This proposal which is in the same general location as the existing use is seeking to increase the amount of testing above the level that was being undertaken in the period leading up to the notice being served.

As has already been stated the proposal is likely to result in noise levels up to five times that which the Council would normally accept. It is clear that significant disturbance will occur from the proposed site. It is acknowledged that similar levels of disturbance occur at the current unauthorised site, and the permitted site. Different groups of residents are affected to a lesser or greater degree dependant on whether the authorised, unauthorised or proposed site is used for testing.

The proposal is contrary to the relevant policies in the Development Plan i.e. TRA9 and CS14 of the Broadland District Local Plan, it will conflict with the objectives of the East of England Plan which seeks to promote development to the north east of Norwich and it will prejudice the future vision for the Greater Norwich Area in seeking to encourage development in the Old Catton, Sprowston, Thorpe St Andrew and Rackheath growth triangle.

The proposal to establish an engine testing facility at Site C on the plan will result in a serious curtailment of amenity to existing and future residents and businesses in the local area. No justification has been put forward as to why this particular use needs to be located on this particular site such that the policies of the Development Plan should be set aside in this instance. As has already been indicated in the report there is an existing permission for engine testing to be carried out on site A. The Airport has chosen not to utilise this site for the consented use and has indicated that other airport activities now take place within this area. There is no evidence that testing would resume on the previously approved site and therefore the only rational conclusion with regard to this current application is for the proposal to be rejected.

However, without prejudice to the above recommendation, if Norwich City Council is

mind to grant planning permission for the proposal it is recommended that this Council requests that the following conditions are imposed: (i) The level of testing not to exceed 100 high powered tests in any 12 month period; (ii) The hours of operation of the test facility not to take place outside the hours of 0800hrs to 2000hrs Monday to Friday, and 0900hrs to 1300hrs Saturday. (iii) No testing to take place on Sundays or Bank Holidays; (iv) The airport to provide information (either through an accessible website or by other means) so that residents are given reasonable notice of impending tests; (v) Any proposals for lighting for the proposed test area should be submitted to the City Council for approval; (vi) If the airport wishes to exceed the 100 test limit then the airport be advised that measures will need to be taken to increase the mitigation measures proposed for the testing area, e.g. ground run pen or similar.

**43. Norwich Airport Joint Advisory Committee:** Having noted the proposals, recommend that the City Council's Planning Applications Committee undertakes a site visit prior to determination of the application.

## ASSESSMENT OF PLANNING CONSIDERATIONS

### Relevant Planning Policies

#### Relevant National Planning Policies

PPS1- Delivering Sustainable Development  
PPS23 – Planning and Pollution Control  
PPS23, Annex 1 – Air and Water Quality  
PPG24 – Planning and Noise  
PPS25 – Development and Flood Risk

#### Relevant Strategic Regional Planning Policies

##### East of England Plan 2008

E7 – The Region's Airports  
ENG 1 Carbon dioxide emissions and energy performance  
T15 Transport investment priorities  
H1 Regional housing provision  
NR1 Norwich key centre for development and change

#### Relevant Local Plan Policies

##### City of Norwich Replacement Local Plan 2004

TRA1 Norwich Airport development  
TRA2 Airport operational boundary  
EP5 Air Pollution emissions and sensitive uses  
EP8 Noise amelioration measures at Norwich Airport  
EP16 Water conservation and sustainable drainage systems  
EP17 Protection of watercourses from pollution from stored materials, roads and car parks  
EP20 Reuse of materials  
EP22 High standard of amenity for residential occupiers  
EMP2 Growth of existing businesses  
HBE12 High standard of design

#### Emerging Joint Core Strategy

Spatial planning objective 2: To allocate enough land for housing and affordable housing in the most sustainable settlements

Spatial planning objective 3 – To promote economic growth and diversity and provide a wide range of jobs

Policy 4: Housing delivery

Policy 5: The Economy

Policy 6: Access and transportation

Policy 9: Strategy for growth in the Norwich Policy Area

Policy 10: Locations for major new or expanded communities in the Norwich Policy Area

Policy 12: the remainder of the Norwich urban area including the fringe parishes

Policy 15: Service villages

Policy 17: Smaller rural communities and the countryside

## Principle of Development

### Policy Considerations

44. Norwich Airport has been operating on the site since the late 1960's. Policies within the East of England Plan (EEP) 2008 and saved policies of the City of Norwich Replacement Local Plan (RLP) 2004 (which together form the Development Plan) strongly support the continued operation of the Airport and make provision for growth to occur subject to certain criteria.
45. The EEP states that: 'Norwich Airport [has] an important regional role in meeting local and niche markets [...]. Airports provide a range of employment opportunities with a significant proportion of jobs not requiring high skill and educational attainment levels and attract firms that value proximity to airport services. Airport growth will provide a catalyst for the regeneration of nearby towns, notably [...] Norwich.'
46. In policy NR1 it states, amongst other things, that: 'Planning for employment growth [in Norwich] should focus on [...] Norwich Airport (uses benefitting from an airport related location).'
47. Although a document which should only be afforded limited weight, this approach towards the support for the continued use and growth of the airport is also followed in the emerging Joint Core Strategy (JCS) for the Greater Norwich Area.
48. Engine testing is an essential part of the operation of the airfield and specific reference to this activity is made within saved policy EP8 of the RLP. The retention of KLM at the airport is understood to be dependent upon the continued ability to undertake engine testing in connection with their MRO operations at the site. The importance to the local economy of the airport is referred to within policies E7, T15 and NR1 of the EEP, saved policies TRA1, TRA2 and EP8 of the RLP and objective 3 and policies 5 and 6 of the emerging JCS.
49. However, policies within the EEP, RLP and emerging JCS also refer to environmental considerations and there is a need to balance these considerations with those outlined above. Reference to emissions, noise and residential living conditions are referred to specifically within the RLP. These issues are assessed below.
50. Central government guidance in the policy documents listed above also addresses this issue of balance. It is recognised that, whilst polluting or noisy uses are generally encouraged to be located in areas where they are less likely to cause detriment to other sensitive uses, it is not always possible to do this.
51. The general principles outlined in paragraph 2 of PPG24 state: 'The impact of noise can be a material consideration in the determination of planning applications. The planning system has the task of guiding development to the most appropriate locations. It will be hard to reconcile some land uses, such as housing, hospitals or schools, with other activities which generate high levels of noise, but the planning system should ensure that, wherever practicable, noise-sensitive developments are separated from major sources of noise (such as road, rail and air transport and certain types of industrial development). It is equally important that new development involving noisy activities should, if possible, be

sited away from noise-sensitive land uses. Development plans provide the policy framework within which these issues can be weighed but careful assessment of all these factors will also be required when individual applications for development are considered. Where it is not possible to achieve such a separation of land uses, local planning authorities should consider whether it is practicable to control or reduce noise levels, or to mitigate the impact of noise, through the use of conditions or planning obligations.'

52. In respect of imposing conditions, paragraph 16 of PPG24 states: '[...] local planning authorities should give careful consideration to the individual circumstances of each application before imposing any conditions. In particular, authorities should not use the opportunity presented by an application for minor development to impose conditions on an existing development, which already enjoys planning permission. In the case of aerodromes, for example, limits on hours of operation and the number and type of aircraft may be applied to new aerodromes, but in the case of existing aerodromes they should only be sought where the proposed development is likely to have a material effect on use.'

### **Other Material Considerations**

53. In addition to supporting the continued use and growth of the airport in both transport and economic terms, the EEP and the emerging JCS identify Norwich as a growth area and propose significant new housing growth, amongst other things, for the greater Norwich area. Part of this growth is proposed, within the emerging JCS, to take place in the area of land to the east of the airport site, including within the parish of Old Catton, with the villages of Horsham and Newton St Faith, Spixworth and Horsford identified as service villages potentially suitable for small scale development.
54. The supporting information provided by the applicant indicates that, generally, the noise profile associated with moving the engine testing location is unlikely to have a significantly different effect on most existing and future residents in the parishes around the site when compared with the noise impact associated with the authorised site. Advice received from environmental health colleagues suggests that the applicants' assessment is appropriate. Although, there will be some increase in impact for some existing properties, as outlined above, the proposal is considered unlikely to result in a material change to the considerations that would apply to possible future proposals for housing development to the north and east of the airport.
55. In addition to the above, relevant policies require consideration of matters regarding emissions, water quality and drainage, visual impact, the re-use of materials and energy efficiency. The matters are assessed below.

### **Overall assessment of principle of use on the site**

56. Consequently, contrary to the officer views expressed by Broadland DC, it is considered that the proposal is acceptable in principle in policy terms and, subject to the assessment below, would not conflict with the policies within the Development Plan. Furthermore, notwithstanding the limited amount of weight that should be given to the document at this stage, the proposal is considered unlikely to prejudice the possible future growth of Norwich as outlined in the emerging JCS.

## **Impact on Living Conditions**

### **Noise**

57. Engine testing does create noise and disturbance, not only as it is a very noisy activity but also due to the length of time that the testing occurs for (which can vary from a few minutes to a few hours) and the uncertainty as to when the testing will happen. The noise impact information provided in support of the application has been assessed and is considered to be sufficient to determine the current proposal. However, further clarification as to the precise definition of an 'engine test' is considered to be required (as there are various types of tests that are carried out on aircraft engines) and it is recommended that this matter be conditioned if the application is approved.



58. Broadland DC officers consider that further assessment is required of the noise impact of the engine testing when combined with the other activities operating from the airport (notably the taking off and landing of aircraft). However, it is considered that this information is not necessary to determine the acceptability of relocating the testing site. The activity already takes place in conjunction with other activities at the airport and the comparative change in impacts associated with the relocation of the testing site has been adequately assessed.
59. It is clear from the information provided that the engine testing will continue to cause problems of noise and disturbance to surrounding properties. However, for the majority of residents this problem is likely to be made no worse than it would be from the authorised site and for some (notably the more densely populated area of Hellesdon) there would be a noticeable improvement.
60. In comparison with the use of the unauthorised site, most of the representative noise receptors would have an improvement in noise impact, with some (Spixworth) having a noticeable improvement.
61. Therefore in terms of noise impact, the proposal can be considered to represent an overall gain to the majority of people living around the airport site. The exception to this will, to some extent, be the three properties located at Quaker Farm. However, although the level of noise that they experience will be noticeably (by 5dB) higher than from the authorised site, it will also be noticeably quieter (3dB) than from the unauthorised site and so represent some limited improvement to their living conditions in that sense.

### **Disturbance**

62. In addition to the considerations regarding the level of noise experienced, it is also important to have regard to the frequency and duration of this noise impact. Some representations have expressed considerable concern that the level of testing proposed would result in a significant increase in the number of tests being carried out in comparison with the number carried out in the past.
63. Whilst this concern is understandable, it should be remembered that no limit exists on the number or frequency of testing that can be carried out from the authorised site. In addition to this, the numbers of tests submitted as being typical of the current level of activity were recorded during a period of economic downturn. Furthermore, it would appear that not all testing carried out at the airport is listed within these representative figures, although this matter is still being clarified.
64. The airport has indicated that, as part of the relocation of the site, they are prepared to accept restrictions on the activity which do not currently exist. The level of restrictions proposed would represent an increase in absolute terms in comparison with recent activity, but it is understood that these limits have been suggested to allow for the flexibility of operation and future growth of the engine testing activity.
65. Taken overall, notwithstanding the opportunity to impose restrictions on this activity and the economic benefits of the activity continuing from the airport site, it is considered that the suggested maximum level of use proposed by the airport would have a unacceptably detrimental impact on the living conditions of the closest residents.
66. Consequently, discussions have taken place with the airport about the level of restrictions proposed to try to negotiate a lower absolute figure or a more restrictive pattern of use. Clarification has been provided as to the operational needs of KLM and the nature of engine testing within the MRO work which indicate that, for example, it would not be appropriate to impose a time limit on the maximum length of testing to be carried out or the power applied during the test. These factors are dependent on the requirements of the test equipment and to go outside these requirements would invalidate the test being carried out.
67. The airport have indicated that some restrictions which go beyond those first identified would, however, be acceptable and have offered a limit on 80% tests being carried out between the hours 0800-1800 and maximum 30% tests at weekends and bank holidays.

68. Mindful of the advice in PPG24 with regard to imposing conditions on existing uses (and the specific reference made to airfield uses) it is considered that the overall impact in terms of noise and disturbance would not be made materially worse by the relocation of the site for the majority of surrounding residents. However, the level of noise impact experienced by the residents closest to the site would be high and it is considered that this would justify the imposition of conditions to reduce the impact of the disturbance experienced.
69. It is therefore recommended that restrictive conditions are imposed to limit the maximum number of tests per annum to 240 (as proposed by the airport) but with a maximum of 20 tests per month (not 30), with no testing to take place outside the hours of 0800-2000 Monday-Saturday and 0900-2000 Sunday, with no more than 15% (max 3 per month) of tests carried out outside the hours of 0800-1800 Monday to Friday, no more than 6 hours of testing on any one day, no more than one aircraft to be tested at any one time, testing not to be carried out on consecutive Saturdays/Sundays/public holidays on any weekend or holiday period, arrangements put in place to maintain a publicly visible/accessible log of all engine testing and to provide advance warning of forthcoming tests (e.g. via a webpage). All of the above would make allowances for exceptions in an emergency situation with the definition of 'emergency' and 'engine testing' made clear.

## Design

### Layout , form, scale, height

70. The design, layout and form of the proposed testing area are functional and the reasoning for this has been outlined above. It is considered unlikely to result in any visual detriment to the surrounding area. The bunds partially exist at present and their alteration and extension are considered appropriate and would be seen in the context of the remainder of the airport site.
71. The airport has indicated that the extent of hard-standing may be less than originally shown and a reduction in the extent of this would have benefits in terms of sound absorption. Consequently it is considered that this aspect should be the subject of a condition requiring the submission of precise details.
72. Whilst it would be possible to have designed the bunding to be higher than the 6 metres shown, this would have required far more ground area and required considerable more material than is proposed with relatively little benefit in terms of noise mitigation.
73. Different type and methods of noise attenuation are available and some possible alternatives have been outlined above. Whilst an alternative design may have a different impact, it is important to assess the merits of the scheme submitted. Should an alternative type of engine testing facility be proposed in the future, this would be a matter for consideration at that time.

## Transport and Access

### Surface vehicle impacts

74. The proposal seeks to relocate an exiting activity which operates at the airport. Taking into account the specialist views of the Council's Transportation section, the development is considered unlikely to lead to a significant change in surface transport accessing the airport site and on this basis the proposal is considered acceptable. However, should a substantial increase in the use of the facility were to occur this situation may alter. It is therefore considered that the recommended imposition of conditions on the extent of use of the facilities would enable any increase in surface transportation as a consequence of an increase in use to be assessed as part of a formal application submission.

## **Environmental Issues**

### **Noise**

75. Many of the issues relating to the noise associated with the use refer to the impact on living conditions for local residents and these are outlined above. However, there are some wider issues which also require assessment.
76. Concerns have been expressed by Broadland DC about the principle of the use proposed and whether it constitutes 'operational' development in terms of the needs of the airport. Whilst the engines being tested are not limited to those in aircraft using the airport for transportation purposes, they do form part of the MRO operations undertaken by one of the operators at the airport. This MRO use can be considered as the provision of a service or facility of the airport for the airlines and the aircraft industry rather than passengers or freight transporters. The MRO activity is considered to be an appropriate service or facility to be located at the airport and is clearly intrinsically linked to the use of the site as an airport (the MRO activity would not take place here if the airport didn't exist). Furthermore, as outlined above, all airports have to undertake a certain amount of engine testing, therefore the engine testing use per se can be considered to be an legitimate operational use of the airport.
77. Concerns have also been expressed about the extent of engine testing proposed in relation to the amount of testing carried out previously and currently. There would appear to be some confusion at this stage as to the precise definition of engine testing and this matter requires further clarification. However, for the avoidance of doubt, it is recommended that engine testing covers the testing of all engines, with the exception of start/stop tests and idle run tests which could be carried out elsewhere within the airfield, and that this matter be defined by condition.
78. Discussions have also taken place about possible changes to the type of engines tested in the future and the likely noise impact that may occur. It is understood that, due to hanger space limitations, the size of aircraft visiting the site for MRO reasons is limited. Additionally, aircraft engines are predicted to get less noisy over time. However, it is possible that both these factors may change in the future. To avoid a situation where the noise impact on surrounding land users could be made worse due to a change in aircraft or engine type, it is suggested that a maximum noise level restriction condition should be imposed to be measured at a defined location on the boundary of the site and for the limit to reflect the current activity.

### **Air Quality**

79. Specialist advice has been provided by the Council's Environmental Health Officers that indicates that the proposal is unlikely to lead to any deterioration of air quality compared with the existing. On this basis, it is considered that taking into account the nature of the application, the proposal is acceptable in this respect.

### **Flood Risk**

80. A Flood Risk Assessment (FRA) was submitted with the application which is considered acceptable, subject to condition, by the Environment Agency. The proposal is therefore not considered likely to increase the risk of flooding within the area and is considered acceptable in this respect.

### **Archaeology**

81. On the basis of the comments provided by Norfolk Landscape Archaeology the scheme is considered acceptable in archaeological terms.

### **Energy Efficiency, renewable energy and re-use of materials**

82. Although policy ENG1 of the EEP requires proposals in excess of 1000sq.m. to generate 10% of their energy requirements from decentralised and renewable energy or low-carbon sources, given the nature of the development proposed, this is not considered feasible in this instance.

83. It is proposed that the construction of the site makes use of the existing structures and supplements them with additional material. This is material that has been created by development elsewhere and the use of this would enable this material to be productively used on site rather than taken off-site as waste.

### **Plant**

84. It is recommended to impose a condition requiring details of any plant and machinery to be used in connection with the engine testing use to be submitted to and agreed by the Council prior to the first use of the site.

### **Lighting and CCTV**

85. The lighting for the proposed testing area would be on portable structures as is currently used at the unauthorised location. No complaints have been received regarding the lighting and it is considered that this type of provision would continue to be acceptable. However, to ensure that adequate controls exist it is recommended that this matter be conditioned.

## **Trees and Landscaping**

### **Replacement Planting**

86. The proposal will not lead to the loss of any existing trees. A request for additional planting has been made by Spixworth PC for sound attenuation purposes. However, having taken specialist advice, it is considered that introducing additional tree planting around the site would not have any material impact in terms of noise reduction and cannot therefore be required.

## **Conclusions**

87. The relocation of the engine testing site within the airfield as proposed would enable the continuation of this activity without serious disruption to the other operations of the airport and would support the continued use and potential growth of the airport in line with local and regional policies. However, engine testing is inherently noisy and despite the mitigation measures proposed and notwithstanding the likely improvement in impact in comparison with the use of the unauthorised site, the relocation of the site is likely to have a materially detrimental impact on the living conditions of those residents nearest the site.
88. Consequently, it is considered that, overall, the relocation of the engine testing as proposed is acceptable in principle and would be in accordance with the relevant policies regarding the use of the airport. Furthermore, it is considered that the relocation of the use will result in a materially detrimental affect on a relatively limited number of residents in comparison with the use of the approved site, but that the impact of the use on residential living conditions is such that the extent and frequency of the use should be limited by condition which will be of benefit to all those affected. Subject to the imposition of these conditions, the proposal is considered acceptable in terms of design, transportation, emissions, water quality and drainage, visual impact, the re-use of materials and energy efficiency and therefore is considered to meet the relevant policy requirements and all material considerations.

## **RECOMMENDATIONS**

To approve Application No 09/00679/F Norwich Airport Amsterdam Way Norwich NR6 6JA and grant planning permission, subject to the following conditions:-

1. Standard time limit (3 years)
2. In accordance with submitted details
3. Use of the unauthorised site for engine testing shall cease within 1 month of the date of failure to meet any of the requirements below: (i) within 1 month of the date of permission a scheme for the details of hard-standing and a timetable for the construction of the test site including the provision of the bund and timetable for

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implementation to be submitted to the local planning authority for approval; (ii) if within a period of 6 months of this decision the local authority refuse to approve the details or fail to give a decision within the prescribed period an appeal shall have been made to and accepted as valid by the Secretary of State; (iii) if an appeal is made in pursuance of (ii) above, that appeal shall have been finally determined and the submitted details shall have been approved by the Secretary of State; (iv) the approved scheme shall have been carried out and completed in accordance with the approved timetable.

4. Following completion of the development hereby approved in accordance with the details and timetable to be approved in condition 3 above, all engine testing within the airport shall take place from the approved site and no other site within the airport shall be used for that purpose.
5. For the avoidance of doubt, should the requirements of condition 3 fail to be met all use of the unauthorised site shall cease as specified in condition 3 and all engine testing at the airport shall cease or revert to the authorised site as detailed in condition 9 of permission 05/0697/F
6. Size of surface water infiltration system
7. Details of the extent and construction of the hard-standing
8. Details of lighting
9. Details of any plant and machinery
10. Definition of engine testing
11. Scheme of publicly viewable log of all engine testing and for the prior notification of testing to be submitted and agreed within 2 months of permission and scheme to be operational within 4 months of permission; any variation to the scheme to be subject to further approval
12. Maximum of 240 tests per annum
13. Maximum of 20 tests per month
14. No testing to take place outside the hours of 0800-2000 Monday-Saturday and 0900-2000 Sunday
15. No more than 15% (max 3 tests per month) of tests carried out outside the hours of 0800-1800 Monday to Friday,
16. No more than 6 hours of testing on any one day
17. No more than one aircraft to be tested at any one time
18. Testing not to be carried out on consecutive Saturdays/Sundays/public holidays on any weekend or holiday period
19. Conditions 11-18 above to make allowances for exceptions in an emergency situation with 'emergency' defined
20. Maximum noise level limit at defined location on boundary of site

### Informative:

1 The airport be advised that, without prejudice to the determination of a future application, the level of testing as set out above is considered to be the maximum reasonable level of use of the site taking into account the impact on neighbouring living conditions and that any proposed increase in the level or extent or timing of testing proposed would be expected to make provision for substantial noise mitigation measures.

### Reasons for approval:

It is considered that, overall, the relocation of the engine testing as proposed is acceptable in principle and would be in accordance with the relevant policies regarding the use of the airport. Furthermore, it is considered that the relocation of the use will result in a materially detrimental affect on a relatively limited number of residents in comparison with the use of the approved site, but that the impact of the use on residential living conditions is such that the extent and frequency of the use should be limited by condition which will be of benefit to all those affected. Subject to the imposition of these conditions, the proposal is considered

## **Appendix 1**

acceptable in terms of design, transportation, emissions, water quality and drainage, visual impact, the re-use of materials and energy efficiency and therefore is considered to meet the relevant policy requirements of PPS1, PPS23, PPS23 Annex 1, PPG 24 and PPS25, EEP policies E7, ENG 1, T15, H1, NR1, saved RLP policies TRA1, TRA2, EP5, EP8, EP16, EP17, EP20, EP22, EMP2, HBE12 and all material considerations.

MINUTES

**PLANNING APPLICATIONS COMMITTEE**

**9.30 a.m. – 5.10 p.m.**

**18 March 2010**

Present: Councillor Bradford (Chair), Councillor Llewellyn (Vice-Chair),  
Banham, Driver, George, Jago, Lay, Little (S), Lubbock, Read (not  
on site visit) and Wiltshire

**1. SITE VISIT – APPLICATION NO 09/00679/F - NORWICH AIRPORT**

The committee undertook a site visit in respect of Application No 09/00679/F - Norwich Airport, Amsterdam Way, Norwich, NR6 6JA.

**2. DECLARATIONS OF INTEREST**

Councillors Driver and Little declared a personal interest in respect of Application No 09/00679/F - Norwich Airport Amsterdam Way, Norwich, NR6 6JA as representatives of the City Council on the Norwich members of the Norwich Airport Joint Consultative Committee. Councillor Driver also declared that he was a member of the Norwich Airport Joint Advisory Committee and had been present during a presentation on the application on 11 March 2010 but had left the room prior to the discussion and the determination of the item.

**3. MINUTES**

**RESOLVED** to approve the minutes of the meeting held on 25 February 2010.

**4. APPLICATION NO 09/00679/F - NORWICH AIRPORT, AMSTERDAM WAY, NORWICH, NR6 6JA**

(Councillors Driver and Little had declared a personal interest in this item.)

The Head of Planning Services introduced the report and said that the Council had been working with the airport to bring this application before the Committee. He acknowledged that the Council had failed to take prompt action against the airport for the use of the unauthorised site for engine testing and apologised for this failing. There was an established use for the airport to test engines on an authorised site which was no longer suitable for operational reasons. The proposed relocation gave an opportunity to add conditions to the planning permission to mitigate adverse impacts of development and address the concerns of local residents. Officers had negotiated further revisions to the conditions with the applicants. (A supplementary report was circulated at the meeting which listed the revised conditions.) The airport and KLM UK Engineering had confirmed that they would be able to operate within

the conditions proposed. The application would bring economic benefits to the airport. The principle of the proposed development was considered supportable and refusal of the application might be difficult to defend at appeal.

The Planning Development Team Leader then presented the report with the aid of slides and plans. She pointed out that as aircraft to be tested did not generate as much noise as given in the table of worst case noise levels (table, paragraph 28 of the report) 10 decibels should be subtracted from each figure. All members of the committee had received a letter from KLM UK. Referring to the representations set out in the report, she pointed out that 5 parish councils had been consulted and a number of local residents had commented. A further 5 letters had been received since the report had been written, one of which was a further representation from a local resident and another was an email from Keith Simpson, MP. The issues raised included noise, emissions and the importance of the proposal to the local economy and were addressed in the report. Members were advised that the Norwich Airport Consultative Committee had written to support the application and that Broadland District Council's Planning Committee had supported the application subject to conditions.

The Enforcement Officer (Environmental Health) demonstrated what the various differentials of decibels would sound like from different locations and answered questions. The Planning Development Team Leader then summarised the main points in the report and the revised conditions which had been circulated at the meeting.

Objectors to the proposals resident in Horsham St Faiths, Quaker Cottages, Quaker Farm and Lingwood, and a local businessperson then addressed the committee outlining their concerns relating to noise and vibration, the modelling used for the noise assessment and calling for a purpose built engine testing facility to be provided.

The Chair of the Norwich Airport Consultative Committee then addressed the committee in support of the application that it would ensure the retention of KLM UK but also that the needs of local residents should be addressed and undertaking to monitor that the airport complied with the conditions.

A representatives of Spixworth Parish Council expressed concern about noise and lack of amenity and that the airport was monitored to ensure compliance with the conditions. The representative of Newton and Horsham St Faiths Parish Council considered that the modelling had not been conducted in the most vulnerable areas; the reduction of noise from engine testing in Horsham St Faiths from the relocation of the engine testing facility to the proposed site was not significant; that the proposed facility should be the standard of the one at Stansted Airport rather than increasing bund height; and that a site visit without experiencing an engine being tested was a waste of time.

The Chair of Broadland District Council's Planning Committee also addressed the committee in support of the application subject to the imposition of more stringent conditions than the revised conditions proposed by the City Council's officers.



A representative of KLM UK addressed the committee in support of the application and confirmed that the company would comply with the conditions but that any further restrictions would compromise the viability of the business, resulting in the loss of 450 jobs to the local economy.

The applicant then addressed the committee outlining the importance to the viability of the airport in providing an engine testing facility and retaining the business of KLM UK which was vital to the future of the airport. Both the airport and KLM UK had agreed to the revised conditions proposed by the City Council. However KLM UK could not operate from Norwich Airport if tighter controls were applied.

The Head of Planning Services, the Planning Team Leader and the Enforcement Officer then answered members' questions. Members were advised that it had not been possible to organise the site visit to coincide with engine testing and that it was not possible for the operators to give more than 2-3 days notice. The arrangements for giving notice of engine testing was subject to further discussion with the airport but it was envisaged that this would be by text alerts or advertised on the airport's website. The condition stipulating the time that the facility could be used was similar to the restrictions on late flights and would be incorporated into the airport's operating framework. Members were advised that as the proposal would lead to a greater level of adverse impact on some residents than that associated with the authorised site on the eastern apron it was legitimate to consider the acceptability of the impact and the seek to control it via appropriate conditions. The current authorised site could be used at any time between 6.00 a.m. and 11.00 p.m. and considerable tighter restrictions were proposed on the proposed site.

During discussion members referred to the objectors' experiences of the noise from engine testing and considered that there needed to be further monitoring from locations around the airport of the noise generated from engine testing on the unauthorised site before coming to a decision. Some members also considered that it would be beneficial if they could attend whilst the monitoring was being conducted so that they could experience the level of noise generated from the engine testing. Councillor Wiltshire moved and Councillor Jago seconded that determination of the application should be deferred to allow for the Council's Environmental Health Enforcement Officer to conduct noise assessment of engine testing from the unauthorised site and to notify members of the committee when this will be taking place to enable them to attend.

**RESOLVED** with 7 members voting in favour (Councillors Bradford, Lay, Banham, Wiltshire, Lubbock, Llewellyn and Jago) and 4 members against (Councillors George, Little, Read and Driver) to defer determination of Application No Application no 09/00679/F - Norwich Airport, Amsterdam Way, Norwich, NR6 6JA to allow for monitoring of the noise generated from engine testing on the unauthorised site at locations in the residential areas around the airport and to invite members of the committee to attend whilst this is being conducted.

(The committee then adjourned for lunch and reconvened at 3.10 p.m.)





0900079F

23 DEC 2009

REV	DATE	DESCRIPTION	BY	CHKD	APPD

• NOTES

- |   |                            |
|---|----------------------------|
| A | PERMITTED TESTING LOCATION |
| B | CURRENT TESTING LOCATION   |
| C | PROPOSED TESTING LOCATION  |



Parsons Brinckerhoff

Queen Victoria House, Redland Hill, Bristol, United Kingdom, BS6 6US  
Tel: 44-(0)117 9339300 Fax: 44-(0)117 9339253

• CLIENT/PROJECT

NORWICH AIRPORT LTD  
NIA ENGINE TESTING FACILITY

• TITLE

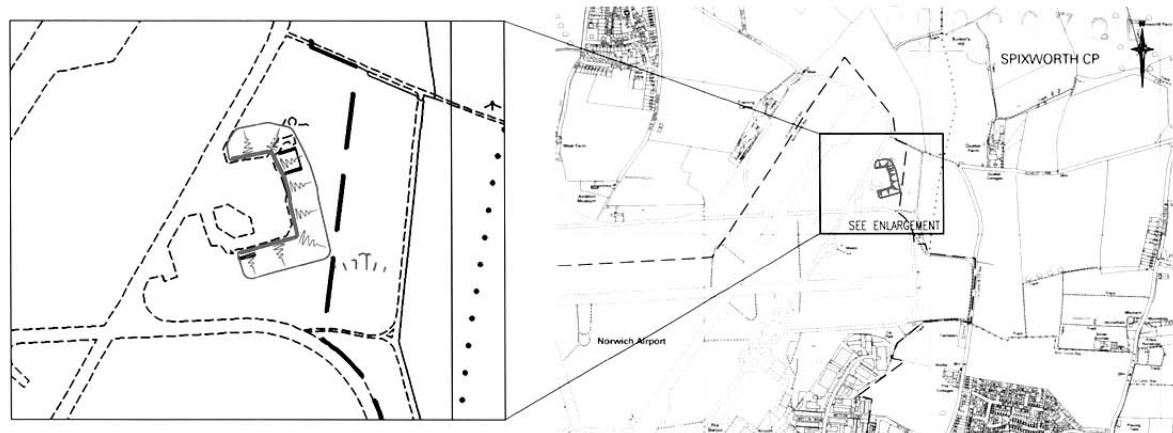
SITE PLAN SHOWING TESTING  
LOCATIONS

- DATE: 04/12/09
- SCALE: 1:1000 at A3
- CAD REF: \FSE\972\36A\2\1\FSE97236A-F01.dwg

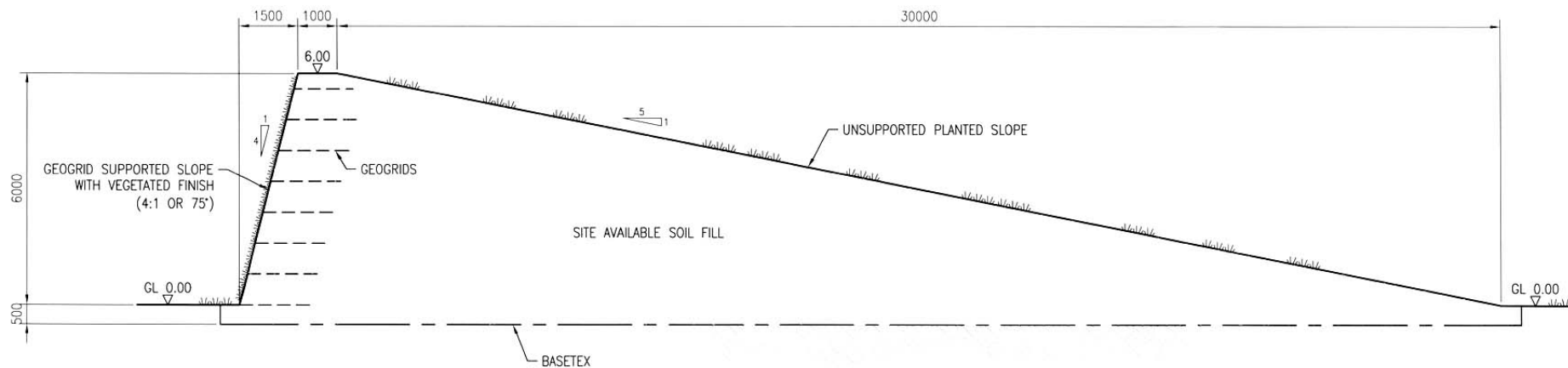
DRAWN BY	BRG
PRODUCED BY	PJ
CHECKED	
APPROVED	

• DRAWING NUMBER

FIGURE 1



BUND LOCATION  
1:20,000



TYPICAL SECTION THROUGH BUND  
1:100

REV	DATE	DESCRIPTION	BY	CHKD	APPD	NOTES



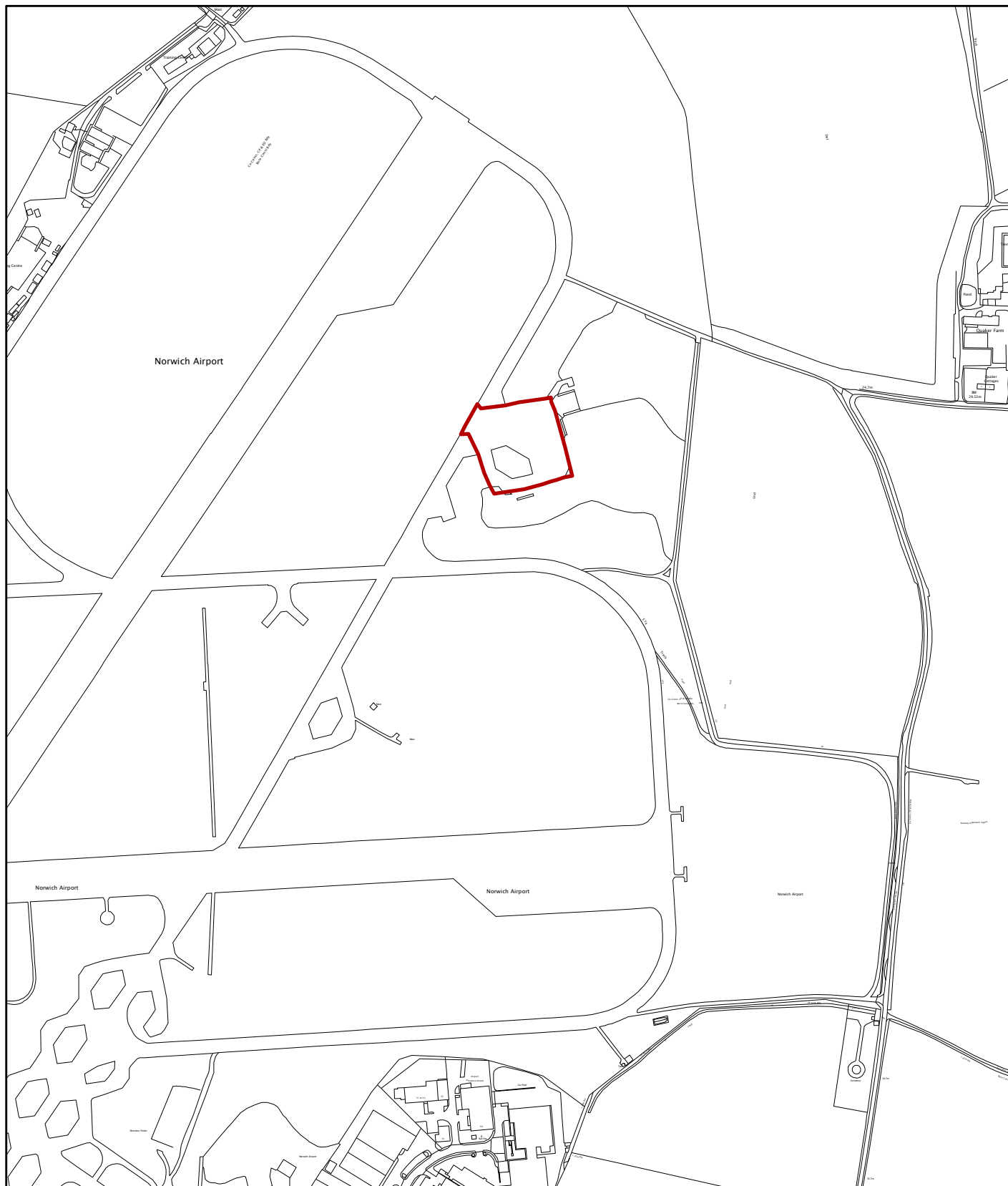
**Parsons Brinckerhoff**  
Queen Victoria House, Redland Hill, Bristol, United Kingdom, BS6 6LS  
Tel: 44-(0)117 9339300 Fax: 44-(0)117 9339253

CLIENT/PROJECT  
**NORWICH AIRPORT**

TITLE  
**Proposed Bund  
Plan and Elevation**

DATE 04/12/09  
SCALE As Shown at A3  
CAD REF \FSE\972\36A\Z\1\FSE97236A-BUND-F04  
DRAWN BY BRG  
PRODUCED BY HR-P  
CHECKED  
APPROVED

DRAWING NUMBER  
**FIGURE 4**



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Planning Application No - 09/00679/F

Site Address - Norwich Airport, Amsterdam Way, Norwich

Scale - 1:6,000



**NORWICH**  
City Council

**PLANNING SERVICES**

