

Principal Areas of Disagreement Summary Statement (PADSS) from National Trust		Version Number: 1 Submitted at: 23/06/2023	
Principal Issue in Question	Concern held	What needs to change / be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
Noise assessment is inadequate, excluding outdoor recreation sites from non-residential receptors which could be impacted by the noise pollution caused by the expansion proposals.	National Trust sites at Ashridge Estate and Ivinghoe Beacon, Dunstable Downs, Chilterns Gateway, Whipsnade Estate Coombe Hill/Low Scrubs Pulpit Hill, Smithcombe, Sharpenhoe and Sundon Hills SSSI, and Totternhoe Knolls SSSI have not been included in monitoring for baseline noise and are excluded from the assessment as non-residential receptors. As the assessment has not considered our sites, we are concerned that the proposed expansion could have an adverse impact on the tranquillity of these important recreation sites.	Baseline monitoring needs to be undertaken at the named National Trust sites and these should be included in the category of non-residential receptors to allow for comprehensive assessment of the impact on the tranquillity of these sites.	It is noted that the ExA's unaccompanied site visit included both Ashridge Estate and Ivinghoe Beacon, where noise from planes was noted. Should the ExA consider it appropriate, the concern could be addressed during the examination through the baseline monitoring of the referenced sites being undertaken.
Air quality assessment is inadequate, excluding National Trust sites within the 15km of the development site and scoping out the sites within 10km of the development site from the assessment.	National Trust sites at Ashridge Estate and Ivinghoe Beacon, Dunstable Downs, Chilterns Gateway, Whipsnade Estate Coombe Hill/Low Scrubs Pulpit Hill, Smithcombe, Sharpenhoe and Sundon Hills SSSI, and Totternhoe Knolls SSSI have been excluded from the assessment on the grounds that they do not fall within the Zone of Influence grid area. As the assessment has not considered our sites, we are concerned that the proposed expansion could have an adverse impact on the condition of these important ecological designations.	Given the distance of these internationally and nationally designated sites from the airport and the level of proposed growth, they should be included within air quality assessments and impact of proposals on these designated features assessed to identify whether the development itself is appropriate and whether there is the need for any mitigation.	Should the ExA consider it appropriate, the concern could be addressed during the examination through the assessment of the referenced sites being undertaken.

