

Principal Areas of Disagreement Summary Statement (PADSS) from National Trust		Version Number: 2 Submitted at: 12/09/2023	
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, omitting 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 been omitted from monitoring for baseline noise and are excluded from the assessment as non-residential receptors. Evidence within the Applicant's Noise Assessment indicates an increase in projected overflights at Ashridge Estate, Dunstable Downs and Whipsnade Heath. This outcome has not been addressed by the Applicant in respect of our concerns 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. We anticipate that a reduction in the number of proposed overflights would be likely to address our concern in terms of the anticipated impact on tranquillity.	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, and consideration of whether the anticipated number of overflights across NT sites could be reduced.