

Response to REP2-019 (Statement of Common Ground between LR and UKHSA)

Author: Michael Reddington

Unique Reference: 20037459

Note 1: Page numbers in column headed 'REP2-019 Page/Row' below refer to 'pdf' document page

Note 2: Para. 'x' where denoted is the relevant paragraph in the 'Luton Rising's Response' column.

1 Responses to 'The Applicant Position' column

| Response # | REP2-019 Page/Row | Comment |
|------------|-------------------|--|
| 1. | 16/1 | Para.2 'Assessment approach - Significant effects' It should be noted that Chapter 16: 'Noise and Vibration' also compares the 'Do Minimum' with 'Do Something' scenarios for each of the years 2027, 2039 and 2043 to demonstrate the increase in air noise contours. |
| 2. | 18/1 | Para. 2 'Mitigation and noise envelope' This does not answer the point. UKHSA have identified that there has been no testing of the efficacy of this insulation and implying that they would expect to see testing as part of the submission. This is only basic Scientific Method - test the parameters beforehand then test after insulation. There is a problem however, the efficacy of insulation can only be tested inside a property but the Applicant has not set out any parameters for internal noise levels (Day or NIght) |
| 3. | 20/2 | 'Assessment approach - significance ' Cannot find reference 16.3.21 in Chapter 16 |
| 4. | 21/1 | 'Assessment approach - significance ' The Applicant has been asked to provide more details on the parties to a S106 Agreement and how this would be policed. under responses to REP2-034. |
| 5. | 21/2 | 'Noise Compensation' The Applicant's proposals for (1) Eligibility; (2) Testing and (3) Programme need much more detail. The ExA has been requested under responses to REP2-034 to instruct the Applicant accordingly. |
| 6. | 22/2 | 'Noise Compensation'. Refer to response #5 above |
| 7. | 23/1 | Para. 2 'Accessibility of the PEIR and ES ' The Applicant has responded as follows to comment in REP2-034 page 209 Para. 2 'Noise/Compensation': <i>"The Draft Compensation Policies, Measures and Community First has been updated to include further information on the proactive approach</i> |

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| | | <p><i>that will be adopted by the Applicant to ensure both knowledge and availability of the offer has been clearly and openly communicated. This will include an online compensation look-up tool post consent that will allow residents to find out which noise insulation scheme they may be eligible for, avoiding the need to interpret contour maps. “</i></p> <p>This look-up tool will need to be secured.</p> |
| 8. | 25/1 | <p>‘Monitoring’</p> <p>The Applicant fails to answer the comment. An enormous undertaking such as airport expansion has enormous consequences and just because the Applicant does not want to spend the money or time carrying out this analysis does not mean it is unnecessary. One example could be the monitoring of the effectiveness of insulation. Another could be monitoring the health of those who are subject to excess noise (typically above SOAEL) in outside spaces where noise mitigation is not possible.</p> |
| 9. | 25/2 | Refer to Response #8 above |
| 10. | 27/1 | <p>‘Community engagement’</p> <p>Even if this commitment were to be fulfilled it would only cover the Construction period and not the Operation period which arguably has more serious impacts.</p> |

Response to REP2-020 (Statement of Common Ground between LR and LBC)

Author: Michael Reddington

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1 Responses to 'The Applicant Position' column

| Response # | REP2-020 Page/Row | Comment |
|------------|-------------------|---|
| 1. | 36/2 | LBC29: 'Implications of parking restraint and pricing policies' LBC is proposing to implement parking control areas around the airport in order to dissuade opportunistic parking by airport users. Unless the parking control system is free to residents, this is a totally unacceptable situation. Residents will be punished - by having to buy a permit - because parking charges at the airport are too steep. LLAL or LBC - as the beneficiary of the airport's expansion, must fund any such scheme and its enforcement. This Planning condition must be secured. |
| 2. | 72/4 | LBC85: 'Appropriateness of the noise insulation scheme' "LBC agrees with the (introduction ?) of the nighttime SOAEL eligibility criteria and accepts the appropriateness of the noise insulation scheme in principle". The Applicant's proposals for (1) Eligibility; (2) Testing and (3) Programme need much more detail. The ExA has been requested under responses to REP2-034 to instruct the Applicant accordingly. |
| 3. | 86/2 | LBC107: 'Quantitative assessment of health outcomes associated with aircraft noise' LBC expects the number of people affected by noise should not increase. Chapter 16 'Noise and Vibration' sets out very clearly the <u>additional</u> numbers of residents affected by noise. |
| 4. | 91/2 | LBC113: 'Measures to mitigate the impacts of the development' The Applicant has proposed measures to mitigate noise by use of sound insulation but this does not mitigate, for example, against external noise in the open. |

Response to REP2-021 (Statement of Common Ground between LR and CBC)

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Note 1: Page numbers in column headed 'REP2-021 Page/Row' below refer to 'pdf' document page

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| Response # | REP2-021 Page/Row | Comment |
|------------|-------------------|--|
| 1. | 42/1 | <p>CBC33: 'Parking Demands'</p> <p>The Applicant is committed to supporting parking control areas around the airport in order to dissuade opportunistic parking by airport users. Unless the parking control system is free to residents, this is a totally unacceptable situation. Residents will be punished - by having to buy a permit - because parking charges at the airport are too steep. LLAL or LBC - as the beneficiary of the airport's expansion, must fund any such scheme and its enforcement.</p> <p>This Planning condition must be secured.</p> |
| 2. | 42/2 | <p>CBC34: 'Parking restraint and pricing policies'</p> <p>Refer to Response #1 above</p> |
| 3. | 116/4 | <p>CBC132: 'Introduction appropriateness of the noise insulation scheme'</p> <p>"CBC agrees with the introduction of the nighttime SOAEL eligibility criteria and accepts the appropriateness of the noise insulation scheme in principle".</p> <p>The Applicant's proposals for (1) Eligibility; (2) Testing and (3) Programme need much more detail. The ExA has been requested under responses to REP2-034 to instruct the Applicant accordingly.</p> |

Response to REP2-022 (Statement of Common Ground between LR and HCC)

Author: Michael Reddington

Unique Reference: 20037459

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| Response # | REP2-022 Page/Row | Comment |
|------------|-------------------|---|
| 1. | 36/2 | <p>HCC33: 'Parking restraint and pricing policies'</p> <p>The Applicant is committed to supporting parking control areas around the airport in order to dissuade opportunistic parking by airport users. Unless the parking control system is free to residents, this is a totally unacceptable situation. Residents will be punished - by having to buy a permit - because parking charges at the airport are too steep. LLAL or LBC - as the beneficiary of the airport's expansion, must fund any such scheme and its enforcement.</p> <p>This Planning condition must be secured.</p> |
| 2. | 86/3 | <p>HCC95: 'Introduction appropriateness of the noise insulation scheme'</p> <p>"HCC agrees with the introduction of the nighttime SOAEL eligibility criteria and accepts the appropriateness of the noise insulation scheme in principle".</p> <p>The Applicant's proposals for (1) Eligibility; (2) Testing and (3) Programme need much more detail. The ExA has been requested under responses to REP2-034 to instruct the Applicant accordingly.</p> |

Response to REP2-023 (Statement of Common Ground between LR and NHDC)

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| Response # | REP2-023 Page/Row | Comment |
|-------------------|--------------------------|--|
| 1. | 35/1 | <p>NHDC33: 'Parking restraint and pricing policies'</p> <p>The Applicant is committed to supporting parking control areas around the airport in order to dissuade opportunistic parking by airport users. Unless the parking control system is free to residents, this is a totally unacceptable situation. Residents will be punished - by having to buy a permit - because parking charges at the airport are too steep. LLAL or LBC - as the beneficiary of the airport's expansion, must fund any such scheme and its enforcement.</p> <p>This Planning condition must be secured.</p> |
| 2. | 85/3 | <p>NHDC95: 'Introduction appropriateness of the noise insulation scheme'</p> <p>"NHDC agrees with the introduction of the nighttime SOAEL eligibility criteria and accepts the appropriateness of the noise insulation scheme in principle".</p> <p>The Applicant's proposals for (1) Eligibility; (2) Testing and (3) Programme need much more detail. The ExA has been requested under responses to REP2-034 to instruct the Applicant accordingly.</p> |

Response to REP2-024 (Statement of Common Ground between LR and Dacorum Borough Council, DBC)

Author: Michael Reddington

Unique Reference: 20037459

Note 1: Page numbers in column headed 'REP2-024 Page/Row' below refer to 'pdf' document page

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| Response # | REP2-024 Page/Row | Comment |
|------------|-------------------|---|
| 1. | 34/1 | <p>DBC33: 'Parking restraint and pricing policies'</p> <p>The Applicant is committed to supporting parking control areas around the airport in order to dissuade opportunistic parking by airport users. Unless the parking control system is free to residents, this is a totally unacceptable situation. Residents will be punished - by having to buy a permit - because parking charges at the airport are too steep. LLAL or LBC - as the beneficiary of the airport's expansion, must fund any such scheme and its enforcement.</p> <p>This Planning condition must be secured.</p> |
| 2. | 74/1 | <p>DBC88: 'Use of a future baseline'</p> <p>"DBC agrees with the (introduction ?) of the nighttime SOAEL eligibility criteria and accepts the appropriateness of the noise insulation scheme in principle".</p> <p>The Applicant's proposals for (1) Eligibility; (2) Testing and (3) Programme need much more detail. The ExA has been requested under responses to REP2-034 to instruct the Applicant accordingly.</p> |