

Response to Issue Specific Hearing No. 9 [EV16-009] Action 34: Comments on Noise Insulation Delivery Programme [REP4-079]

Author: Michael Reddington
Unique Reference: 20037459

ID	Paragraph no.	M Reddington Comment
1	General	There is significant repeating of text between Draft Compensation Policies, Measures and Community First Tracked Change Version [REP4-043] , and [REP4-079] . Any comments made in relation to REP4-079 therefore will also apply to the equivalent paragraph of REP4-043
2	General	It may be useful for the Applicant to note the current progress of insulation under Project Curium (and by extension the 19mppa update ?). This is shown in Appendix A below.
3	1.1.7	<p>This paragraph states: “... <i>and all properties identified as experience [sic] adverse likely significant effects or ongoing significant effects on health and quality of life from ground noise would also be eligible for the prioritised air noise Schemes 1 to 3”.</i></p> <p>The eligibility of properties for compensation in respect of Ground Noise, and the actual monetary amount thereof, are different for Air Noise Schemes 1-5 and should not be conflated.</p>
4	1.1.7	<p>This paragraph also states: <i>“This document therefore focusses on the air noise scheme and in particular the prioritised rollout of Schemes 1 to 3.”</i></p> <p>(Note that Scheme 3 encompasses Night-time SOAEL and Schemes 1 and 2 encompass Daytime SOAEL.)</p> <p>This document [REP4-079] actually encompasses the complete Insulation programme.</p>
5	2.1.2a	<p>The setting up of a Noise Insulation Sub-committee (NIS) is potentially the most important initial step.</p> <p>It is expected the NIS will include The Applicant, LLAOL, Independent Chair, Local Authorities representatives, Acoustics experts, LADACAN,. The NIS will be responsible for preparation of Test documents, the Insulation Eligibility Document, and offer letter to residents in addition to deciding what properties are to be prioritised. We suggest strongly that there is a case (as for the GCG) that there should be a quorum defined, in order for the NIS to meet and have the necessary authority to make decisions.</p>
6	2.1.2b-e	<p>In addition to obtaining a list of all property owners eligible for any form of insulation the Applicant will have to extract from LLAOL the list of properties:</p> <ul style="list-style-type: none"> (a) Already insulated, when, and to what level of insulation (b) Already approached, and agreed to accept insulation, and products either purchased or on order but not yet fitted (c) Already approached and agreed to insulation but no products purchased.

ID	Paragraph no.	M Reddington Comment
		(d) Not yet approached.
7	2.1.2e	The provision of a look up tool and its date of deployment are the subject of a separate Action by the Applicant
8	2.1.2.f,k,l	<p>Lessons learned from the current insulation programme is that few residents respond to a letter and are more likely to respond to door knocking, direct contact, or possibly social media that includes colleagues or neighbours.</p> <p>Trust in the process is very low and the NIS will have to convince residents this is not a scam nor does it signal support for the Development Order.</p> <p>The one major advantage of the DCO is the level of expenditure they are willing to support. This may be another strong reason why existing insulation scheme has been less successful.</p>
9	2.1.2.f	If residents fail to respond to postal, personal or social media contact, they must be given the opportunity to re-apply after a time period. The current Scheme sets this at 5 years. We believe this is far too much especially if the property is subject to Significant levels.
10	3.1.2 (1)	<p>In this case the Applicant has laid aside £40m for Phase 1 and £18m for Phases 2a, 2b in the Funding Statement [REP5-009] Table 3. It is not anticipated that finance will be a driving factor.</p> <p>The Applicant is required under Action #37 of ISH9 [EV16-009] to: <i>“Provide a breakdown of the number of Category Three interests that have been assumed to be eligible for noise insulation, including the numbers eligible for each of the compensation categories, to demonstrate how the provisional sums in the funding statement have been determined”</i>.</p>
11	3.1.2 (2)	The Applicant will have to identify what claims are possible against LLAOL who have failed to insulate the great majority of eligible properties under their responsibility thus saving themselves significant expenditure. There is also the issue of LLAOL continuing to insulate properties under Project Curium at the same time as the Applicant is setting up the NIS, developing documentation, recruiting suitable contractors. It is very important to identify where the change-over will take place.
12	3.1.2 (3)	There is one new concern and that is the issue of before-and-after testing. [REP4-042] states that a ‘proportionate testing policy will be developed’. However, in discussions the Applicant has advised that the Airport Operator LLAOL will fund these tests. What cannot be allowed to happen is that LLAOL dictate this policy and timeframe based on minimising their costs.
13	3	<p>Practicalities of Roll Out and Supply</p> <p>The Applicant has carried out market research on availability of equipment and personnel. Ignoring for the moment the practicalities of canvassing eligible properties, and estimating what the take-up could be, there is no detail of what insulation companies were approached, what their workforce size is, whether they could scale up to the demand, and whether their suppliers can do the same. This, allied to the proposal that only Schemes 1-3 are currently included in the Programme leaves a very big gap in our confidence of completion.</p>
14	n/a	The current insulation contractor for LLAOL is Granville who have managed – we are verbally advised – to insulate 230 properties in 2023, a number we believe was limited by LLAOL’s budget. What we are waiting to be advised is WHAT insulation was provided to these properties – one window or the whole property ? We have attempted to gauge what size company Granville are through Company

ID	Paragraph no.	M Reddington Comment
		House records but they do not provide full accounts. Lates accounts ending 2022 show a significant drop in assets since 2019, i.e. the start of Covid.
15	3.1.2, 3.1.3	The Applicant has provided data on three schemes: <ol style="list-style-type: none"> 1. Insulated 300 this year and expects to insulate 400-450 per annum 2. Is currently completing 200 per annum 3. 50 per month (600 per annum)
16	Table 4.1	Table 4.1 provides a breakdown of what appears to be Phase 1 <u>and includes Ground Noise</u>
17	Table 5.3	Table 3 (Core Case) identifies Schemes 1-5 for 2027-2030 but does not include Ground Noise. The Applicant is looking to complete the insulation programme in approximately 7 years with most activity taking place from 2027.
18	6.1.8	States: “ The Applicant will commence invitations to participate on schemes 4, 5 and the ground noise schemes as soon as offers on the first three schemes have been completed so that the roll out continues without delay. “ Therefore Ground Noise has not been forgotten. However it would be more complete to include Ground Noise in Tables 5.3 and 5.4.
19	Conclusion	Given that there are so many unknowns (installers, equipment suppliers, take-up, Development Permission date, current insulation scheme, to contractor but a few) it is understandable that the Applicant cannot undertake a detailed Programme of Works. However, we would recommend doing some further investigative work on specific installation contractors to assess their capability, scale, and solvency.

ExA: With reference to ID12 above we understand that before-and-after-insulation testing of eligible premises will be carried out by the Airport Operator AT THEIR COST. We would greatly appreciate this being secured in any Development Agreement so that there is no conflict in the future nor any barrier to timely insulation installation.

Glossary

AMR	Annual Monitoring Report
ATM	Air Traffic Movement
ICCAN	Independent Commission on Civil Aviation Noise
JZMF	Jet Zero Modelling Framework
LA	Local Authority
LBC	Luton Borough Council
LR	Luton Rising
LOAEL	Lowest Observable Adverse Effect Level
LLA	London Luton Airport
LLAOL	London Luton Airport Operations Limited
NAP	Noise Action Plan
NIS	Noise Insulation Sub-committee (of the Consultative Committee)
NOEL	No Observable Effect Level
mppa	million passengers per annum
SOAEL	Significant Observed Adverse Effect Level
UAEL	Upper Adverse Effect Level
UKHSA	UK Health Security Agency

Appendix A

1. Current Status of Insulation Roll-out March 2023

Year:	Properties Approached*		Properties Accepted	Insulation Installed	Notes
	(from BAP ^[1] document 2023)	(from AMR and LLA minutes 09/03/2023)			
2016	30	31	11	11?	
2017	111	78	38	38?	
2018	79	117	31	31?	
2019	40	42	34	34?	
2020	0	214	43	0	Annual report states 43 accepted by end Q1 but moratorium on works due to Covid March-Dec 2020. None insulated
2021 ^[2]	30	30	?	0	
2022	826	930	270	116	Not sure how many of these were the original 'accepted' properties from 2020.
2023	n/a			184**	184 <u>Projected</u> installations for 2023. ^[3]

Table 1: Noise insulation provided by LLAOL 2016-2023

*There is a disparity between what LLAOL have recorded in their Annual Monitoring Report and what their acoustic specialist BAP have reported, so both columns are shown.

**Apparently 230 properties have been insulated in 2023.

^[1] BAP = Bickerdike Allen Partners

^[2] Moratorium on works due to Covid Jan-Sept 2021. None insulated

^[3] Not sure if projected installations include the outstanding 154 (270-116) from 2022. 98 properties from 2018 have been re-contacted (in 2022 or 2023 ?).

2. We have asked LLAOL for records of all properties that have been fitted, tested, and had a post-installation satisfaction survey carried out. This information is supposed to be provided by end January 2024.
3. The 2023 Eligibility Document "A11060_02_RP016_1.0" by Bickerdike Allan Partners ('BAP') shows the total of residential properties affected to be 2,509 with 14 non-residential properties. To date, 1,116 eligible residential properties out of 2,509, and 2 non-residential properties out of 14 have been contacted.
4. A11060_02_RP016_1.0 does not identify those residences that have been insulated already but clarifies: "Of these no dwellings which previously had only bedrooms eligible now have all habitable rooms eligible".
5. Of the 1,393 residential properties not yet contacted, some were identified as early as 2016^[4] as needing some form of insulation - see below.

2016	128
2017	85
2018	15
2019	0
2020	0
2021	0
2022	1074
2023	91

^[4] Extracted from A11060_02_RP016_1.0