

January 2024

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.179 Applicant's Response to Examining Authority's Rule
17 Request dated 17 January 2024**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.179



The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

**London Luton Airport Expansion Development Consent
Order 202x**

**8.179 Applicant's Response to Examining Authority's Rule 17
Request dated 17 January 2024**

Deadline:	Deadline 8
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1 INTRODUCTION

1.1 Purpose of this document

- 1.1.1 This document has been prepared by Luton Rising (a trading name of London Luton Airport Limited) ('the Applicant') for submission to the Examining Authority ('ExA'). It provides the Applicant's response to the Rule 17 request issued by the ExA on 17 January 2024 **[PD-019]** and provides the information requested from the Applicant for Deadline 8.

2 APPLICANT'S RESPONSE TO THE EXA'S RULE 17 REQUEST FOR DEADLINE 8

Table 1.1: Applicant's response to the ExA's Rule 17 Request dated 17 January 2024

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
General			
1	<p>Applicant - response to Deadline 6 submissions [REP7-063]</p> <p>The ExA notes that the numbering of the main table in this document is not always sequential. As an example, row 5.5 appears to be missing. The ExA requests that the Applicant confirms whether rows are missing. If they have been accidentally omitted, please amend and resubmit the document as necessary.</p>	Deadline 8	<p>The Applicant confirms that there are not rows missing from the main table contained within the Applicant's Response to Deadline 6 Submissions [REP7-063].</p> <p>In the uncommon instance that the row ID numbering is not directly sequential, it is as a result of the Applicant's triage process whereby it was considered by the Applicant that there was verbatim text contained within the Interested Party submissions that did not require a response, and subsequently this was not included in the Applicant's final submission of the document [REP7-063]. Due to the multiple cross-references to other ID rows within the large document, the Applicant considered it prudent not to change the row ID numbering, as this would impact upon the accuracy of the cross-references made.</p> <p>This avoided any possibility that references were made to the unintended ID row, causing confusion to Interested Parties and the ExA.</p>
2	<p>Luton Borough Council (LBC), Central Bedfordshire Council and the Applicant - Solar Farm on Land to the South of the Runway (LBC ref: 23/01314/GPDOPD and CBC ref: CB/23/03617/OAC)</p>	Deadline 9	<p>The Applicant will provide the requested information at Deadline 9.</p>

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
	<p>The ExA notes the responses from LBC [REP7-090] and Central Bedfordshire Council [REP7084] to its further written question BCG.2.4, advising that they issued a decision for the creation of a solar farm on land to the south of the runway, which confirmed that the proposal constitutes permitted development.</p> <p>Please provide a copy of the plans for this development and advise of any implications for the current application.</p> <p>As the solar farm development is now in the consented baseline, the Applicant is requested to submit further information setting out any implications on the Proposed Development and the findings of the Environmental Statement (ES). This should include any potential changes to the Landscape and Visual Impact Assessment, and Cultural Heritage, with reference to Luton Hoo and Someries Castle. This element of the response can be submitted at D9.</p>		
Heritage			
3	<p>Applicant - Cultural Heritage Management Plan (CHMP) [REP4-020]</p> <p>The ExA notes the Applicant's response [REP7-052] to its further written question PED.2.9. To ensure a Written Scheme of Investigation is</p>	<p>Deadline 8</p>	<p>The Applicant has updated the CHMP [TR020001/APP/5.02] with the requested changes. This has been submitted at Deadline 8.</p>

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
	<p>secured, it is requested this provision is included in section 8 of the CHMP.</p> <p>Paragraph 11.1.5 of the CHMP [REP4-020] states that the removal of any human remains would take place in accordance with the requirements set out in Schedule 2 of the draft Development Consent Order (DCO) [REP7-003]. However, removal of human remains would be managed by Article 23. Please review and amend documents as necessary.</p>		
4	<p>Applicant - Assessment of Noise on Cultural Heritage Assets</p> <p>Whilst the ExA notes the Applicant's response to Issue Specific Hearing (ISH) 8 [REP7-048, WQ14] it requests further information explaining how the increased frequency of aviation noise from the operational phase has been considered in the assessment on cultural heritage assets. This should include clarification of whether this solely relates to the change in the noise contour LAeq,16h metric or whether other factors were also considered, such as the impact of aural intrusion from increased frequency</p>	Deadline 8	<p>The consideration of noise impacts on heritage assets, as presented in Chapter 10 of the ES [AS-077], uses The Setting of Heritage Assets produced by Historic England as its principal guidance (Ref 1).</p> <p>The assessment has been supplemented by guidance based on a report analysing the impact of aviation noise on the historic environment which was commissioned by English Heritage (Ref 2). This guidance methodology considers the asset's sensitivity to noise, informed by whether a specific soundscape formed an important part of their setting which contributed to its understanding, such as a specific noise that forms part of an asset's functional understanding or where the absence of sound is important for the asset's understanding.</p> <p>The understanding of the change in noise experienced by the asset is informed by Chapter 16 of the ES [AS-080]. This considers the change in noise produced by the</p>

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
			<p>increased frequency of flights. It is acknowledged that this alone does not present a full understanding of the impact of increased frequency of flights associated with the Proposed Development. The specific assessment of increased frequency of flights is useful when understanding significant increases in noise level and where this would have a significant effect on a heritage asset. No significant increases in noise levels at heritage assets were identified; therefore, specific assessment was not undertaken.</p> <p>The Applicant can confirm that other factors in increased flights were considered in the assessment. This included consideration of visual impacts from increased overflying. No significant effects were identified.</p>
5	<p>Applicant - Assessments for St Paul's Walden Bury Registered Park and Garden (RPG) and Bendish Conservation Area Designated Heritage Assets.</p> <p>In respect of St Paul's Walden Bury RPG it is unclear how the assessment in the ES [AS-007, paragraphs 10.9.87 to 10.9.89] has considered the impact of increased frequency of overflight noise and how this would impact on aural intrusion to that asset, noting that it focuses on changes to the noise contours. In respect of visual intrusion, the ExA notes the comment in the ES [AS-077, paragraph 10.7.41] which states, "impacts to the asset's significance arising from visual intrusion are unlikely". The ExA requests a</p>	Deadline 8	<p>The consideration of noise impacts on heritage assets, as presented in Chapter 10 of the ES [AS-077], uses The Setting of Heritage Assets produced by Historic England as its principal guidance (Ref 1).</p> <p>The assessment has been supplemented by guidance based on a report analysing the impact of aviation noise on the historic environment which was commissioned by English Heritage (Ref 2). This guidance methodology considers the asset's sensitivity to noise, informed by whether a specific soundscape formed an important part of their setting which contributed to its understanding, such as a specific noise that forms part of an asset's functional understanding or where the absence of sound is important for the asset's understanding.</p>

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
	<p>more detailed explanation as to how aural and visual intrusion from overflights has informed the assessment of likely significant effects and the conclusion of no harm to the heritage significance.</p> <p>For Bendish Conservation Area, the ExA requests a more detailed explanation as to how the increased frequency of flights has informed the assessment of likely significant effects from both aural and visual intrusion. The Applicant should explain how the change in overflights has informed the conclusion of negligible effects and a conclusion of no harm to the heritage significance (as per the response to PED.2.16 [REP7-052]).</p>		<p>The understanding of the change in noise experienced by the asset is informed by Chapter 16 of the ES [AS-080]. This considers the change in noise produced by the increased frequency of flights. It is acknowledged that this alone does not present a full understanding of the impact of increased frequency of flights associated with the Proposed Development. The specific assessment of increased frequency of flights is useful when understanding significant increases in noise level and where this would have a significant effect on a heritage asset. No significant increases in noise levels at either St Paul's Walden Bury RPG or Bendish Conservation Area were identified; therefore, specific assessment was not undertaken.</p> <p>Regarding St Paul's Walden Bury RPG, the change in noise levels is assessed as negligible and focussed on an area of the park already subject to noise from an active agricultural environment. No specific analysis of aural intrusion from the frequency of flights has been undertaken. There will be an increase in overflights which may be visible from the asset which has been considered in the assessment of operational effects and is not considered to affect the significance of the asset. No harm has been concluded on this basis.</p> <p>Similarly, the effect of increase in noise on Bendish Conservation Area, as concluded from the noise assessment, is negligible. As such, no specific assessment of aural intrusion as a result of frequency has been undertaken. There will be an increase in overflights which may be visible from the asset which has been considered</p>

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
			in the assessment of operational effects and is not considered to affect the significance of the asset. No harm has been concluded on this basis.
Design			
6	<p>Applicant, Joint Host Authorities and LBC - Independent Design Review Joint Host Authorities:</p> <p>Paragraph 1.2.2(i) of the Design Principles [REP7-034] sets out the Work Nos. that would be subject to design review. Should any other works be subject to design review? If yes, please provide details of the Work No. and the reason for this.</p>	Deadline 8	The Applicant considers that the Coach Station (Work No. 3d) and the Luton DART Terminal 2 Station (Work No. 3g) should be subject to an Independent Design Review in addition to the three items currently listed within Design Principles [REP7-034] namely, Terminal 2 (Work No. 3b(01&02)); Terminal 2 Plaza (Work No. 3f) and the hotel (Work No. 4a). The reasons are as described within ID.7. The Design Principles has been updated at Deadline 8 to reflect this change [TR020001/APP/7.09].
7	<p>Applicant and LBC:</p> <p>Should the following works be included as part of the independent design review given their relationship with and close association to the proposed Terminal 2 (Work No. 3b (01&02)) and Terminal 2 Plaza (Work no. 3f)? If not, please explain why this is the case.</p> <ul style="list-style-type: none"> • Proposed car park P12 (Work No. 4r); • Coach station (Work No. 3d); and • DART Terminal 2 Station (Work No. 3g). 	Deadline 8	<p>The Applicant has submitted an update to the Design Principles at Deadline 8 [TR020001/APP/7.09] to include the Coach Station (Work No. 3d) and the Luton DART Terminal 2 Station (Work No. 3g) within the proposed Independent Design Review process as these Works need to be well integrated with the design of the Terminal 2 and the Plaza to ensure a cohesive design that creates a distinctive place and enhances the overall passenger experience. These are covered within the Design Principles listed below:</p> <ol style="list-style-type: none"> a. Coach Station (Work No. 3d) - the design principles recognise that the Coach Station is intrinsically linked to the integrated design of the Terminal 2 Plaza (Design Principles T.42, T.48)

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			<p>b. Luton DART Terminal 2 Station (Work No. 3g) - will complement and continue the Terminal 1 station design principles (as stated in Design Principle T.64, and will integrate with the design of the T2 Plaza (T.48).</p> <p>The Applicant does not consider the proposed car park P12 (Work No 4r) requires an Independent Design Review as the introduction of this Work is proposed at Stage 2b after the Terminal, Plaza, Luton DART Station and Coach Station have already been constructed. Therefore, the context for the car park will already have been set by these Works and its design in relation to them is covered by the Design Principles ASF.16 to ASF.21, T.48.</p> <p>It should be noted that all other Works will also be subject to a design assessment as part of the relevant planning authority's consideration of detailed design applications under Requirement 6 of the DCO, in accordance with the Design Principles, but not with an Independent Design Review.</p>
Traffic and Transport			
8	<p>Applicant - Action Point 4 from ISH7</p> <p>Action Point 4 from ISH7 [EV14-008] was for the Applicant to provide an update at D7 on progress made in relation to agreeing the transport model with the relevant Highways Authorities.</p> <p>The ExA understands from the relevant Highway Authorities' D7 submissions that outstanding</p>	Deadline 8	<p>Please refer to the following document, submitted at Deadline 8: Applicant's Response to Comments from the Highway Authorities on the 'Accounting for Covid-19 in Transport Modelling Final Report' [AS-159] [TR020001/APP/8.176].</p>

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
	<p>issues in relation to the transport modelling remain. Due to the late stage in the Examination, the ExA requests that the Applicant provides details of the outstanding issues and how these will be resolved.</p>		
9	<p>Applicant and Relevant Highway Authorities - Road Safety Audit</p> <p>In the post hearing submission for ISH7 [REP6-065] the Applicant stated that it was the intention that full completed road safety audits would be provided for D7. These have not been provided.</p> <p>Applicant: Provide these audits, explain what matters, if any, remain outstanding and how these will be resolved by the close of the examination.</p>	Deadline 8	<p>Please refer to the following document, submitted at Deadline 8: Applicant's Response to Issue Specific Hearing 4, Action 7 - Updates on Road Safety Audits [TR020001/APP/8.118].</p> <p>The Applicant notes that the status of the appendices to the above document are as follows:</p> <ol style="list-style-type: none"> a. Appendix A - all documents within this appendix are final signed versions, and all matters are resolved. b. Appendix B - all documents within this appendix are final signed versions, and all matters are resolved. c. Appendix C - all documents within this appendix are in draft, with further responses are awaited from Hertfordshire County Council to enable agreement and signing. The Applicant will provide a further update at Deadline 9. d. Appendix D - all documents within this appendix are in draft, with further responses are awaited from Central Bedfordshire Council to enable agreement and signing. The Applicant will provide a further update at Deadline 9.

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
10	<p>Applicant and Network Rail (NR) - Rail Capacity</p> <p>[REP7-095] stated that although a meeting has been held between the Applicant and NR, until the Applicant sends further information for NR to review, NR will be unable to provide an assessment of whether the increased passenger numbers will create rail capacity issues.</p> <p>Whilst the ExA is mindful that discussions are ongoing, any resolution after the close of the Examination will not be able to be considered by the ExA in its report to the SoS. Therefore, the ExA requests, as a matter of urgency, that the Applicant supplies NR with the information they require so that NR can review and provide a response to the ExA before the close of the Examination (10 February 2024).</p>	Deadline 8	Please refer to the following document, submitted at Deadline 8: Rail Impacts Summary [TR020001/APP/8.121] .
11	<p>Applicant - Cycling and Walking</p> <p>The National Planning Policy Framework states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that 'c) opportunities to promote walking, cycling and public transport use are identified and pursued'. To date the Applicant has only supplied specific detail as to how it has considered non-motorised users for Wigmore Lane [REP7-073].</p>	Deadline 9	The Applicant will provide the requested information at Deadline 9.

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	Provide similar detail regarding cycling and walking provision for all the locations where off-site highway works are proposed, including detail of locations where the recommendations in Local Transport Note 1/20 could not be achieved and the reasons, by D9.		
Noise			
12	<p>Applicant - Response to ISH9 Action Point 37</p> <p>The Applicant states “Provided below is a breakdown of the number of properties potentially eligible for noise insulation which is a larger number than those identified as Category Three interests” [REP7-072]. Can the Applicant explain what is meant by ‘a larger number’ in this context and what the status of the additional eligible properties is if they are not Category Three interests?</p>	Deadline 8	<p>For Category 3 land referencing, the 57dBL_{Aeq,16h} and 51dBL_{Aeq,8h} contours from the Preliminary Environmental Information Report were used to identify all properties and buildings that might be entitled to make a “relevant claim” as a Category 3 interest.</p> <p>The mitigation being offered under the new Noise Insulation Scheme includes for properties inside the 54dBL_{Aeq,16h} and therefore includes more properties than are within Category Three.</p> <p>Because the Funding Statement [REP5-009] was developed to meet the potential costs to deliver the noise insulation policy rather than just those identified as Category Three interests it was necessary to make the qualifying statement and emphasises the generosity of the policy.</p>
13a	<p>Applicant - Accounting for Covid-19 in Transport Modelling - Environmental Appraisal</p>	Deadline 8	<p>The noise assessment reported in the Accounting for Covid-19 in Transport Modelling – Environmental Appraisal [REP7-079] examined the impact on road traffic noise levels from the updated transport modelling as follows:</p>

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
	<p>[REP7-079] explains the effect of updated transport modelling on the outcomes of the environmental appraisal. The noise assessment explains the effect of the changes but does not provide the numeric data that supports this appraisal. Please provide the evidence (eg data tables) that informs the environmental appraisal.</p>		<ul style="list-style-type: none"> a. The Basic Noise Level (BNL), the free-field level 10 m from the road edge, was calculated for all 351 links in the surface access noise study area. b. These levels were compared to equivalent BNLs from the transport modelling that informed the ES. The overwhelming majority of links exhibited a negligible (< 1 dB) change in noise level. c. In areas where a negligible relative increase in road traffic noise had the potential to result in new significant effects (for example where the change in noise (DS-DM) reported in the ES was within 1 dB of the top of the change band, as defined in Table 16.17 of Chapter 16 of the ES [REP1-003]) full calculations of the detailed surface access noise model were carried out. d. This resulted in detailed calculations being completed for over 1000 residential buildings adjacent to the full length of Crawley Green Road and 62 residential buildings adjacent to Eaton Green Road, both with and without the Proposed Development, for each of the years 2027, 2039 and 2043. <p>Following these calculations, no new materially different effects were found with respect to properties adjacent to Crawley Green Road. In this case road traffic noise levels were found to be in line with those informing the ES, with no increase in the number of minor (1.0 - 2.9 dB) impacts for properties above the Significant Observed Adverse Effect Level (SOAEL).</p>

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			<p>However, 17 properties on Eaton Green Road were, in 2027, found to be subject to new significant effects as reported in the Accounting for Covid-19 in Transport Modelling – Environmental Appraisal Accounting for Covid-19 in Transport Modelling – Environmental Appraisal [REP7-079]. A table of the original and updated road traffic noise levels in 2027 for all properties on Eaton Green Road, for which revised calculations were performed, is provided in Appendix A. Numbers in bold indicate the new significant effects. In line with DMRB guidance (Ref 3), results are presented for the facade predicted to experience the greatest magnitude of change in noise. For some buildings this means the reported façade using the ES model is different from the reported façade using the updated model, resulting in relatively large differences in the absolute noise level reported in Appendix A. This does not impact the conclusion around significant effects.</p>
Air Quality			
13b	<p>Applicant - Accounting for Covid-19 in Transport Modelling - Environmental Appraisal</p> <p>[REP7-079] includes air quality criteria for excluding road links from further consideration. The ExA requests that the Applicant provides further justification for using criteria (d) in paragraph 1.3.3, which states:</p>	Deadline 8	<p>The process carried out to review traffic changes in the Covid-19 data set was based on identifying the road links at the greatest risk of resulting in a significant impact to air quality. The modelling carried out for the ES had demonstrated there would be no significant effects based on the traffic data used.</p> <p>Significance for air quality is based on understanding both the <u>total</u> concentration at a receptor and the <u>change</u> in concentration because of the Proposed Development as set out in Appendix 7.1 Methodology [AS-028].</p>

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
	<p><i>“If the DM-DS change in the updated traffic was more than the DM-DS change in the ES traffic, and the updated DM-DS change was above the relevant IAQM/EPUK criteria, but the difference between the updated DM-DS change and the ES DM-DS change (i.e. the difference between the changes in each dataset) was below the relevant IAQM/EPUK criteria”.</i></p> <p>In particular, the Applicant should explain how many links have been screened out using criteria (d). This is because the criteria could potentially exclude consideration of road links already close to the threshold criteria for assessment. As an example, an increase of 499 Annual Average Daily Traffic (AADT) in the ES DM-DS and 998 AADT in the environmental appraisal would not constitute an increase of 500 AADT between the two assessment scenarios. This would mean that the road link would be screened out from further assessment. However, the additive effect would be an increase of 1,497 AADT in the DS scenario, which is nearly 3 times the threshold criteria for assessment. Where such justification cannot be provided, updated appraisal information should be provided.</p>		<p>Therefore, consideration was given to the future year total concentrations and determination of significance alongside the screening criteria noted in Deadline 7 Submission – Accounting for Covid-19 in Transport Modelling – Environmental Appraisal [REP7-079] paragraph 1.3.2. The Applicant notes the air quality section did not provide extensive detail on this point. The report provided in [REP7-079] notes the <i>“approach was taken to focus any detailed assessment in areas where there was the greatest risk of material changes to potential new impacts”.</i></p> <p>Whilst the example provided is noted (although the DM-DS change would be 998 AADT rather than 1,497) the review also needs to consider the headroom in terms of the amount of traffic that would be required to result in a significant impact.</p> <p>As requested, the Applicant has provided the number of links screened out using the criteria in part d. The number of links was two in 2027 and there were none in 2039 and 2043. A summary of the two links is provided:</p> <ol style="list-style-type: none"> a. <i>New Airport Way (A1081) between London Road slip roads</i> – This was screened out in 2027. It has a difference in the change of 297 AADT (the ES DM-DS was 3,065 and the Covid-19 DM-DS was 3,344). The total traffic is around 50,000 AADT. Therefore, the change between the ES and covid represents a very small proportion of total traffic. The road link is part of airport way and was

Ref	Information Requested by the ExA	ExA's Deadline	Applicant's Response
			<p>modelled in the covid appraisal in 2043. The total concentration in the ES was predicted to be below the air quality standard for all pollutants. With the small change in flow compared to the ES, taking into account total traffic and predicted future year concentrations, there is no risk of resulting in a significant impact on this link.</p> <p>b. <i>Crawley Green Rd between the A505 roundabout and Crescent Rd (A6)</i> – This was screened out in 2027. It has a difference in the change of 185 AADT (the ES DM-DS was 782 and the Covid DM-DS was 967). The total traffic is around 20,000 AADT. Therefore, the change between the ES and covid represents a small proportion of total traffic. The road link is part of Crawley Green Road A6, east of the junction with Windmill Road in the town centre. The total concentration in the ES was predicted to be below the air quality standard for all NO₂ and PM₁₀. Total PM_{2.5} was above the 2040 standard of 10µg/m³. With the small change in flow compared to the ES, taking into account total traffic and predicted future year concentrations, there is no risk of resulting in a significant impact on this link.</p> <p>The iterative approach taken gives the Applicant confidence that a suitable area was modelled in detail and that a proportionate and robust assessment was carried out.</p>

GLOSSARY AND ABBREVIATIONS

Term	Definition
AADT	Annual Average Daily Traffic
BNL	Basic Noise Level
CHMP	Cultural Heritage Management Plan
DCO	Development Consent Order
DM	Do-Minimum
DMRB	Design Manual for Roads and Bridge
DS	Do-Something
ES	Environmental Statement
ExA	Examining Authority
ISH	Issue Specific Hearing
LBC	Luton Borough Council
Luton DART	Luton Direct Air-Rail Transit
RPG	Registered Park and Garden
SOAEL	Significant Observed Adverse Effect Level

REFERENCES

Ref 1 Historic England (2017). Historic Environment Good Practice Advice in Planning Note 3. The Setting of Heritage Assets

Ref 2 Temple Group Ltd (2014). Aviation Noise Metric – Research on the Potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England. English Heritage Report, Project No. 6865

Ref 3 Highways England (2020). Design Manual for Road and Bridges LA111: Noise and Vibration, Revision 2

APPENDIX A ROAD TRAFFIC NOISE LEVELS ON EATON GREEN ROAD IN 2027

Table A.1: Daytime noise levels ($L_{Aeq, 16h}$ free-field)

Address	X	Y	ES			Rule 9		
			DM 2027	DS 2027	Change	DM 2027	DS 2027	Change
47 Polzeath Close, Luton, LU2 9LJ	511259	221835	55.5	55.6	0.1	54.2	55.2	1.0
13B Eaton Green Road, Luton, LU2 9HE	511377	221848	59.3	59.7	0.4	62.8	63.8	1.0
1 Mistletoe Hill, Luton, LU2 9HF	511337	221867	53.1	53.1	0.0	51.8	52.6	0.8
23 Eaton Green Road, Luton, LU2 9HE	511458	221887	50.6	50.6	0.0	48.3	49.3	1.0
18 Eaton Green Road, Luton, LU2 9HE	511418	221847	63.8	64.2	0.4	62.6	63.7	1.1
21 Eaton Green Road, Luton, LU2 9HE	511432	221873	54.2	54.3	0.1	52.2	53.0	0.8
17 Eaton Green Road, Luton, LU2 9HE	511412	221846	63.9	64.3	0.4	62.8	63.9	1.1
5 Chertsey Close, Luton, LU2 9JD	511536	221897	59.3	59.6	0.3	57.0	57.7	0.7
10 Eaton Green Road, Luton, LU2 9HB	511335	221824	63.2	63.5	0.3	61.9	62.9	1.0
117 Falconers Road, Luton, LU2 9ET	511100	221765	61.7	62.3	0.6	59.6	59.9	0.3
23 Chertsey Close, Luton, LU2 9JD	511498	221909	47.9	48.5	0.6	45.1	45.7	0.6
9 Eaton Green Road, Luton, LU2 9HB	511329	221822	63.4	63.8	0.4	62.0	63.0	1.0
Britannia Hall, Eaton Green Road, Luton, LU2 9HB	511156	221741	46.9	46.9	0.0	63.0	64.0	1.0
8 Eaton Green Road, Luton, LU2 9HB	511319	221818	63.4	63.8	0.4	62.2	63.3	1.1
26 Eaton Green Road, Luton, LU2 9HE	511463	221864	62.0	62.2	0.2	60.8	61.7	0.9
3 Fielding Heights, Falconers Road, Luton, LU2 9ET	511149	221781	54.7	55.1	0.4	50.2	50.4	0.2

Address	X	Y	ES			Rule 9		
			DM 2027	DS 2027	Change	DM 2027	DS 2027	Change
25 Chertsey Close, Luton, LU2 9JD	511508	221915	47.0	47.2	0.2	44.3	44.7	0.4
9 Chertsey Close, Luton, LU2 9JD	511519	221889	61.7	61.9	0.2	59.6	60.4	0.8
43 Polzeath Close, Luton, LU2 9LJ	511247	221835	55.5	55.3	-0.2	54.1	54.7	0.6
6 Chertsey Close, Luton, LU2 9JD	511532	221896	59.7	59.9	0.2	57.3	58.1	0.8
26 Chertsey Close, Luton, LU2 9JD	511512	221917	46.7	47.0	0.3	44.1	44.5	0.4
24 Eaton Green Road, Luton, LU2 9HE	511460	221879	52.1	51.8	-0.3	49.6	50.5	0.9
21 Chertsey Close, Luton, LU2 9JD	511489	221905	50.2	52.6	2.4	47.2	50.7	3.5
16 Chertsey Close, Luton, LU2 9JD	511491	221869	64.5	65.0	0.5	63.1	64.1	1.0
45 Polzeath Close, Luton, LU2 9LJ	511253	221835	55.9	56.2	0.3	54.7	55.7	1.0
2 Chertsey Close, Luton, LU2 9JD	511493	221907	49.3	49.9	0.6	46.3	46.8	0.5
2B Mistletoe Hill, Luton, LU2 9HF	511369	221862	54.4	54.9	0.5	52.1	53.1	1.0
8 Chertsey Close, Luton, LU2 9JD	511524	221891	59.1	59.0	-0.1	57.0	57.1	0.1
49 Polzeath Close, Luton, LU2 9LJ	511265	221834	56.1	56.2	0.1	54.6	55.5	0.9
7 Eaton Green Road, Luton, LU2 9HB	511314	221814	63.7	64.0	0.3	62.7	63.7	1.0
Napier Hall, Eaton Green Road, Luton, LU2 9HB	511109	221744	58.4	58.4	0.0	61.2	61.5	0.3
7 Chertsey Close, Luton, LU2 9JD	511528	221893	59.8	59.8	0.0	57.7	58.0	0.3
10 Chertsey Close, Luton, LU2 9JD	511515	221887	62.3	62.5	0.2	60.3	61.0	0.7
12B & 12C Eaton Green Road, Luton, LU2 9HB*	511353	221835	62.6	63.1	0.5	61.0	62.0	1.0
Monarch Hall, Eaton Green Road, Luton, LU2 9HB	511128	221728	56.7	56.7	0.0	63.2	64.0	0.8

Address	X	Y	ES			Rule 9		
			DM 2027	DS 2027	Change	DM 2027	DS 2027	Change
2A Chertsey Close, Luton, LU2 9JD	511568	221890	63.4	63.3	-0.1	63.1	63.3	0.2
2 Falconers Road, Luton, LU2 9ET	511128	221781	57.1	57.9	0.8	52.9	53.0	0.1
18 Chertsey Close, Luton, LU2 9JD	511476	221899	52.2	52.6	0.4	49.2	50.1	0.9
6 Eaton Green Road, Luton, LU2 9HB	511304	221809	64.0	64.3	0.3	63.0	64.0	1.0
8 Mistletoe Court, Mistletoe Hill, Luton, LU2 9HF	511364	221876	52.4	52.8	0.4	50.0	51.0	1.0
51 Polzeath Close, Luton, LU2 9LJ	511272	221834	56.4	56.6	0.2	54.8	55.6	0.8
19 Chertsey Close, Luton, LU2 9JD	511481	221901	51.3	51.8	0.5	48.3	49.2	0.9
16 Eaton Green Road, Luton, LU2 9HE	511402	221843	63.7	64.2	0.5	62.6	63.6	1.0
119 Falconers Road, Luton, LU2 9ET	511101	221760	61.6	62.2	0.6	59.6	60.0	0.4
11 Chertsey Close, Luton, LU2 9JD	511511	221885	62.7	62.8	0.1	60.6	61.3	0.7
15 Chertsey Close, Luton, LU2 9JD	511495	221871	64.2	64.8	0.6	62.7	63.8	1.1
13 Chertsey Close, Luton, LU2 9JD	511503	221875	63.8	64.2	0.4	62.1	63.0	0.9
20 Eaton Green Road, Luton, LU2 9HE	511434	221865	56.3	56.4	0.1	54.4	55.3	0.9
19 Eaton Green Road, Luton, LU2 9HE	511435	221858	60.7	61.3	0.6	59.4	60.2	0.8
15 Eaton Green Road, Luton, LU2 9HE	511396	221842	63.6	64.0	0.4	62.3	63.4	1.1
14 Chertsey Close, Luton, LU2 9JD	511499	221872	64.1	64.6	0.5	62.4	63.6	1.2
17 Chertsey Close, Luton, LU2 9JD	511487	221866	64.7	65.3	0.6	63.5	64.5	1.0
5 Eaton Green Road, Luton, LU2 9HB	511299	221806	64.3	64.7	0.4	63.4	64.4	1.0
27 Chertsey Close, Luton, LU2 9JD	511516	221919	46.9	47.2	0.3	44.2	44.6	0.4

Address	X	Y	ES			Rule 9		
			DM 2027	DS 2027	Change	DM 2027	DS 2027	Change
14A & 14B Eaton Green Road, Luton, LU2 9HE*	511385	221845	63.4	63.8	0.4	62.1	63.2	1.1
20 Chertsey Close, Luton, LU2 9JD	511485	221903	52.0	52.8	0.8	49.5	50.7	1.2
22 Eaton Green Road, Luton, LU2 9HE	511430	221880	51.4	51.9	0.5	48.5	49.5	1.0
25 Eaton Green Road, Luton, LU2 9HE	511461	221871	56.3	56.7	0.4	54.2	55.2	1.0
24 Chertsey Close, Luton, LU2 9JD	511504	221912	47.2	47.5	0.3	44.5	45.1	0.6

*Counted as two dwellings

Table A.2: Night-time noise levels (L_{night} , outside)

Address	X	Y	ES			Rule 9		
			DM 2027	DS 2027	Change	DM 2027	DS 2027	Change
47 Polzeath Close, Luton, LU2 9LJ	511259	221835	48.3	48.3	0.0	47.1	48.0	0.9
13B Eaton Green Road, Luton, LU2 9HE	511377	221848	54.4	55.3	0.9	54.8	55.7	0.9
1 Mistletoe Hill, Luton, LU2 9HF	511337	221867	46.1	46.1	0.0	44.9	45.7	0.8
23 Eaton Green Road, Luton, LU2 9HE	511458	221887	43.8	43.8	0.0	41.8	42.7	0.9
18 Eaton Green Road, Luton, LU2 9HE	511418	221847	55.7	56.0	0.3	54.6	55.5	0.9
21 Eaton Green Road, Luton, LU2 9HE	511432	221873	47.1	47.2	0.1	45.3	46.0	0.7
17 Eaton Green Road, Luton, LU2 9HE	511412	221846	55.8	56.1	0.3	54.8	55.7	0.9
5 Chertsey Close, Luton, LU2 9JD	511536	221897	51.6	51.9	0.3	49.5	50.2	0.7
10 Eaton Green Road, Luton, LU2 9HB	511335	221824	55.1	55.4	0.3	53.9	54.8	0.9
117 Falconers Road, Luton, LU2 9ET	511100	221765	53.8	54.3	0.5	51.8	52.1	0.3
23 Chertsey Close, Luton, LU2 9JD	511498	221909	41.4	42.0	0.6	39.0	39.5	0.5
9 Eaton Green Road, Luton, LU2 9HB	511329	221822	55.3	55.7	0.4	54.0	55.0	1.0
Britannia Hall, Eaton Green Road, Luton, LU2 9HB	511156	221741	40.5	40.5	0.0	54.9	55.8	0.9
8 Eaton Green Road, Luton, LU2 9HB	511319	221818	55.3	55.7	0.4	54.3	55.2	0.9
26 Eaton Green Road, Luton, LU2 9HE	511463	221864	54.0	54.2	0.2	53.0	53.8	0.8
3 Fielding Heights, Falconers Road, Luton, LU2 9ET	511149	221781	47.5	47.8	0.3	43.4	43.6	0.2
25 Chertsey Close, Luton, LU2 9JD	511508	221915	40.6	40.7	0.1	38.2	38.5	0.3
9 Chertsey Close, Luton, LU2 9JD	511519	221889	53.7	54.0	0.3	51.8	52.6	0.8
43 Polzeath Close, Luton, LU2 9LJ	511247	221835	48.2	48.1	-0.1	47.0	47.5	0.5
6 Chertsey Close, Luton, LU2 9JD	511532	221896	51.9	52.2	0.3	49.8	50.5	0.7

Address	X	Y	ES			Rule 9		
			DM 2027	DS 2027	Change	DM 2027	DS 2027	Change
26 Chertsey Close, Luton, LU2 9JD	511512	221917	40.4	40.6	0.2	38.0	38.4	0.4
24 Eaton Green Road, Luton, LU2 9HE	511460	221879	45.2	44.9	-0.3	42.9	43.8	0.9
21 Chertsey Close, Luton, LU2 9JD	511489	221905	43.4	45.6	2.2	40.8	43.9	3.1
16 Chertsey Close, Luton, LU2 9JD	511491	221869	56.3	56.7	0.4	55.0	55.9	0.9
45 Polzeath Close, Luton, LU2 9LJ	511253	221835	48.6	48.8	0.2	47.5	48.4	0.9
2 Chertsey Close, Luton, LU2 9JD	511493	221907	42.6	43.2	0.6	40.0	40.5	0.5
2B Mistletoe Hill, Luton, LU2 9HF	511369	221862	47.3	47.7	0.4	45.2	46.1	0.9
8 Chertsey Close, Luton, LU2 9JD	511524	221891	51.5	51.3	-0.2	49.6	49.7	0.1
49 Polzeath Close, Luton, LU2 9LJ	511265	221834	48.8	48.8	0.0	47.4	48.2	0.8
7 Eaton Green Road, Luton, LU2 9HB	511314	221814	55.5	55.8	0.3	54.6	55.5	0.9
Napier Hall, Eaton Green Road, Luton, LU2 9HB	511109	221744	50.8	50.8	0.0	53.3	53.6	0.3
7 Chertsey Close, Luton, LU2 9JD	511528	221893	52.1	52.1	0.0	50.1	50.4	0.3
10 Chertsey Close, Luton, LU2 9JD	511515	221887	54.3	54.5	0.2	52.5	53.2	0.7
12B & 12C Eaton Green Road, Luton, LU2 9HB*	511353	221835	54.6	55.0	0.4	53.1	54.0	0.9
Monarch Hall, Eaton Green Road, Luton, LU2 9HB	511128	221728	49.3	49.3	0.0	55.2	55.8	0.6
2A Chertsey Close, Luton, LU2 9JD	511568	221890	55.3	55.2	-0.1	55.0	55.2	0.2
2 Falconers Road, Luton, LU2 9ET	511128	221781	49.6	50.4	0.8	45.9	45.9	0.0
18 Chertsey Close, Luton, LU2 9JD	511476	221899	45.3	45.6	0.3	42.6	43.4	0.8
6 Eaton Green Road, Luton, LU2 9HB	511304	221809	55.8	56.1	0.3	54.9	55.8	0.9
8 Mistletoe Court, Mistletoe Hill, Luton, LU2 9HF	511364	221876	45.4	45.8	0.4	43.4	44.2	0.8
51 Polzeath Close, Luton, LU2 9LJ	511272	221834	49.0	49.2	0.2	47.6	48.4	0.8
19 Chertsey Close, Luton, LU2 9JD	511481	221901	44.4	44.9	0.5	41.8	42.6	0.8

Address	X	Y	ES			Rule 9		
			DM 2027	DS 2027	Change	DM 2027	DS 2027	Change
16 Eaton Green Road, Luton, LU2 9HE	511402	221843	55.6	56.0	0.4	54.6	55.5	0.9
119 Falconers Road, Luton, LU2 9ET	511101	221760	53.7	54.2	0.5	51.9	52.2	0.3
11 Chertsey Close, Luton, LU2 9JD	511511	221885	54.7	54.8	0.1	52.7	53.4	0.7
15 Chertsey Close, Luton, LU2 9JD	511495	221871	56.0	56.5	0.5	54.6	55.6	1.0
13 Chertsey Close, Luton, LU2 9JD	511503	221875	55.6	56.0	0.4	54.1	55.0	0.9
20 Eaton Green Road, Luton, LU2 9HE	511434	221865	48.9	49.0	0.1	47.2	48.0	0.8
19 Eaton Green Road, Luton, LU2 9HE	511435	221858	52.9	53.4	0.5	51.7	52.4	0.7
15 Eaton Green Road, Luton, LU2 9HE	511396	221842	55.5	55.8	0.3	54.3	55.3	1.0
14 Chertsey Close, Luton, LU2 9JD	511499	221872	55.9	56.4	0.5	54.4	55.5	1.1
17 Chertsey Close, Luton, LU2 9JD	511487	221866	56.5	57.0	0.5	55.4	56.3	0.9
5 Eaton Green Road, Luton, LU2 9HB	511299	221806	56.1	56.5	0.4	55.3	56.2	0.9
27 Chertsey Close, Luton, LU2 9JD	511516	221919	40.5	40.8	0.3	38.1	38.5	0.4
14A & 14B Eaton Green Road, Luton, LU2 9HE*	511385	221845	55.3	55.6	0.3	54.1	55.1	1.0
20 Chertsey Close, Luton, LU2 9JD	511485	221903	45.1	45.8	0.7	42.9	43.9	1.0
22 Eaton Green Road, Luton, LU2 9HE	511430	221880	44.6	44.9	0.3	42.0	42.8	0.8
25 Eaton Green Road, Luton, LU2 9HE	511461	221871	48.9	49.3	0.4	47.1	47.9	0.8
24 Chertsey Close, Luton, LU2 9JD	511504	221912	40.8	41.1	0.3	38.4	38.9	0.5

*Counted as two dwellings