

LYDD AIRPORT ENQUIRY

07/09/2011

Review of issues pertinent to Greatstone Primary School

With reference to

CD 17.12 - latest draft of S106

CD 17.18 - Guide on incorporation of conditions

CPRE/10/E - CPRE's response to SDC/105 (draft 17.12)

Note: CD 17.12 is another revision of SDC/105, itself a new draft of the S106 Agreement.

Paragraph 16: Greatstone Primary School - further changes

16.1 No fixed sum (£10,000) for the Sound Insulation Survey = ACCEPTABLE

16.2 All monies for the fee to pay for the Survey = ACCEPTABLE

* Payments to be made to Greatstone PS = what about supervision costs in managing the Consultant, over and above the Consultant's fees? (say 2% = c £200)

16.3 16.3.1 - Approval of Consultant by SDC = ACCEPTABLE

16.3.2 - Copy of the Survey Report to SDC on completion = ACCEPTABLE

16.4 Pay-back to Airport Operator of any monies above that required for Survey and for Mitigation Measures, with interest - and full Survey fee with interest if not used within 5 years = ACCEPTABLE

* 16.5 Weight (45 tonnes) trigger point monitoring, on 3-month intervals = does weight strictly correlate to noise? - what about planes of 44 tonnes, which are noisy (eg freight)? - is 3 months notice to the school adequate?

Review of documents CD 17.12, CD 17.18, CPRE/10/E
with respect to Greatstone PS.

- * 16.6 Second and in-combination approach of trigger levels -
300,000 ppa or 45 tonnes - payment of £90,000 to
SDC within 28 days of application from SDC =
- a) Does weight and/or passengers strictly correlate to noise levels?
 - b) SDC must apply for payment - not automatic
 - c) Payment alone is one month on from theoretical increase in noise levels - how much later could mitigation measures be completed, with consideration to the need to fit in with the school calendar?

16.7 Similar to 16.2 : all monies to be used for mitigation measures = ACCEPTABLE

- * • Again, what about supervision costs in managing the installation contractor(s)?

16.8 SDC to account for money spent, to Airport Operator =
ACCEPTABLE

16.9 Similar to 16.4 : pay-back of un-used money = ACCEPTABLE

Additional Notes:

- i) CD 17.12, clause 16.6, quotes a payment of £90,000 - yet CD 17.18, clause 5.5, quotes a payment of £100,000

Review of documents CD 17.12, CD 17.18, CPRE/10/E with respect to Greaveskone P.S.

UN-ANSWERED ISSUES

1) The Nursery Block, outside teaching area, and play areas cannot be soundproofed (CPRE/10/c - report by Parsons Brinkerhoff - Executive Summary). So will these amenities be forced to suffer noise disruption, or lost?

2) The payment of £90k (£100k?) is generous - but what if it is not enough? What if a new Nursery Block is required, for example? Who will make up the difference?

The school has only £8k in its budget for building works. SDC don't have the remit to use public money for this. But there is nothing to tie the Airport Operator into additional costs.

3) There does not appear to be a satisfactory means of giving adequate notice to the school - both of impending increases in noise levels - and to make necessary arrangements for the mitigation measures while causing the least disruption to the school calendar.

Review of documents CD 17.12, CD 17.18, CPRE/10/E
with respect to Greatstone P.S.

ADDITIONAL COMMENT

Trigger points for the consideration of mitigation measures and payments towards them are 300,000 ppa and 45 airlift tonnes.

These pre-suppose there is a direct correlation between both ppa and tonnes to noise levels at the school.

Has any consideration been given to real-time noise monitoring at the school?

We can accept that parallel metrics, such as ppa or tonnage, are the only means of gauging some impacts. But with noise, this can easily be measured, so there is no need to use such less-accurate parallels.

I recognise that a noise report was submitted with the application, but this is predictive, not actual. While the accuracy of these predictions have already been questioned during the inquiry, they are no substitute to real-time measurement of the actual events (which is not possible).

So why not establish conditions around real-time noise monitoring and associated trigger levels?

Note that Paragraph 13: Noise Management Plan includes for monitoring - so why cannot this para be linked into para 16 for the school?