

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
1	Noise	<p>Under the Environmental Noise (England) Regulations 2006, Airports with above 50,000 movements a year are required to produce a Noise Action Plan (NAP) designed to manage noise issues and effects arising from aircraft departing from and arriving at the airport.</p> <p>Cranfield Airport does not at present meet this limit, so is not designated as a major airport. As a result, the competent authority is the airport operator. Under the Air Park planning application, the total number of movements is expected to rise to 46,355 by 2027. Given that this is just below the 50,000 thresholds, the Parish Council considers it necessary that a Noise Action Plan is devised and implemented for Cranfield Airfield.</p>	<p>As part of appropriate mitigation relating to the Air Park proposals, the applicant is committed to producing an annual NAP (from here on referred to as the Noise Management Plan [NMP]), which has been discussed with the Local Planning Authority (LPA). Details of the NMP is expected to be submitted to and approved by the LPA via a planning condition.</p> <p>It should be noted that the 50,000 movements are calculated by "excluding those purely for training purposes on light aircraft" according to the regulations. Therefore, the regulations do not apply to Cranfield Airport.</p>
2	Noise	<p>The applicant appears to be relying on historically higher level of flights to justify the additional noise associated with the proposed aircraft movements.</p> <p>The Parish Council recognises that the airfield has a 24-hour licence for up to 150,000 movements and this would be well within capacity.</p> <p>However, the Parish Council makes the following points:</p> <ul style="list-style-type: none"> - Since 2003 many homes have been built in Cranfield and so there will be a significant new population in the village who will have only experienced the current low level of airport activity. - Existing residents have got used to the current noise levels. - There has been a change in the noise regulatory system for aircraft noise over the years; for example, the introduction of the Aviation Policy Framework, 2013, affording better protection for residents living close to an airfield. 	<p>It is reasonable to compare the future levels with the current situation and recent historical activity to determine the impact.</p> <p>The new homes should have taken account of the presence of the airfield in 2003 as the Airport was still servicing over 100,000 aircraft movements as shown in Figure 2.1 on page 8 of the submitted Planning Statement (see Appendix 1).</p> <p>A previously approved scheme for an Air Park to increase business jet activities at the Airport was granted on 25 June 2008 (LPA Ref. 08/00613/RM) and so developers should have taken into account the likely future activity of the Airport.</p> <p>There is no distinction drawn in Government policy regarding assessing noise exposure to existing residents differently from new ones.</p> <p>The Aviation Policy Framework (APF) and the levels of protection set out in it have been referenced in the submitted Environmental Statement (ES) and will be implemented as part of the NMP when those levels (or any future changes) are exceeded.</p>

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
3a	Noise	<p>The following information on the aircraft noise regulatory environment is taken from <u>Simon Urquart's Proof of Evidence to the Mill Road Phase II Appeal</u>. (Mill Road Phase II Appeal, February 2018, APP/P0240/W/17/3181269):</p> <ul style="list-style-type: none"> - Section 3, page 5 'The table [PPG Noise guidance which sets out the perception of noise and increasing effects] shows that as the exposure increases beyond the lowest observed adverse effect level boundary, consideration needs to be given to mitigating and minimising these effects. - 3.1.3 Increasing the noise exposure further will, at some point, cause the significant observed adverse effect level boundary to be crossed. In relation to this, Paragraph 30-005 of PPG-Noise states; "If the exposure is above this level the planning process should be used to avoid this effect occurring, by use of appropriate mitigation such as by altering the design and layout". - 3.1.5 Only when the noise exposure crosses the unacceptable adverse effect level, where adequate mitigation cannot be provided, should development be prevented. 	<p>Noted. The lowest-observed-adverse-effect level (LOAEL) has been set and this Guidance has been taken into account in our submitted Noise Assessment.</p> <p>The mechanism to mitigate the noise levels through the use of available techniques will be determined via the NMP and implemented to minimise noise effects on local residents.</p> <p>The worst-case scenarios have been presented in the Noise Assessment and the control mechanism is the implementation of the NMP that will be used to predict future impacts and provide mitigation to minimise these.</p> <p>As an academic exercise (see Appendix 2), the TAG Farnborough (coloured red) and Biggin Hill (coloured blue) 57dB LAeq,16hr noise contours were overlaid onto the area of Cranfield Airport. The noise minimisation techniques employed at these airports will be incorporated within the NMP where they are appropriate for this airfield.</p>
3b	Noise	<p><u>Simon Urquart's Proof of Evidence also mentioned the following:</u></p> <p><u>Aviation Policy Framework 2013</u></p> <p>3.2.1 The Government's overall policy on aviation noise is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise. The Aviation Policy Framework (APF), at paragraph 3.17 states: "we will continue to treat the 57 dB LAeq 16 hour contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance".</p> <p>3.2.2 Under the heading "Noise Insulation and Compensation", paragraph 3.39 of the APF states; "As a minimum, the Government would expect operators to offer financial assistance towards acoustic insulation to residential properties which experience an increase in noise of 3 dB or more, which leaves them exposed to levels of noise of 63 dB LAeq 16 hours or more".</p> <p>3.2.3 Paragraph 3.36 of the APF sets an upper limit to exposure to noise from aircraft. It states; "The Government continues to expect airport operators to offer households</p>	<p>This is the main reference in the Noise Assessment submitted and used as part of the assessment.</p>

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
		exposed to levels of noise of 69 dB LAeq 16 hours or more, assistance with the costs of moving".	
3c	Noise	<p><u>Simon Urquart's Proof of Evidence also mentioned the following:</u></p> <p><u>Civil Aviation Authority</u></p> <p>3.3.1 The recently published CAA (CAP 1616 "Airspace Design") Guidance document requires airports to provide noise contours down to 51 dB LAeq, 16hr.</p> <p>3.3.2 A Department for Transport document titled; Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace,(Appendix 2), States; "2.72 So that the potential adverse effects of an airspace change can be properly assessed, for the purpose of informing decisions on airspace design and use, we will set a LOAEL at 51 dB LAeq 16 hr for daytime, and based on feedback and further discussion with CAA we are making one minor change to the LOAEL night metric to be 45dB LAeq 8hr rather than Lnight to be consistent with the daytime metric. These metrics will ensure that the total adverse effects on people can be assessed and airspace options compared. They will also ensure airspace decisions are consistent with the objectives of the overall policy to avoid significant adverse impacts and minimise adverse impacts."</p>	<p>Since there are no changes to the airspace design as part of the proposals (e.g. the Airport is not intending to switch to radar but continue to use instrument landing system [ILS]) then this is not considered to be relevant to the Air Park proposals.</p> <p>If the NMP determines that a change in airspace design would reduce the noise impact at Cranfield Airport then this document will be used to assess that improvement or otherwise.</p>
3d	Noise	<p><u>Simon Urquart then goes onto say that 'Compliance with Guidance on Noise':</u></p> <p>3.5.1 Based on the above guidance the following action levels are suggested; · 51 dB LAeq 16 hour. This is the Lowest Observed Adverse Effect Level (LOAEL) in PPG Noise. This level is also below onset of significant community annoyance in the APF. Therefore, there is no specific action required.</p> <ul style="list-style-type: none"> - 63 dB LAeq 16 hour. This is the Significant Observed Adverse Effect Level (SOAEL) in PPG Noise. This level is above onset of significant community annoyance in APF and the level above which airport operators should offer financial assistance towards acoustic insulation in existing properties. Therefore, the action required is to mitigate and reduce to a minimum. - 69 dB LAeq 16 hour. This is likely to be above unacceptable adverse impact level in PPG Noise, and above the level at which APF says occupiers of existing properties should be offered financial assistance with moving. Therefore, the action required is to prevent. 	<p>The Parish Council has misinterpreted the policy. The 51dB LAeq,16hr noise level does not appear in PPG Noise it has only appeared in the recently published CAP 1616 Airspace Design Document issued by the CAA in December 2017.</p> <p>PPG Noise does not set prescriptive noise level for the LOAEL and Significant Observed Adverse Effect Level (SOAEL). These should be derived from the APF as done in the Noise Impact Assessment accompanying the EIA that was submitted with the Air Park planning applications.</p> <p>As correctly stated, the onset of significant community annoyance is set as 57dB in the Aviation Policy Framework (APF) and therefore levels below this require no specific action.</p> <p>63dB is the level at which we have set the SOAEL and in which it will result in financial assistance towards residents for sound insulation.</p>

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
		3.5.2 In summary therefore, proposed residential properties situated between the 57 dB LAeq 16 hour and 69 dB LAeq 16-hour contours need to be provided with adequate sound insulation, and where necessary an alternative means of ventilation, to comply with national guidance and therefore with Local Policy DM3.' (Page 8, S.Urquart Proof of Evidence).	<p>69dB is again as set out in the APF and the level to which we have used for the UOAEL (Unacceptable Level) - we do not expect any properties to fall within this level based on the worst-case assessment. If they were to then the APF will be complied with.</p> <p>The current Government policy (i.e. APF) does not state this. Sound Insulation is provided when the level exceeds or is predicted to exceed 63dB. If this were to change in the future through changes to Government policy via an update to the APF then this would be captured in the annual NMP report which will take full account of any changes to Government policy.</p>
4	Noise	<p>The Cranfield Air Park evidence suggests that 715 houses by phase II in Cranfield will be within the 57dBL 16-hour contour, 327 of them, new homes, and that 24 properties will be within the 63dBL contour. (Table 8.1, page 44 ES technical Annex 7).</p> <p>Of course, this number of homes will rise over the next 9 years up to and beyond 2027. The Mill Road Phase II enquiry is an appeal for 78 houses close to the airfield, which Mr Urquart acknowledges fall within the 60- 66dBL contour.</p>	<p>These properties are identified based on the worst-case scenarios so that appropriate budgets can be set for sound insulation if it were to be required.</p> <p>The Air Park, via the NMP, will firstly implement noise reduction measures to control the noise levels to below the 57dB LAeq,16hr contour level as far as possible rather than the use of sound insulation measures. Control of noise at source is always more desirable than at the receptor.</p> <p>Any new / future developments will need to take account of the presence of the airfield (to include the Air Park) and the noise it generates. The NMP will set this out and the LPA can use this to determine the noise impact now and, in the future, when they make their decisions.</p> <p>For future developments, the onus is on the respective developers to provide appropriate noise mitigation measures to its developments.</p>
5	Noise	The Air Park considers 'there are not expected to be any unacceptable adverse effects due to aircraft noise. That 'there will be permanent minor adverse effects arising from the impact of noise affecting residential receptors within the 57dBL contour once Phase I airpark reaches maximum capacity.' (page 4, ES technical summary annex 7.) This statement does not even mention the impact of phase II, and is completely at odds with	This statement is identifying the point in time at which the 57dB contour is expected to impinge on the local residents without any mitigation.

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
		<p>Mr Urquart's evidence, which tells us that above 57dBL is the onset of significant community annoyance.</p> <p>The Parish Council has no reason to doubt Mr Urquart's evidence as he is unlikely to overestimate harm when he is presenting noise evidence on behalf of an applicant who is seeking planning permission for 78 homes very close to the airfield boundary.</p> <p>The Parish Council therefore concludes that the noise evidence provided by the Air Park does not offer a fair assessment of the level of adverse effects that will be experienced by residential receptors within Cranfield.</p>	<p>The table and the contour maps (as shown in Appendix 3) clearly show how this would affect additional residential properties in the future phases if the noise were not mitigated through the NMP.</p>
6	Noise	<p>Furthermore, the noise measures provided are all averages, and given the nature of the proposed aircraft movements particularly in the early morning – i.e. infrequent, they are likely to be more disturbing. This should be assessed as intermittent noise.</p> <p>The Parish Council therefore requests that intermittent noise data to be provided, and the noise contours to extend to the 51dBL in line with good practice.</p>	<p>This is the prescribed way of producing contours for airports for consistency and comparison.</p> <p>Single event contours are also produced for reference - these are shown for night time, as shown in Appendix 4.</p> <p>It should be noted that these business jets already fly in and out of Cranfield Airport. The frequency of movements and there being only one runway means that there can only be one aircraft landing or departing at any one time.</p> <p>As shown in Appendix 5, the pictures and times show the business jet type aircraft that arrived and departed Cranfield Airport during our baseline survey last year.</p>
7a	Noise	<p>The Parish Council feel there has to be a noise action plan produced by the applicant. With the Council also having the following recommendations:</p> <p>i) Cranfield Airport should draw up a Noise Action Plan that should be designed to manage noise issues and effects, including noise reduction if necessary.</p>	<p>Noted. The NMP is a firm commitment from the applicant.</p>
7b	Noise	<p>ii) The Action Plan should be drawn up using the guidance issued by DEFRA 'Guidance for Airport Operators to produce noise action plans under the terms of the Environmental Noise (England) Regulations 2006 (as amended)' Attention should be paid to paragraph 3.14 and 4.1-4.15 in particular.</p>	<p>Relevant current guidance will be used to inform the NMP.</p>
7c	Noise	<p>iii) Mitigation measures such as contribution toward improved acoustic insulation such as double glazing, ventilation or cash payments should be offered to those properties most affected.</p>	<p>This would be considered as part of the NMP.</p>

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
7d	Noise	iv) It should be a S106 requirement that an annual report on the effectiveness of the Noise Action Plan should be made.	This is not necessary and can be appropriately captured as a condition.
7e	Noise	v) It should be a S106 requirement that the noise maps and Action Plan are reviewed and updated before the second phase of the Airpark can commence.	There is sufficient information to assess the impacts of Phase II now. A planning condition should not be inserted that effectively postpones determination outside of the accepted requirement to provide annual monitoring and updated NMP.
7f	Noise	vi) In preparing and revising the action plan the competent authorities must ensure that: (a) the public is consulted about proposals for action plans; (b) the public is given early and effective opportunities to participate in the preparation and review of the action plans; (c) the results of that public participation are considered; (d) the public is informed of the decisions taken; and (e) reasonable time frames are provided allowing sufficient time for each stage of public participation.	Noted. The Airport already has a liaison meeting with the Parish Council and would simply extend/adapt this mechanism.
8a	Noise	In relation to noise annoyance, the local authority must be aware, ensure sufficient understanding of, and take forward the recommendations: Annoyance responses in relation to exposure may be higher than predicted by the traditional annoyance curves.	Noted.
8b	Noise	Monitoring of annoyance responses over the long-term using survey methods in the exposed population would be advisable. Annoyance responses at various times of the day should be examined. Surveys assessing baseline annoyance, in terms of annoyance responses prior to the development of the new Air Park would be useful for comparative purposes. Such monitoring would help the airport to identify any increases in annoyance related to operational decisions.	This would be considered as part of the NMP and after a period of monitoring.
8c	Noise	The use of APUs (auxiliary power units) should be controlled by specifying a maximum running time, or the use of electric ones encouraged.	This would be considered as part of the NMP.

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
8d	Noise	<p>There should be real time monitoring of noise levels, with the data available to the public, as well as a publicised complaint system for annoyance issues to be reported. These should be included in the annual report.</p> <p>Cranfield Airport should acquire, install and maintain a continuous Noise Monitoring Track Keeping system (NMTK) that will provide the community with improved visibility of noise levels and track keeping performance of flights using the airport. This will utilise two fixed monitoring locations along with a mobile unit at the commencement of the scheme. Both the system and the location of the fixed noise monitors located underneath the flight path at each end of the runway, and a portable NMT which can be deployed to appropriate locations. Once sufficient data has been acquired the performance of the NMTKS will be assessed and a review of its efficacy will be conducted and any improvements or enhancements will be identified. All the acquisition, installation and running costs of the NMTKS could be met by Cranfield Airport from levies raised from aircraft using the airport.</p> <p>Live data from the NMTK should be made publicly available, so that the public can monitor the noise and movement of aircraft. It is suggested that Cranfield Airport uses a system similar to the WebTrak system as used by London Biggin Hill Airport.</p> <p>The community need a system in which it is simple and easy to access.</p>	<p>We would propose spot monitoring initially and leave the introduction of fixed monitoring to a review of the NMP.</p>
8e	Noise	<p>Investigate, log and respond to all complaints relating to Cranfield Airport, reporting details to CBC and CPC on a quarterly basis.</p>	<p>Noise complaints are currently logged by Cranfield Airport and also by Central Bedfordshire Council.</p>
9a	Noise	<p>In regard to noise annoyance relating to aircraft, there must be conditions applied to ensure:</p> <ul style="list-style-type: none"> - Cranfield Airport should require the use of idle power at reverse thrust unless operationally essential to do so e.g. for safety purposes. - The use of APUs (auxiliary power units) should be controlled by specifying a maximum running time, or the use of electric ones encouraged. 	<p>This would be considered as part of the NMP.</p>
9b	Noise	<ul style="list-style-type: none"> - Cranfield Airport should offer discounts on landing fees for planes fitted with exhaust silencers. 	<p>Jet aircraft are not fitted with silencers nor can they be retrofitted. The engine noise and compliance with International Civil Aviation Organization (ICAO) limits is determined by Annex 16. All civil aircraft have to comply with the ICAO noise limits for their respective class.</p>

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
9c	Noise	<ul style="list-style-type: none"> Implement a scheme to incentivise operators of light and training aircraft to install noise suppression equipment or to replace noisy aircraft. 	<p>This is not possible, but ICAO are pushing to reduce noise levels from new aircraft as part of the certification process. The Air Park would promote the use of modern lower noise aircraft as part of the NMP.</p> <p>Note that light and training aircraft are not part of the Air Park proposals.</p>
9d	Noise	<ul style="list-style-type: none"> Implement a scheme to restrict circuit training to agreed operating hours. Monitor and record the aircraft movements comprising details of movement numbers in each hour each day, and runway use. 	<p>There is no circuit training aircraft proposed as part of the Air Park proposal as it is just for private jets.</p>
10a	Noise	<p>Conditions around airport operating hours and aircraft operating must include:</p> <ul style="list-style-type: none"> Limit airport operating hours to 06.30-23.00 on weekdays, and on Saturdays, Sundays and Public Holidays limit operating hours to 08.00-22.00. A cap on aircraft movements should be: <p>Monday to Friday</p> <ul style="list-style-type: none"> cap of 8 aircraft movements between 06.30 and 07.00 on any one day cap of 8 aircraft movements between 22.00 and 23.00 on any one day <p>Saturday, Sunday and Public Holidays</p> <ul style="list-style-type: none"> circuit training will not be permitted before 09:00 or after 17:00 during British Summer Time. 	<p>It should be noted that the current Airport does not have any timing restrictions and the imposition of controls would present investors and operators with some difficulty. At the very least, we need operational hours between 6am and 11pm.</p> <p>In addition, the Air Park would require the ability to operate between 11pm and 6am under emergency or adverse weather conditions. We also need to ability to offer a handful of serviced night flights – no more than 365 per annum.</p> <p>Note that circuit training will not be part of the Air Park's operations and it is unreasonable to seriously hamper these flights which have been undertaken for many years without complaint.</p>
10b	Noise	<ul style="list-style-type: none"> From when the Air Park opens, operate a ban on fixed wing aircraft which are not fully compliant with ICAO Chapter 3 or above noise certification numerical standards. 	<p>The Air Park can promote quieter aircraft but cannot operate a ban. The impact of noisier aircraft would be dealt with through the NMP should it become an issue, though the noise profile of</p>

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
10c	Noise	<ul style="list-style-type: none"> - Operate a ban on fixed wing aircraft that do not meet the ICAO Chapter 4 noise certification numerical standards between 06:30 and 07:00 and 22:00 and 23:00 (except for existing based aircraft). 	business jets is declining as newer airframes replace the older stock.
10d	Noise	<ul style="list-style-type: none"> - Operate the Airport using reasonable endeavours to ensure that these Chapter 4 aircraft operate within a maximum noise level set by the noise characteristics of the Learjet 35 or a comparable aircraft. 	
11a	Noise	<p>There has to be a Residential Sound Insulation Scheme (RSIS) and Estate Agent information:</p> <ul style="list-style-type: none"> - Cranfield Airport to put in place a sound insulation scheme including double glazing for residential properties within the 57dBL contour and above. - The details of a grants scheme should be in line with U.K. practice and agreed with CBC prior to implementation. - The Scheme should be advertised on the Airport's website. The advertisement will describe the Scheme, and clarify that eligible property owners will be approached, and so application to the Airport will not be required. - Cranfield Airport should provide an information pack to local Estate Agents, and to those seeking information on local conditions prior to relocating to near the Airport or its departure and arrival tracks. 	<p>Currently the 63dB contour is the trigger for a sound insulation scheme.</p> <p>The NMP would be used to consider an appropriate level for this scheme and would be changed and reviewed annually in-line with Government policy, complaints, local effects and consultation.</p>
11b	Noise	<ul style="list-style-type: none"> - Residential receptors subject to noise above the 69dBL contour should be given financial assistance in moving. 	This is a requirement of current Government policy and would be considered as part of the NMP.
12a	Noise	<p>The Council feel that in regard to maximum sound levels, this is not truly appreciated in the document, what significant high levels of sounds will come from the airfield with this proposal. The WHO Community Noise guidelines should be used as the guidance for the maximum permissible sound levels:</p> <p>a) Indoors the dwelling during the day/evening – 35 dB LAeq 16 hour.</p> <p>b) Outdoor living areas - 55 dB LAeq 16 hour to protect most people from being 'seriously annoyed' during the day-time.</p> <p>c) Night-time:</p>	<p>This is reflected in the AFP with the use of the 63dB contour as the trigger level for sound insulation.</p> <p>In simple terms, standard double glazing provides approximately 28dB of attenuation and so it is not until the level exceeds 63dB outside that the internal level is likely to exceed the World Health Organization internal noise guidelines of 35dB during the day.</p>

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
		<ul style="list-style-type: none"> - Outside façades of the living spaces should not exceed 45 dB LAeq 8 hour and 60 dB LAmx to protect from sleep disturbance. - Inside bedrooms - 30 dB LAeq 8 hour and 45 dB LAmx for single sound events to protect from sleep disturbance. 	The level of 57dB has and is being used in the UK for aircraft noise and is compatible with the 55dB set for other transport sources.
12b	Noise	<p>In line with the Environmental Noise (England) Regulations 2006 (as amended):</p> <ul style="list-style-type: none"> - "Lday" covers the period 07:00 – 19:00 hours in any 24-hour period - "Levening" covers the period 19:00 – 23:00 hours in any 24-hour period - "Lnight" covers the period 23:00 – 07:00 hours in any 24-hour period 	If Government policy required, it then these could be produced as part of the NMP.
12c	Noise	Operate the Airport to ensure that the resultant noise, expressed in the form of Summer Daytime noise contour area does not exceed that specified, namely 4 km2 at 57 dB LAeq,16h.	The aim is to operate the airport so as not to impinge the 57dBA contour on residential properties.
12d	Noise	Where ground operating noise is necessary for instance engine ground testing, this noise should be mitigated through incorporating the use of noise attenuating pens or earth bunds	This would be considered as part of the NMP.
13a	Noise	<p>There needs to be a commitment to research by the applicant:</p> <ul style="list-style-type: none"> - Carry out a review of arrival and departure routes, based on the results trial any new procedure with the aim of reducing further the over flight of residential areas. 	This would be considered as part of the NMP.
13b	Noise	<ul style="list-style-type: none"> - Use reasonable endeavours to promote and support airspace changes in order to benefit local residents through the creation of greater amount of controlled airspace. 	The Airfield is currently using ILS. There is no plan to upgrade to using radar. Therefore, no change in air space.
13c	Noise	<ul style="list-style-type: none"> - Prepare and issue a quarterly complaint report to be supplied to CBC and CPC. 	This would be considered as part of the NMP.
13d	Noise	<ul style="list-style-type: none"> - Prepare and issue Integrated Noise Monitoring (INM) report when contours are prepared. 	This would be included as part of the NMP
13e	Noise	<ul style="list-style-type: none"> - Prepare and issue five yearly Performance Monitoring Report. 	This would be considered as part of the NMP

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
13f	Noise	- Investigate the potential and benefit that might arise from introducing a departure noise preferential route track performance target, with penalties for recurrent failures to meet target.	This would only be considered as part of the NMP if a particular issue was identified.
14	Noise	There has to be communication of the above items, Cranfield Airport should actively and regularly communicate the above actions and in particular the NMTK system, the operating hours and movements to the local community through the use of appropriate mediums such as through its website, Cranfield Express and Facebook.	This would be considered as part of the NMP
15a	Landscape/ Visual	Phase 1: the Air Park scheme that was consented in 2008 seems broadly comparable with the Phase 1 scheme in terms of scale and number of buildings, although it is configured differently. It seems difficult therefore for the Parish Council to sustain an objection to the Phase 1 scheme, although it will result in landscape and visual harm for all the reasons given below. The Parish Council also considers that these large buildings could be designed to integrate more into the landscape – please see below.	Noted.
15b	Landscape/ Visual	Phase 2: the scheme however as well as having a cumulative effect in conjunction with Phase 1, is more harmful as it extends development further away from the University Campus towards Crawley Road and will introduce major built form into a rural landscape of wide expansive open views with little built development in it when viewed from Cranfield.	It should be noted that Phase 2 is currently an outline planning application and that details of scale, appearance, and landscaping are to be submitted as part of reserved matters application.
17	Landscape/ Visual	The Parish Council are particularly concerned by the scale and massing of the aircraft hangars 9, 10 and 11, and by the proposed 5-storey hotel. With regard to the hotel, the Parish Council has seen no indicative impressions or been given any indication as to how this may look within the landscape. The Parish Council feels very strongly that a 5-storey building would be completely out of keeping with the setting of the university in the Bedfordshire countryside, and strongly requests that, if CBC is minded to grant outline permission, that the height and number of storeys of the hotel is significantly reduced. The Parish Council does not consider that it would be reasonable to give outline permission for such a potentially dominant feature in the landscape with no information being provided. Three wireframes indicating the position of hangars 9-11 suggest that this building would completely dominate the views out of Cranfield and along Crawley Road, Wharley End,	Phase 2 will evidently extend the development footprint across a wider area, and there would be a cumulative effect as a result. This cumulative effect, when experienced, will be experienced in the context of the built (or at least consented) Phase 1 development (and the Fuel Farm) and therefore in a context already established for Air Park uses. Against this revised baseline, the magnitude of change and sensitivity would be moderated, and although there would be an extension of effects under the cumulative scenario, this would not be at a significant level. In addition, the wireframes provided are based upon the worst-case size and parameters, and do not consider architectural merit (which would be considered by the LPA as part of the

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
		<p>Astwood Road, and footpaths in the area, especially the re aligned FP 21/22, and the surrounding area, completely altering the current rural open character.</p> <p>The change would be overbearing and would completely alter the character of this very rural landscape. At odds with the strong skylines, and conflict with the historic grain of a low landscape of open fields defined by strong hedgerows.</p> <p>The change is acknowledged to an extent in the Schedule of effects, (EIA Technical Appendix 11.3), although the Parish Council considers this to be an under-representation of the scale of change and its effects. Furthermore, the Parish Council does not accept in particular that the effect on the Landscape Character Area 1A would only extend to a few hundred metres, and that overall, there would only be a very low level of change to the entire LCA area.</p>	<p>reserved matters application), which will serve to further moderate change and increase visual acceptability.</p> <p>The proposed hotel, again, is shown as a worst case, and change will be moderated through high quality design and the revised baseline situation at the reserved matters application stage.</p> <p>In addition, on drawing 17662-P026B (see Appendix 6), the indicative eastern elevation of the five-storey hotel shows that at approx. 23.8 max height, it is only approx. 9.6m higher than the proposed Fixed Base Operator (FBO) Airport Terminal that is at 14.2m high. To put this into context, a typical two-storey dwelling would be circa 7.5m high, therefore, the hotel would likely only be higher than the FBO Airport Terminal (of Phase 1) by the height of a two-storey house. Such hotel building height in the context of Phase 1 development (which the Parish has acknowledged that Phase 1 will be difficult to resist) is considered appropriate from a landscape/visual perspective.</p>
18a	Landscape/ Visual	<p>The following extracts are taken from the Landscape Character Assessment for Area 1A.</p> <p>The Parish Council considers that the proposed development conflicts with the following guidelines for future development: (reproduced in full, see in Appendix i)</p> <ul style="list-style-type: none"> - 1A.1.26 Avoid further linear expansion at Cranfield and ensure that cumulative effects of further development at Cranfield University and Technology Park and Airfield together with potential future development does not impact on the rural character and highly visible highest ground on the plateau. 	<p>The site is not on the highest ground in the locality, although the proposed development will be more visible than the existing Airport. There are also no statutory or designated landscape designations.</p> <p>Phase 1 will, however, be similar to the 2008 consented development, and this needs to be borne into consideration when considering change.</p> <p>The overall rural character of the Landscape Character Area will be altered to a limited degree, and this harm needs to be considered in the planning balance.</p> <p>The extent of additional harm the proposed development will result in (considering both Phase 1 and 2) is at the lower end of the scale given current (and historic) land uses.</p>
18b	Landscape/ Visual	<ul style="list-style-type: none"> - 1A.1.28 Conserve strong skylines. Avoid introducing large scale vertical features where these will detract from undeveloped skylines, key views or characterising landmarks. 	<p>The proposed features are consistent with Airport infrastructure generally.</p>

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
18c	Landscape/ Visual	Landscape Management Guidelines <ul style="list-style-type: none"> 1A.1.29 Ensure mid-long-range views across the landscape are retained and that the historic grain of the landscape is respected. 	<p>Mid-long-range views will be retained for the majority of receptors, including for those using the diverted footpath (FP22), although the proposed development will be a new visible element of the local landscape.</p> <p>This is inevitable when proposing a development of this type, and an element of visual harm is unavoidable.</p>
19	Landscape/ Visual	The quality of the wire frames provided is dreadful. The Parish Council has not been given such small photo montages as part of a major planning application before, and yet the effect of the proposed buildings in the landscape is clearly overwhelming.	The photomontages have been produced above Industry standard guidance and are fully verifiable. They are a tool used all over the UK to assess landscape impact.
20	Landscape/ Visual	<p>The Parish Council has done some research online and found examples of high quality buildings that are designed to melt into their surroundings. The Parish Council requests that, if recommended for approval, a similarly high design code should be imposed.</p> <p>Cranfield Parish Council would request that the visual and environmental impact of the proposed new buildings is minimised by techniques such as those shown below. Benchmark examples of buildings that have features to reduce their visual impact and help them blend in to the environment.</p>	<p>Green roofs not appropriate for hangar type structures given their weight. The example schemes provided by the Parish show a solid brick multi-storey building on an industrial estate. However, given aircraft hangars are not as sturdy as brick-built buildings and are not designed to be stacked with multiple storeys, it is not considered to be structurally appropriate to install a green roof.</p> <p>In addition, the placing of green roofs will not mitigate from a landscape/visual perspective when viewed from publicly accessible points on ground level.</p>
22	Landscape/ Visual	<p>Adnams Distribution Centre Southwold. Architect: Aukett Fitzroy Robinson</p> <p>Incorporates sedum roof, highly efficient lime / hemp wall, and to minimise the area of concrete, a reinforced grass surface has been used for car parking to blend in with the adjacent grassland. Golpla is a strong, honeycomb mesh, made from low-density recycled plastic. It controls erosion and provides sustainable drainage and control of storm water.</p>	See reason as per above (point 20).

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
23	Ecology	<p>The application does not appear to include much, if any mitigation, for the loss of roughly 14ha of semi-improved grassland, among other habitats. To get a sense of what scale of mitigation might be appropriate for the grassland loss one can use the biodiversity offsetting metric used during the Government's biodiversity offsetting pilot projects (https://www.gov.uk/government/publications/technical-paper-the-metric-for-the-biodiversity-offsetting-pilot-in-england).</p> <p>The metric can be a useful tool in an intellectual exercise to gauge the scale of mitigation required. Using this metric, 14ha of moderate-quality semi-improved neutral grassland would require 112 biodiversity units of compensation. That is:</p> <ul style="list-style-type: none"> - 14ha x 'distinctiveness multiplier' 4 x 'quality multiplier' 2 = 112 	<p>The need to undertake biodiversity offsetting metric calculations for development proposals is neither a local or national planning policy requirement.</p> <p>In addition, due to the operational need of the Air Park in terms of the structures proposed, there will not be sufficient space to provide any significant biodiversity on site. Any biodiversity enhancements on air side is also not acceptable from an airport safeguarding perspective as the planting of wildflowers for example is considered to attract insects and ultimately birds, increasing the chances of bird strikes and thereby endangering airport safety.</p>
24	Ecology	<p>The Environmental Statement acknowledges that there will be a 'loss of the majority of habitats on site' but does not propose any mitigation or compensation. Given the extent of the landowner's estate one would expect that off-site compensation should be entirely possible.</p> <p>Paragraph 118 of the NPPF states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:</p> <ul style="list-style-type: none"> - if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Overall the Parish Council do not see how the proposed development enables the application to achieve no net loss of biodiversity as required by the NPPF. 	<p>The Environmental Statement (ES) Table 8.1 is clear that, with the exception of foraging bats, the development will result in either ecological impacts that are <u>not significant</u> or are only <u>minor negative</u>.</p> <p>We note that with respect to paragraph 118 of the National Planning Policy Framework (NPPF)(2012): '<u>if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused</u>'.</p> <p>The NPPF is clear that only development that causes 'significant harm' to ecology should be refused. Given the level of harm to ecology is less than significant/minor negative, we do not consider the need to provide compensatory habitat, particularly when the biodiversity value of the site is relatively low and that it is not a designated ecological protection area such as being a SSSI, SPA, SAC, RAMSAR etc.</p> <p>Clearly the LPA will need to balance the loss of limited biodiversity against the significant benefits that the Air Park proposal will bring in terms of economic development and to ensure the long-term viability of Cranfield Airport, which is considered an asset to University aviation research.</p>

No.	Topic	Cranfield Parish Council Comment	Applicants' Response
			<p>In addition, the draft NPPF (2018) that was published recently recognises the importance of aviation facilities such as Cranfield Airport:</p> <p>'Local Authority plans should.... recognise the importance of maintaining a national network of general aviation facilities – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy'.</p> <p>We would conclude however by highlighting that the University is implementing a biodiversity and tree planting strategy in support of its Campus Masterplan which will more than indirectly off-set these impacts.</p>