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Draft reply to AI re SMP

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Tue, Sep 3, 2019 at 2:28 PM

Christine

Here is my suggested reply - version 8 is attached:

Hello AI,

Thank you for the version 8 SMP received on Friday.

We appreciate that you have amended many of the sections but section 5 has not been improved; it is the key part of the SMP as it is the section that addresses the requirement set out in the condition. The condition seeks to ensure that wherever there is a significant increase in sound from helicopters using either of the new pads (as compared to the former pad) that mitigation will be promptly provided based on a specific set of criteria that can be easily assessed.

Both of our consultants and Jeff Sanders during the review have identified that the properties nearest to the East Tower will be adversely affected and therefore we do not think it is reasonable that these properties have to wait for others to complain and/or wait 6 mos for mitigation. You agreed to identify a cone of impact for mitigation and we have requested that this be included in the SMP.

We also do not consider it to be reasonable to constrain complaints regarding the area outside the "cone" to flight paths or specific flights, as it has become clear that sound is difficult to predict and its possible that properties outside the flight path are affected by the pad location itself. A general complaint process should be identified as previously requested.

The question of flight path "pattern of non-compliance" is somewhat separate and we suggest that sentence should be moved up with the 10-complaint section.

Regarding the section on longer term monitoring, it would be helpful to have that section clarify who will be consulted and involved in the re-evaluations, particularly where new flight paths are proposed or there is an increase in the number of flights/use of the secondary pad.

Thanks
Jean

 **Sound Measurement Plan REVISED REVISED v8 clean.pdf**
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