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London Luton Airport Expansion

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6.02 Appendix L 2019 Due Regard Tables

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The Planning Act 2008

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

6.02 CONSULTATION REPORT

APPENDIX L: 2019 DUE REGARD TABLES

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- L3** Due regard tables in response to comments on the PEIR from WSP on behalf of Host Authorities

Appendix L

- L1 Due regard tables for need case and forecasts; climate change and carbon; noise; flightpaths and fleetmix; air quality; natural environment and landscape; historic environment; and water and drainage**

Statutory Consultation 2022

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Appendix A

The following tables describe all comments received during the 2019 Statutory Consultation, by stakeholder type and the project's response to them. The table headings are explained in the table below.

Table A1.1: Explanation of table headings

Table Header	Key	Description
PC	Prescribed Consultee	Organisations identified as Prescribed Consultees under the Planning Act 2008: Section 42 – Prescribed consultees and The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Schedule 1
LA	Local Authority	Local authorities as prescribed under Section 43 of the Planning Act 2008
PIL	Persons with an Interest in the Land	Persons with an interest in the land as prescribed under Section 44 of the Planning Act 2008
CC	Community Consultee	Community Consultees with whom we have a duty to consult as prescribed under Section 47 of the Planning Act 2008
No. CC	Number of Community Consultees	Count of Community Consultees
No. PIL	Number of Persons with an Interest in the Land	Count of Persons with an Interest in the Land
C	Change	Describes whether there has been a change to the project in response to the comment (Y = Yes / N= No)

A1 Need Case and Forecasts

Table A1.2: Regard had to statutory consultation responses on Need Case and Forecasts - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
1.1.1	Concern the need case and forecast for the Proposed Development is underpinned by continued operation of low cost carriers and holiday companies. Particular concerns include that these companies are vulnerable to: market contraction, falling load factors and potential collapse, the potential effects of Brexit on traveller numbers.			5	<p>Details of how the demand forecasts for the Proposed Development have been produced are included in the Draft Need Case. In preparing demand forecasts, full account has been taken of the performance and financial health of low cost carriers. The forecasts have also considered the potential effects of Brexit on traveller numbers and employment, and rising environmental concerns.</p> <p>With regard to the issues raised, it should be noted that the low cost airlines using the airport are some of the most financially stable in the aviation industry. The demand projections are based on the underlying market for air travel, which take account of the latest economic projections post-Brexit. If any specific airline were to fail, it would be expected that other airlines would take up the demand as has happened in the past including when Monarch Airlines failed in 2017 and Thomas Cook Airlines in 2019. The former of which was based at the airport. In many cases, across the UK, the capacity these airlines provided was backfilled very quickly and despite the failure of these airlines in 2017 and 2019, most airports saw continued growth in demand and passenger throughput after these airlines failed.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>The demand forecasts underpinning the Proposed Development have been prepared based on the overall level of demand for short haul air travel to and from the UK and are expected to be robust to shifts in individual airlines' route networks.</p> <p>The forecasts are over a 20-year period and within this it is expected that there will always be peaks and troughs in the demand profile in individual years, but the overall expectation remains for growth, in line with Government projections.</p> <p>Regarding falling load factors, it is noted that prior to the Covid-19 pandemic, these figures remained strong for the key carriers at the airport in 2018 and 2019. Wizz Air's network wide load factor (percentage of seats sold) increased from 91.3% to 92.8% between the end of 2018 and 2019 calendar years, with Ryanair's network wide load factor increasing from 95% to 96% over the same timeframe. easyJet was the only one of the three big carriers at the airport to experience a small dip in its load factor across its network during the 2019 calendar year, down 1.4% to 91.5%. However, it must be recognised that this remains a very high load factor and that the small dip came at a time when the airline was introducing larger aircraft, with an overall increase in flown seats of over 10% in the year, and an increase in passengers of nearly nine percent. These trends are expected to resume once the impacts of Covid-19 have passed, as explained in the Updated Aviation Forecasts included in the Draft Need Case.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>In respect of the concern expressed by some respondents that Brexit may affect passenger and employment numbers, it should be noted that growth in the capacity at the airport is expected to widen the base of airlines and broaden the destinations served, including those outside the European Union (EU). It also opens opportunities for longer haul services to the eastern USA or Middle East. The existing carriers at the airport, including Wizz Air, easyJet and Ryanair, are continuing to diversify their existing networks and increasingly serving a broader range of destinations from the airport and as such are less reliant on serving employment related markets within the EU.</p>	
1.1.2	<p>Concern the Proposed Development is based on the unrealistic expectation low cost carriers will upgrade their fleet to meet the required aircraft noise and air pollution targets necessary to make expansion viable.</p>			1	<p>We are proposing a Green Controlled Growth (GCG) framework which will ensure that the airport operates within particular “limits”. Limits will be set in respect of air quality, noise, surface access and carbon emissions. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time, in this case specific to carbon emissions. The full details of GCG are contained in the Draft Green Controlled Growth Proposals.</p> <p>One of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>In respect of noise and air quality, the fleet projections within the Draft Need Case take full account of airline fleet orders and delivery schedules. New aircraft offer lower operating costs to the airlines, so it is highly unlikely that aircraft replacement will be slowed materially.</p> <p>If fleet transition is slower than projected and causes an exceedance of a set “limit”, growth at the airport would be limited under GCG, unless the breach can be avoided or mitigated. We are undertaking sensitivity testing of the projections to better understand what impact the slowing fleet transition may have on the Proposed Development. This is set out in the Draft Need Case.</p>	
1.1.3	Concern about the so called ‘tourism deficit’ and loss of UK based economic revenue overseas, associated with the proposed growth of outbound leisure travel from the airport.	Chilterns Conservation Board		2	<p>The issue of the effect of outbound travel on the UK economy is highly complex and it is not as straight forward as simply estimating expenditure overseas by UK travellers.</p> <p>Factors that need to be taken into account include, but are not limited to:</p> <ul style="list-style-type: none"> the extent of substitutability of UK airports, from the perspective of outbound leisure passengers is high. This suggests that many outbound travellers will still travel if they cannot use the airport, if sufficient capacity is not provided; travellers having to use more distant airports will suffer from increased travel time and costs, which is a negative economic impact and also 	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>gives rise to potential environmental implications;</p> <ul style="list-style-type: none"> • outbound travel from the UK supports significant Gross Value Added (GVA) and employment in the domestic economy (outside of that supported through the operation of the airport) because travellers buy goods and services before they leave the UK; • it is not clear whether the expenditure lost via people travelling overseas would actually be injected into the UK economy if they were not able to travel overseas; • travellers may take longer holidays – if potential passengers cannot travel as frequently from the airport because of future constraints on its capacity, they may simply choose to take longer holidays, thereby increasing the overseas expenditure associated with any individual trip; and • outbound travel has positive economic benefits – the potential positive impacts of outbound travel on GVA would need to be considered. <p>Further details of any potential tourism deficit have been considered in the Draft Need Case.</p> <p>It is also noted that it is not UK Government policy to limit outbound leisure travel from the UK. The Government has stated previously in the Aviation Policy Framework (2013) <i>“that the evidence available</i></p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p><i>to us does not show that a decrease in the number of UK residents flying abroad for their holidays would have an overall benefit for the UK economy.”</i></p> <p>This highlights the vital role outbound tourism plays in strengthening quality of life in the UK, underpinning the UK's attractiveness as a place to live and work. In this context it is important to note that over 50% of passengers at the airport in 2019 were travelling to visit friends or relatives.</p> <p>The impact of outbound leisure travel has not been assessed because it was excluded from the scope of Environmental Impact Assessment (EIA). This was agreed with the Planning Inspectorate, which is the body responsible for examining the application (on behalf of the Government) and for making a recommendation to the Secretary of State as to whether consent should be granted for the Proposed Development.</p> <p>It should also be noted that inbound tourism through the airport, is an important economic driver and brings significant economic benefits to Luton, the broader region and the UK generally.</p>	
1.1.4	Concern the need case and forecast did not consider the uncertainty associated with Brexit, including how	Kings Walden Parish Council		12	Our response to ref 1.1.1 sets out how the need case and projections have considered the effect of Brexit on demand for flights to and from EU countries and how it may cause a shift in passenger focus towards more distant locations.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	it may affect demand for flights to and from EU countries (particularly Eastern Europe) and associated immigration patterns, how it may cause a shift in passenger focus towards more distant locations requiring larger aircraft. Some respondents suggested expansion should be delayed until the impacts of Brexit are better understood.				<p>The demand forecasts take account of Brexit, using updated Gross Domestic Product (GDP) projections from the Office of Budget Responsibility (OBR) and other official bodies, which reflect the Government's projected impact of Brexit on the UK economy.</p> <p>Any further economic effects related to Brexit including any emerging post-Brexit trends will be taken into account when the demand forecasts are updated prior to submission of the application for development consent.</p>	
1.1.5	Concern the Proposed Development need case and forecast is using outdated data, including the Department for Transport (DfT) 'UK Aviation Forecasts 2017' and do not consider factors	Kings Walden Parish Council	WSP for Host Authorities	6	We have not utilised the DfT's 2017 Aviation Forecasts in the demand forecasts. We have based our forecasts on the underlying econometric relationships derived by DfT, taking into account updated economic parameters. The airport's share of the market is separately modelled using a bespoke model, which considers capacity expansion at other airports. Further explanation on the methodology and assumptions underpinning the demand forecasts is provided in the Draft Need Case .	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>including Brexit, expansion at other airports, a slowdown in air passenger growth, changes in the balance between leisure and business travel, a delay in technological advances, rising climate awareness, government commitment to net zero and High Speed Rail.</p>				<p>For concerns regarding need case and demand forecasts in relation to Brexit, please see the response to refs 1.1.1 and 1.1.4.</p> <p>Expansion at other airports is discussed in further detail in response to ref 1.1.12.</p> <p>In preparing the demand forecasts for the Proposed Development, slower and faster growth cases have been developed which consider a range of scenarios, including a slowdown in passenger numbers, expansion at other airports or other factors including a change in balance between leisure and business travellers. The slower growth scenarios conclude that if future demand growth is slower than the forecasts, the phasing of the Proposed Development will be slowed to ensure that new infrastructure is not built prematurely.</p> <p>The Draft Need Case sets out these slower and faster growth scenarios as well as the core demand forecasts that underpin the Proposed Development.</p> <p>The impact of any delay in technological advances would be managed through the proposed GCG framework, as outlined in the response to ref 1.1.2. There may be other technological changes however, which are considered further in the sensitivity tests included within the Draft Need Case.</p> <p>For commentary on the impacts of climate change awareness on forecasts and government commitment to net zero, please see the response to ref 1.1.6.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					For details on the relationship between high speed rail and the Proposed Development, please see ref 1.1.10.	
1.1.6	Concern demand forecasts do not take into account the Government's commitment to addressing climate change including the agreement to reduce greenhouse gas emissions to net zero by 2050 and signing of the Paris Agreement.	Kings Walden Parish Council		1	<p>The demand forecasts are based on the latest economic projections and take full account of Government policies on aviation and climate change. Details of how the demand forecasts have been produced and the approach taken to identified Government policy is included in the Draft Need Case.</p> <p>More detail on compliance with the identified Government policy and strategies, particularly as they relate to climate change, will be provided in due course in the Planning Statement, to be submitted with the application for development consent.</p> <p>The demand forecasts assume that the costs of carbon and/or abatement are met by users of the airport and is consistent with the Government's emerging Jet Zero strategy, which was published in July 2021, for consultation. This strategy also makes it clear that it does not support demand management or capping growth in aviation in order to meet net zero or any other carbon target.</p> <p>It is recognised that Government policy could change during the life of the project and, if so, the proposals will be adapted accordingly.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
1.1.7	Concern the demand forecast data is inaccurate or overoptimistic. Some respondents stated there was no demonstrated national, regional or local need for expansion, that the level of forecast detail required to make an informed decision had not been provided and that expansion was a matter of opinion and forecasts had been manufactured.	Slip End Parish Council		17	<p>Details of how the demand forecasts have been produced are included in the Draft Need Case. The demand forecasts take into account the potential expansion at other airports and factor in the cost of carbon to be consistent with climate change policies. Demand forecasts also consider changes in passenger behaviour, including increased use of digital technologies, such as video-conferencing.</p> <p>Please also see the response to ref 1.1.6.</p>	No
1.1.8	Concern demand forecasts do not take into account the potential for economic downturn, including decreasing growth in GDP, wages and disposable income.			2	<p>The demand forecasts use updated GDP projections from the OBR and other official bodies, which reflect recent economic projections for the UK (and the rest of the world). This is set out in the Draft Need Case.</p> <p>Please also see the response to ref 1.1.4.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
1.1.9	Concern demand forecasts do not consider the potential for changes in working arrangements and less business travel due to increases in online working, working from home and/or remotely and other digital technical innovation.			1	Trends over recent years suggest that increasing use of digital technologies enhances the prospects for trade, but that the increased trade also leads to increased demand for air travel. So, whilst the use of technologies such as video conferencing have increased, including during the Covid-19 pandemic, and led to a reduction in the number of air trips needed for any transaction or project, experience suggests that the increased number of transactions or projects enabled still leads to air travel demand growth overall. Such trends are factored into the DfT forecasting relationships that are used as the basis for any demand forecasts for the Proposed Development (which are explained further in our response to ref 1.1.5).	No
1.1.10	Concern alternatives for short and medium haul travel, including existing and future high speed rail, have not been adequately considered in forecasts.	Kings Walden Parish Council		6	Existing and proposed international and domestic high speed rail routes generally do not serve the markets served by air from the airport, with domestic air services to Scotland and Northern Ireland making up only a very small proportion of total passengers. High Speed 1 and future services provided by High Speed 2, currently serve or will serve routes which have no impact on air travel demand from the airport. It is accepted by the UK Government that rail services can compete well with aviation on journeys of around two to three hours. Beyond that, air travel remains the mode of choice (Guidance on the Protection of Regional Air Access to London, DfT, 2013).	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Regarding alternatives to mainland Europe, including Paris and the new direct Amsterdam rail service, these are reflected in the baseline forecasts and provide competition in the more mature parts of the European market. This means routes such as Amsterdam are unlikely to be big drivers of growth in the long term, in any event.	
1.1.11	Concern demand forecasts do not consider the potential for future additional costs associated with air travel, including taxes on airplane fuel, mandatory carbon offsetting and/or frequent flyer levies.	Kings Walden Parish Council		5	<p>Deterring low cost airlines through increased taxes and/or fuel duty would not be consistent with Government policy which supports a competitive aviation industry to deliver lower air fares to benefit consumers (see Airports National Policy Statement, paras 2.10, 3.25, 3.26). However, if additional taxes, offsets or levies are introduced by the Government to address climate change, these may slow the rate of air travel growth depending on how they are applied. The potential for this has been included within the sensitivity testing of the demand forecasts reported in the Draft Need Case.</p> <p>Airlines such as easyJet are also increasingly adopting the Carbon Offsetting and Reduction Scheme for International Aviation (CORSA), with these costs expected to be passed on to air fares in some form. Should new taxes be introduced prior to the submission of the application for development consent, the demand forecasts would be updated.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
1.1.12	Concern the need case does not consider the possibility of forecast demand being met by other airports in England. Some respondents considered other airports, including Heathrow, Gatwick, Stansted, Birmingham, East Midlands and other northern airports as more suitable for additional flights, for the following reasons: recent or proposed expansion, new runways, location away from large population centres, relative proximity to areas of population growth in the north, existing public transport and surface road access and/or larger estate holdings.	Kings Walden Parish Council	Harrow London Borough Council St Albans District Council	19	<p>Government policy supports all airports making best use of their existing runways.</p> <p>The demand forecasts reported in the Draft Need Case are generated by allocating demand across all the London airports and consider the projected capacity of each and the ability for them to attract a share of the growth expected across the Greater South East. Even with this allocation of demand to other airports, the forecasts still indicate strong growth potential at the airport.</p> <p>The original demand forecasts did not include the potential for Gatwick Airport to use its standby runway as a permanent second runway, because the proposal was unclear at the time the forecasts were prepared. This possibility has now been considered in the updated forecasts included in the Draft Need Case, which also reflects the delays to the delivery of additional runway capacity at Heathrow.</p> <p>The Proposed Development is driven by the underlying growth in the air travel market in the Greater South East of England, rather than seeking to draw more regional passengers to use the airport. The demand forecasts took as their start point an assumption that airports outside the South East of England would be able to expand to accommodate growth in their own local market. The faster growth expected at the airport reflects faster economic growth driving the need for more airport capacity. Expansion of airport capacity in the north would not be an</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>alternative as suggested by some respondents, nor is the Proposed Development seeking to expand at the expense of airports elsewhere.</p> <p>The majority of the airport's passengers travel from a relatively tight catchment area. Only around 13% of passengers using the airport presently have surface origins or destinations outside of the South East and East of England and this includes passengers in parts of the East and West Midlands for which the airport would be the most convenient, such as Northamptonshire. The airport is expected to continue to serve its local catchment enhanced by improved surface access such as the Luton DART.</p> <p>The fact that other airports may have land available for development does not make them alternatives for meeting the need for air travel from within the airport's catchment area.</p>	
1.1.13	Concern that by providing additional capacity, the Proposed Development is creating demand, rather than responding to it. Some respondents stated that inflating the number of flights was solely for	Kings Walden Parish Council		2	Please see response to ref 1.1.6.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	economic gain, at the expense of the environment, based on unsound GDP forecasts, at odds with reducing non-essential air travel for environmental reasons.					
1.1.14	Consider the Proposed Development unnecessary. Respondents stated this on the basis of the following: economic growth is not sufficient justification for expansion, the DfT's 2017 Aviation Growth figures do not require expansion of Luton beyond 18mppa up until to 2050, the airport has already expanded, the size of the expansion, Luton's relative proximity to other			21	<p>The airport is central to the local economy and is an important connectivity asset for the broader region it serves, including the Oxford-Cambridge Arc. It also supports regeneration and levelling up in Luton and neighbouring areas, where levels of deprivation are below average. To maintain its connectivity and significance across the economic region, the airport must address its capacity constraints.</p> <p>Without additional capacity the airport will not be able to accommodate any further growth in demand in the future. This would limit its ability to support wider economic growth across the sub-region.</p> <p>With expansion to 32 mppa, the airport's economic impact will increase considerably. The number of direct airport-related jobs is expected to increase by 4,500 by the time the airport is handling 32 mppa.</p> <p>When indirect and induced jobs are considered, the total number of new jobs would be 4,800 in Luton, 6,600 in the three counties, and a total of 12,100 across the UK. The contribution of the airport's</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>airports including Heathrow, Gatwick, Stansted, London City and Birmingham, distance from London, improvements in telecommunications, the lack of benefit to surrounding communities, the number of empty seats on existing flights leaving Luton, the capacity of surrounding infrastructure, the climate crisis and/or the environmental impacts associated with the Proposed Development.</p>				<p>operation to the UK economy would also increase by over £1.6 billion by the time the airport is handling 32 mppa. Of this increase, £1 billion in total would be realised within the three counties region.</p> <p>Luton is the UK's only major airport wholly owned by the local council, and we are committed to reinvesting the benefits of growth back to the community. Alongside our contribution to employment, the airport contributes more per passenger than any other airport, back into community services. There are both significant dividends that are returned to Luton Borough Council (LBC), our shareholder, along with numerous grants to Community Funding Programmes.</p> <p>The Proposed Development is being brought forward in the context of Government policy which supports airports making best use of their runways because of the economic benefits of air transport as set out in the Draft Need Case.</p> <p>The 2017 DfT forecasts capped the airport at 18 mppa because that reflected the existing planning consent. However, as made clear in "Beyond the horizon: Making best use of existing runways" of June 2018, airports are encouraged to expand beyond these limits, subject to the expansion being tested through the planning process as the application for development consent will do. It is evident in this document and in Jet Zero (July 2021) that the Government envisages airports expanding beyond the limits originally applied in the 2017 Aviation Forecasts.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>The 18 mppa was a capacity assumption rather than a projection of demand for the airport.</p> <p>Further information is set out in the Consultation Brochure and Draft Need Case.</p> <p>Regarding the size of the Proposed Development, the scale has been designed and benchmarked against other UK airports of similar scale and intended airline users. The most recent sift report is appended to the Works Description Report (WDR), and previous sift reports can be found on the Luton Rising website.</p> <p>Regarding the capacity of surrounding infrastructure, as part of the Proposed Development, we are seeking to increase the percentage of passengers accessing the airport by public transport. Despite this, additional car journeys will be required, due to the growth in passengers as a result of the Proposed Development. The proposed strategy aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods. Further details regarding surrounding surface infrastructure can be found in the Getting To and From the Airport – Our Emerging Transport Strategy (SAETS).</p> <p>Our response to ref 1.1.12 provides further details on why the proposed alternative locations are not appropriate to accommodate the need for air travel from within the airport’s catchment area.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Our response to ref 1.1.9 covers improvements in telecommunications and the impact this may have on demand forecasts.</p> <p>Details regarding load factors, such as the number of empty seats on planes, is discussed in detail in our response to ref 1.1.17.</p> <p>Regarding environmental impacts associated with the Proposed Development, the PEIR provides preliminary assessments of a wide range environmental effects, including benefits and disbenefits. This document must be viewed as a whole as an assessment and not considered in piecemeal fashion. The findings of the PEIR will be updated in an Environmental Statement (ES) prior to the submission of the application for development consent. It will then be for the Planning Inspectorate to consider the balance between the costs and benefits of the Proposed Development in providing its recommendation to the Secretary of State, based on the evidence submitted with the application.</p>	
1.1.15	Suggest the airport would be better located elsewhere. Suggestions from respondents include on land in North Hertfordshire, Lincolnshire, in the Midlands or north or	Kings Walden Parish Council		5	Government policy supports making best use of existing runways. It does not support the construction of new runways other than at Heathrow. Our response to ref 1.1.12 provides further details on why the proposed alternative locations are not appropriate to accommodate the need for air travel from within the airport's catchment area.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	east of England, within the Thames Estuary, by the coast or on land generally away from built up or residential areas.					
1.1.16	Suggest building Terminal 2 south of the runway.			1	This was considered at an early stage of the optioneering process but was discounted for several reasons including, in particular the fact the new terminal would have meant extensive development in Green Belt which is contrary to Government policy.	No
1.1.17	Suggest the additional capacity created by the Proposed Development could be achieved by filling all available seats on existing flights.			2	<p>Currently around 90% of all seats on passenger flights from the airport are filled across the year. It is unlikely that 100% of seats will ever be filled across the year, because demand is not evenly spaced across each route by day, week, or month. Demand will be higher at certain times of the year (such as school holidays), leading to higher load factors, but will be lower outside of peak times.</p> <p>Lowering the fares to fill these seats in order to achieve higher year round load factors would simply generate additional demand and increase the forecasted passenger numbers above those already assessed based on the underlying patterns of demand for travel over the day and over the year.</p> <p>Furthermore, load factors rarely reach 100% because airlines may need to retain some seats empty for their flexible ticket holders (who will need to know they can</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					get on a flight when they arrive at an airport) and also reflects that some passengers will buy tickets, but not show up for the flights.	
1.1.18	Suggest the existing airport is closed. Some stated this was the only way to provide any benefit to the three counties or to mitigate against noise and vibration. Other respondents suggested the existing airport should be demolished and used for greenspace, NHS affordable housing or to create new high-tech jobs in renewable energy/green industries.			1	Government has identified a shortage of airport capacity, particularly in the South East of England, to meet demand and so supports airports making best use of their existing runways. The Proposed Development responds to this policy.	No
1.1.19	Suggest the capacity of the existing terminal and/or the Proposed Development is reduced. Some			3	Please see the responses to refs 1.1.6, 1.1.14 and 1.1.18 which outline the basis of demand forecasts and their relationship with Government policy. The proposals set targets related to public transport use to reduce reliance on car travel. Passengers will be able to access each terminal, by public transport.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	respondents also suggested that Terminal 1 (T1) should be reconfigured, and its capacity reduced following construction of Terminal 2 (T2) and that the car parking footprint should be reduced to ensure passengers use public transport.					
1.1.20	Suggest a reduction in the number of flights. Some respondents suggested this was required to meet pollution targets, reduce climate change and noise and air pollution for neighbouring communities and the three counties.			5	<p>Please see responses to refs 1.1.12 and 1.1.14.</p> <p>Demand for air transport has grown rapidly in the UK, more than doubling since 1997 and reaching 292 million passengers using UK airports in 2018. The DfT publishes forecasts of aviation demand, with the latest being UK Aviation Forecasts 2017. These forecasts show air passenger demand to use the UK's airports rising to between 335 and 380 million passengers by 2030 and between 470 and 535 million passengers by 2050. Based on the DfT forecasts, all London airports are expected to reach their consented planning limits over the period to 2040.</p> <p>Before the Covid-19 pandemic the airport was at capacity and is expected to be so again in the near future, it has been important to prepare specific forecasts of future passenger demand to inform our</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>thinking about the scale and timing of the capacity enhancement required to support making the best use of our runway. The Covid-19 pandemic led to an almost complete suspension of flying from many UK airports and a significant drop in demand. Therefore, updated forecasts have been developed using the latest economic projections, and these take into account the effects of Covid-19, Brexit and the costs associated with off-setting, removal or abatement of carbon. The forecasts are also set out as a range to reflect greater market uncertainty over the forecast period. These can be found in the Draft Need Case.</p> <p>Additionally, we are proposing our GCG framework, which will ensure that the airport operates within particular “limits”. Please see response to ref 1.1.2 for further details on GCG or the Draft Green Controlled Growth Proposals for full details.</p>	
1.1.21	Suggestion that steps need to be taken to limit passenger growth.		Hertfordshire County Council	1	Please see response to ref 1.1.6.	No
1.1.22	Suggest expansion of the airport is too large and the scale of the Proposed Development should be reduced or limited.			2	<p>Please see response to ref 1.1.2 which explains how appropriate measures are embedded into the project phasing to limit any potential impacts.</p> <p>In developing the Proposed Development, we have carefully considered the scale of new infrastructure required and minimised this where possible. A range of mitigation measures have been embedded into the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>proposals to minimise the effects of the development. Further details are provided in Chapter 4 The Proposed Development of the PEIR.</p> <p>Please see response to ref 1.1.12 which demonstrates how the project is consistent with Government policy.</p> <p>The scale of Proposed Development is necessary to enable the forecasted demand to be accommodated. Further details regarding the scale of expansion are included in the Draft Need Case.</p>	
1.1.23	Suggest the Need Case and Forecast benefits do not consider smaller or slower rates of expansion.	Chilterns Conservation Board		3	Please see response to ref 1.1.5.	Yes
1.1.24	Suggest the passenger growth forecast and associated profit is revised and reduced.			2	Please see response to ref 1.1.4.	No
1.1.25	Suggest the Proposed Development is delayed.			2	Please see response to ref 1.1.5.	Yes
1.1.26	Suggest the Proposed Development facilitate			1	Long haul flights are included within the forecasts, as detailed in our Draft Need Case . These will be	No

Ref	Comment	PC	LA	No PILs	Response	Change
	expansion of the route network at Luton Airport to include services to long haul destinations.				<p>enabled by improvements in runway performance for new generation widebody aircraft as well as the provision of terminal, apron and taxiway infrastructure to accommodate these activities.</p> <p>Currently the ability to operate long haul flights at the airport is limited in part due to the shorter runway, which will remain, but also by a lack of terminal and apron infrastructure appropriate to handle such flights.</p> <p>There is no specific restriction on airlines operating such long haul routes from the airport, but there are Government air service agreements that may limit the number of routes and airlines that can fly to some countries.</p>	
1.1.27	No expansion. Some respondents opposed expansion on the basis that they did not perceive the Proposed Development to provide any benefits or that the negatives of the expansion outweighed the potential benefits. Other respondents opposed the Proposed Development on the	Kings Walden Parish Council Chilterns Conservation Board	Central Bedfordshire Council Hertfordshire County Council	104	<p>Please see response to ref 1.1.14.</p> <p>Concerns related to topics beyond Need Case and Forecasts are addressed in detail in the relevant topic sections, as per the following:</p> <p>A2: Climate change and Carbon</p> <p>A3: Noise</p> <p>A5: Air Quality</p> <p>A11: Wigmore Valley Park</p> <p>A14: Surface access</p> <p>A15: Land and Compensation</p> <p>A18: Consultation</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>basis that not enough information was provided, the additional impacts to climate change, increased noise during the day and night, increased air pollution, existing and future parking and traffic congestion, the applicability of the noise insulation scheme and the inappropriate use of compulsory purchase powers. Some respondents stated they could not support expansion if the airport expanded beyond its current boundary or until current mitigation and planning conditions had been addressed or the introduction of electric planes.</p>					
1.1.28	Concern the Proposed			2	We have carefully considered the requirements of Government policy including the National Planning	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Development does not consider the National Planning Policy Framework and International Civil Aviation Organisation (ICAO) principles of balanced growth and mitigation.				Policy Framework in bringing forward the Proposed Development. This is reflected Chapter 5 Approach to the Assessment in the PEIR, the Draft Need Case and our proposed approach to GCG. Please see response to ref 1.1.2 for further details on GCG.	
1.1.29	Consider the current size of the airport large enough. Some suggested the airport should not be expanded further as it would have detrimental affect on the lives of surrounding residents, as the current capacity cannot be managed appropriately, has not reached full capacity from its last planning approval.			4	<p>Please see responses to refs 1.1.6 and 1.1.14 regarding Government policy and the Proposed Development's response, with particular regards to capacity.</p> <p>The airport has reached its maximum consented capacity of 18 mppa, as per its last planning approval. On 1 December 2021, the local planning authority (LBC) resolved to grant permission for the current airport operator (LLAOL) to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa.</p> <p>There is a clear need to expand capacity at the airport and the benefits of doing so compared to environmental disbenefits, will be considered through the Examination of the application for development consent.</p>	No
1.1.30	Concern the need case and forecast for			26	Please see responses to refs 1.1.6 and 1.1.14 regarding Government policy, including on climate	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the Proposed Development is based purely on profit. Some respondents stated the airport owners were pursuing the Proposed Development with no justifiable need, was being undertaken at the expense of the environment and local community and would not deliver any stated benefits for Luton beyond money for the council. Some respondents stated the use of land acquisition powers was unjustified on this basis.				<p>change, and how the Proposed Development addresses this.</p> <p>The benefits of the specific proposal will be weighed against the environmental disbenefits through the Examination of the application for development consent. Furthermore, the dividend paid to LBC, as the owners of the airport, is reinvested locally.</p>	
1.1.31	Concern the Proposed Development prioritises increasing the amount spent by users, for example on retail or drop off charges, over			1	The development of T2 is intended to improve the passenger experience, within which retail is a discretionary activity. Drop off charges are likely to remain as part of the strategy to incentivise a shift to greater use of public transport to access the airport. The Proposed Development also includes an extension to T1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	passenger experience.					
1.1.32	Support for demand forecast and consider all relevant factors have been included.			4	The respondents support has been noted.	No
1.1.33	Support expansion. Respondents consider: the Proposed Development is necessary, is in the national, regional and local interest, will create local employment opportunities, will secure ongoing funding for the local community and reduce pressure on other airports such as Heathrow.	NATS En Route Safeguarding Bedfordshire Police and Crime Commissioner	Chiltern District Council	4	The respondents support has been noted.	No
1.1.34	Suggest a complete or partial ban on air freight at Luton airport.			1	Overall, the number of freighter aircraft operations at the airport are relatively limited, albeit there were more freighter movements in 2019 than usual.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>The main overnight freight operator is DHL, and it has indicated that these services are essential to serving the local and North London market, with high value packages and products which are time sensitive and need to be delivered during the night to ensure next day delivery. The items carried not only support the local economy, but also provide a social role, for example in the movement of pharmaceuticals and other essential supplies to hospitals.</p> <p>Having regard to the important role played by such deliveries, a limited number of freighter movements each year by these operators is included within the aircraft movement forecasts, but on the assumption that the number of such movements reverts to historic levels.</p> <p>In addition, when longer haul services are established at the airport, it is envisaged that these will also carry some freight in the bellyholds of passenger aircraft.</p>	
1.1.35	Suggest the current service offering at Luton Airport is better managed prior to expansion.			2	<p>The existing terminal area is heavily constrained due to the loop taxiway around it and the associated surface access requirements. This limits the scope for expansion planned as part of Phase 1 of the Proposed Development.</p> <p>Expansion of the airport onto the adjacent land included in the Proposed Development is essential if future growth in demand is to be accommodated.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
1.1.36	The airport should not be expanded beyond its current boundary.			1	Expansion of facilities to meet demand could not be achieved within the existing airport boundary.	No
1.1.37	DHL would like to stress the importance of continued night flying at Luton Airport and in particular the importance of the small number of inbound cargo flights we operate which play a critical role in ensuring connectivity for the surrounding counties and UK Plc more broadly.			1	This operational requirement is recognised and is reflected in the demand forecasts for the Proposed Development. Please see response to ref 1.1.34 for further information on freight movements.	No
1.1.38	easyJet does not believe that London Luton airport will require a second passenger terminal before 2029 at the earliest. Earlier construction would result in unnecessary costs and disruption. Options should be			1	As noted earlier, the forecasts have been updated and the proposed phasing adjusted. Details are set out in the Draft Need Case and are subject to ongoing discussions with easyJet and all the airlines using the airport.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	sought for more limited capacity increases in the short and medium term.					
1.1.39	DHL provide the following response with regards to cargo growth: While it is welcome that Luton plans on maintaining its existing 2,000 cargo movements, it is disappointing that it has not projected any growth of cargo movement at the airport. Given the UK's current focus on boosting trade links, this seems like a missed opportunity that is not coordinated with national policy.			1	The ability to accommodate more cargo flights beyond No levels assumed in the demand forecasts will depend on compatibility with the GCG framework and the limits imposed on operations within the night period. Please see response to ref 1.1.2 for further details.	No
1.1.40	The decision not to grow cargo movements at the airport is a missed opportunity from a			1	Discussions with DHL on this matter are ongoing. Ultimately, the use of the airport will be determined following slot allocation rules and in accordance with GCG parameters as outlined in the Draft Green Controlled Growth Proposals . There is no in	No

Ref	Comment	PC	LA	No PILs	Response	Change
	trade perspective and is something that LLAL may wish to consider given national strategic priorities. DHL would be happy to discuss these points in more detail at a bilateral meeting should this be of interest.				principle constraint on cargo growth within these parameters.	
1.1.41	easyJet believes that timelines for proposed capacity development should be revised downwards. easyJet supports the construction of additional capacity at Luton Airport. But the issue is the scale and speed of expansion. Expansion carries both cost and operational risks.			1	Please see response to ref 1.1.38.	No
1.1.42	This representation is submitted on behalf of Legal & General			1	Support for the Proposed Development in principle is welcomed.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Capital (LGC) in response to the statutory consultation under s42 of the Planning Act 2008 (the Act) by London Luton Airport Ltd (LLAL) in relation to the proposed expansion of the airport. The consultation is in connection with LLAL's proposal to apply for a Development Consent Order (DCO) under the Act and responds to the Preliminary Environmental Information Report (PEIR) and related documents. LGC owns about 298 ha of land adjacent to the southern boundary of the Airport and further areas of land around Junction 10 and 10a of the M1 and Slip End to the south west</p>				<p>Concern regarding the impacts to development potential of adjacent landholders is noted and will be the subject of ongoing discussions with affected landowners.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>of Luton (63 ha). The extent of these land parcels are shown on the attached site location plan at Appendix 1, which also show the Airport's proposed operational area. LGC supports the expansion of the Airport in principle, but has significant concerns that the proposals would prejudice LGC's ability to optimise the potential of its landholdings in terms of land use and development.</p>					
1.1.43	<p>LGC support the expansion of the Airport in principle. However, LGC considers that the concerns raised in this representation must be addressed in order to make the</p>			1	<p>The respondent's response is noted. Engagement with all affected landowners is ongoing.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	detailed aspects of the Airport expansion proposals acceptable and sustainable. LGC is open to discussing these matters with LLAL in order to arrive at an acceptable accommodation.					
1.1.44	Concern the demand forecast figures are unrealistic and potentially understated. Respondents stated that mitigation measures, which are to be employed alongside gradual expansion, may not materialise as per previous expansion.			2	Please see responses to refs 1.1.2 and 1.1.5 which explain how appropriate measures are proposed to be embedded into the project phasing to limit potential impacts.	No
1.1.45	Suggest the current service offering at Luton Airport is better managed as an alternative to expansion.			3	Please see response to ref 1.1.35.	No

Ref	Comment	PC	LA	No PILs	Response	Change
1.1.46	Concern the need case and forecast do not consider changes to passenger behaviour, including the effects of flight shaming, less overseas leisure travel and travellers taking more UK based holidays.			3	For concerns regarding need case and demand forecasts in relation to Brexit, please see response to ref 1.1.1. For commentary on the impacts of climate change awareness on forecasts, please see response to ref 1.1.6.	No
1.1.47	Suggest alternative forms of transport are encouraged or incentivised over air travel.			4	The Proposed Development is responding to demand forecasts for air travel. Currently, Government is not seeking to constrain growth in air travel, as it recognises the wider economic benefits that such travel brings. With regards to other forms of transport, including rail and digital technologies, please see responses to refs 1.1.9 and 1.1.10.	No
1.1.48	No modelling based on the airlines who actually use Luton, two of whom have mentioned a drop in profits (EasyJet's Annual Report 2019 mentions total revenue per seat	Kings Walden Parish Council		1	Please see response to ref 1.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	decreasing by 1.8% while headline cost per seat including fuel increased 1.5%), (Ryanair's 2019 Annual Report states that profit after tax declined by 39%).					
1.1.49	Your graph showing demand in air travel is misleading. Any projection into the future is subject to tolerance. The further into the future the projection, the less accurate the data. You should show this as a fan chart, allowing for all the factors that could impact. It is entirely possible that demand could peak and fall, as new modes of transport are developed, population changes are realised and the effects of immigration,	Kings Walden Parish Council		1	Please see responses to refs 1.1.4 and 1.1.5 in relation to the implications of Government policy for the scheme.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	emigration and even space travel are felt.					
1.1.50	Concern the UK projection graph is for the whole country, not the Luton area. Impact of the "Northern Power House", HS2 and HS3 could drive demand to northern airports. The London-centric model is flawed.	Kings Walden Parish Council		1	Please see response to ref 1.1.12.	No
1.1.51	Rather than seeking to expand to compete with other airports (reducing their business) only flights which are best located at Luton to serve local demand should be pursued.	Chilterns Conservation Board		1	Please see response to ref 1.1.12.	No
1.1.52	An independent aviation commission should determine where increased	Kings Walden Parish Council		1	Please see response to ref 1.1.12.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>capacity is best located. As a majority of passengers have to travel over thirty miles to reach an airport, why would you assume that travel should be towards Luton. Expansion at East Midlands, or an entirely new airport away from built up areas would be a much-preferred solution.</p>					
1.1.53	<p>The Department of Transport has stated that the implications of Parliament's (May 2019) declared environment and climate emergency and the CCC's recommended policy approach to aviation will be taken into account in further developing its aviation policy through the Aviation 2050</p>		<p>North Hertfordshire District Council</p>		<p>Please see response to ref 1.1.6 and 1.1.14 regarding Government policy, including on climate change.</p>	<p>No</p>

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>process. Given the current DCO timeframe, new aviation policy should be in place with demand limits before a decision on this DCO is made. Therefore, NHDC is strongly of the view that LLAL should wait and fully consider the implications of the governments new Aviation Policy before progressing further.</p>					
1.1.54	<p>Government has been called upon to intervene and restrict the grant of planning permission for aviation growth-related planning applications until new national aviation policy is in place. Given the current programmed timeframe for the DCO process, new</p>		Hertfordshire County Council		Please see response to ref 1.1.6 and 1.1.14 regarding Government policy, including on climate change.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>national aviation policy should be in place and therefore national uncertainty resolved by the time a decision is made. However, should this prove not to be the case the County Council is strongly of the view that the proposed project timeframe should be reprogrammed to ensure that any decision is made in the context of new Government aviation policy, when published. Only in these circumstances can a properly informed and robust decision be made.</p>					
1.1.55	<p>Type of Market Growth - ECC notes that LLAL is firmly seeking to continue with low cost carriers and attracting long</p>		Essex County Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	haul is of interest. ECC appreciates that London Luton are unable to attract wide bodied aircraft due to restrictions on the runway. It is acknowledged that attracting long haul services at London Luton will be possible by smaller aircraft and especially as aviation technology advances.					
1.1.56	Demand forecasting: ECC welcomes a greater appreciation of how the analysis has considered future growth at London Stansted and London Southend airports. It is noted that LLAL utilised the Department for Transport Aviation Forecasts.		Essex County Council		Please see response to ref 1.1.5.	No

Ref	Comment	PC	LA	No PILs	Response	Change
1.1.57	<p>The demand forecasts used to inform the outline need case have been prepared on an unconstrained basis, using the DfT's 2017 projections of passenger growth demand for the UK. Luton and the other London airports as a whole are currently outperforming these forecasts and it is therefore recommended that the final need case show that it has factored in the implications of this faster growth in both the short and longer term and how this might impact the overall need for and potential phasing of the Project.</p>		WSP for Host Authorities		Please see response to ref 1.1.5.	No

Ref	Comment	PC	LA	No PILs	Response	Change
1.1.58	<p>Passenger Numbers and Air Transport Movements In reviewing the Guide to Statutory Consultation ECC notes that it states, in order to assess the environmental impacts of our current development proposal the passenger forecasts were converted to forecasts of aircraft movements and other design parameters (LLAL, 2019, 28). Whilst ECC appreciates that the amount of air transport movements required to deliver the proposed growth at London Luton, it is not clearly set out within the consultation document. ECC considers that the air transport movements required to deliver 32</p>		Essex County Council		<p>Full details of aircraft movements are set out in the Draft Need Case.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	mppa should be set out given the environmental and health impacts associated with further air transport movements.					
1.1.59	The outline need case should set out if/how it proposes to factor in the latest growth proposals outlined by Gatwick or London City in their latest masterplans. Whilst this capacity is not consented, the potential delivery and timing of these proposals will likely have implications for the passenger allocation model used to estimate Luton s share of the market within the catchment area currently shown within the ONC.		WSP for Host Authorities		Please see response to ref 1.1.12.	No

Ref	Comment	PC	LA	No PILs	Response	Change
1.1.60	<p>Essex County Council provide the following response with regards to general aviation and cargo movements: ECC notes that the consultation document states that it is currently assumed that the number of cargo and business aviation flights will remain largely the same as now. Due to constraints around the current permitted level of noise at Luton, some restrictions have been applied to business and general aviation, particularly during night periods .As cargo airline and business aviation fleets move towards newer, quieter variants, such restrictions could</p>		Essex County Council		<p>Please see response to ref 1.1.34.</p> <p>Full details of the future split of aircraft movements are contained in the Draft Need Case.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>potentially be lifted. Our assumptions of 30,000 business aviation aircraft movements a year reflects a return to the 2017 position in the medium term, as quieter aircraft are introduced and current limitations on the availability of aircraft parking stands in peak periods are lifted (LLAL, 2019, 28). ECC recommends that the proposal be clearer regarding the proportion of air transport movement likely to be required by LLAL in the medium longer term. This is important for the local community. It is also recommended that the proposal provides a clear indication on the proportion of</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	passenger air transport movements, General Aviation and Cargo flights.					
1.1.61	It is in this context that my advice to the Strategic Transport Forum will be that the STB should support the principle of expanding Luton Airport, but that that support is conditional upon the promoter being able to demonstrate that the package of supporting measures is sufficiently robust and deliverable, as well as being consistent with the policy framework of the draft Transport Strategy	Englands Economic Heartland			Please see response to ref 1.1.44. Further information on the surface access proposals can be found in the SAETS .	No
1.1.62	In May 2019, the CCC published its report (Net Zero The UK's contribution to		Hertfordshire County Council		Please see response to ref 1.1.6 and 1.1.14 regarding Government policy, including on climate change, and the Proposed Development's response.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>stopping global warming Committee on Climate Change May 2019) to the UK Governments. Its overarching recommendation was that the UK should amend its legislation to commit to net zero greenhouse gas emissions by 2050 and in relation to aviation, that this target should include the UKs share of international aviation and be met through domestic action rather than international offset credits This will require immediate steps from Government, industry and the public. Challenges that have not yet been confronted such as aviation and shipping emissions must now be addressed. The</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>UK should legislate as soon as possible to reach net-zero greenhouse gas emissions by 2050. The target can be legislated as a 100% reduction in greenhouse gases (GHGs) from 1990 and should cover all sectors of the economy, including international aviation and shipping.</p>					
1.1.63	<p>Demand Forecasts are being considered as part of the ongoing technical assessment of traffic impacts associated with the proposed airport expansion. We note that information on the methodology and assumptions made in the arriving at the forecasts is now included in the 'Outline Need Case'.</p>	Highways England			<p>Noted. Discussions with National Highways (formerly Highways England) have continued since 2019 and will continue up to submission of the application for development consent and beyond.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>A meeting was held on 15th November 2019 to discuss this information and the possible sensitivity of traffic forecasts to the variation of certain assumptions in the aircraft movement forecasts. In summary, agreement is yet to be reached on the aircraft movement forecasts so no further comment can be made at this time.</p>					
1.1.64	<p>Suggest there is a case for a further statutory consultation following the completion of additional work. The implications of the likely future change in climate change/aviation policy needs to be further</p>		Host Authorities		<p>A further round of statutory consultation is being held in 2022.</p> <p>Please see responses to refs 1.1.4 and 1.1.5 in relation to the implications of Government policy for the scheme.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	considered though sensitivity testing.					
1.1.65	Concern whether there is capacity for the potential cumulative increases in capacity in the SE as a whole and whether that additional capacity is directed to the most sustainable and sequentially preferable locations.		Stevenage Borough Council Harrow London Borough Council St Albans District Council		Please see response to ref 1.1.12.	No
1.1.66	Concern the need case assumptions regarding capacity at other airports within the south east will need to be updated to reflect the latest published master plans for Gatwick and London City Airport. Whilst the Host Authorities accept that this capacity is not presently consented,		Host Authorities		Please see response to ref 1.1.12.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the potential delivery and timing of these proposals will have implications for the passenger allocation model used to estimate Luton's share of the market within Luton's catchment area.					
1.1.67	It's a bad idea in it's current form and will result in wasted investment and funds unless more research is done on current traveller attitudes and trends and more thought and exploration is done of measures to mitigate the environmental impact and contribution to climate change together with innovative business thinking to make the expansion attractive			1	<p>Details of how the demand forecasts have been produced are included in the Draft Need Case. The demand forecasts take into account the potential expansion at other airports and factor in the cost of carbon to be consistent with climate change policies. Demand forecasts also consider changes in passenger behaviour, including increased use of digital technologies, such as video-conferencing.</p> <p>For commentary on the impacts of climate change awareness on traveller attitudes, please see response to ref 1.1.6.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	and future proof the scheme.					
1.1.68	There should be no expansion without either: a) a new runway b) the new alignments of the existing runway.			1	<p>Please see responses to refs 1.1.14</p> <p>Government policy supports airports making best use of their runways because of the economic benefits of air transport as set out in the Draft Need Case.</p> <p>New alignment of the runway was considered at an early stage but was considered not to be consistent with Government's policy on making best use of the existing runway. It would also have resulted in encroachment onto Green Belt land.</p> <p>Improvements to the existing runway including improved taxiways are included in the Proposed Development.</p>	No
1.1.69	Proposals to mitigate the impacts of airport expansion would be unnecessary if the airport was not expanded.	Kings Walden Parish Council		3	Noted.	No
1.1.70	Concern that the current location of the airport is not suitable for expansion.	Kings Walden Parish Council		8	Government policy supports making the best use of existing runways.	No

Table A1.3: Regard had to statutory consultation responses on Need Case and Forecasts - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
1.2.1	Concern the need case and forecast for the Proposed Development is underpinned by continued operation of low cost carriers and holiday companies. Particular concerns include that these companies are vulnerable to: market contraction, falling load factors and potential collapse, the potential effects of Brexit on traveller numbers and employment and rising environmental concerns. Other respondents suggested low cost carriers were bad for the environment, inducing climate change and should not be allowed to continue.	67	Please see response to ref 1.1.1. Environmental concerns associated with low cost carriers and the perception that they are higher polluting in comparison to other airlines, should be considered in the context that many low cost airlines, such as easyJet, have strong environmental policies. easyJet, for example, is leading in terms of ensuring that the carbon impacts of its operations are fully offset. For further concerns related to climate change and aviation, please see response to ref 1.1.2.	No
1.2.2	Concern the Proposed Development is based on the unrealistic expectation low cost carriers will upgrade their fleet to meet the required aircraft noise and air pollution targets necessary to make expansion viable.	6	Please see response to ref 1.1.2.	No
1.2.3	Concern about the so called 'tourism deficit' and loss of UK based economic revenue overseas, associated with the proposed growth of outbound leisure travel from the airport.	21	Please see response to ref 1.1.3.	No
1.2.4	Concern the need case and forecast did not consider the uncertainty associated with Brexit, including how it may affect demand for flights to and from EU countries (particularly Eastern	142	Please see response to ref 1.1.4.	No

Ref	Comment	No CC	Response	Change
	Europe) and associated immigration patterns, how it may cause a shift in passenger focus towards more distant locations requiring larger aircraft. Some respondents suggested expansion is delayed until the impacts of Brexit are better understood.			
1.2.5	Concern the Proposed Development need case and forecast is using outdated data, including the DfT 'UK Aviation Forecasts 2017' and do not consider factors including Brexit, expansion at other airports, a slowdown in air passenger growth, changes in the balance between leisure and business travel, a delay in technological advances, rising climate awareness, government commitment to net zero and High Speed Rail.	47	Please see response to ref 1.1.5 for an explanation of the basis of demand forecasts and ref 1.1.4 for an explanation on Brexit. Changes in the balance between leisure and business travel as well as a delay in technological advances, would be managed in accordance with the GCG framework, as outlined in response to ref 1.1.2. For commentary on the impacts of climate change awareness on forecasts and Government commitment to net zero, please see the response to ref 1.1.6.	No
1.2.6	Concern demand forecasts do not take into account the Government's commitment to addressing climate change including the agreement to reduce greenhouse gas emissions to net zero by 2050 and signing of the Paris Agreement.	13	Please see response to ref 1.1.6.	No
1.2.7	Concern the demand forecast data is inaccurate or overoptimistic. Some respondents stated there was no demonstrated national, regional or local	222	Please see response to ref 1.1.7.	No

Ref	Comment	No CC	Response	Change
	<p>need for expansion, that the level of forecast detail required to make an informed decision had not been provided and that expansion was a matter of opinion and forecasts had been manufactured. Some suggested a complete reassessment should be undertaken, that more sensitivity tests were required (including those negative of expansion), that forecasts were underpinned by unrealistic technological improvements, ignored growth at other airports and that aviation generally was a diminishing market, subject to change as the UK moves towards online working and net zero (including increased taxes on fuel and higher ticket prices), which would limit the benefits of the Proposed Development.</p>			
1.2.8	<p>Concern demand forecasts do not take into account the potential for economic downturn, including decreasing growth in GDP, wages and disposable income as well as potential impacts on aircraft manufacturing.</p>	12	<p>Please see response to ref 1.1.4.</p> <p>Concerns regarding a downturn in aircraft manufacturing have been considered in the updated forecasts, which are based on recent economic projections for the UK and the rest of the world.</p>	No
1.2.9	<p>Concern demand forecasts do not consider the potential for changes in working arrangements and less business travel due to increases in online working, working from home and/or remotely and other digital technical innovation.</p>	27	<p>Please see response to ref 1.1.9.</p>	No

Ref	Comment	No CC	Response	Change
1.2.10	Suggestion that Luton Airport should strive to become airport of choice for hi-tech organisations located within the OxCam corridor.	1	The Proposed Development will facilitate the airport offering a wider range of services, better meeting the needs of hi-tech organisations in the Oxford-Cambridge Arc. The Draft Needs Case considers the Oxford-Cambridge Arc in further detail.	No
1.2.11	Concern alternatives for short and medium haul travel, including existing and future high speed rail, have not been adequately considered in forecasts. Some suggested there would be less demand for international air travel if cost efficient alternatives existed within the UK or that the public would choose alternative means of transport if they understood the noise and pollution impacts associated with Luton. Other respondents suggested future restrictions may limit airport capacity and force passengers onto other forms of transport and flying should only be reserved for long haul destinations.	29	Please see response to ref 1.1.6 regarding Government policy, including on climate change, and the Proposed Development's response. Please see response to ref 1.1.10 for discussion on alternative travel modes.	No
1.2.12	Concern demand forecasts do not consider the potential for future additional costs associated with air travel, including taxes on airplane fuel, mandatory carbon offsetting and/or frequent flyer levies.	55	Please see response to ref 1.1.11.	No
1.2.13	Concern that the need case and forecast do not take into account political uncertainty, including a change in government or change in government policy favouring a green agenda and reduced	19	Please see response to ref 1.1.6.	No

Ref	Comment	No CC	Response	Change
	carbon emissions. Some respondents stated the project would have implications for local and central government.		It is recognised that Government policy could change during the life of the project and, if so, the proposals will be adapted accordingly.	
1.2.14	Concern the need case does not consider the possibility of forecast demand being met by other airports in England. Some respondents considered other airports, including Heathrow, Gatwick, Stansted, Birmingham, East Midlands and other northern airports as more suitable for additional flights, for the following reasons: recent or proposed expansion, new runways, location away from large population centres, relative proximity to areas of population growth in the north, topography, frequent bad weather, existing public transport and surface road access and/or larger estate holdings.	232	Please see response to ref 1.1.12.	No
1.2.15	Concern that by providing additional capacity, the Proposed Development is creating demand, rather than responding to it. Some respondents stated that inflating the number of flights was solely for economic gain, at the expense of the environment, based on unsound GDP forecasts, at odds with reducing non-essential air travel for environmental reasons and that Luton was unfairly polluted by others traveling to the airport for cheap flights.	28	Please see response to ref 1.1.6 regarding Government policy, including our response on climate change. Concerns regarding capacity being met elsewhere are addressed in response to ref 1.1.12. Our response to ref 1.1.17 explains the basis of our demand forecasts.	No
1.2.16	Consider the Proposed Development unnecessary. Respondents stated this on the basis of the following: economic growth is not sufficient	376	Please see response to ref 1.1.14.	No

Ref	Comment	No CC	Response	Change
	justification for expansion, the DfT's 2017 Aviation Growth figures not requiring expansion of Luton beyond 18mppa up until to 2050, the airport has already expanded, the size of the expansion, Luton's relative proximity to other airports including Heathrow, Gatwick, Stansted, London City and Birmingham, distance from London, improvements in telecommunications, the lack of benefit to surrounding communities, the number of empty seats on existing flights leaving Luton, the capacity of surrounding infrastructure, the climate crisis and/or the environmental impacts associated with the Proposed Development.			
1.2.17	Concern the Need Case and Forecast ignores the impacts of climate change. Some respondents stated that the public should be educated about the environment and that increases in air travel should not be encouraged.	5	Please see response to ref 1.1.6 regarding Government policy, including our response on climate change. Please see response to ref 1.1.2 for details of how we propose to manage climate change impacts.	No
1.2.18	Suggest the airport would be better located elsewhere. Suggestions from respondents include on land in North Hertfordshire, Lincolnshire, in the Midlands or north or east of England, within the Thames Estuary, by the coast or on land generally away from built up or residential areas.	59	Please see response to ref 1.1.15.	No
1.2.19	Suggest building Terminal 2 south of the runway.	2	Please see response to ref 1.1.16.	No

Ref	Comment	No CC	Response	Change
1.2.20	Suggest reconfiguration of runway 30 degrees towards Luton Hoo airport to reduce impacts on south Luton.	1	<p>Consideration of alternative runway configurations was considered at an early stage of scheme development but was considered not to be in compliance with Government policy and of making best use of the existing runway. It would also have resulted in encroachment onto Green Belt land and result in new noise impacts.</p> <p>Further details of the Proposed Development design evolution are included in Chapter Alternatives of the PEIR and in the sift reports. The most recent sift report is appended to the WDR, and previous sift reports can be found on the Luton Rising website.</p>	No
1.2.21	Suggest more people should be encouraged to holiday within the UK. Some respondents also suggested: this would lead to greater local investment in Luton and the UK, this would reduce the UK outbound tourism deficit, greater investment in the airport would lead to greater investment in Luton itself and Luton should investigate providing holiday destination via train.	8	<p>Please see responses to refs 1.1.6 and 1.1.14 regarding Government policy, including on climate change, and the Proposed Development's response.</p> <p>Concerns regarding the perceived tourism deficit are discussed in our response to ref 1.1.3.</p>	No
1.2.22	Suggest Luton should only offer critical flights, not holiday flights.	1	Please see response to ref 1.1.3.	No
1.2.23	Suggest the additional capacity created by the Proposed Development could be achieved by filling all available seats on existing flights. Some respondents also suggested: airlines who achieve	14	Please see responses to refs 1.1.1 and 1.1.17 regarding load factors.	No

Ref	Comment	No CC	Response	Change
	higher passenger densities should be rewarded, decreasing empty passenger seats from 13-14% to 3-4% would save airlines money and reduce other impacts.			
1.2.24	Suggest Luton only operate night time flights.	1	<p>Many respondents to the consultation identified their dislike of night flights. This is reflected in our commitment to remaining within existing night flight quota limits.</p> <p>Notwithstanding this, the majority of people wish to fly in the daytime and airlines generally only schedule a limited number of arrivals within the night period.</p> <p>The airport also operates under limitations on nighttime operations, set as conditions following the application to extend capacity to 18 mppa. There is no intention to seek to vary these limits as they apply the night quota period.</p>	No
1.2.25	Suggest the existing airport is closed. Some stated this was the only way to provide any benefit to the three counties or to mitigate against noise and vibration. Other respondents suggested the existing airport should be demolished and used for greenspace, NHS affordable housing or to create new high-tech jobs in renewable energy/green industries.	21	Please see response to ref 1.1.18.	No
1.2.26	Suggest the capacity of the existing terminal and/or the Proposed Development is reduced.	20	Please see response to ref 1.1.19.	No

Ref	Comment	No CC	Response	Change
	Some respondents also suggested the following: T1 should be reconfigured and its capacity reduced following construction of T2 and car parking footprint should be reduced to ensure passengers use public transport.			
1.2.27	Suggest a reduction in the number of flights. Some respondents suggested this was required to meet pollution targets, reduce climate change and noise and air pollution for neighbouring communities and the three counties. Other respondents stated that the number of flights should be reduced by 45% or 50%, capped at 2018 levels, 20mppa, capped at 18mppa up to 2050 as per the DfT Aviation demand figures. Others suggested less 24/7 flying, the diversion of flight paths, removal of domestic flight paths altogether, banning business flights and travellers having to reduce their number of holidays and justify their necessity to fly.	127	Please see response to ref 1.1.20.	No
1.2.28	Suggestion that steps need to be taken to limit passenger growth. Some respondents stated this was required so the UK can meet its net zero target and was the responsible thing to do. Other respondents suggested that demand management measures such as the active discouragement of holidays through the banning of overseas holiday advertising material, increased airfares, carbon pricing or frequent flyer levies, limiting air travel to current levels, 25% above current levels to 2050 or that business travel should be reduced.	59	Please see response to ref 1.1.6 which outlines the basis of demand forecasts and their relationship with Government policy Concerns regarding the capping or reduction of flight numbers or limiting growth in demand are discussed in response to refs 1.1.11 and 1.1.20.	No

Ref	Comment	No CC	Response	Change
1.2.29	Suggest a reduction in hours of operation. Some respondents suggested Luton should adopt the same flight time limitations as Heathrow.	2	Please see response to ref 1.2.24.	No
1.2.30	Suggest a reduction in the frequency of flights in the summer period, where flights operate on a 5-to-10-minute frequency.	2	<p>Please see response to ref 1.1.6 which demonstrates how the Proposed Development is consistent with Government policy of making best use of existing runways.</p> <p>Our response to ref 1.1.20 highlights how the proposed increase in flights is consistent with Government policy. Further details on the need for the Proposed Development including the associated passenger capacity are set out in the Draft Need Case.</p> <p>Summer is the time of peak demand and this is unlikely to change in future. Reducing flights in summer is not possible without year-round reductions in the use of the airport which would be economically damaging.</p>	No
1.2.31	Suggest air traffic is reduced to previous levels and further reduced year on year, similar to car emissions.	1	<p>Please see response to ref 1.1.20 which addresses reducing the number of flights.</p> <p>Our responses to refs 1.1.2 and 1.1.6 provide further detail on how the Proposed Development complies with Government policy on achieving net zero.</p>	No
1.2.32	Suggest expansion of the airport is too large and the scale of the Proposed Development should be	29	Please see responses to refs 1.1.22 and 1.1.29 on the scale of the proposed airport expansion.	No

Ref	Comment	No CC	Response	Change
	reduced or limited. Respondents suggested capacity of the airport should be capped at varying limits, including its current 18mppa, but also 19, 20, 21.5, 24 or 25mppa. Other respondents suggested the Proposed Development should be limited to the current airport boundaries, should not use any land in Hertfordshire, should expand by no more than half or two-thirds of its current size, should be modest and based on existing infrastructure and be justified in the context of net zero carbon emissions.		Further details on the need for the Proposed Development including the associated passenger capacity is set out in the Draft Need Case . In developing the scheme, we have carefully considered how we can make best use of existing infrastructure and how the Proposed Development complies with Government policy on achieving net zero. Further details on this are provided in our responses to refs 1.1.2 and 1.1.6.	
1.2.33	Suggest the Need Case and Forecast benefits do not consider smaller or slower rates of expansion. Respondents suggest options for more modest growth would allow the Proposed Development to take into consideration impacts to future demand more cautiously and only expand if future demand materialises.	7	Please see response to ref 1.1.5.	No
1.2.34	Suggest the passenger growth forecast and associated profit is revised and reduced. Respondents suggested the following: an independent passenger growth forecast should be provided and that forecast figures should be reassessed based on Brexit, changes to trade, climate change and the Climate Emergency, an aging population, declining birth rate, changes to aviation taxes and compliance with net zero. Other respondents suggested the benefits of the project should be presented in a more balanced manner.	56	The rationale for the demand forecasts which support the need for the scheme including the implications of Brexit can be found in the responses to refs 1.1.1 and 1.1.4. The demand forecasts referenced in these responses also account for underlying demographic trends. Information on how the Proposed Development would respond to the imposition of aviation taxes is set out in our response to ref 1.1.11. Our responses to refs 1.1.2 and 1.1.6 provide further	No

Ref	Comment	No CC	Response	Change
			details on how Proposed Development complies with net zero policy.	
1.2.35	Suggest the government assess its airport capacity strategy, in relation to the Proposed Development forecast demand, in the context of climate change.	4	Please see responses to refs 1.1.6 and 1.1.14 regarding Government policy, including our response on climate change.	No
1.2.36	Suggest the Proposed Development is delayed. Some respondents suggested the expansion be delayed until 2025 or 2030. Others suggested the Proposed Development should be delayed until the following: a review of forecast figures against current and future trends is undertaken, a review of GHG emissions from current operations and the proposed forecast is made publicly available, following further development and use of biofuels and electric aircraft, following release of new government guidance and policy on aviation and climate change, following the airspace reorganisation exercise and other external approvals, the assumptions associated with the construction of the third runway at Heathrow are confirmed or once Luton Airport addresses current night time noise limits.	32	Please see response to ref 1.1.5.	No
1.2.37	Suggest the Proposed Development facilitate expansion of the route network at Luton Airport to include services to long haul destinations such as the United States, India, Sri Lanka, Asia and the Middle East. Some respondents suggested this could be achieved by extending the runway or	15	Please see response to ref 1.1.26.	No

Ref	Comment	No CC	Response	Change
	capitalising on the trend of using medium sized aircraft.			
1.2.38	No expansion. Some respondents opposed expansion on the basis that they did not perceive the Proposed Development to provide any benefits or that the negatives of the expansion outweighed the potential benefits. Other respondents opposed the Proposed Development on the basis that not enough information was provided, the additional impacts to climate change, increased noise during the day and night, increased air pollution, existing and future parking and traffic congestion, the applicability of the noise insulation scheme and the inappropriate use of compulsory purchase powers. Some respondents stated they could not support expansion if the airport expanded beyond its current boundary or until current mitigation and planning conditions had been addressed or the introduction of electric planes.	1456	Please see response to ref 1.1.27.	No
1.2.39	Concern cheap flights are inflating demand at Luton, with unequitable impacts on the local community and environment.	3	Please see response to ref 1.1.5. Government policy supports airlines meeting the consumer demand for air travel, to ensure that everyone can benefit from the ability to travel.	No
1.2.40	Growth at Luton should be limited to existing airlines.	1	Restricting growth at the airport to existing airlines would be anti-competitive and would not be permitted under competition and air transport law.	No

Ref	Comment	No CC	Response	Change
1.2.41	Luton should prioritise short haul destinations over long haul, due to the amount of emissions per hour flying.	1	It is expected that most flights using the airport will be short haul, but some long haul services are expected to operate over time where there is clear demand. Government is taking action nationally and internationally to address emissions from aircraft. Please see response to 1.1.26 for further details on long haul flights.	No
1.2.42	Concern the demand forecasts do not provide real world figures of how many additional flights will be operating and flying over homes.	1	Full details of aircraft movements are set out in the Draft Need Case .	No
1.2.43	Concern there will not be enough demand to justify an airline moving to the second terminal.	1	Please see responses to refs 1.1.6, 1.1.14 and 1.1.18 which outline the basis of demand forecasts and their relationship with Government policy.	No
1.2.44	Concern the Proposed Development does not consider the National Planning Policy Framework and International Civil Aviation Organisation (ICAO) principles of balanced growth and mitigation.	29	Please see response to ref 1.1.28.	No
1.2.45	The sited benefits of the Proposed Development can be met by the proposed expansion of Heathrow Airport.	1	Please see response to ref 1.1.12. Expansion at Heathrow alone would result in passengers with journey origins close to Luton having to travel further to catch flights with	No

Ref	Comment	No CC	Response	Change
			consequential implications for surface access congestion and emissions.	
1.2.46	Consider the current size of the airport large enough. Some suggested the airport should not be expanded further as it would have detrimental affect on the lives of surrounding residents, as the current capacity cannot be managed appropriately, has not reached full capacity from its last planning approval.	105	Please see response to ref 1.1.29.	No
1.2.47	Concern the need case and forecast for the Proposed Development is based purely on profit. Some respondents stated the airport owners were pursuing the Proposed Development with no justifiable need, was being undertaken at the expense of the environment and local community and would not deliver any stated benefits for Luton beyond money for the council. Some respondents stated the use of land acquisition powers was unjustified on this basis.	319	Please see response to ref 1.1.30.	No
1.2.48	Concern the Proposed Development prioritises increasing the amount spent by users, for example on retail or drop off charges, over passenger experience.	16	Please see response to ref 1.1.31.	No
1.2.49	Concern the need case and forecast charges unrealistic surface access fees.	4	Current parking charges are set by the current parking operators and are not within the scope of the application for development consent. Charges	No

Ref	Comment	No CC	Response	Change
			will be assessed accordingly in future with a view to supporting the airport being sustainable.	
1.2.50	Support for demand forecast and consider all relevant factors have been included.	87	The respondent's support has been noted.	No
1.2.51	Support expansion. Respondents consider: the Proposed Development is necessary, is in the national, regional and local interest, will create local employment opportunities, will secure ongoing funding for the local community and reduce pressure on other airports such as Heathrow. For some respondents support was caveated on the basis that: green credentials were delivered in full, there is action to reduced carbon emissions and action to reduce the negative impacts on local areas. Other respondents supported the development of a future second runway to reduce pressure on the existing airport.	590	The respondent's support has been noted. Further details on how the impacts of the Proposed Development will be managed is set out in our response to ref 1.1.2.	No
1.2.52	Suggest operation of smaller shuttle plane services to maximise seat take up.	1	It is the airlines that will decide what routes and aircraft will be operated. Notwithstanding that, seat take up is high on current flight services. Please see response to ref 1.1.17 for further details.	No
1.2.53	Suggest air freight operations should be shifted to rail and maritime.	2	There is a need for just in time deliveries of goods overnight to meet with business and e-commerce requirements. Air freight at the airport is largely goods coming into the UK for morning delivery to local addresses in North London and the	No

Ref	Comment	No CC	Response	Change
			<p>surrounding area. This could not be achieved using rail or sea transport.</p> <p>As outlined in our Draft Need Case, we anticipate a continued need for certain goods which are time critical and require air freight.</p> <p>Please see responses to refs 1.1.10 and 1.1.47 which concern alternatives over aviation.</p>	
1.2.54	Suggest a complete or partial ban on air freight at Luton airport. Respondents suggest air freight planes are the loudest fleet and cause the most disruption.	2	<p>Please see response to ref 1.1.34.</p> <p>Regarding the older nature of the aircraft used for freight operations, (and therefore their higher noise levels), as with the passenger fleets, there will come a point when, commercially, the freight operators will want to replace these aircraft for operating cost and reliability reasons. As seen historically in such fleet replacements, this will typically lead to a newer generation of aircraft being used, which will be quieter than those they replace. This is reflected in the future fleet forecasts.</p>	No
1.2.55	Suggest freight coming into Luton could access the airport by train rather than lorry.	1	Please see response to ref 1.2.53.	No
1.2.56	Suggest other airports, including Alconbury, could manage freight operations rather than Luton.	1	Alconbury is not currently a commercial airport and is further away from London, so it is unlikely to provide a realistic alternative for the air freight using the airport due to the economic benefit of freight operations closer to North London.	No

Ref	Comment	No CC	Response	Change
1.2.57	Suggest Luton take Heathrow's share of freight operations to reduce the need for a third runway at Heathrow.	1	Most air freight at Heathrow is carried in the 'bellyhold' of wide-bodied passenger aircraft (other than during the Covid-19 pandemic). This remains the most cost effective means of carrying international air freight to a wide range of destinations. The airport will not provide an alternative in this regard, although a small amount of bellyhold freight capability is expected to develop over time. Please see response to ref 1.1.12 for further details.	No
1.2.58	Suggest the current service offering at Luton Airport is better managed prior to expansion. Some respondents suggested the existing site could be better used through additional taxiways, improving the existing terminal facilities and better managing current noise and pollution levels,	45	<p>Please see response to ref 1.1.35.</p> <p>The existing site is virtually fully used with very limited space to provide any additional aircraft stands. It would not be possible to increase capacity further than is proposed in the first phase through better management of the existing infrastructure as the limitation is in available space to park additional aircraft and the constraints imposed by the circular taxiway around the existing terminal area.</p> <p>The capacity of T1 is limited principally by a shortage of aircraft stands. New aircraft stands would need to be constructed to the east of the airfield, which would be remote from T1 and required extensive use of buses to transport passengers to/from aircraft. It is more efficient to service these stands from a second terminal, which will provide additional space for passengers and an improved level of service.</p>	No

Ref	Comment	No CC	Response	Change
1.2.59	Suggest the taxiways are extended to make better use of the existing runway.	1	Noted. The Proposed Development includes extending taxiways at both ends of the existing runway.	No
1.2.60	The airport should not be expanded beyond its current boundary.	1	Please see responses to refs 1.1.36.	No
1.2.61	Concern the demand forecast figures are unrealistic and potentially understated. Respondents stated that mitigation measures, which were are to be employed alongside gradual expansion, may not materialise as per previous expansion. Other respondents suggested this expansion lays the way for further expansion in the future.	9	Please see responses to refs 1.1.2 and 1.1.5 which concern our approach to GCG and demand forecasts.	No
1.2.62	Suggest the current service offering at Luton Airport is better managed as an alternative to expansion. Some respondents suggested Terminal 1 and the existing site could be better used through additional taxiways, improving the existing terminal facilities with more seating and check in desks, stopping the constant construction activity, using the former Monarch aircraft hangers as terminals, relocating maintenance hangers to the other side of the northern taxiway and online ticket optimisation to reduce rush hour crunch. Other respondents suggested the decline in the holiday market would make additional capacity for business flights.	46	Please see responses to refs 1.1.35 and 1.2.58 regarding the existing and proposed terminals.	No

Ref	Comment	No CC	Response	Change
1.2.63	Suggest the Proposed Development not proceed, and Luton use its maximum capacity to control flight destinations and green credentials.	2	Please see response to ref 1.1.12 which concerns the need for the Proposed Development. As detailed in our response to ref 1.1.20, the airport is currently operating at capacity. Our response to ref 1.1.2 provides further details of how we propose to manage the impacts of the Proposed Development.	No
1.2.64	Concern the need case and forecast do not consider changes to passenger behaviour, including the effects of flight shaming, less overseas leisure travel and travellers taking more UK based holidays.	19	Please see response to ref 1.1.46.	No
1.2.65	Suggest alternative forms of transport are encouraged or incentivised over air travel. Respondents suggested travel should be undertaken by greener travel methods, where possible, including rail and maritime or airship. Some suggested the greater use of digital technology as an alternative to travel altogether. Others suggested Luton expand in rail or facilitate holidays within the UK where flying was not needed.	52	Please see responses to refs 1.1.10 and 1.1.47 which concern travel alternatives.	No
1.2.66	We the undersigned from Community Interest Luton are in support of London Luton Airport Ltd.'s proposals for sustainable growth of the airport because of the boost it will give to the economy, jobs and opportunities it will create for our	Petition	Support for the Proposed Development is welcomed.	No

Ref	Comment	No CC	Response	Change
	residents and the additional funding it will provide our communities.			
1.2.67	<p>I strongly oppose any additional expansion of capacity at Luton Airport on the grounds that it is not in the public interest for the following reasons:</p> <ul style="list-style-type: none"> - The Intergovernmental Panel on Climate Change (IPCC) has said we have only a dozen years for global warming to be kept to a minimum. This means we have a duty to our children to stop the increase in flights and aircraft emissions. Aviation is one of the most energy and carbon intensive forms of transport, both per passenger km or per hour travelling. - Local air quality will be severely affected by a rise in air pollution, increasing the likelihood of long term health problems such as chronic respiratory diseases, lung cancer and heart disease. - Luton and the surrounding countryside and urban areas would see a significant increase in both noise and air pollution. - The proposed site for airport expansion risks disturbing old landfill that is currently contained under Wigmore Valley Park, an area of over 70 acres. Its disturbance could cause the release of harmful materials in to the local water supply and surrounding area. There is also a high risk of methane and other gases causing danger to life and the atmosphere. 	Petition	<p>Concerns related to topics beyond Need Case and Forecasts are addressed in detail in the relevant topic sections, as per the following:</p> <p>A2: Climate change and Carbon A3: Noise A5: Air Quality A11: Wigmore Valley Park A14: Surface access</p> <p>Some changes to the scheme in response to these comments are highlighted below:</p> <p>We have amended the earthworks design to reduce the volume of landfill required to be excavated and therefore associated impacts.</p> <p>We have a responsibility to replace open space affected by the Proposed Development with a facility that is at least as good in terms of size, usefulness, attractiveness, quality and accessibility as may be lost through our airport expansion plans. The Proposed Development seeks to achieve this in a manner that minimises impacts on the environment and local community, retaining existing open space where feasible and replacing affected areas in the adjoining land.</p>	Yes

Ref	Comment	No CC	Response	Change
	<ul style="list-style-type: none"> - Expansion would see the destruction of vital local green space and the felling of hundreds of trees that currently improve local air quality and absorb pollution from the surrounding area. - Local residents do not wish to lose a well-loved park to airport buildings and proposed airport infrastructure. - Luton is already the 4th most congested town or city in the UK, only London, Birmingham and Manchester are worse. Luton's roads simply cannot cope with the additional increases in traffic that a second terminal would bring. - The new DART link will do little to alleviate the problem of congestion, plus there are no guarantees people will use it. 			

A2 Climate Change and Carbon

Table A2.4: Regard had to statutory consultation responses on Climate change and carbon - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
2.1.1	<p>Opposition to the Proposed Development on the basis of climate change. Some respondents expressed that any benefits of the Proposed Development were outweighed by concerns regarding increased carbon emissions from additional flights and vehicles, stating measures needed to be taken to reduce passenger growth. Other respondents stated that no expansion was needed as air travel was unsustainable, with the prioritisation of economic growth over the environment and the planet and growth in passenger numbers, in conflict with moves towards net zero, the climate emergency and climate change generally as well as emerging national and international government policy on pollution and emissions.</p>			33	<p>We have carefully considered climate change and related matters, including carbon emissions, in bringing forward the Proposed Development. Addressing climate change has been embedded in many of the processes we have adopted. We have also sought to integrate measures into our proposals which minimise the contribution the Proposed Development makes to climate change, supporting our transition to net zero.</p> <p>The Draft Sustainability Statement demonstrates how the scheme complies with local and national emissions reduction targets, including net zero. Additional further information on greenhouse gas emissions, including carbon dioxide and net zero, are set out in Chapter 12 Greenhouse Gases of the PEIR and the Draft Greenhouse Gas Management Plan in Appendix 12.1 of Volume 3 of the PEIR.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>The Proposed Development has been informed by the Environmental Impact Assessment (EIA) process, which has considered how the impact of the Proposed Development on climate change can be minimised. It identifies mitigations measures to further reduce the impact of the Proposed Development on climate change.</p> <p>Measures embedded in the Proposed Development include reducing emissions from surface access and airport operations, the removal of fossil-fuel equipment and replacement with on-site clean power generation through photovoltaic cells, construction of an energy efficient new terminal building and supporting the move to electric vehicles and less carbon-intensive flight technologies. In response to feedback, we have updated the design to include more sustainability measures, such as designing Terminal 2 to BREEAM Excellent and Passivhaus principles. A Green Controlled Growth (GCG) framework which will ensure that the airport operates within particular “limits” is proposed. Limits will be set</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>in respect of air quality, noise, surface access and carbon emissions. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time, in this case specific to carbon emissions. The full details of GCG are contained in the Draft Green Controlled Growth Proposals. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such "limits".</p> <p>Following the application of mitigation measures to reduce the generation of CO2 emissions, as far as reasonably practicable, there will still be residual emissions associated with both the Proposed Development and the ongoing operation of the airport.</p> <p>To meet net ero, the offsetting of residual emissions will be required. These residual emissions can be managed and potentially offset through different mechanisms depending on the activity that</p>	

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					<p>generated them and the regime under which they are, or will be, monitored, reported and controlled.</p> <p>We have committed to achieving net zero for ground based airport operations by 2040. The offsetting mechanism or schemes by which this will be achieved is currently under review and will be developed and reported with the application for development consent. This is discussed in further detail in Chapter 12 Greenhouse Gases of the PEIR.</p> <p>The potential for a local carbon emissions offsetting scheme, outside the Proposed Development, is also under consideration.</p> <p>For a response to the comment suggesting passenger numbers should be reduced, please see response to ref 2.1.6.</p> <p>For an explanation of how the Proposed Development is consistent with Government policy, please see response to ref 2.1.11.</p> <p>For details of how the benefits of the Proposed Development will be assessed, please see response to ref 2.1.13.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
2.1.2	Suggest Luton mitigate future operations and/or flights.			2	Please see response to ref 2.1.1.	No
2.1.3	Suggest climate change mitigation measures are implemented regardless of the Proposed Development.			1	<p>This is something we are already doing. For example, in collaboration with the Airport Operator, London Luton Airport Operations Limited (LLAOL), over the past several years we have actively reduced our Scope 1 and Scope 2 carbon CO₂ emissions (these are direct emissions from our owned and controlled resources and indirect emissions associated with the purchase of electricity or heat, respectively). The carbon intensity of flight operations and surface access have also both been falling in line with industry trends.</p> <p>More recently, the Luton DART has been developed which will further encourage sustainable travel to the airport. LLAOL is also continuing to bring forward additional measures to reduce the amount of carbon emitted by airport operations.</p> <p>Please see response to ref 2.1.1 for details of the mitigation measures integrated into the Proposed Development.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
2.1.4	Suggest carbon/greenhouse emissions associated with the airport are reduced or removed entirely.			3	Please see response to ref 2.1.1.	Yes
2.1.5	Suggest Luton Airport expand into, invest and utilise green energy and new technologies, both with and without the Proposed Development.			2	<p>The Proposed Development has been amended to incorporate more renewable energy on-site. Our strategy is to maximise renewable generation on-site, before exploring off-site opportunities.</p> <p>More broadly, how the wider economic benefits of the Proposed Development are maximised locally (such as attracting additional investment, supporting innovation cluster development or supporting new industries), is currently being considered.</p> <p>For details of how we are utilising green energy and new technologies in our existing operations, please see response to ref 2.1.3.</p>	Yes
2.1.6	Suggest a reduction in the number of flights. Some respondents suggested the planning documentation should reflect lower patronage, as this was			18	The proposed increase in the number of flights is in line with Government policy that airports should make best use of their existing runways. This supersedes the current limit on the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>required to ensure the UK meets its political 2030 and 2050 emissions targets, the Paris Agreement, net zero ambitions and to address the climate emergency. Some respondents stated people need to be encouraged to fly less, use other forms of transport such as by sea or hot air balloon and only fly where were necessary, suggesting flights from Luton should increase in price and there should be additional taxes on frequent flyers.</p>				<p>airport's capacity of 18 mppa within the Department for Transport's 2017 Aviation Forecasts.</p> <p>Government has made it clear that it does not support demand management, or capping growth in aviation, to meet net zero or any other carbon target.</p> <p>The Proposed Development is aimed at ensuring the airport can meet demand for air travel within the local area and the impacts of these proposals will be considered in full through examination of the application for development consent.</p> <p>Please refer to Need Case and Forecasts topic responses for further information regarding aviation technologies, other forms of transport and the approach to levies/taxes. Details of how the demand forecasts have been produced, taking into account climate change and relevant Government policy, is included in the Draft Need Case.</p>	
2.1.7	<p>Suggest addressing climate change should be a priority, either as part of the Proposed</p>			4	<p>Please see responses to refs 2.1.1 and 2.1.3.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Development or without it. Respondents suggested measures should be implemented to keep any environmental impact to an absolute minimum and airport expansion should not be at the detriment of the environment and/or for the sake of increased profit and should be subject to detailed cost-benefit analysis.				The PEIR provides preliminary assessments of a wide range environmental effects, including benefits and disbenefits. This document must be viewed as a whole as an assessment and not considered in piecemeal fashion. The findings of the PEIR will be updated in an Environmental Statement (ES) prior to the submission of the application for development consent. It will then be for the Planning Inspectorate to consider the balance between the costs and benefits of the Proposed Development in providing its recommendation to the Secretary of State, based on the evidence submitted with the application.	
2.1.8	Suggest an increase in the cost of flying.			4	<p>The cost of flying is outside the control of the application for development consent.</p> <p>The demand forecasts take full account of Government policies on climate change. The demand forecasts assume that the costs of carbon and/or abatement are met by users of the airport and are consistent with the Government's emerging Jet Zero strategy, which it published in</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>July 2021 for consultation. Further information regarding demand forecasts is provided in the Draft Need Case.</p> <p>Furthermore, airlines such as easyJet are also increasingly adopting the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), with these costs expected to be passed on to air fares in some form.</p>	
2.1.9	Respondents suggest the need for hard legislation, regulations and/or policies on carbon emissions - enforced by either the government or Luton.			1	Setting national policies and regulations on carbon emissions is a matter for Government.	No
2.1.10	Concern the measures the Proposed Development intends to manage environmental impacts associated with climate change are inadequate and/or unrealistic. Some respondents stated the mitigation proposals were greenwashing and that Luton had failed to consider how it will reduce carbon emissions from flights or meet any future carbon budget, passing this requirement			12	Please see response to ref 2.1.1.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>onto airlines without serious consideration or hard enforcement and has not provided any value of carbon required to offset the Proposed Development. Some respondents stated they were concerned or sceptical that mitigation measures would ever be delivered.</p>					
2.1.11	<p>Concern the Proposed Development is incompatible with government climate targets and legislation, such as the Climate Change Act. Respondents stated the expansion conflicted with 2030 and 2050 net zero carbon emission targets, with some stating these dates conflicted with the proposed phasing of the Proposed Development, particularly if these dates are brought forward. Some respondents noted the Proposed Development was inconsistent with the findings of the Committee on Climate Change view that flights should be capped at no more than 25% of present day, some questioning how the Proposed Development sought to</p>			23	<p>Government policy supports the continued growth of aviation to 2050 and has explained in the Sixth Carbon Budget how this is consistent with reaching net zero by the same year.</p> <p>Our Proposed Development is compatible with central and local Government climate change targets. More detail on compliance with the identified Government policy and strategies, particularly as they relate to climate change, will be provided in the Planning Statement to be submitted with the application for development consent.</p> <p>We are committed to playing our part in the decarbonisation of aviation and the UK economy as a whole. Further details on the measures proposed to</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	mitigate increases in carbon emissions rather than remove them entirely and how these targets may impact the Proposed Development's viability.				achieve this are set out in the response to ref 2.1.1. For further details on demand management or the capping of flights, please see response to ref 2.1.6.	
2.1.12	Concern the Proposed Development is incompatible with Luton Borough Council emissions reduction targets.			2	Please see response to ref 2.1.11.	No
2.1.13	Concern the benefits of the Proposed Development do not outweigh the negative environmental impacts.			1	Please see response to ref 2.1.7.	No
2.1.14	Concern the proposals within the Proposed Development to minimise increases in greenhouse gases will be ineffective or insufficient. Some respondents noted how offsetting lost vegetation, traffic and ground operations was insignificant in comparison to the expected increase in greenhouse gas emissions from additional flights and stated the Proposed Development would not achieve net zero by 2050. Some			10	Please see response to ref 2.1.1. This includes details of our GCG proposals, which limit growth at the airport where a breach of a particular "limit" occurs and provides flexibility to airline operators on how they achieve emission reductions. However, if fleet transition is slower than projected, causing an exceedance of a "limit" for example, then growth at the airport would be limited.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	questioned why carbon offsetting was considered an appropriate policy response, when there is already a need to offset historic carbon emissions and were unsatisfied with Luton's lack of hard line approach to encouraging airline operators to switch to the cleaner technology required to get to net zero.					
2.1.15	Concern the Proposed Development is incompatible with global greenhouse gas emission targets. Respondents stated the Proposed Development would impact the UK's ability to meet its net zero targets as required under the Paris Agreement or achieve targets as outlined by the UN International Panel on Climate Change (IPCC).			10	Please see response to ref 2.1.11.	No
2.1.16	Consider the Proposed Development unnecessary. Respondents stated that mitigation measures to curb impacts to greenhouse gas emissions would not be required if			5	We believe there is a strong case for expansion of the airport which is consistent with Government policy. The airport is central to the local economy and is an important connectivity asset for the broader region it serves, including the Oxford-	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the Proposed Development did not proceed.				<p>Cambridge Arc. It also supports regeneration and levelling up in Luton and neighbouring areas where levels of deprivation are below average. In order to maintain its connectivity and significance across the economic region, the airport must address its capacity constraints. Without additional capacity the airport will not be able to accommodate any further growth in demand in the future and this would limit its ability to support wider economic growth across the sub-region.</p> <p>Further details on the case for the Proposed Development including the basis for the demand forecasts is set out in the Draft Need Case.</p>	
2.1.17	Support for proposed mitigation measures to be put in place to minimise greenhouse gas emissions.			1	The respondent's response is noted.	No
2.1.18	DHL shares the commitment of Luton Airport to grow in a responsible and sustainable way. DHL makes all efforts to minimise the environmental impact of the flights we operate by using			1	The respondent's response is noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	techniques such as continuous descent approach, reduced power take offs, re-equipping the air fleet with quieter engines and investing in air fleet improvements.					
2.1.19	Suggest proposals to mitigate climate impacts are more ambitious.			2	Please see response to ref 2.1.1.	No
2.1.20	Concern that air travel is unsustainable and contributes towards climate change. Respondents are concerned that; current aviation technologies do not address the negative environmental impacts of airport expansions, there are no alternative green technologies on the horizon, air travel is more unsustainable than other modes of transport, the aviation industry is economically unsustainable, the applicant is not responding appropriately or responsibly to the climate change emergency, and efforts to sustainably expand the airport are contributing to a so-called 'greenwashing' effect, whilst			8	Please see response to ref 2.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	not solving the intrinsic unsustainability of air travel itself.					
2.1.21	Concern that the development's forecasted local economic benefits do not justify the longer term negative environmental impacts and contributions to climate change, both locally and beyond.			3	Please see the response to ref 2.1.7.	No
2.1.22	Concern that climate change awareness will reduce demand. Respondents stated that demand for air travel will reduce due to; new knowledge on climate change, net-zero targets, frequent flier levies, increased flight costs, future governments' position/legislation on climate change, the influence of other countries' reduced airline passenger numbers (notably Sweden), preference for alternative travel modes (including rail), awareness raised by climate action groups, foreign holiday destinations becoming undesirable, warmer UK weather enabling 'staycations', and 'flight-shaming'. Some respondents			26	Please see response to refs 2.1.1, 2.1.8 and 2.1.11. We do not anticipate awareness raised by climate action groups, foreign holiday destinations becoming undesirable, warmer UK weather enabling 'staycations' or 'flight-shaming' to lead to a decline in demand.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	noted this may affect the justification for increasing airport capacity, questioning the viability of investing in an industry in threat of decline. Other respondents stated that those who do fly will choose their airport based on the provision of high-quality sustainable transport access.					
2.1.23	Concern that the Proposed Development's construction works will result in an increase of greenhouse gas emissions. Respondents were concerned that; diesel-powered machinery/vehicles and construction related traffic/roadworks will have a negative environmental impact and increase the airport's carbon footprint. Some respondents were concerned about the embedded emissions associated with the manufacturing of materials including; iron, steel, concrete, power cables and pipes. Other respondents expressed a lack of trust in the management and			2	Please see response to ref 2.1.1 which concerns greenhouse gas emissions. Regarding greenhouse gas emissions arising specifically from construction, the details of this will be included in the application for development consent. The PEIR sets out the climate change mitigation measures that will be applied during construction, which will primarily be secured through the Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	mitigation efforts of the developer to minimise emissions.					
2.1.24	Concern that the Future LuToN Impact Reduction Scheme does not sufficiently mitigate against the development's environmental damage and contribution to climate change.			1	<p>Mitigation measures identified through the ES and secured via the application for development consent, will be the primary means of mitigating any environmental effects of the development.</p> <p>The Future LuToN Impact Reduction Scheme (FIRST) has been renamed Community First and its purpose is to make funds available to community groups and Town and Parish Councils to address local needs in areas of high deprivation or for decarbonisation projects.</p>	No
2.1.25	Concern that the applicant is driving demand for air travel by expanding the airport, rather than responding to demand, resulting in negative environmental effects.			2	Please see response to ref 2.1.21.	No
2.1.26	Concern that the Proposed Development will result in an increase in greenhouse gas emissions. Respondents were concerned about a rise in fossil fuel consumption from airplane			19	<p>Please see response to ref 2.1.1.</p> <p>Regarding the relationship between Luton Borough Council (LBC) and the application for development consent, the application will be considered by</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>activity (both airborne and taxiing), the expanded airport building itself and associated surface access movements. Some respondents expressed concern that; the emissions would enlarge the airport's carbon footprint, there would be negative impacts on the local environment and the health/wellbeing of neighbours, the use of larger planes will worsen emissions, there was a lack of evidence to justify increasing emissions, and the expansion will increase the number of flights to destinations with existing train links. Other respondents were concerned that Luton Borough Council does not oppose the increase in emissions due to its relationship with the airport.</p>				<p>the Planning Inspectorate, which in turn will make a recommendation to the Secretary of State for Transport to make a decision. The host Local Authorities (LBC, North Hertfordshire, Hertfordshire County Council and Central Bedfordshire) will assess the proposals (using their own consultants) and prepare a Local Impact Report which will be considered by the Planning Inspectorate in its assessment of the proposals, before making a recommendation to the Secretary of State for Transport. The decision-making process is therefore independent of LBC.</p>	
2.1.27	<p>Concern that all aspects of the Proposed Development (increased flights, new buildings, supporting infrastructure and/or associated vehicular traffic) will cause harm to the environment, locally and beyond, and that it will contribute to the climate change</p>			39	<p>Please see response to ref 2.1.1 for details of how the Proposed Development will manage its impacts on climate change.</p> <p>Regarding the concerns about the environmental impact of the Proposed Development, it has been</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>crisis, including global warming. Some respondents are concerned about; the airport's carbon footprint, unsustainability, greenhouse gases, air/noise/light/smell pollution, weather changes, contrail clouds, fuel fall-out, urban sprawl, the increasing density of the local area, the existing saturation of airspace, a lack of demand for expansion, worsening of climate protests, desertification, flooding, rising sea levels, food insecurity, warming/acidification of oceans, forest fires, impacts on local trees/green belt/Wigmore Valley Park, and impacts on ecosystems/biodiversity/water table/soil structure and human health. Some respondents are concerned that the case for expansion is based on outdated or dubious data and/or goes against scientific evidence, political party manifestos, the Climate Change Committee and United Nations. Other respondents are concerned that the applicant is behaving hypocritically by mitigating against</p>				<p>informed by the EIA process and has been designed to avoid or reduce adverse effects on the environment. Our preliminary assessment of the impacts of the Proposed Development are set out in the PEIR. A full assessment of the environment impacts of the Proposed Development will be contained in the ES submitted in support of the application for development consent. Please see the response to ref 2.1.7 which sets out how the benefits and the disbenefits of the Proposed Development will be weighed up.</p> <p>The Proposed Development is underpinned by a robust need case as described in the Draft Need Case. Please see responses to refs 2.1.11 and 2.1.16.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	the effects of climate change whilst contributing to its cause.					
2.1.28	Concern that climate change awareness will reduce demand.	Chilterns Conservation Board		1	Please see response to ref 2.1.22.	No
2.1.29	The anticipated benefits section only models Do-Nothing and 32 mmpa, failing to assess other reasonable alternatives, like smaller or slower expansion. Options like more modest growth would be prudent given the scale of the investment. This would allow for impacts of current forces, like changing travel behaviour and climate change imperative, to become clearer.	Chilterns Conservation Board		1	Please see response to ref 2.1.1. For details of how demand forecasts have been produced, please see response to ref 2.1.22. The Draft Need Case includes faster and slower growth scenarios.	No
2.1.30	Expansion of Luton Airport has national and global consequences, as well as local ones.	Chilterns Conservation Board		1	Please see response to ref 2.1.7.	No
2.1.31	Concern the Proposed Development is incompatible with government climate targets and legislation, such as the 2050 net zero carbon emission target.	Chilterns Conservation Board	St Albans District Council	1	Please see response to ref 2.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
			Central Bedfordshire Council			
2.1.32	No account taken of the impact of the Government's commitment to be carbon neutral by 2050. This will inevitably influence passenger numbers/airline profitability and sustainability of increases in fuel tax, possible passenger taxes to offset carbon emissions, the cost of carbon offset schemes which all the airlines are now introducing, partly because of increased public worries over climate change.	Kings Walden Parish Council		1	Please see responses to ref 2.1.11 and 2.1.8.	No
2.1.33	Any expansion (including development work) should be carbon neutral from day 1. The DCO claims that the expansion would have no significant effect on existing air-quality during construction or operation. At the same time, it proposes adding some 80,000 flights per year and 14 million passengers, equating to 28 million passenger journeys ' possibly more with drop-off ' which makes the claim that air-quality	Kings Walden Parish Council		1	Please see response to ref 2.1.1.	No

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	will not be affected completely implausible. This is a significant area of weakness, and should be properly researched and evidenced. The DCO should also show how conforms to latest advice from the climate change committee regarding the importance of restraining airport growth.					
2.1.34	Hertfordshire County Council's present planning assumption, which underpins the fifth carbon budget and the current 2050 target, is that UK aviation emissions in 2050 should be around their 2005 level (i.e. 37.5 MtCO _{2e}). Your acceptance of this planning assumption in the consultation is a very welcome step. The final white paper should further clarify that this will be met on the basis of actual emissions, rather than by relying on international offset credits.		Hertfordshire County Council		Please see responses to refs 2.1.1 and 2.1.11.	No
2.1.35	Aviation emissions in the UK have more than doubled since 1990, while emissions for the economy		Hertfordshire County Council		Please see responses to refs 2.1.1, 2.1.6, 2.1.8 and 2.1.11.	Yes

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	<p>as a whole have fallen by around 40%. Achieving aviation emissions at or below 2005 levels in 2050 will require contributions from all parts of the aviation sector, including from new technologies and aircraft designs, improved airspace management, airlines operations, and use of sustainable fuels. It will also require steps to limit growth in demand. In the absence of a true zero-carbon plane, demand cannot continue to grow unfettered over the long-term.</p>					
2.1.36	<p>In terms of the Climate Change topic area, which is inherently linked to the Greenhouse Gases and Health and Community topic areas, Central Bedfordshire Council support the points raised by WSP on these aspects and the need for further assessment to inform establishment of appropriate mitigation measures. This information needs to be provided in a timely manner as there is a danger that should this be provided too late in the process, there would be</p>		Central Bedfordshire Council		<p>Noted. Our preliminary assessment of the impacts of the Proposed Development are set out in the PEIR. This second round of statutory consultation provides another opportunity for formal consultation on the Proposed Development. Beyond this discussions with local authorities, including Central Bedfordshire, will continue.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	insufficient time for proper consultation with specialists on these issues.					
2.1.37	WSP for the Host Authorities suggest additional mitigation measures in relation to GHGs (e.g. carbon neutrality commitments, and additional low carbon flight incentivisation) will need to be identified in the ES.		WSP for Host Authorities		Please see response to ref 2.1.1.	Yes
2.1.38	The Buckingham County Council and Aylesbury Vale District Council would welcome LLAL explaining how the airport will ensure that it will in the coming decades meet national policy targets for carbon impacts. In particular we seek clarification in the four areas of: a net increase in air travel of some 14million passengers a year, associated airside ground movements and airport operations, changes in surface access arrangements and construction of new infrastructure. With regards to surface connectivity we, as part of the England Economic Heartlands		Buckinghamshire County Council and Aylesbury Vale District Council		Please see responses to refs 2.1.1 and 2.1.11.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Sub National Transport Body, would want to ensure that the NSIP application sets out how the airport will play its part in delivering a zero carbon transport system by 2050. In addition we would welcome LLAL setting out how expansion would support investment to deliver a net zero position, if the airports share of international aviation emissions, are included in the UK s carbon budget, and consequently attributable to the airport s current and future operations.</p>					
2.1.39	<p>Stevenage Borough Council will now address its concerns using the consultation material headings: Greenhouse Gasses (GHG) and Climate Change - The Council has declared a climate change emergency and is currently working on its own Climate Change Strategy, Action Plan and Charter. The Council would encourage LLA to consider and sign up to the Charter once adopted to show commitment to the Council's vision and to</p>		Stevenage Borough Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	demonstrate collaborative working.					
2.1.40	The implications of the expansion, including its environmental implications need to be carefully considered and appropriate measures put in place to ensure that the proposal is consistent with the wider strategic ambition for the region.	Englands Economic Heartland			Please see responses to refs 2.1.1 and 2.1.11.	No
2.1.41	National aviation policy and the Climate Change Act 2008. The consultation material assesses the proposal in terms of its compatibility with existing national aviation policy [Aviation Policy Framework (APF) (2013), Making best use of existing runways (MBUER) (June 2018) and the Airports National Policy Statement (ANPS) (June 2018)] and the carbon budgets set in accordance with the historic Climate Change Act 2008 target of an 80% reduction of greenhouse gas emissions compared to 1990 levels (with the 5th Carbon Budget setting a limit that aviation		Hertfordshire County Council		Please see response to refs 2.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>emissions for the UK being capped at 37.5MtCO₂ in 2050 based on 2005 levels, excluding emissions from international aviation). The assessment concludes that the increase in carbon emissions resulting from the proposed development is considered (with mitigations in place) will not have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets. This conclusion is consistent with that of the Government more generally in terms of the compatibility between policy to make best use of existing runways/Heathrow third runway and 80% reduction Climate Change Act target and related carbon budgets. In a joint letter (15th October 2018) to the Committee on Climate Change (CCC) the Governments of the UK, Scotland and Wales requested advice from the Committee on their respective long-term CO₂ emissions targets:</p> <ol style="list-style-type: none"> 1. the date by which the UK should achieve (a) a net zero 					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>greenhouse gas target and/or (b) a net zero carbon [dioxide] target in order to contribute to the global ambitions set out in the Paris Agreement. 2. whether now is the right time for the UK to set such a target. 3. the range which UK greenhouse gas emissions reductions would need to be within, against 1990 levels, by 2050 as an appropriate contribution to the global goal of limiting global warming to well below 2 C and towards global efforts to limit the increase to 1.5 C. 4. how reductions in line with your recommendations might be delivered in key sectors of the economy. 5. the expected costs and benefits across the spectrum of scenarios in comparison to the costs and benefits of meeting the current target. 6. updated advice on the long-term emissions targets for Scotland and Wales provided with regards to the respective devolved statutory frameworks on climate change. In December 2018 Government consulted on its Aviation Green Paper Aviation 2050 - The future of UK aviation ,</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>reaffirming Government’s commitment to provide additional capacity through the development of a third runway at Heathrow Airport and airports throughout the UK making best use of their existing runways. The Strategy is based on the 80% reduction Climate Change Act target and related planning assumptions. In its response (February 2019) to the consultation the CCC stated that it would write to Government specifically about the implications of its forthcoming net-zero recommendations for the emerging national Aviation Strategy. The UKs currently legislated 2050 target is to reduce economy-wide greenhouse gas emissions by at least 80% from 1990 levels. Since the Climate Change Act became law, the UK has ratified the Paris Agreement, implying even stronger action. You will be aware that my Committee has been asked by Ministers to offer advice on the implications of the Paris Agreement for the UKs statutory framework, including when net-zero emissions can be</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	achieved. A stronger UK target would require more effort from all sectors, including aviation. We intend to provide an updated view on the appropriate long-term ambition for aviation emissions within our advice on the UK's long term targets. We will publish our report in spring. Following that, we will write to you directly to set out the implications for the Aviation Strategy.					
2.1.42	The most notable considerations for the final need case will be the potential implications of the Climate Change Committees recent recommendations to Government that in order to help the UK to reach net zero greenhouse gas emissions by 2050, growth at UK airports be limited to, to at most 25% above current levels.		WSP for Host Authorities		Please see the response to ref 2.1.11.	No
2.1.43	It is noted that a climate emergency has since been declared nationally (Harrow has also done some at a local level). The aviation industry is identified		Harrow London Borough Council		Please see responses refs 2.1.1 and 2.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	as being a large contributor to the impacts on climate change and an increase in aircraft and associated ground-based movements at Luton would appear contradictory to this.					
2.1.44	This work (the proposal) needs to include an updated assessment of future UK internal and short haul European flights in light of the recent shift in public opinion and the government's commitment to reduce carbon emissions and the increasing importance of the climate change debate.		Stevenage Borough Council		Please see response to ref 2.1.22.	No
2.1.45	Wider Environmental Considerations. The promoter proposes a range of different mitigation approaches to offset the impact of the airport expansion [at surface level] on the environment. Whilst these are welcome, there is a need for the promoter to quantify how they will ensure the proposal is consistent with the national targets to bring greenhouse gas emissions to net-zero by 2050. This is pertinent, not only for	Englands Economic Heartland			Please see response to ref 2.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	surface access to the airport but also given the possibility the aviation sector could soon be included in Government's target to deliver net zero by 2050.					
2.1.46	We consider that a comprehensive approach to Environmentally Managed Growth is essential.		Host Authorities		Please see response to ref 2.1.1.	No
2.1.47	The current consultation outlines that the airports energy requirements will be primarily serviced by the national grid and supplemented by onsite renewable energy sources. However, no commitments are made as to what percentage of electricity will be produced by the onsite renewables, while there are no guarantees that the electricity from the grid will be from renewable sources.		Stevenage Borough Council		Please see response to ref 2.1.5. The amount of renewable energy to be generated on site, will be confirmed at a later date, following detailed scheme development.	Yes
2.1.48	We will set out our recommended policy approach for aviation in follow-up advice to the Government later in 2019. Reducing emissions from aviation		Hertfordshire County Council		Setting national policies and regulations on carbon emissions is a matter for Government.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	will require a combination of international and domestic polices, and these should be implemented in ways that avoid perverse outcomes (e.g. carbon leakage). A package of policy measures should be put in place that include carbon pricing, support for research, innovation and deployment, and measures to manage growth in demand.					
2.1.49	In line with this report, the Committee on Climate Change (CCC) has recommended a new emissions target for the UK, which is net-zero greenhouse emissions by 2050. This also includes the reductions in emissions from aviation, the CCC's present planning assumption is that UK aviation emissions in 2050 should be around their 2005 level. Key to reducing emissions in UK aviation will be the steps taken to limit growth in demand as the CCC stated: in the absence of a true-zero-carbon plane, demand cannot continue to grow unfettered over the long-term. In September 2019 the CCC wrote to		North Hertfordshire District Council		Please see responses to refs 2.1.1 and 2.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the Secretary of State for Transport advising that key to achieving net-zero emissions by 2050 was to limit demand growth to at most 25% above current levels, with potential to reduce emissions further with lower levels of demand.					
2.1.50	All in force and emerging national aviation policy precedes the June 2019 Climate Change Act net-zero declaration/legislation. The Department of Transport has stated that the implications of the declaration/legislation and the CCCs recommended policy approach to aviation will be taken into account in further developing is aviation policy through the Aviation 2050 process. It has also stated that it will provide advice and a recommendation to the Secretary of State on whether the statutory criteria for a review of part or all of the Aviation National Policy Statement (the Government's national planning policy commitment to Heathrow third runway) are met and whether or not it is appropriate to carry out		Hertfordshire County Council		Please see the response to ref 2.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>such a review. In its Leading on Clean Growth - The Government Response to the Committee on Climate Change's 2019 Progress Report to Parliament Reducing UK emissions (October 2019), Government has stated that it will publish an ambitious Aviation Strategy next year and in doing so will continue to consider the implications of our 2050 net zero target. The consultation material states that the revised carbon legislation has not been specifically addressed in the greenhouse gas assessment due to the timing of its introduction into UK law , but recognises that this is a significant piece of legislation that will have an impact on the Proposed Development and as such will be further considered in the ES. Our assessment of greenhouse gas emissions will continue to be updated to consider the latest proposals and the developing government policy on the net-zero carbon target.</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
2.1.51	<p>9. Carbon 9.1 The PEIR advises that the assessment of the greenhouse gas (GHG) emissions from the Proposed Development has been undertaken under the previous targets of an 80% reduction in carbon emissions by 2050, compared to 1990 levels Ch8.1.1. This has been superseded by a national target of net zero carbon emissions within the same timeframe, which was adopted by the UK Government in June 2019. The PEIR further acknowledges the need for a steeper reduction in emissions and the crucial role of the aviation sector in reaching the net zero target but it falls short of providing any committed initiatives through which this might be achieved.</p>		Milton Keynes Council		Please see response to ref 2.1.1.	No
2.1.52	<p>The proposed expansion of Luton airport will directly contribute to increasing rather than decreasing the problem. Please reconsider and please refrain from proceeding with your proposed DCO application to expand London Luton Airport.</p>			1	Please see response to ref 2.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
2.1.53	Pollution free aircraft are still a long way away so any expansion should be refused.			1	Please see response to ref 2.1.1.	No
2.1.54	Renewable Energy LLAL has set a number of objectives and targets for reducing its carbon footprint through the use of renewable energy: 1.The PEIR contains Table 8-11 showing the scope of inherent mitigation relating to the use of renewable energy sources within the proposed expansion scheme; 2. Paragraph 8.9.5 of the PEIR set out proposed additional mitigation relating to the use of renewable energy sources within the proposed expansion scheme. This mitigation is over and above that built into the scheme proposals (at 1 above). This highlights that there is a need for sources of renewable energy for the Airport; 3. Vision for sustainable growth 2020-2050. This notes the Airport's aim to further reduce its carbon emissions and its intention to develop a comprehensive strategy is likely to plot a path to meeting			1	Please see response to ref 2.1.5. Within the application for development consent, our ambition is to produce renewable energy, within the existing airport boundary.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>long term goals, of which the mitigation at 2 above would be a subset; 4. Luton Airport Sustainability Strategy September 2019. This contains the objectives and target for the existing Airport, i.e. a long term target to purchase all electricity from renewable sources and supply at least 20% of the Airport's electricity requirement from low-carbon sources by 2021 and at least 100% by 2032, from dedicated low-carbon generation capacity. The intention to run the DART rail link on renewable energy is noted by not the source of such energy. Given the above, it is clear that the Airport is in need of further sources are. LGC's land to the south of the Airport could accommodate a solar facility with direct feed to the Airport, so offering a significant and long term source of renewable energy. A solar scheme has been implemented on land to the south east of LGC's landholding, so the principle of solar energy in this area has been established. LGC would be open to discussions with</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	LLAL on the potential for a solar array on its landholding with direct feed to the Airport.					
2.1.55	Concern that calculations of future greenhouse gas emissions are incorrect and that an expansion of Luton Airport would result in adverse impacts on air quality, contrary to what is reported in the consultation documents.			1	Please see response to ref 2.1.1. Responses to concerns regarding air quality are discussed in further detail in Air Quality topic responses.	No
2.1.56	Concern on the sites and methods used for monitoring and modelling greenhouse gas emissions, including a lack of monitoring of emissions from vehicles and ground operations at Luton Airport. Concern that the modelling and monitoring of greenhouse gases is under reporting the levels experienced. Some respondents request greater clarity on monitoring that is being undertaken, including information on the location of monitoring sites; information on time and duration of monitoring; information on how exceedances in acceptable levels will be			2	Details of the greenhouse gas baseline, from which the subsequent greenhouse gas impact assessment has been undertaken, are included in Chapter 12 Greenhouse Gases of the PEIR. The Draft Greenhouse Gas Management Plan in Appendix 12.1 of Volume 3 of the PEIR includes information on the baseline and how greenhouse gas emissions from the Proposed Development will be mitigated. The management of air quality impacts (dust, emissions and odour) will be controlled via the measures outlined within the Draft CoCP in Appendix 4.2 of Volume 3 of the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	managed; and clearer reporting on the current emissions associated with Luton Airport.				<p>PEIR. This includes details of mitigation and monitoring requirements. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.</p> <p>All current air quality monitoring in and around the airport shows that NOx and PM levels are all within UK objectives.</p>	
2.1.57	Concern that the methods used for monitoring and modelling greenhouse gas emissions will not take account of new types of pollutants.			1	The assessment of Greenhouse Gases in Chapter 12 Greenhouse Gases of the PEIR is in line with best practice and considers all seven Kyoto Protocol gases. Greenhouse gases are not considered to be pollutants. Emissions to air are considered in Chapter 7 Air Quality of the PEIR.	No
2.1.58	The worst-case scenario also has not been applied to the assessment of greenhouse gases, Given the exclusion of radiative forcing on the grounds of uncertainty results in an assessment which is not realistic as radiative forcing will occur. The assessment should account for		WSP for Host Authorities		Emissions from aviation have both direct (CO ₂ , CH ₄ & N ₂ O) and indirect (non-CO ₂ emissions such as water vapour, contrails, NO _x) climate change effects. The UK Government dataset of emissions factors for company reporting provides two sets of emissions factors for aviation; one set that includes these additional	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the realistic total increase in emissions, and not be limited to who is responsible - therefore the total emissions due to flights that are additional due to the proposed development should be assessed, rather than only the return leg assessed in the PEIR.</p>				<p>indirect effects and one set that includes direct effects only. In the 2021 emissions factors dataset, these emissions factors that include additional indirect effects are 89% higher than the factors that only include the direct effects.</p> <p>The UK Government acknowledges that there is significant scientific uncertainty around the magnitude of the indirect effects of non-CO2 aviation emissions, and that it is an active area of research. Part of the uncertainty arises from the difficulty of comparing short-lived climate forcers, such as these indirect warming effects, with long-lived greenhouse gases such as carbon dioxide.</p> <p>Improved engine design can help to reduce the formation of contrails and their associated warming impact. The so-called climate-optimised routing of aircraft can also help to reduce the formation of contrails.</p> <p>Indirect emissions from aviation are not included in the basket of gases covered by the Kyoto Protocol, and The Committee on Climate Change excludes these indirect warming effects from consideration when</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>setting provisional carbon budgets. For this reason, only the direct effects are considered when comparing emissions against the UK's carbon budgets. The indirect effects of aviation have been excluded from the quantitative analysis of the Proposed Development.</p> <p>Further information is included in the Draft Greenhouse Gas Management Plan in Appendix 12.1 of Volume 3 of the PEIR.</p>	
2.1.59	Milton Keynes Council has aims to be carbon neutral by 2030 and carbon negative by 2050. The council considers the mitigation strategies set out in the PEIR to be vague and unambitious given that the operational phase of the airport at full capacity in 2039 will almost double the current level of emissions from 1 million tonnes of carbon dioxide equivalent (MtCO ₂ e) when capacity is capped at 18 mppa, to 1.9 MTCO ₂ e.		Milton Keynes Council		Please see response to ref 2.1.1.	
2.1.60	PEIR Volume 1 General	Civil Aviation Authority			Please see responses to refs 2.1.6 and 2.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Overall, it would have been helpful had the PEIR had more detail about how LLAL will comply with the following: - The Climate Change Act 2008 (2050 Target Amendment) Order 2019 Paragraph 8.2.3 indicates that LLAL intend to say more about this only in the ES; - HMRC Technical note - Carbon Emissions Tax, 29 March 2019 this would allow LLAL to show how it would deal with EU ETS emissions if the UK leaves the EU in January 2020; - Net Zero - The UK's contribution to stopping global warming, Committee on Climate Change, May 2019 Paragraph 8.2.8 indicates that LLAL intend to say more about this only in the ES General LLAL should outline its approach to international flight emissions not covered by CORSIA and EU ETS (if significant). 8.5.9 Consider using ICAOs rate of improvement per year 8.7.1 Table 8-13 Consider including the percentage reduction of impact expected 8.12 Consider (1) including the year of worst case scenario and the</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>emissions associated with it, (2) identifying mitigation measures and % emissions expected to be mitigated (3) including assessment if impact with and without mitigation are significant or not 8.12.2 Consider assessing total and mitigated emissions against UK carbon budgets and target reductions by 2050, including mitigation measures</p>					

Table A2.5: Regard had to statutory consultation responses on Climate change and carbon - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
2.2.1	Opposition to the Proposed Development on the basis of climate change. Some respondents expressed any benefits were outweighed by concerns regarding increased carbon emissions from additional flights and road vehicles, stating measures needed to be taken to reduce passenger growth. Other respondents stated that no expansion was needed as air travel was unsustainable, with the prioritisation of economic growth over the environment and the planet and growth in passenger numbers, in conflict with moves towards net zero, the climate emergency and climate change generally as well as emerging national and international government policy on pollution and emissions.	575	<p>Please see response to ref 2.1.1 for details of how we will address climate change and related matters such as carbon emissions in our Proposed Development.</p> <p>For a response in respect of the comment to reduce passenger growth, please see the response to ref 2.1.6.</p> <p>For an explanation of how the Proposed Development is consistent with Government policy, please see response to ref 2.1.11.</p> <p>For details of how the benefits of the Proposed Development will be assessed against potential impacts, please see response to ref 2.1.7.</p>	No
2.2.2	Suggest Luton minimise and mitigate its current CO2 emissions, before or without expanding. Respondents suggest Luton should work within its constraints to minimise its current emissions, the planting of more trees around the airport boundary, a tree planting program to offset operations and rewilding the existing surface car parking areas (for carbon sequestration). Other respondents suggest Luton make all operational vehicles electric, invest in carbon capture and research new offsetting methods to make flying more sustainable.	27	<p>Regarding the reduction of current CO2 emissions, please see response to ref 2.1.3.</p> <p>Please see response to ref 2.1.1 for details of mitigation measures integrated into the Proposed Development.</p> <p>Regarding the offsetting of operational CO2 emissions through tree planting or rewilding areas of the airport, due to the increased risk of bird strike arising from tree plantings, this may not be a suitable approach in the immediate environs of the airport. The creation of new grassland areas as part</p>	Yes

Ref	Comment	No CC	Response	Change
			<p>of the Proposed Development will have some benefit in terms of carbon sequestration.</p> <p>Proceeds from the airport concession agreement are returned to LBC and it will therefore be for LBC to consider the potential for investment in carbon capture and storage as part of its wider environmental planning.</p>	
2.2.3	<p>Suggest Luton cap emissions at current levels. Some respondents suggested all airport expansion should be cancelled in order to make an actual reduction in UK carbon emissions.</p>	2	<p>The Proposed Development is consistent with the Government's climate change policy. Please see responses to refs 2.1.1. and 2.1.11 for the detail of how our approach to managing emissions complies with Government policy. Our response to ref 2.1.16 provides further detail on the case for the Proposed Development.</p>	No
2.2.4	<p>Suggest Luton mitigate future operations and/or flights. Respondents suggest Luton should establish an emissions offset scheme, invest its profits into carbon capture and storage, develop on-site power generation (such as solar panels) and plant more vegetation (such as a new tree for each passenger flight or planting high carbon absorbing vegetation). Respondents suggested new plantings should be ecologically diverse, that woodland should be increased in the airports vicinity and that neighbouring farmers fields and car parking areas could be used for new planting.</p>	35	<p>Please see responses to refs 2.1.1 and 2.2.1.</p>	Yes

Ref	Comment	No CC	Response	Change
2.2.5	Suggest climate change mitigation measures are implemented regardless of the Proposed Development. Mitigation measures suggested included renewable energy systems, drainage systems designed to prevent pollution, the use of electric vehicles and car sharing, sustainable waste management measures and the extensive planting of trees and other vegetation. Some respondents suggested the mitigation measures should be implemented now and the need for expansion reconsidered in five or 10 years.	19	Please see response to ref 2.1.3 regarding mitigation measures being implemented as part of the current operation of the airport. We believe the case for the Proposed Development is strong. Please see response to ref 2.1.16.	No
2.2.6	Suggest further research and consultation into the links between aviation, climate change and mitigation measures is required. Some respondents offered support for assessing potential mitigation opportunities.	5	The Proposed Development is consistent with Government policy, which has been informed by the latest research on the topics identified. Please see response to ref 2.1.11 for further details. Further details on our approach to mitigating the impact of the Proposed Development on climate change is set out in our response to ref 2.1.1.	No
2.2.7	Suggest carbon/greenhouse emissions associated with the airport are reduced or removed entirely. Some respondents suggested existing emissions should be reduced or removed, not just those associated with future expansion. Others suggested complete removal of emissions was preferable to minimisation or mitigation, should be removed in line with net zero targets by 2030 or	89	Please see responses to refs 2.1.1 and 2.1.11.	No

Ref	Comment	No CC	Response	Change
	2050 and that emissions should be capped at current levels and decreased year on year.			
2.2.8	Suggest Luton stop burning kerosene.	1	It is anticipated that over time aircraft operating from the airport will increasingly use a proportion of Sustainable Aviation Fuel in lieu of kerosene.	No
2.2.9	Suggest the Proposed Development needs to do more to address increases in greenhouse gases. Some respondents suggested additional measures, such as more efficient planes, lower carbon fuels and limiting passenger growth to no more than 25% of today's levels would be required. Other respondents suggested the the proposed mitigation measures needed to be revised in line with recent targets and guidelines and needed to incorporate the international response to climate change.	7	Please see responses to refs 2.1.1 and 2.1.11.	Yes
2.2.10	Suggest Luton Airport expand into, invest and utilise green energy and new technologies, both with and without the Proposed Development. Some respondents suggested this would diversify the local economy away from aviation, provide a means of maximising employment and skills for neighbouring communities and help offset the proposed development. Suggestions include more onsite power generation from renewables, including solar and wind, green roofs, heat generation from the runway, recycled and clean	69	Please see response to refs 2.1.3 and 2.1.5. While the proposal for an innovation hub is outside the scope of the Proposed Development, it is acknowledged that there are other ways to improve the local economy. The proposed airport expansion programme will be complementary to other major regeneration and placemaking programmes (such as the Enterprise Zone and Hat District), transport schemes and business support in the borough. The expansion will provide additional jobs and	Yes

Ref	Comment	No CC	Response	Change
	water systems and the construction of a Luton Eden Project. Some respondents also suggested building an innovation hub and investing in research into cleaner fuel technology such as biofuel and fuel cell technology and quieter planes.		skills/training support above and beyond these programmes to support local employment and opportunities for residents.	
2.2.11	Suggest a reduction in the number of flights. Some respondents suggested the planning documentation should reflect lower patronage, as this was required to ensure the UK meets its political 2030 and 2050 emissions targets, the Paris Agreement, net zero ambitions and to address the climate emergency. Some respondents stated people need to be encouraged to fly less, use other forms of transport such as by sea or hot air balloon and only fly where were necessary, suggesting flights from Luton should increase in price and there should be additional taxes on frequent flyers. Some respondents suggested capping expansion at 20mppa or capping flights until 'green flight' technology is available.	391	Please see response to refs 2.1.6 and 2.1.11.	No
2.2.12	Suggest the public should be educated more on the impact of flying on the environment.	2	The response is noted.	No
2.2.13	Suggest addressing climate change should be a priority, either as part of the Proposed Development or without it. Respondents suggested measures should be implemented to keep any	120	Please see response to refs 2.1.1, 2.1.3, 2.1.6 and 2.1.11.	Yes

Ref	Comment	No CC	Response	Change
	environmental impact to an absolute minimum and airport expansion should not be at the detriment of the environment and/or for the sake of increased profit and should be subject to detailed cost-benefit analysis. Other respondents suggested Luton should lead the way in developing sustainable levels of flying, such as capping the number of existing flights, developing green technologies or research into making existing flights less damaging to the environment.			
2.2.14	Suggest the existing terminal is upgraded to the highest environmental standard.	3	We are working with the current Airport Operator, LLAOL, to agree improvements to the existing terminal, which would be delivered as part of the Proposed Development.	No
2.2.15	Suggest an increase in the cost of flying. Respondents suggest increases to the cost airfares and/or creation of aviation related taxes (such as frequent flyer levies, aviation fuel tax, taxes on older aircraft to encourage airlines to upgrade their fleet to newer less polluting models), to deter air travel and better reflect the true cost of flying, akin to road vehicles. Some respondents suggested this may lead to a decline in passenger demand and growth which may affect the viability of the Proposed Development.	66	Please see response to ref 2.1.8.	No
2.2.16	Respondents suggest the need for hard legislation, regulations and/or policies on carbon emissions -	48	Please see the response to ref 2.1.9.	No

Ref	Comment	No CC	Response	Change
	enforced by either the government or Luton. Some respondents suggested there should be hard policies regulating aviation taxes, which act to either limit the number of flights across the UK or control the types of planes using Luton. Other respondents advocated for a Green New Deal for the UK and Luton.			
2.2.17	Concern the measures the Proposed Development intends to manage environmental impacts associated with climate change are inadequate and/or unrealistic. Some respondents stated the mitigation proposals were greenwashing and that Luton had failed to consider how it will reduce CO2 emissions from flights or meet any future carbon budget, passing this requirement onto airlines without serious consideration or hard enforcement and has not provided any value of carbon required to offset the Proposed Development. Some respondents stated they were concerned or skeptical that mitigation measures would ever be delivered.	303	Please see response to ref 2.1.1.	Yes
2.2.18	Concern the Proposed Development is incompatible with government climate targets and legislation, such as the Climate Change Act. Respondents stated the expansion conflicted with 2030 and 2050 net zero carbon emission targets, with some stating these dates conflicted with the proposed phasing of the Proposed Development,	378	Please see the response to ref 2.1.11.	No

Ref	Comment	No CC	Response	Change
	<p>particularly if these dates are brought forward. Some respondents noted the Proposed Development was inconsistent with the findings of the Committee on Climate Change view that flights should be capped at no more than 25% of present day, some questioning how the Proposed Development sought to mitigate increases in carbon emissions rather than remove them entirely and how these targets may impact the Proposed Development's viability.</p>			
2.2.19	<p>Concern the Proposed Development is incompatible with Luton Borough Council emissions reduction targets.</p>	39	Please see response to ref 2.1.11.	No
2.2.20	<p>Concern the benefits of the Proposed Development do not outweigh the negative environmental impacts. Some respondents noted that the benefits would be short term but result in long term harm. Others noted that the international nature of climate impacts associated with the airports expansion could not be justified or outweighed by local benefits.</p>	45	Please see response to ref 2.1.7.	No
2.2.21	<p>Concern the proposals within the Proposed Development to minimise increases in greenhouse gases will be ineffective or insufficient. Some respondents noted how offsetting lost vegetation, traffic and ground operations was insignificant in comparison to the expected increase in</p>	218	Please see response to ref 2.1.14.	Yes

Ref	Comment	No CC	Response	Change
	greenhouse gas emissions from additional flights and stated the Proposed Development would not achieve net zero by 2050. Some questioned why carbon offsetting was considered an appropriate policy response, when there is already a need to offset historic carbon emissions, and were unsatisfied with Luton's lack of hard line approach to encouraging airline operators to switch to the cleaner technology required to get to net zero.			
2.2.22	Concern the Proposed Development is incompatible with global greenhouse gas emission targets. Respondents stated the Proposed Development would impact the UK's ability to meet it's net zero targets as required under the Paris Agreement or achieve targets as outlined by the UN International Panel on Climate Change (IPCC).	191	Please see response to ref 2.1.11.	No
2.2.23	Concern a permanent piped supply of aviation fuel to the airport will hinder achievement of net-zero carbon targets.	13	Please see response to ref 2.1.11 which demonstrates how our Proposed Development is compatible with Government climate targets. Until electric aircraft technology has advanced, we need to plan for aircraft to continue to be fuelled in the current manner. As the aviation fuel industry adopts Sustainable Aviation Fuels these products will be delivered using the same infrastructure and therefore the fuel pipeline will be part of the solution to de-carbonise air travel. Nevertheless, our design safeguards for the use of future electric aircraft.	No

Ref	Comment	No CC	Response	Change
2.2.24	Consider the Proposed Development unnecessary. Respondents stated that mitigation measures to curb impacts to greenhouse gas emissions would not be required if the Proposed Development did not proceed.	121	Please see response to ref 2.1.16.	No
2.2.25	Support for proposed mitigation measures to be put in place to minimise greenhouse gas emissions.	74	The response is noted.	No
2.2.26	Suggest there is a limit to the amount that can be offset and therefore direct action to reduce emissions from the Proposed Development is required.	2	Please see response to ref 2.1.1.	Yes
2.2.27	Suggest more information is required regarding who manages, monitors and enforces offsets and increased taxes.	7	Taxation related to air travel is a matter for the Government along with all other issues of taxation in the UK. The monitoring of compliance with mandatory offsetting commitments is also a matter for the Government, which is proposing the formal adoption into UK law of CORSIA.	No
2.2.28	Suggest proposals to mitigate climate impacts are more ambitious. Respondents suggested Luton should be an active leader promoting net zero, emissions reduction targets should be higher, Luton should follow the lead of airports overseas (capping their carbon emissions to 1990 levels),	20	Please see response to ref 2.1.1.	Yes

Ref	Comment	No CC	Response	Change
	Luton should become a net clean energy producer or implement carbon capture. Respondents suggested that Luton should not leave the operational management of climate change up to airlines and take an active role in managing these impacts.			
2.2.29	Suggest the Applicant funds community climate change programmes, including a climate crisis response action plan for the surrounding local authorities.	1	Please see the response to 2.1.24 which concerns Community First. Proceeds from the airport concession agreement are returned to LBC and it will therefore be for LBC to consider how to reinvest this.	No
2.2.30	Concern that air travel is unsustainable and contributes towards climate change. Respondents are concerned that; current aviation technologies do not address the negative environmental impacts of airport expansions, there are no alternative green technologies on the horizon, air travel is more unsustainable than other modes of transport, the aviation industry is economically unsustainable, the applicant is not responding appropriately or responsibly to the climate change emergency, and efforts to sustainably expand the airport are contributing to a so-called 'greenwashing' effect, whilst not solving the intrinsic unsustainability of air travel itself.	198	Please see response to ref 2.1.1.	No

Ref	Comment	No CC	Response	Change
2.2.31	<p>I write this as the United Nations discuss the future global action on climate change at COP25. Our global climate is warming at a terrifying rate, and this is being caused by human activities. There is no longer space or time in the world for climate sceptics: the IPCC*1 state that “Continued emission of greenhouse gases will cause further warming and long-lasting changes in all components of the climate system, increasing the likelihood of severe, pervasive and irreversible impacts for people and ecosystems”. Climate change disasters are happening at a rate of one a week. We have seen intensifying drought fuelled by climate change causing horrific bushfires in Australia and crippling communities in California. Cyclones have smashed into the coasts of India, Bangladesh and Southern Africa this year, and annually we watch in horror as hurricanes decimate the Caribbean. The summer heatwave across Europe was unprecedented in scale and intensity, and this event was absolutely consistent with the extremes linked to the impacts of GHG emissions. Many low-lying areas of the world are at dire risk of sea level rise, as we have seen with the Venice floods this year, and in the UK communities across the country are increasingly battling with flooding events. The impacts of the climate emergency affect every country on every continent, developing and developed. It threatens the world’s food supply, the cleanliness of our air,</p>	1	Please see response to ref 2.1.1.	No

Ref	Comment	No CC	Response	Change
	<p>depletes our water sources and undermines ecosystems that we rely on for survival. It increases the risk of conflict, hunger and poverty, and we will continue to see a growing movement of climate refugees as people are driven from their homes. The planet's atmosphere, land and oceans are all interlinked. The decisions and actions of anyone, anywhere in the world has a direct impact on our global climate. No individual, business or nation operates in a bubble. This includes your airport.</p>			
2.2.32	<p>Other non-CO2 effects due to release of high-altitude NOx and formation of contrail clouds could double the warming impact of aviation. Newer engines are only about 15% more fuel efficient. The warming is already killing the SSSI woodland - with conversations we have had with Natural England about the Knebworth Woods SSSI site - they say they are already recommending the planting of other oak species from France that are more tolerant of dryer and hotter weather meaning that the over time the entire oak/hornbeam ancient woodland is at risk - as are many of the plant species that rely on the land being seasonally flooded, which has a knock on effect with the other species the plants support. There are also many ponds within the woodland many of these this year have dried out. We have all of the newt species present here and really are a special and</p>		<p>1 Please see response to ref 2.1.1.</p> <p>Concerns related to topics beyond Climate Change and Carbon are addressed in detail in the relevant topic sections, including:</p> <p>A5: Air Quality</p> <p>A6: Natural Environment</p>	No

Ref	Comment	No CC	Response	Change
	significant area as there are only about half a dozen ponds in Hertfordshire that support all the newt families - this is at risk with global warming.			
2.2.33	Luton's plans are based on challengeable forecasts of growth from 2017 which confuse demand with need. There is potentially the demand for the doubling of air traffic in the south east UK by 2050, but there is clearly a need for restraint with regard to the Climate Emergency. How restraint is applied isn't determined in the absence of any up to date National Aviation Policy. The Airport National Policy Statement June 2018 supports (but doesn't demand) the best use of existing runways, acknowledging a minority reject the need for expansion. This NPPS was based on the Airport Commission's Report July 2015 which said a new runway and air traffic growth could still take place within the national obligations of the Climate Change Act 2008, when only an 80% carbon reduction was sought by 2050. The target now is of course 100%, not 80%. Furthermore, national policy is in a vacuum and fails to connect the interrelated aspects of Aviation Strategy, Climate Action and Carbon Targets. No government policy has revised carbon targets or reviewed Airport and Aviation Policy since the latest IPCC report Oct 2018 or the UK Parliament voted for a Zero Carbon target by 2050, a target that itself may well be further tightened. The NPPF	1	We have a strong case for the Proposed Development which is consistent with Government policy. Please see responses to refs 2.1.11 and 2.1.16 for further details.	No

Ref	Comment	No CC	Response	Change
	<p>2019 refers to the Department of Transport General Aviation Strategy 2015, a document which makes no mention of climate change or carbon reduction targets. Implicitly acknowledging the inadequacies, the government publication Beyond the Horizon 2016 referred to the need to set the right carbon and environmental framework in developing a new aviation strategy. A Government Consultation Aviation 2050 2018 also acknowledged the need to negotiate long term international goals on emissions with the ICAO (International Civil Aviation Organisation). It expects any new EU and Global emissions goals to be the drivers for emission reductions. The robustness of measures for offsetting and carbon trading are widely questioned by Climate Scientists.</p>			
2.2.34	<p>Nationally, carbon emission figures show international flights leaving the UK alone amount to 34.6 million tonnes of CO₂, totalling 7.2% of UK emissions. The International Council on Clean Transport has found in a recent study that CO₂ emitted by airlines is rising 70% faster than predicted, with a 32% increase between 2013 and 2018. This has the environmental impact of the construction of fifty coal-fired power plants, which is unacceptable.</p>	1	Please see response to ref 2.1.11.	No

Ref	Comment	No CC	Response	Change
2.2.35	<p>LLAL justifies its proposals in terms of the economic benefit it brings to Luton and to the region. The recent letter from Lord Deben, Chair of the Committee on Climate Change, to the Secretary of State for Transport states investments will need to be demonstrated to make economic sense in a net-zero world and the transition towards it. In its expansion plans, it is clear that the airport has failed to assess the risk to its assets and to the region in a climate of rising public concern about emissions and likely increasing legislative hostility. The fundamental assumption that demand will continue on its upward trend indefinitely is naive, irresponsible and unsustainable.</p>		<p>1 Please see responses to refs 2.1.1 and 2.1.11.</p>	No
2.2.36	<p>(ref: Report for the Committee on Climate Change, Behaviour change, public engagement and Net Zero Dr Richard Carmichael of Imperial College London October 2019.) '(ii) Aviation. Zero-carbon aviation is highly unlikely to be feasible by 2050. Aviation emissions could be reduced by around 20% from today to 2050 through improvements to fuel efficiency, some use of sustainable biofuels, and by limiting demand growth to at most 25% above current levels. This is likely to be cost-saving. There is potential to reduce emissions further with lower levels of demand. Novel fuels (e.g. synthetic carbon-neutral kerosene, algal biofuels) could allow greater reductions, but their</p>		<p>1 Noted. The Proposed Development will include a range of emission mitigation measures including those associated with improvements in aviation technology and facilitating the use of Sustainable Aviation Fuels. Please see response to ref 2.1.1 for further details.</p>	No

Ref	Comment	No CC	Response	Change
	development is highly speculative and should not be relied upon.			
2.2.37	Concern that the development's forecasted local economic benefits do not justify the longer term negative environmental impacts and contributions to climate change, both locally and beyond. Some respondents express a desire for investment in more sustainable industries to provide employment instead and/or concern that the development is overly profit-driven. Other respondents are concerned about the social/economic inequalities associated with climate change, and/or the impact on local house prices due to pollution.	29	<p>Please see response to ref 2.1.7 which concerns the assessment of the Proposed Development benefits and disbenefits.</p> <p>The Employment and Economics topic responses provide further details on how we are facilitating aviation the benefits of the Proposed Development locally.</p> <p>Please see response to ref 2.1.24 for further details of how we are proposing to address socio-economic inequality through the Proposed Development.</p> <p>Concerning property prices, a range of statutory compensation measures exist, where land is acquired under compulsory acquisition and also where residential property values are impacted due to use of the new airport facilities. The entitlement to claim arises at different times during the project. Such compensation will be paid in accordance with the so called Compensation Code, which is the statutory framework that governs compensation for projects of this nature. Where a right to compensation arises the property owner is able to take professional advice and they will be able to negotiate a settlement with our instructed surveyors. Such discussions will always remain confidential between us and the affected property owner.</p>	No

Ref	Comment	No CC	Response	Change
2.2.38	<p>Concern that climate change awareness will reduce demand. Respondents stated that demand for air travel will reduce due to; new knowledge on climate change, net-zero targets, frequent flier levies, increased flight costs, future governments' position/legislation on climate change, the influence of other countries' reduced airline passenger numbers (notably Sweden), preference for alternative travel modes (including rail), awareness raised by climate action groups, foreign holiday destinations becoming undesirable, warmer UK weather enabling 'staycations', and 'flight-shaming'. Some respondents noted this may affect the justification for increasing airport capacity, questioning the viability of investing in an industry in threat of decline. Other respondents stated that those who do fly will choose their airport based on the provision of high-quality sustainable transport access.</p>	398	Please see response to ref 2.1.22.	No
2.2.39	<p>Concern that the Proposed Development's construction works will result in an increase of greenhouse gas emissions. Respondents were concerned that; diesel-powered machinery/vehicles and construction related traffic/roadworks will have a negative environmental impact and increase the airport's carbon footprint. Some respondents were concerned about the embedded emissions associated with the manufacturing of materials</p>	40	Please see response to ref 2.1.23.	Yes

Ref	Comment	No CC	Response	Change
	including; iron, steel, concrete, power cables and pipes. Other respondents expressed a lack of trust in the management and mitigation efforts of the developer to minimise emissions.			
2.2.40	Concern that the Future LuToN Impact Reduction Scheme does not sufficiently mitigate against the development's environmental damage and contribution to climate change. Some respondents are concerned that the applicant is 'paying off' residents to enable the development to go ahead and/or there is a lack of compensation for the environmental damage felt in other countries who are affected by climate change.	17	Please see the response to ref 2.1.24.	No
2.2.41	Concern that the applicant is driving demand for air travel by expanding the airport, rather than responding to demand, resulting in negative environmental effects. Respondents are concerned that demand forecasts may never be satisfied, that meeting demand will sacrifice environmental goals, that previous maximum airport capacities have been ignored, that demand is artificially inflated due to a lack of taxation on aviation fuel, and that the applicant should restrict supply to reduce demand.	12	Please see response to ref 2.1.21.	No
2.2.42	Suggest building works associated with the Proposed Development are made to be carbon neutral. Respondents suggested the Applicant	1	Please see the response to ref 2.1.23.	Yes

Ref	Comment	No CC	Response	Change
	should use effective ways to offset the carbon cost of construction.			
2.2.43	Concern that the Proposed Development will result in an increase in greenhouse gas emissions. Respondents were concerned about a rise in fossil fuel consumption from airplane activity (both airborne and taxiing), the expanded airport building itself and associated surface access movements. Some respondents expressed concern that; the emissions would enlarge the airport's carbon footprint, there would be negative impacts on the local environment and the health/wellbeing of neighbours, the use of larger planes will worsen emissions, there was a lack of evidence to justify increasing emissions, and the expansion will increase the number of flights to destinations with existing train links. Other respondents were concerned that Luton Borough Council does not oppose the increase in emissions due to its relationship with the airport.	373	Please see response to ref 2.1.26.	No
2.2.44	Concern that all aspects of the Proposed Development (increased flights, new buildings, supporting infrastructure and/or associated vehicular traffic) will cause harm to the environment, locally and beyond, and that it will contribute to the climate change crisis, including global warming. Some respondents are concerned about; the airport's carbon footprint,	820	Please see response to ref 2.1.27.	No

Ref	Comment	No CC	Response	Change
	<p>unsustainability, greenhouse gases, air/noise/light/smell pollution, weather changes, contrail clouds, fuel fall-out, urban sprawl, the increasing density of the local area, the existing saturation of airspace, a lack of demand for expansion, worsening of climate protests, desertification, flooding, rising sea levels, food insecurity, warming/acidification of oceans, forest fires, impacts on local trees / green belt / Wigmore Valley Park, and impacts on ecosystems / biodiversity / water table / soil structure and human health. Some respondents are concerned that the case for expansion is based on outdated or dubious data and/or goes against scientific evidence, political party manifestos, the Climate Change Committee and United Nations. Other respondents are concerned that the applicant is behaving hypocritically by mitigating against the effects of climate change whilst contributing to its cause.</p>			
2.2.45	<p>Concern that the Proposed Development will contribute to climate change and this will have a detrimental impact on local wildlife, including the destruction of habitats, species extinction (including insects and bees) and loss of biodiversity. In addition, concern raised that the use of biofuels would also have adverse detrimental impacts to wildlife at the regional, national and global scale, due to the inclusion of</p>	10	<p>Please see the response to ref 2.1.1. For natural environment concerns, please see Natural Environment and Landscape.</p>	No

Ref	Comment	No CC	Response	Change
	palm oil which is linked with deforestation and associated impacts including habitat loss and species extinction.			
2.2.46	Concern that calculations of future greenhouse gas emissions are incorrect. Specific concern was raised that CO2 emissions from international aviation were not included in projections of future greenhouse gas emissions. In addition, specific concern was raised that the consultation assessment does not take account of developing government policy on net-zero carbon targets.	31	<p>Please see response to ref 2.1.1 where we have considered how to address climate change and related matters such as carbon emissions in our Proposed Development.</p> <p>For an explanation of how the proposed development is consistent with Government policy, please see response to ref 2.1.11.</p> <p>Please see response to 2.1.58 for an explanation regarding CO2 emissions, as relevant to the Proposed Development.</p>	No
2.2.47	Concern on the sites and methods used for monitoring and modelling greenhouse gas emissions, including a lack of monitoring of emissions from vehicles and ground operations at Luton Airport.	27	<p>Please see response to ref 2.1.1 where we have considered how to address climate change and related matters such as carbon emissions in our Proposed Development.</p> <p>For an explanation of how the Proposed Development is consistent with Government policy, please see response to ref 2.1.11.</p>	No
2.2.48	Concern that the modelling and monitoring of greenhouse gases is under reporting by excluding CO2 and NOx from the assessment.	2	Please see response to ref 2.1.1 where we have considered how to address climate change and related matters such as carbon emissions in our Proposed Development.	No

Ref	Comment	No CC	Response	Change
			For an explanation of how the proposed development is consistent with Government policy, please see response to ref 2.1.11.	
2.2.49	Concern that the modelling and monitoring of greenhouse gases is under reporting because only CO2 is considered and other greenhouse gases must be monitored and modelled to understand the full air quality impacts.	1	<p>Please see response to ref 2.1.1 where we have considered how to address climate change and related matters such as carbon emissions in our Proposed Development.</p> <p>For an explanation of how the Proposed Development is consistent with Government policy, please see response to ref 2.1.11.</p>	No
2.2.50	BHF urges the new government to adopt into law World Health Organisation (WHO) air pollution limits. In July 2019, the Dept for Environment & Rural Affairs (Defra) published findings stating that implementing WHO air pollution guidelines is "technically feasible". This would certainly not be so if Luton Airport, sitting on a hill over a valley which traps air pollution, was allowed to expand further. Aircraft emit CO2, NOx and harmful particulates while they taxi on the ground and while airborne. Official UK forecasts predict annual fleet carbon-efficiency improvements of less than one percent between now and 2050, totally insufficient to offset the proposed growth in flights or to reduce either CO2 or noise. Luton is simply the wrong place to have as many flights as it has already, let alone more.	1	<p>Please see response to ref 2.1.1.</p> <p>Responses to concerns regarding air quality are discussed in further detail in the Air Quality topic.</p>	No

Ref	Comment	No CC	Response	Change
2.2.51	Concern about the existing levels of air pollution, emissions from aircraft vapour trails (including particulates, carbon dioxide, sulphur oxides and nitrogen) and acid rain. This poses risks to the environment and climate change, as well as quality of life and comfort for local communities, even if people are not aware of the impacts. Specifically, concern that expansion would compromise the government's commitment to net zero carbon emission growth by 2050.	19	<p>Please see response to ref 2.1.1 where we have considered how to address climate change and related matters such as carbon emissions in our Proposed Development.</p> <p>For an explanation of how the Proposed Development is consistent with Government policy, please see response to ref 2.1.11.</p>	No

A3 Noise

Table A3.6: Regard had to statutory consultation responses on Noise - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
3.1.1	Concern about the impact of future increase in levels of noise and/or vibration; including as a result of changes to flight paths, increases in the number of flights (including night flights), road traffic, and the proposed Fire Training Ground (FTG) . Some respondents considered this would cause long term harm to the surrounding countryside; habitats; landscape; towns; house prices; businesses, loss of sleep and reduction in the quality of life and physical and mental health and well being of local communities, the elderly and young people. Specific locations of concern cited were: Aylesbury, Baldock, Bedfordshire, Breachwood Green, Caddington, Cambridgeshire, Childwickbury, Chilterns AONB (including Ashridge Estate), Fairly Hill, Flamstead, Harpenden, Hertfordshire, Kensworth,			53	<p>Our noise modelling shows that as the airport grows over time, noise levels will reduce as aircraft become quieter. As part of the Proposed Development, we are developing a Noise Envelope. The Noise Envelope will contain control measures to ensure that the Proposed Development cannot go ahead unless certain noise targets are met.</p> <p>The Noise Envelope will be the mechanism through which our Green Controlled Growth (GCG) framework is monitored and enforced in respect of noise.</p> <p>In addition to the Noise Envelope there are other measures which can be used to ensure noise stays within the agreed limits.</p> <p>Airspace modernisation through the FASI-S process (modernisation of airspace across the South East of England) is currently being undertaken by the Civil Aviation Authority (CAA), this is expected to result in noise</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Kimpton, Leighton Buzzard, Letchworth, Linslade, Luton, Preston, Sandridge, Slip End, St Albans, Stevenage, Welwyn, Whitwell, Wheathampstead, Wigmore and Wymondley, and along the River Ver. Some respondents also raised concerns about the impact of noise on users of the new replacement park.</p>				<p>reductions even with the current generation of aircraft.</p> <p>Chapter 16 Noise and Vibration of the PEIR considers the noise effects on local communities due to increases in aircraft movements, changes in road traffic flows and changes in ground activity (including the relocated Fire Training Ground) at the airport. Potential changes to flight paths are being undertaken separately from the Proposed Development. Consequently, the assessment of aircraft noise is based on the current airspace. Any submissions that are made on potential changes to airspace that may affect noise contours will be considered as a sensitivity test in the ES.</p> <p>The assessment in Chapter 16 Noise and Vibration will be updated in the ES submitted with the application for development consent and will include analysis of supplementary noise metrics to provide context to the assessment of average day and night noise contours.</p> <p>Please also see response to ref 3.1.17 for further details on GCG.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
3.1.2	Object to the expansion as it will exacerbate the impact of noise and/or vibration. Specific concerns included the increase in night flights, impact on sleep, quality of life and health of local communities and areas under the flight path.			10	Please see response to ref 3.1.1.	No
3.1.3	Consider existing noise pollution and/or vibration from the airport to be too high, including noise caused by flights (day and night) and traffic. Current impacts cited include: on value of homes; to businesses; cost to the NHS; on mental health, well being and quality of life; sleep deprivation; and learning in school. Some respondents considered there to be a lack of noise abatement funding. The following locations were specifically mentioned; Ashridge Estate (National Trust), Aylesbury, Bedford, Breachwood Green, Buckinghamshire, Caddington, Chiltern AONB, Childwick Green, Bovingdon, Dagnall, Farley Hill, Flamstead, Harpenden, Hertfordshire,			66	LLAOL as the current airport operator has responsibility for existing noise levels and more information about their approach to managing noise can be found on the airport website. We understand that noise is a concern for many local residents. Expansion of the airport should not mean that local communities suffer detrimental noise effects. As part of the Proposed Development, we are looking to introduce new measures to control noise, for example through the Noise Envelope and GCG. Please see response to ref 3.1.1 and 3.1.17.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Hitchin, Kimpton Village, Knebworth, Leighton Buzzard, Letchworth, Linslade, Luton, Lye Hill, Marshalswick, Markyate, Pepperstock, Peters Green, Redbourn, Sandridge, Slip End, St Albans, Stevenage, Stopsely, Studham, Tring, Wheathampstead, Welwyn Garden City, Whitwell, Whipsnade, Wigmore and other local residential areas under the flight path.					
3.1.4	Concern about noise pollution and/or vibration during construction including from: piling, excavation, earthworks and roadworks. Specific concerns included the impact on nearby residential areas and on quality of life and health of local communities. With some respondents concerned about the duration of the works.			6	A Code of Construction Practice (CoCP) will be implemented which organisations undertaking construction works for the Proposed Development will be required to comply with. This document will contain noise and vibration limits, construction working hours and mitigation measures that will need to be followed for the whole construction period. It will set out how Best Practicable Means (as defined in section 72 of the Control of Pollution Act) will be adopted to ensure that noise and vibration emissions from earthworks and construction activities are minimised as far as reasonably possible. A Draft CoCP is available in	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Appendix 4.2 of Volume 3 of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	
3.1.5	Concern that proposals to mitigate the impact of noise and/or vibration during construction and/or operation are inadequate and/or would not be delivered. Inadequacies in specific mitigation measures included: preventing new noise sensitive developments given the demand for housing; noise insulation for houses would not mitigate the noise outside; the noise envelope does not cover a wide enough area; night quota period starts too late; mitigation measures are not specific to Luton Airport; concern about lack of enforcement; a noise plan has not been provided; no noise cancelling devices have been suggested; no policies are provided to control noise; noise from take off/landing has not been considered in all relevant areas; and the assessment of noise is limited. Some			23	<p>Please see response to ref 3.1.4 in respect of construction.</p> <p>All measures to mitigate noise and vibration generated during construction and operation of the Proposed Development will be investigated and adopted where practicable. Mitigation measures are covered in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR.</p> <p>Additionally, proposals for a Noise Envelope have been developed with stakeholders to aim to control the growth of the airport based on defined noise targets. The Noise Envelope will be a statutory requirement for the airport to comply with. The Noise Envelope will be the mechanism through which our GCG framework is monitored and enforced in respect of noise.</p> <p>The proposed compensation and Noise Insulation Schemes we</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>respondents raised concern that there is no plan comprising of measurable targets; concern that a different flightpath for westerly take-offs will not be delivered; and there are no proposals for noise mitigation for specific local areas.</p>				<p>consulted on in 2019 already represented a significant improvement on the current offer at Luton, and were more generous than any other UK airport. Since then other airports have moved on and we have also further improved our offer to be the most extensive of UK airport noise compensation schemes.</p> <p>In line with the proposed policy changes set out in 'Aviation 2050: The future of UK aviation' in developing the proposed Noise Insulation Schemes, we have reviewed the existing scheme in light of the feedback received and extended the noise insulation policy threshold beyond the current 63dB LAeq, 16h contour. The proposed Noise Insulation Schemes have been designed to significantly improve on the current noise insulation scheme not only by increasing the number of properties which may be eligible under the new proposals schemes but also by substantially improving the level of contribution.</p> <p>All eligible properties making an application under the Noise Insulation Schemes will be visited by an assessor appointed to agree with the</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					owner what works can/should be undertaken. If listed building consent is required, the owner will need to obtain this in the same way they would for any other changes to the property before the works could be undertaken. Further information is available in Draft Compensation Policies and Measures .	
3.1.6	Proposals to mitigate impacts of noise and/or vibration would be unnecessary if the airport was not expanded.			3	Noted.	No
3.1.7	The benefits of the Proposed Development, such as jobs, do not outweigh the negative impact of increased noise pollution.			6	The PEIR provides preliminary assessments of a wide range environmental effects, including economic benefits. This document must be viewed as a whole as an assessment and not considered in piecemeal fashion. The findings of the PEIR will be updated in an ES prior to the submission of the application for development consent. It will then be for the Planning Inspectorate to consider the balance between the impacts and benefits of the Proposed Development based on the evidence submitted with the application.	No

Ref	Comment	PC	LA	No PILs	Response	Change
3.1.8	Request clarity on the proposed noise mitigation measures.			1	Please see response to ref 3.1.5.	Yes
3.1.9	Suggest that measures are taken to minimise noise and/or vibration during construction during the day and/or night.			1	Please see response ref 3.1.4.	No
3.1.10	Concern that the modelling and monitoring of noise and/or vibration levels are inaccurate and/or not comprehensive.			6	The assessment of noise is required to be undertaken based on a framework in national policy that defines the average daytime noise level that is considered equivalent to a low adverse effect. Noise monitoring was undertaken on the basis of preliminary noise modelling, which indicated that the extents of noise contours that represent a low adverse noise effect do not stretch as far as St Albans, Harpenden and Wheathampstead. The effect of noise due to the Proposed Development has been covered in Chapter 16 Noise and Vibration of the PEIR. Subsequently the assessment will be reviewed and updated for the ES. This will include analysis of noise from individual aircraft that will allow noise effects on communities outside the low adverse noise effect contours to be identified.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Noise predictions and assessment are based on best practice and current government policy. The full detail of the methodology is set out in the PEIR. Noise models are being calibrated through the use of extensive noise monitoring to ensure their accuracy. The forecasts have been based in the first instance on DfT 2017 forecasts, which remain the latest published forecasts, but were updated to reflect the latest Office of Budget Responsibility economic forecasts.</p> <p>The intention of noise monitoring is to define baseline ambient noise conditions and to validate the aircraft noise model. Positioning noise monitoring equipment in a quiet location is beneficial for the community as it defines lower than typical baseline noise levels. This precautionary approach to defining ambient noise conditions will ensure that potential impacts are not understated. A quiet noise environment will also allow aircraft noise to be better defined in the assessment results. The noise model attempts to recreate actual conditions, so the location is arbitrary so long as</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>aircraft noise levels are appropriately captured.</p> <p>The airport currently has three permanent and seven temporary noise monitoring stations. The results of noise monitoring are presented on their website.</p>	
3.1.11	Concern that the modelling and monitoring of future noise and/or vibration levels is based on technology changes that have not occurred yet.			1	<p>For the application for development consent, the future fleet mix which informs the noise assessment, will be based on analysis of the likely timeframes over which airlines will replace their fleet, taking into account existing airline orders for new aircraft. The dominant low fare airlines at the airport replace their aircraft on cycles of between eight to 14 years in order to reduce the costs of maintaining older aircraft. Newer generation aircraft are already being introduced into the airline fleets at the airport. By the time that the Proposed Development delivers any significant uplift in airport capacity (so permitting a significant increase in aircraft movements and passengers), many of the existing aircraft will have been replaced or coming to the end of their operating lives. Further consideration</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					will be given to whether it is appropriate to set targets for the airlines to operate quieter aircraft through the process of developing the Draft Green Controlled Growth Proposals.	
3.1.12	Suggest that there should be a ban on night flights (including ground based engine testing at night). Some respondents suggested that this would bring London Luton Airport in line with other London airports in banning night flights.			7	<p>We understand that aircraft noise at night is the most detrimental in terms of health effects. Existing movement limits on aircraft movements at night and night quotas will be retained with no increase being sought.</p> <p>In line with the International Civil Aviation Organisation (ICAO) Balanced Approach, as required by EU598, we are required to propose mitigation for aircraft noise in line with a hierarchy, with imposing operational restrictions on the airport the last resort (e.g. a scheduled night flight ban).</p> <p>Of the main London airports, only London City Airport operates with a complete night time closure. Currently the other London airports, like London Luton Airport, operate with aircraft movement and noise quota limits at night.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					An element of night flying is a fundamental part of the business model of the airlines operating at the Application Site and most other UK airports have some degree of night operations, mostly landings around midnight, is essential. However, recognising the concern existing movement limits on aircraft movements at night and night quotas will be retained to limit increases in night noise.	
3.1.13	Suggest that noise levels at night be reduced.			1	Please see response to ref 3.1.12.	No
3.1.14	Suggest that existing noise and/or vibration from current airport operations be reduced (including at night).			5	LLAOL as the current airport operator has responsibility for existing noise levels and more information about their approach to managing noise can be found on the airport website. We understand that noise is a concern for many local residents. Expansion of the airport should not mean that local communities suffer detrimental noise effects. As part of the Proposed Development, we are looking to introduce new measures to control noise, for example through the Noise Envelope and GCG which are	No

Ref	Comment	PC	LA	No PILs	Response	Change
					explained in response to refs 3.1.1 and 3.1.17.	
3.1.15	Suggest that noise and/or vibration from the airport expansion be reduced.			5	Please see response to ref 3.1.5.	Yes
3.1.16	Support proposals to manage and mitigate the impact of noise and/or vibration. With some respondents specifically in support of the existing night quota being maintained; provision of household insulation; and use of modern aircraft.			2	Noted.	No
3.1.17	Suggest an independent body be set up to monitor noise and/or vibration levels, including enforcing compliance.			3	A GCG framework which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to noise. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals . However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that	No

Ref	Comment	PC	LA	No PILs	Response	Change
					any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.	
3.1.18	Chilterns Conservation Board has not been included as a stakeholder for the noise and vibration element of the PEIR, despite the Chilterns AONB being directly under the Luton's flightpaths, including the final approach for landing and take-off.	Chilterns Conservation Board		1	Noted. Chilterns Conservation Board has been approached since the 2019 consultation and will be engaged in future.	Yes
3.1.19	Whilst the proposed development will enable aircraft activity up to 32 mppa, with no changes to current night-time limits (it is assumed that a cap in mppa will be a DCO requirement), LLAL confirms in the consultation material that the vision to maximise the use of the runway up to 38 mppa in the much longer term remains. An additional 6 mppa over and above the 32 mppa will further increase the frequency of noise events from aircraft over-flying the Estate. There is no assessment of			1	The expansion project initially consulted on increasing capacity to 38 mppa. Based on feedback from consultation, the capacity that consent is being applied for was reduced to 32 mppa, which will secure long-term growth until 2043. The Proposed Development does not seek consent to expand beyond 32 mppa.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	impacts arising from this scenario in the consultation material.					
3.1.20	Suggest that a seismic survey be undertaken.			1	A baseline vibration survey will not be undertaken for the application for development consent. There is no evidence at London Luton Airport, or any other airport, to suggest that aircraft induced vibration is an issue that requires additional study. However, vibration monitoring may be undertaken during the construction phase if high-generating vibration activities are required in close proximity to buildings.	No
3.1.21	Stress that any decisions regarding future operating restrictions must be taken in accordance with the balanced approach under EU 598, which is implemented in UK law. A Balanced Approach aims to ensure that airports and airlines can strike a balance between stricter environmental measures and the need to meet the current and future demand for air transport by avoiding operational restrictions unless all other			1	The ICAO Balanced Approach has been followed and is detailed in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR. Additionally, LLAOL cover the ICAO Balanced Approach in their Noise Action Plan.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>options have been exhausted. Such an approach seeks to: - Minimise noise at source; - Make use of land-use planning where minimising noise at source is insufficient; - Adopt operational practices that minimise noise; - Consider restricting the operation of noisier aircraft types (only when all other avenues have been explored). A detailed impact assessment which takes into consideration the impact of any future restrictions on both the local economy and UK Plc, both in terms of GVA but also catalytic and consequential loss for businesses in the supply chain, must be undertaken before any decisions are taken.</p>					
3.1.22	<p>Suggest that further consultation in undertaken when a full assessment of noise impacts is provided in the final Environmental Statement.</p>			1	<p>Leading up to the second round of statutory consultation, engagement on the noise and vibration assessment has continued with local authorities through a noise technical working group and through the Noise Envelope Design Group (NEDG) and this has informed the noise assessment which is set out in Chapter 16 Noise and Vibration of the PEIR. The outcome</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					of this round of statutory consultation will be used to inform the Proposed Development including finalisation of the ES for the application for development consent.	
3.1.23	Request evidence of how noise objectives will be achieved, monitored and enforced.		Stevenage Borough Council	2	The full noise assessment and any proposed operational monitoring regime will be reported in the ES. Please also see response to ref 3.1.1 regarding the proposed noise envelope.	No
3.1.24	Concern that there would be difficulty in providing effective noise mitigation measures for Listed Buildings.			1	All eligible properties making an application under the Noise Insulation Schemes will be visited by an assessor appointed to agree with the owner what works can/should be undertaken. If listed building consent is required, the owner will need to obtain this in the same way they would for any other changes to the property before the works could be undertaken.	No
3.1.25	Suggest changes to methods of modelling and/or monitoring.			2	Aircraft noise is assessed by comparing the future Do-Something scenario with the equivalent Do-Nothing scenario from the same year in accordance with national policy. This is considered worst case as	No

Ref	Comment	PC	LA	No PILs	Response	Change
					future Do-Nothing years have lower noise levels due to the increase in quieter aircraft. Details on supplementary noise metrics will be provided in the ES. The Proposed Development does not seek to change flight paths so existing flight paths are used in the assessment. Additional noise monitoring locations will be investigated and covered in the ES.	
3.1.26	Query the location of noise monitoring. With some respondents querying why noise monitors are placed in back gardens.			1	Noise monitoring was undertaken in secure locations to determine typical ambient noise conditions at locations which could be affected by the Proposed Development.	No
3.1.27	The Planning Inspectorate's Scoping Opinion comments that 'the assessment of impacts to tranquillity should include consideration of effects to the Chilterns AONB' is contested in the PEIR (appendix 17 page 30) and it appears at this stage that the recommendation is being ignored and 'there is no intention to do a conduct an assessment of impacts on tranquillity' (page 40). The cumulative effects	Chilterns Conservation Board		1	There is no agreed methodology for assessing effects on tranquillity. The Landscape Visual Impact Assessment (LVIA) in Chapter 14 Landscape and Visual of the PEIR considers tranquillity as part of the assessment of effects on landscape receptors (specifically where identifying the value of a landscape receptor and when considering the magnitude of landscape impacts on that receptor). This includes considering tranquillity in areas within	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>assessment in PEIR Table 20-8 discounts most of the large scale proposals in and near the Chilterns AONB. This means that cumulative impacts including noise on the nationally protected landscape of the Chilterns AONB of major schemes like HS2, Heathrow Third Runway and major house growth at Aylesbury and Hemel Hempstead are being ignored.</p>				<p>the Chilterns AONB where aircraft would be below 7,000 ft. (AMSL). This approach reflects the guidance set out in ‘CAP1616: Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information’ (CAP1616).</p> <p>The selection of developments for inclusion in the cumulative assessment follows the methodology described in Chapter 21 In-combination and Cumulative Effects of the PEIR and agreed through EIA scoping. Whilst these developments have been considered in a long list for the PEIR, they did not meet the criteria for inclusion in the cumulative assessment.</p> <p>Further engagement with Local Planning Authorities (LPA will be held ahead of the submission of the ES in an effort to agree the cumulative assessment criteria.</p> <p>Should LPAs identify other developments not listed (outside of the criteria identified), these will be added</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					to the assessment and considered further.	
3.1.28	Concern about noise pollution and/or vibration during construction. Particularly including the impact on neighbouring sites.	Kings Walden Parish Council		1	Please see response to ref 3.1.4.	No
3.1.29	Concern about noise pollution and/or vibration during construction including from: piling and excavation. Particular concern included the proximity to residential areas.	Kings Walden Parish Council		1	Please see response to ref 3.1.4.	No
3.1.30	By only inviting local authority stakeholders, residential amenity is driving the work, to the detriment of noise considerations in the nationally protected landscape. The PEIR addresses AONB tranquillity only in the landscape chapter, but this chapter has no mitigation proposals around noise.	Chilterns Conservation Board		1	Please see response to ref 3.1.27. Noise mitigation measures are covered in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR.	No
3.1.31	The Chilterns Beechwoods Special Area of Conservation (SAC) is in close proximity to	Chilterns Conservation Board		1	Chapter 13 Health and Community of the PIER assesses all potential impacts to human and ecological	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>motorways and major roads which are likely to experience increased traffic from the expansion of Luton Airport. The Aston Rowant SAC is possibly the only SAC in the UK which is actually severed by a motorway, with the vast cutting of the M40 motorway constructed through this nature reserve in the 1960s. The M25 also cuts through the Chilterns through the AONB. Increased traffic for Luton Airport could have an effect on air quality, noise and habitats.</p>				<p>health as a result of the Proposed Development. This includes road traffic changes. The spatial scope of the assessment and ecological sites in the study area is described. Where required, mitigation is proposed to reduce emissions to air.</p> <p>A draft Habitat Regulations Assessment Screening Report (HRA) No Significant Effects Report is included within Appendix 8.3 of Volume 3 of the PEIR and specific sites such as the Chilterns Beechwoods Special Area of Conservation (SAC) and Aston Rowant SAC have been considered in the assessment.</p> <p>Please also see response to ref 3.1.1 in respect of the Noise Envelope.</p> <p>Chapter 16 Noise and Vibration of the PEIR presents a preliminary assessment of the impacts of the Proposed Development. This will be updated in the ES and will include analysis of supplementary noise metrics to provide context to the assessment of average day and night noise contours. The assessment will provide sufficient information to allow the Secretary of State to make a</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					balanced decision on whether to grant consent to the Proposed Development.	
3.1.32	Concern that proposals to mitigate the impact of noise and/or vibration during construction and/or operation are aspirational and breaches are inevitable.	Kings Walden Parish Council		1	Please see response to ref 3.1.5.	No
3.1.33	Hertfordshire County Council will expect there to be a substantive focus on noise - (including the rationale for why a ban on night flights is not being considered)		Hertfordshire County Council		Please see response to ref 3.1.12	No
3.1.34	Acknowledge that the recent growth in passenger numbers has outstripped that previously envisaged by LLAL, hence the need to consider expansion, however remain concerned that expansion is being considered whilst current noise issues are still unresolved.		Dacorum Borough Council		The airport has expanded quicker than expected and reached their consented capacity of 18 million passengers per annum in 2019 instead of 2028 as expected. A Noise Envelope is being developed that will control the level of growth in the airport unless noise targets are met. This will be a statutory requirement for the expansion if it is consented and will provide a means to share the benefits of new, quieter aircraft with local communities.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					In regards to current nose issues please see response to ref 3.1.3.	
3.1.35	Note there is no mention in the consultation document of noise violation limits and conditions that might be placed on the development to minimise noise impacts.		Stevenage Borough Council		Noise Violation Limits are referred to in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR. A Noise Envelope is being developed with stakeholders to control the growth of the airport based on agreed noise targets. The Noise Envelope will be part of the application for development consent and a statutory requirement for the airport to comply with.	No
3.1.36	Noise remains a significant concern to Dacorum Borough Council and its residents and we would wish to see clear noise mitigation measures agreed in association with any permitted growth of the airport which are fully enforceable by an independent body.		Dacorum Borough Council		Please see response to refs 3.1.1, 3.1.5 and 3.1.17. The contents of the Noise Envelope will be enforced through GCG and consultation on this enforcement process has been undertaken with the Noise Envelope Design Group (NEDG).	No
3.1.37	In terms of construction impacts, North Hertfordshire District Council would expect noise and vibration to be minimised as		North Hertfordshire District Council		Noise and vibration monitoring will be undertaken during onstruction to demonstrate compliance with limits set out in the CoCP a draft of which can be found in Appendix 4.2 of Volume 3	No

Ref	Comment	PC	LA	No PILs	Response	Change
	much as possible as the nearest property is only 25 metres away.				of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO. Details of monitoring locations and durations will be covered in Section 61 consents. Further information can be found in response to ref 3.1.4.	
3.1.38	Note from the report of previous consultation undertaken by London Luton that there is significant concern about noise from night flights.		Harrow London Borough Council		Please see response to ref 3.1.2.	No
3.1.39	Particularly support the consideration of noise mitigation measures, such as those indicated by LLAL, which would: a. Maintain the current limit on night-time flights; b. Provide firm requirements for airlines to adopt quieter aircraft; c. Apply the principles of the International Civil Aviation Organisation's Balanced Approach to Aircraft Noise Management and; d. Extend the coverage of the current Noise Insulation Scheme into the most		Dacorum Borough Council		Mitigation measures are covered in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR. Existing limits on aircraft movements at night and night quotas will be retained to limit increases in night noise. The current noise insulation policy at the airport sets eligibility for properties within the 63 dB LAeq,16h or 55 dB LAeq, 8h noise contours. The proposed policy changes set out in 'Aviation 2050: The future of UK aviation. A Consultation' require that	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	affected parts of Dacorum Borough.				<p>noise insulation policy threshold extend from 63dB LAeq,16h to 60dB LAeq, 16h. In developing the proposed Noise Insulation Scheme, we have reviewed the existing scheme in light of Government policy requirements and feedback received during the 2019 statutory consultation and extended the noise insulation policy to three tiers covering:</p> <ul style="list-style-type: none"> • Scheme 1 – properties within the 60 dB LAeq,16h and 55 dB LAeq,8h contour; • Scheme 2 – properties within the 57 dB LAeq,16h contour; and • Scheme 3 – properties within the 54 dB LAeq,16h contour. <p>The compensation schemes improves significantly on the existing scheme by reducing the threshold noise contour for eligibility to 54 dB LAeq,16h, which extends into the northeast of Dacorum Borough. Eligibility will be determined by a property falling within an annually updated noise contour. The contours will change due to the growth in air traffic movements.</p> <p>Additionally, a Noise Envelope is being developed with stakeholders to</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>aim to control the growth of the airport based on agreed noise targets. The Noise Envelope will be part of the application for development consent and a statutory requirement. The contents of the Noise Envelope will be enforced through GCG and consultation on this enforcement process has been undertaken with NEDG.</p> <p>The ICAO Balanced Approach has been followed and is detailed in the Draft Operational Noise Management Plan. Additionally, LLAOL cover the ICAO Balanced Approach in their Noise Action Plan.</p>	
3.1.40	<p>In any event, St Albans District Council considers that any increase in noise and pollution to residents in the District is unacceptable. The wider health and quality of life impacts from the increased number of noise events and their frequency/pattern do not appear to have been fully considered in the consultation documentation, with a heavy reliance of noise contour monitoring. This should</p>		St Albans District Council		<p>Health and wellbeing is considered in Chapter 13 Health and Wellbeing and Chapter 16 Noise and Vibration of the PEIR. Chapter 13 includes Health Impact Assessment which considers aircraft noise, this will be updated in the ES submitted with the application for development consent.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	be addressed before the Acceptance stage in the DCO process.					
3.1.41	The noise projections made in the consultation documentation are fundamentally flawed and should be revised to include other potential, less optimistic scenarios. Otherwise, it cannot be concluded that the environmental impacts of the proposal have been accurately identified, or that they can be properly managed in accordance with national aviation policy.		St Albans District Council		<p>Whilst there is uncertainty over how aircraft fleet will evolve over time, the Noise Envelope will provide a statutory requirement for noise targets to be met before growth will be permitted. Consequently, there will be certainty on aircraft noise throughout the project lifespan.</p> <p>The level of impact from the Proposed Development has been assessed within the PEIR and provides mitigation measures appropriate to the impacts identified. Further assessment will be undertaken and reported in the ES submitted with the application for development consent. It will be a legal requirement of the DCO to deliver all mitigation proposed.</p>	No
3.1.42	The assessment should consider changes in vibration which may affect the fabric of Someries Castle where likely significant effects may occur.	Historic England			<p>Construction vibration that may potentially affect Someries Castle structure has been assessed. Preliminary findings on the vibration assessment are set out in Chapter 16 Noise and Vibration of the PEIR. As vibration from individual aircraft is</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					unlikely to change in the future, there would be no change to the operational vibration effects on the Someries Castle structure. As such, no further assessment is considered required.	
3.1.43	In defining criteria for observed effect levels, these are based on average levels for day (16 hour) and night (8 hour). The study does not consider max events (from overpass). Section 3.3.4 of the management plan acknowledges that average levels are not consistent with people's perception of aircraft noise as a number of discrete, noticeable events. At night in particular, maximum event levels are used to describe likely potential for sleep interference but little justification for their inclusion in the study. When revising the LOAEL from aircraft the survey of noise attitudes has found that despite aircraft becoming quieter, annoyance has increased with lower average levels due to busier skies. Noting that passenger numbers are set to almost double it assumes twice		Dacorum Borough Council		The ES submitted with the application for development consent will provide analysis of supplementary noise metrics, which will provide information on maximum aircraft noise levels and the number of aircraft movements that communities are likely to experience if the Proposed Development is consented.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>as many flights overhead. Although this may equate to a 2-3 dB difference in exposure (2029 DN vs 2039 DS), this does not consider the full picture where there is distraction from twice as many aircraft passing overhead, i.e. discrete, noticeable events that distract and interfere. It is also not apparent through the PEIR that noise surveys were conducted with audio recordings that would help with the listener perception of the degree to which overpasses currently intrude, and how potential the period of respite between flights would halve.</p>					
3.1.44	<p>The CAA has three key roles in relation to aviation noise: Deciding whether or not the design of airspace can be changed in accordance with UK law and noise policy. Detailed information is available on our airspace change pages. Monitoring noise around UK airports and publishing information about noise levels and impact. We do this for a range of customers including the</p>	Civil Aviation Authority			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>UK Government, airport operators², airspace change proposers and local authorities. Collaborating on and reviewing research into the effects of noise and how they can be reduced, and offering advice to Government on these effects. The CAA does not make decisions about the amount of noise that is considered damaging or a nuisance for people, nor does it make decisions about particular plans for airports, such as expansions. Further, CAP 1616 and the Air Navigation Guidance 2017 do not place any requirement on the CAA in terms of regulating noise on the ground at airports.</p>					
3.1.45	<p>PIER Specific Comments on Chapter 9: Noise and Vibration 9.5 Assumptions and limitations. It is noted that there is a different modal split assumed for the future scenarios compared to the baseline. We would question the validity of this approach as it means that future data is calculated on a different basis to</p>		Chiltern District Council		<p>A 70/30 modal split has been adopted to provide a consistent approach to noise modelling so future scenarios are directly comparable. Summer average modal splits will be analysed to ensure that this approach is reasonable.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the baseline and therefore they are not directly comparable. The 70/30 modal split assumed for future modelling seems to be based on the average annual modal split over the past five years, however, we would question whether or not this is representative of the 92 day summer period being modelled. The last published average summer modal split, in the 2013 Annual Monitoring Report, showed a 79/21 5 year average which actually matches the 2017 summer modal split.</p>					
3.1.46	<p>A major concern with the consultation documents is the lack of any presentation or analysis of the impacts of doubling passengers over the expansion decade 2009-2019. We are being presented with the present or near-present (2017 in the case of aircraft noise) as the baseline for environmental analysis (for example, section 5.4 of the PIER Vol 1 study). This gives the impression that everything is fine and we can just</p>	Slip End Parish Council			<p>The assessment of the proposed increase in aircraft movements tests how noise will change against baseline levels. Historical analysis of noise is not required to determine the effects of the Proposed Development.</p> <p>The assessment considers the noise impacts as a result of increased aircraft movements due to the Proposed Development. This is undertaken through comparison of the future assessment year with the development against the equivalent</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	plan ahead a clever but dishonest approach. The PEIR evaluation claims to have analysed the environmental data for past noise and emissions, so surely we should have the right to access and consider this.				future year without the Proposed Development. This allows the impact of the Proposed Development to be compared against a scenario where the existing consented limit is retained and the fleet transitions to less noisy new generation aircraft. Context is provided to the assessment through comparison to 2019 noise levels, which was the last year of typical operating conditions.	
3.1.47	The modelling study predicts that the noise contours for day and night flights will place Dacorum residents within the Lowest Observed Adverse Effect Level (LOAEL) for both day and night. There is a reduction in the noise contours compared with the baseline, which the model has assumed arises from airlines upgrading aircraft over time. However the degree of fleet renewal is not described in transparent detail.		Dacorum Borough Council		Details on the aircraft fleet used in noise predictions are presented in the Noise and Vibration Methodology in Appendix 16.1 of Volume 3 of the PEIR.	No
3.1.48	CAA is preparing guidance on noise modelling for Airspace Change sponsors. For the population exposures estimated	Civil Aviation Authority			The noise assessment in Chapter 16 Noise and Vibration of the PEIR uses adapted flight profiles based on local data and noise estimates have been	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>in the PEIR, CAA would expect airports to adapt flight profiles based on local data and check noise estimates against airport noise measurement for the noise dominant aircraft types. CAA encourages this is done for the ES to ensure consistency with the subsequent Airspace Change Process and to ensure that the noise envelope reflects local operations and does not fetter the ACP.</p>				<p>checked against airport noise measurements for the noise dominant aircraft types as requested by CAA.</p>	
3.1.49	<p>There is a disparity in that the Noise Mitigation Plan (NMP) discusses night flights between 23:00 - 06:00, but modelling is based on a night period of 23:00 - 07:00. The NMP implies no increase in night flights, but modelling shows that under the 2039 [Do Something] DS scenario compared to 2029 [Do Nothing] DN, noise contours increase. This suggests an increase in night flights. This disparity may arise because of what is defined as night for modelling purposes (23:00 - 07:00) and night for the airport</p>		Dacorum Borough Council		<p>The movement cap of 9,650 movements in a 12-month period for the period of 23:30 to 06:00 will be retained. This period has historically been used to control aircraft noise at night and is applied at major UK airports. National policy requires aircraft noise during the night time period to be assessed covering the hours of 23:00 to 07:00. Consequently, there is a disparity regarding how aircraft movements are controlled at night and how noise is assessed.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	(23:00 - 06:00). These periods should align however for consistency and this apparent disparity should be addressed and explained.					
3.1.50	The wider health and quality of life impacts from the increased number of noise events and their frequency/pattern do not appear to have been fully considered in the consultation documentation, with a heavy reliance of noise contour monitoring. This should be addressed before the Acceptance stage in the DCO process.		St Albans District Council		Health and wellbeing is considered in Chapter 13 Health and Wellbeing and Chapter 16 Noise and Vibration of the PEIR. Chapter 13 includes Health Impact Assessment which considers aircraft noise, this will be updated in the ES submitted with the application for development consent.	No
3.1.51	Within the NMP there is concern with measures that can be implemented, rather than those which are to be investigated and for which there is limited evidence. There is a noticeable gap between 2022 - 2035 based on equivalency of aircraft. The NMP does not specify if objectives for fleet modernisation can be mandated or will be voluntary. This again goes basis		Dacorum Borough Council		Fleet modernisation will be controlled through noise targets set in the Noise Envelope. This will be a statutory requirement and will limit growth of the airport if noise targets are not met.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	of the modelling assumptions which have been made and which should be clarified so that we may properly assess the significance of impacts.					
3.1.52	In some areas the consultation is premature as work still needs to be done. The PIER lacks transparency across a number of topics including for example; noise. To achieve adequate consultation much more information is required as is a step change in technical engagement. Need a project plan to provide this information and ensure the right engagement takes place. This will avoid technical debate during the examination.		Host Authorities		The NEDG provides a forum to engage on Noise Envelope proposals. This allows a technical discussion to take place regarding the process of producing noise contours. Further information on the noise modelling process can be found in Chapter 16 Noise and Vibration of the PEIR.	Yes
3.1.53	The Guide to Statutory Consultation includes a section on noise and vibration. It is proposed that households which would experience significant effects as a result of aircraft noise would be eligible for noise insulation. If the mansion and	Historic England			All eligible properties making an application under the Noise Insulation Schemes will be visited by an assessor appointed to agree with the owner what works can/should be undertaken. If listed building consent is required, the owner will need to obtain this in the same way they would	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>other historic buildings at Luton Hoo are considered to experience significant effects and therefore noise insulation may be proposed. The installation of insulation is likely to require listed building consent. Clearly any alterations to the listed buildings which would result in harm to their significance would be undesirable. We recommend other methods of mitigation are explored and if insulation is proposed the impact of this on the significance of the buildings should be considered in the context of any benefits it may bring in mitigating noise levels.</p>				<p>for any other changes to the property before the works could be undertaken.</p>	
3.1.54	<p>Whilst it is accepted that indicative noise modelling of airspace test cases would have limited value until the noise model is fully validated and able to accurately determine noise levels for the existing airspace conditions, LLAL may wish to consider the application of such indicative testing. for example, it might be feasible for the ES to include an analysis of the noise</p>		WSP for Host Authorities		<p>A noise model validation exercise has been undertaken to ensure that noise contours provide a good representation of existing airspace conditions. The validation exercise has been discussed and agreed with relevant stakeholders through the NEDG.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	effects arising from adoption of revised arrivals paths as a potential sensitivity analysis. The information might even be factored into the provisions that are to be contained in the noise envelope, which will effectively determine how much noise the Airport can make in the future.					
3.1.55	Question why night-time landing charges are lower than daytime charges; this may encourage operators to schedule flights to land in the night-time period.		Chiltern District Council		Landing charges are subject to existing agreements between the operator (LLAOL) and the airlines. The potential to review these will be considered as part of the measures discussed in the NEDG. The final measures proposed will be described in the application for development consent.	No
3.1.56	Suggest that noise mitigation measures relating to Luton Hoo be included in the Cultural Heritage Chapter of the Environmental Statement.	Historic England			The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR identifies a moderate adverse effect to the setting of Luton Hoo Registered Park and Garden (RPG) during operation as a result of an increase in daytime and night-time noise levels. Mitigation is not proposed in Chapter 10 Cultural Heritage of the PEIR as there are currently no suitable	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>measures to mitigate noise impacts to the RPG. If suitable measures are identified during statutory consultation, these will be included in the ES.</p> <p>More generally, noise mitigation measures are covered in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR.</p>	
3.1.57	Suggest further consultation and engagement on the noise impact scheme.		Host Authorities		Engagement on the noise and vibration assessment has continued with local authorities through a noise technical working group and the NEDG. The outcome of this round of statutory consultation will be used to inform the Proposed Development including finalisation of the ES and the application of development consent.	Yes
3.1.58	Suggest that Noise Management Plan (NMP) reflects feedback from residents, including the nature of complaints and how they impact residents.		Dacorum Borough Council		The Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR provides measures so that aircraft are not flown in a way that generates additional noise. Complaints are investigated to determine whether the aircraft has been flown appropriately. Complaints are reported in LLAOL's annual and quarterly monitoring reports.	No

Ref	Comment	PC	LA	No PILs	Response	Change
3.1.59	Request clarity on the methodology used to identify properties eligible for the Noise Insulation Scheme.	Slip End Parish Council			Properties eligible for compensation have been identified through noise contour modelling, further information is contained in Draft Compensation Policies and Measures .	No
3.1.60	<p>CAA's comments on the consultation documents with regard to noise.</p> <p>General year of maximum environmental impact</p> <p>The PEIR seems to use the year of maximum capacity as the year of maximum environmental impact without any justification. However, the year of maximum environmental impact may vary depending on the environmental topic or pollutant. Therefore, the ES should present evidence demonstrating that the correct year for maximum environmental impact has been identified.</p> <p>General comparison scenarios</p> <p>Greater clarity is needed on whether likely significant effects are related to the do nothing or to the 2017 scenarios. PEIR Volume 1 indicates the assessment is</p>	Civil Aviation Authority			<p>Noted.</p> <p>Three scenarios are considered in the noise assessment: 2027 where forecasts indicate the aircraft will handle 21.5 million passengers per annum (mppa), 2039 (27 mppa) and 2043 (32 mppa). Analysis of these scenarios indicates that 2043 is the year of maximum impact. This is due to the fact that forecasts show a fleet transition to new generation aircraft in 2039 so, for the period between 2039 and 2043, there are no new aircraft introduced to offset increases in noise from additional aircraft movements.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>relative to do nothing in 2039, whereas the PEIR non-technical summary (para 9.3.5) refers to Comparison of the modelled 2039 Proposed Development scenario with the 2017 (existing) scenario. For the avoidance of doubt, likely significant effects should be reported relative to a do nothing scenario in the same year. The 2017 baseline uses the actual runway modal split of 21% east/79% west, whereas the forecast scenarios use a long-term modal split of 30% east/70% west. In order to make comparison of the future scenarios against the baseline, 2017 needs to be reassessed using the long-term standard modal-split, i.e. 30/70</p>					
3.1.61	<p>Suggest that the Explanatory Note on Airspace is included within the ES as part of the application for development consent.</p>		WSP for Host Authorities		<p>Airspace changes are being undertaken by the CAA and are not part of the Proposed Development. They will run concurrently. Consequently, airspace changes will be covered based on the best available information at the time of finalising the assessment.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
3.1.62	Question if the hour between 06:00 – 07:00 is considered night, and a period when people would reasonably expect to have undisturbed sleep. If there is a significant upturn in departures it appears that there may be a greater impact potential that is not being reported, especially based on maximum noise events.		Dacorum Borough Council		Please see response to ref 3.1.49. The assessment of noise in the ES will contain information on supplementary metrics to provide context to aircraft noise impacts. One of the supplementary metrics relates to the potential for sleep disturbance caused by individual aircraft movements.	No
3.1.63	Suggest changes to methods of modelling and/or monitoring. Particularly including more fixed noise monitors.		Chiltern District Council		Additional noise monitoring locations will be investigated and covered in the ES.	No
3.1.64	It is not the 'average noise' that impacts the residents of Chiltern District Council and the CAONB so we welcome the use of other metrics N65/ N60, overflights. Details of how these metrics are used to determine significance of impacts will need to be included in the final Environmental Statement.		Chiltern District Council		Details on supplementary noise metrics will be provided in the ES.	No

Ref	Comment	PC	LA	No PILs	Response	Change
3.1.65	Note that while an increased angle will reduce the size of the noise envelope, the additional stress on the engines will increase emissions which will potentially have an impact on air quality in Stevenage.		Stevenage Borough Council		The aircraft thrust settings and flight path assumptions used to calculate the emissions for the air quality assessment are provided in Chapter 7 Air Quality of the PEIR.	No
3.1.66	Welcome confirmation that the assessment of heritage assets will be cross referenced with other assessments including air quality, noise, vibrations landscape and visual. Lighting is not specifically mentioned here but should also be referenced. We note reference is made later to a Light Obtrusion Report to reduce the impact of lighting on heritage assets.	Historic England			The ES will cross-reference data from other chapters, including landscape, air quality and noise chapters, in order to assess potential impacts on cultural heritage assets.	No
3.1.67	Query whether a scheme to mitigate the impacts of what will be a significant period of construction works has been considered, as is proposed at Heathrow.		WSP for Host Authorities		The application for development consent will contain a Draft CoCP, which contains noise and vibration limits, construction working hours and mitigation measures that will be adopted throughout the construction programme. A Draft CoCP is provided within Appendix 4.2 of Volume 3 of the PEIR. It will be a legal requirement for	No

Ref	Comment	PC	LA	No PILs	Response	Change
					the contractor to comply with the CoCP under the DCO.	
3.1.68	Consider existing noise pollution and/or vibration from the Airport to be too high. Specifically in relation to Slip End and Woodside.	Slip End Parish Council			Please see response to ref 3.1.1. The noise assessment accounts for the effect of noise from increased aircraft movements at Slip End and Woodside.	No
3.1.69	Suggest that there should be a ban and/or reduction in night flights.		Central Bedfordshire Council		Please see response to ref 3.1.12.	No
3.1.70	Suggest more noise monitoring and potential for a ban on night flights and reasons why this is not being considered.		North Hertfordshire District Council		Please see response to ref 3.1.12. Additional noise monitoring locations will be investigated and covered in the ES.	No
3.1.71	Future scenario's should be based on the average 92 day summer modal split, not the annual average and the baseline should be calculated on the same basis. Chiltern District Council welcome the use of data collected during the baseline monitoring to validate the findings of the noise modelling. Any discrepancies found during this		Chiltern District Council		The baseline and future scenarios are calculated based on the daily air traffic movement average over the 92-day summer period. Baseline data has been used to validate the aircraft noise model. Details on the validation process will be presented in the ES.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	exercise should be recorded in the final Environmental Statement.					
3.1.72	Concern about the impact of future increase in levels of noise and/or vibration. Particularly in regards to the impact of the Proposed Development on local communities.		Central Bedfordshire Council		Please see response to ref 3.1.1.	No
3.1.73	In terms of noise the only current, and potential, impacts arise from the operational activities of the airport. We are not concerned by construction or ground noise. The main transport noise impacts also arise outside of the Districts.		Chiltern District Council		Please see response to ref 3.1.1.	No
3.1.74	Concern that there is a lack of detail regarding future flight paths and its noise implications.	Chilterns Conservation Board			Due to the timescales over which airspace change processes will take place, the application for development consent will continue to assess the environmental impacts associated with the current airspace and flight paths. Adopting this approach will represent the worst case for an environmental assessment because the airspace change process, outlined by the CAA in CAP1616, makes clear that	No

Ref	Comment	PC	LA	No PILs	Response	Change
					airspace changes require their own process of environmental assessment and can only be approved themselves when the effects are net beneficial. Assessments of the impact of potential options for future flight paths associated with AD6 (alterations to the arrival flight path to the airport) and associated with the full modernisation of airspace are being undertaken by the current airport operator, LLAOL. Whilst the airspace change process is necessarily separate from the DCO process, the assessment of the impact of future airspace changes is being undertaken on the basis of the growth forecasts underpinning the application for development consent to ensure that the future implications of any changes are properly assessed.	
3.1.75	Concern about the impact of future increase in levels of noise and/or vibration and reduction tranquillity.	Natural England			Please see response to refs 3.1.1 and 3.1.27.	No
3.1.76	Unmanaged accelerated growth at the Airport has proceeded in the full knowledge that restrictions on operations to		Hertfordshire County Council		Please see response to ref 3.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	safeguard communities from adverse noise impacts would be compromised.					
3.1.77	Object to the expansion as it will exacerbate the impact of noise and/or vibration for the residents of St Albans City and District area.		St Albans District Council		Please see response to ref 3.1.1.	No
3.1.78	Query why consideration has not been given to the possibility of a night-flight ban.		Host Authorities		Please see response to ref 3.1.12.	No
3.1.79	On the issue of night-time noise levels, LLAL has not given any indication within the consultation materials as to whether a ban on night-flights has been considered as a means of mitigating the impacts of further growth, as is proposed at Heathrow.		WSP for Host Authorities		Please see response to ref 3.1.12.	No
3.1.80	Concern about the impact of future increase in levels of noise and/or vibration as a result of an increase in number of flights.	Slip End Parish Council			Please see response to ref 3.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
3.1.81	Suggest that the Applicant take steps to minimise noise and/or vibration from the Proposed Development. Specifically minimising noise and/or vibration over Stevenage.		Stevenage Borough Council		Please see response to ref 3.1.5.	No
3.1.82	Concern that noise mitigation proposals ignore night-time noise, falling short of current good practice at other airports.		WSP for Host Authorities		The draft noise compensation scheme improves significantly on the current compensation scheme. The scheme focuses on daytime noise contours that cover a significantly larger area than the current scheme and contain night-time contours that define eligibility for compensation within. Further information can be found in Draft Compensation Policies and Measures .	No
3.1.83	Dacorum Borough Council are pleased to note that the Applicant's consultation documentation acknowledges that aircraft noise is one of the key issues it needs to deal with, if it is to obtain approval for expansion through the DCO process. They ask the Applicant to note that in Dacorum Borough, current flightpaths from the		Dacorum Borough Council		Noted. The full impact of the flight paths used for the Proposed Development has been modelled and considered in the relevant chapters of the PEIR, in particular Chapter 16 Noise and Vibration .	No

Ref	Comment	PC	LA	No PILs	Response	Change
	airport, have a significant impact upon the villages of Markyate and Flamstead in terms of aircraft noise. Eastern Hemel Hempstead and Tring are also significantly affected by noise.					
3.1.84	Noise is a key environmental issue in terms of the acceptability of the Proposed Development and they believe that significant further engagement, monitoring, (including attended monitoring and assessments) will be required. The conclusions of the noise assessment in the PEIR are not robustly supported by the analysis and no monitoring regime is articulated.		Host Authorities		Chapter 16 Noise and Vibration of the PEIR contains a preliminary assessment to identify significant noise effects. The PEIR is published for statutory consultation so feedback can be incorporated into and ES to be submitted with the application for development consent.	No
3.1.85	The Council welcomes all of the commitments offered in relation to noise mitigation, particularly in maintaining the current limit on night flights, incentivising the adoption of quieter aircraft and reviewing the extent of the Noise Insulation Scheme.		Stevenage Borough Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
3.1.86	It is clear that doubling passenger throughput at the airport, essentially means a doubling of flights and a potentially significant increase in noise disturbance under flightpaths and holding areas, unless effective mitigation measures can be put in place, or significant investment in new and less noisy aircraft by the airlines operating from the airport.		Dacorum Borough Council		Please see response to ref 3.1.1.	No
3.1.87	Concern about the impact of future increase in levels of noise and/or vibration from aircrafts and road traffic.	Historic England			Please see response to ref 3.1.1.	No
3.1.88	Methodology: We welcome use of the broad definition of health proposed by the World Health Organisation (WHO) and the specific reference to mental health. Identification of impacts: We welcome the commitment to express the public health impacts due to noise in terms of Disability Adjusted Life Years. We welcome the tables showing population exposure (Tables 9-19 to 9-24) at the various noise levels for	Public Health England			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	baseline and future scenarios, which assists in presenting a clear picture of the potential effects of the Scheme.					
3.1.89	<p>PEIR Volume 1</p> <p>Table 9-13: It would help to have a column indicator for the receptor type.</p> <p>Tables 9-16 and 9-17: The tables use incorrect area units (km² not ha)</p> <p>Tables 9-25 to 9-30: These tables need revising with the 2017 baseline using the same long-term modal split in order that the comparisons are appropriate.</p> <p>PEIR Volume 3</p> <p>Appendix 9 3.4: Magnitude of Impact for Changes in Operational Noise. Not clear whether the noise change is relative to 'do nothing' or 2017</p> <p>Appendix 9 6.2.3: Noting that A350 modelling is not critical because there are few operations to be modelled, it is incorrect to use an A350 NPD with a A330</p>	Civil Aviation Authority			These comments have been noted and considered in developing the PEIR published as part of this Statutory Consultation.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>flight profile, and unnecessary, since flight procedure data for the A350 is now available. The ANP website also now includes a substitution table including future types.</p> <p>Appendix 9 6.3: Tables 22 to 24, would be clearer with a total movements row added to each table.</p>					

Table A3.7: Regard had to statutory consultation responses on Noise - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
3.2.1	<p>Concern about the impact of future increase in levels of noise and/or vibration; including as a result of changes to flight paths, increases in the number of flights (including night flights), road traffic, and the proposed Fire Training Ground (FTG) . Some respondents considered this would cause long term harm to the surrounding countryside; habitats; landscape; towns; house prices; businesses, loss of sleep and reduction in the quality of life and physical and mental health and well being of local communities, the elderly and young people. Specific locations of concern cited were: Aylesbury, Baldock, Bedfordshire, Breachwood Green, Caddington, Cambridgeshire, Childwickbury, Chilterns AONB (including Ashridge Estate), Fairly Hill, Flamstead, Harpenden, Hertfordshire, Kensworth, Kimpton, Leighton Buzzard, Letchworth, Linslade, Luton, Preston, Sandridge, Slip End, St Albans, Stevenage, Welwyn, Whitwell, Wheathampstead, Wigmore and Wymondley, and along the River Ver. Some respondents also raised concerned about the impact of noise on users of the new replacement park.</p>	738	Please see response to ref 3.1.1.	No
3.2.2	<p>Object to the expansion as it will exacerbate the impact of noise and/or vibration. Specific concerns included the increase in night flights, impact on sleep, quality of life and health of local communities and areas under the flight path.</p>	85	Please see response to ref 3.1.1.	No

Ref	Comment	No CC	Response	Change
3.2.3	<p>Consider existing noise pollution and/or vibration from the Airport to be too high, including noise caused by flights (day and night) and traffic. Current impacts cited include: on value of homes; to businesses; cost to the NHS; on mental health, well being and quality of life; sleep deprivation; and learning in school. Some respondents considered there to be a lack of noise abatement funding. The following locations were specifically mentioned; Ashridge Estate (National Trust), Aylesbury, Bedford, Breachwood Green, Buckinghamshire, Caddington, Chiltern AONB, Childwick Green, Bovington, Dagnall, Farley Hill, Flamstead, Harpenden, Hertfordshire, Hitchin, Kimpton Village, Knebworth, Leighton Buzzard, Letchworth, Inslade, Luton, Lye Hill, Marshalswick, Markyate, Pepperstock, Peters Green, Redbourn, Sandridge, Slip End, St Albans, Stevenage, Stopsely, Studham, Tring, Wheathampstead, Welwyn Garden City, Whitwell, Whipsnade, Wigmore and other local residential areas under the flight path.</p>	842	Please see response to ref 3.1.3.	No
3.2.4	<p>Concern about noise pollution and/or vibration during construction including from: piling, excavation, earthworks and roadworks. Specific concerns included the impact on nearby residential areas and on quality of life and health of local communities. With some respondents concerned about the duration of the works.</p>	47	Please see response to ref 3.1.4.	No

Ref	Comment	No CC	Response	Change
3.2.5	<p>Concern that proposals to mitigate the impact of noise and/or vibration during construction and/or operation are inadequate and/or would not be delivered. Inadequacies in specific mitigation measures included: preventing new noise sensitive developments given the demand for housing; noise insulation for houses would not mitigate the noise outside; the noise envelope does not cover a wide enough area; night quota period starts too late; mitigation measures are not specific to Luton Airport; concern about lack of enforcement; a noise plan has not been provided; no noise cancelling devices have been suggested; no policies are provided to control noise; noise from take off/landing has not been considered in all relevant areas; and the assessment of noise is limited. Some respondents raised concern that there is no plan comprising of measurable targets; concern that a different flightpath for westerly take-offs will not be delivered; and there are no proposals for noise mitigation for specific local areas.</p>	214	Please see responses to refs 3.1.4 and 3.1.5.	No
3.2.6	<p>Proposals to mitigate impacts of noise and/or vibration would be unnecessary if the airport was not expanded.</p>	64	Noted.	No
3.2.7	<p>Consider current noise and/or vibration to be modest.</p>	4	Noted.	No

Ref	Comment	No CC	Response	Change
3.2.8	The benefits of the Proposed Development, such as jobs, do not outweigh the negative impact of increased noise pollution.	90	Please see response to ref 3.1.7.	No
3.2.9	Note that there is a current planning application made by London Luton Airport Operations Limited to vary noise contours.	2	Whilst the current airport operator, LLAOL, are seeking to adjust current noise contour limits for the short-term future, the application for development consent will seek to secure the long-term future of the airport.	No
3.2.10	Request clarity on the proposed noise mitigation measures.	1	Please see response to ref 3.1.5.	No
3.2.11	Suggest that measures are taken to minimise noise and/or vibration during construction during the day and/or night. Specific measures suggested include: noise barriers around work sites; construction activity limited to the middle of the day; no construction during the night; landscaping; monitoring noise from construction vehicles; noise envelope implemented prior to expansion; installation of white noise alarms to construction vehicles; and a claim for damages procedure if breaches are made. With some respondents querying whether a scheme to mitigate the impacts of construction noise has been considered.	19	Please see response to ref 3.1.4.	No
3.2.12	Concern that the modelling and monitoring of noise and/or vibration levels are inaccurate and/or not comprehensive. Specific concerns raised include: the modelling does not take under consideration	70	Please see response to ref 3.1.10.	No

Ref	Comment	No CC	Response	Change
	<p>planes deviating from the flightpath; the number of effected households are under reported (specific locations included Pitstone and Tring); noise contour maps are incorrect and/or do not take under consideration wind variations (specific locations included Breachwood Green, Caddington and St Albans); no evidence of local calibration data has been used; no evidence of worst-case noise modelling, including taking account of varying rates of uptake of quieter aircraft has been provided; the 70/30 modal split assumed for future modelling is not accurate; no noise monitoring stations located directly under the flight paths including Harpenden, Redbourn, St Albans, Wheathampstead, Marshalswick, Wigmore, Vauxhall Park and Sandridge; noise monitoring stations are purposely placed in quieter locations; concern that the use of dB LAeq as a metric is flawed; the environmental assessment does not account for future flight paths arising from the AD6 and FASI-S airspace changes; and that results from monitoring noise levels provide an average which includes noise levels during non-flying times leading to under reporting; and the no noise increase shown in the PEIR modelling for Slapton and Dagnall is inaccurate.</p>			
3.2.13	<p>Concern that the modelling and monitoring of future noise and/or vibration levels is based on technology changes that have not occurred yet.</p>	7	Please see response to ref 3.1.11.	No

Ref	Comment	No CC	Response	Change
3.2.14	Suggest that there should be a ban on night flights (including ground based engine testing at night). Some respondents suggested that this would bring London Luton Airport in line with other London airports in banning night flights.	72	Please see response to ref 3.1.12.	No
3.2.15	Suggest that noise levels at night be reduced. Some suggestions included: a reduction in night flights; the use of 'neo' planes for all night flights; a reduction in night time cargo flights including other non-emergency aircraft movements; introduction of a shoulder period at night; retention of existing night-time quota; and a ban on older planes flying at night. With some suggestions that the Airport's night operations (including night flights) be regulated by an independent operator such as the Civil Aviation Authority.	32	Please see response to ref 3.1.12.	No
3.2.16	Suggest that existing noise and/or vibration from current airport operations be reduced (including at night). With some respondents suggesting the requirement of further mitigation measures to reduce existing noise levels including expanding the landscaping; reducing number of flights; redesigning airspace; solid security barriers; quieter planes; ban on older planes; and payment for noise reduction to properties under the flight path (including air conditioning units). Specific areas mentioned included Hitchin, Kensworth, Luton and St Albans.	77	Please see response to ref 3.1.14.	No

Ref	Comment	No CC	Response	Change
3.2.17	Suggest that noise and/or vibration from the airport expansion be reduced. Specific measures include; solid noise barriers (including bunds); altering flight paths; radar control for all aircraft; reduction in noise limit should be enforced; and funding (including FIRST) to be directed to noise reduction (including noise reduction measures for homes); future flights should be reduced if mitigation measures are breached; suggest that the noise envelope be conditioned; more noise monitoring (including attended monitoring and assessments); better reporting of complaints; and training of flight crew in operational procedures which reduce noise. Some respondents also suggested further research to investigate minimal noise and vibration impact.	50	Please see response to ref 3.1.155.	Yes
3.2.18	Concern that the impacts of noise and/or vibration from the Proposed Development are greater than set out in the consultation material. Specific concerns included that the consultation material assumes that aircrafts would not deviate from the flightpath and therefore the number of households impacted by noise are reported as lower; using averages rather than peak noise levels is misleading; the data does not reflect the noise impact of heavier long haul planes; and the airspace design has not been finalised therefore data on noise impact is unrealistic.	16	Please see responses to refs 3.1.10 and 3.1.71. Further information on flight paths can also be found in the Flight paths and Fleetmix topic.	No
3.2.19	Support proposals to manage and mitigate the impact of noise and/or vibration. With some	51	Noted.	No

Ref	Comment	No CC	Response	Change
	respondents specifically in support of the existing night quota being maintained; provision of household insulation; and use of modern aircraft.			
3.2.20	Request clarity on who is responsible for undertaking the noise monitoring.		<p>2 The current airport operator, LLAOL, currently undertake noise monitoring at communities affected by aircraft noise.</p> <p>As part of the Proposed Development, we are developing a Noise Envelope. The Noise Envelope will contain control measures to ensure that the Proposed Development cannot go ahead unless certain noise targets are met. The Noise Envelope will be the mechanism through which our GCG framework is monitored and enforced in respect of noise. An independent monitoring and enforcement body is suggested as part of the GCG proposals.</p>	No
3.2.21	Suggest an independent body be set up to monitor noise and/or vibration levels, including enforcing compliance.		8 Please see response to ref 3.1.17.	No
3.2.22	Based on the noise modelling presented in Figure 9-1 it is unclear whether some part of the land in Trust ownership will lie within the noise the Noise Envelope Design Group within which the Proposed Development would be allowed to operate. We are therefore seeking further information in relation to both existing and predicted Lowest Observed Adverse Effect Level values, so that we can better		1 A validation exercise has been undertaken based on measured aircraft noise data and noise contours have been updated, as set out in Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR. These contours are being consulted on as part of this statutory consultation.	No

Ref	Comment	No CC	Response	Change
	understand the likely effects of the proposed expansion.			
3.2.23	It is clear from previous Cole Jarman reports pertaining to Condition 11 changes that the local context must be taken into account: "5.2 The analysis carried out on departure data obtained from the Luton noise monitors indicates that there is poor correlation between the noise levels recorded and the noise levels expected based on certification values." (12/01400/FUL: Planning Condition 11i Report 13/1720/R3) ". We advised that proper use should be made of the measured noise data at Luton in calibrating and refining the INM contour computations that are undertaken to demonstrate compliance with the daytime and night time noise envelopes defined in Condition 12." (Memorandum LLOAL NVL New Planning Condition 11i Reference: 13/1720/M9, 3 Sep 2015) As far as we can see this has not been done and so the AEDT model used will inherently be unreliable.		1 A validation exercise has been undertaken in the Aviation Environmental Design Tool (AEDT) aircraft noise model. Details on the validation exercise are set out in Appendix 16.1 of Volume 3 of the PEIR. The validation exercise uses Sound Exposure Level noise data measured at permanent and temporary monitoring locations as part of the noise monitoring strategy at the airport. The validation exercise provides confidence that predicted noise contours are suitably representative of actual noise conditions.	Yes
3.2.24	Support expansion but concerned about the impact of noise.		3 Noted. Chapter 16 Noise and Vibration of the PEIR presents the preliminary assessment of likely significant effects of the Proposed Development on noise. Further assessment will be included within the the ES. Please also see response to ref 3.1.1.	No

Ref	Comment	No CC	Response	Change
3.2.25	Consider noise and/or vibration during construction to be inevitable. Some respondents noted this would be short term.	1	Please see response to ref 3.1.4.	No
3.2.26	Concern that the expansion proposals are inconsistent with the National Planning Policy Framework 2019 and Policy LLP6 of the Luton Local Plan in respect of noise.	3	<p>The assessment of noise presented in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR identifies likely significant noise effects in line with requirements set out in UK policy. These requirements set out assessment criteria based on average day and average night noise contours. Research undertaken by the CAA identifies a good correlation between the average noise contours and community annoyance. It is acknowledged in the PEIR that, while it is necessary to use average noise contours in the assessment of noise, they do not accurately describe how communities experience aircraft noise. Consequently, analysis of supplementary noise metrics will be undertaken in the ES submitted with the application for development consent. This will provide information on how communities will be affected by frequency of aircraft movements and noise from individual aircraft.</p> <p>Furthermore, Chapter 16 Noise and Vibration in the PEIR explains how policy has been considered in the context of the assessment of noise.</p>	No

Ref	Comment	No CC	Response	Change
			<p>Policy LLP6 of the Luton Local Plan 2011-2031 sets out requirements for airport expansion including an air noise, ground and noise assessment and provision on how noise will be controlled and managed must be made. Chapter 16 Noise and Vibration in the PEIR provides details on air noise impacts due to increases in Air Transport Movements and an assessment on ground noise. The chapter also demonstrates how noise will be controlled and managed through the Noise Envelope</p> <p>It is intended that the Proposed Development will comply with the National Planning Policy Framework (NPPF) requirements and will be judged in this regard by the Planning Inspectorate in examining the application for development consent.</p>	
3.2.27	Suggest that local buildings are checked for damage from vibration.	1	<p>Please see response to ref 3.1.20.</p> <p>The level of vibration required to result in cosmetic building damage is substantially higher than the level that may cause disturbance. As vibration disturbance is only likely to occur when construction activities take place in close proximity to a building, it is considered highly unlikely that airport activities have resulted in any vibration induced cosmetic damage to buildings.</p>	No
3.2.28	The impact of noise will be dependent on a future review by Air Traffic Control (NATS).	1	<p>As airspace change is running concurrently with the Proposed Development, the best available information on airspace change has been</p>	No

Ref	Comment	No CC	Response	Change
			included within the assessment presented in the PEIR at the time of preparation.	
3.2.29	Suggest that the Proposed Development does not commence until the FASI-S airspace changes have been determined.	1	Due to the timescales over which both airspace change processes will take place the application for development consent will continue to assess the environmental impacts associated with the current airspace and flight paths. Adopting this approach will represent the worst case for environmental impact assessment because the airspace change process, outlined by the CAA in CAP1616, makes clear that airspace changes require their own process of environmental assessment and can only be approved themselves when the effects are net beneficial. Assessments of the impact of potential options for future flight paths associated with AD6 (alterations to the arrival flight paths to the airport) and associated with the full modernisation of airspace in the South East of England (FASI-S) are being undertaken by the airport operator, LLAOL. Whilst the airspace change process is necessarily separate from the DCO process, these separate assessments have taken account of the growth forecasts to be delivered through the DCO in assessing the impact of future airspace change.	No
3.2.30	Request evidence of how noise objectives will be achieved, monitored and enforced.	8	Please see response to ref 3.1.17.	No

Ref	Comment	No CC	Response	Change
3.2.31	Request clarity on how the noise envelope will be managed and controlled.	1	The contents of the Noise Envelope will be a statutory requirement for the airport to comply with. Please see response to ref 3.1.17.	Yes
3.2.32	Suggest changes to methods of modelling and/or monitoring. With some respondent suggesting that the methodology should compare the impact between do-nothing scenario and 2039 do-something scenario; use of an alternative metric and details of how these metrics are used to determine significance of impacts to be included in the final Environmental Statement; a variety of flightpath outcomes should be used (including flight paths over Pitstone); cumulative noise impacts from other London airports (including Heathrow) should be modelled; more monitoring required (including in the Chilterns; at individual properties; and beyond the 6.5km start of roll distance in line with CAP 1691); future scenarios should be based on 92 day summer modal split and recorded in the final ES; noise should be measured using the standards set out in ISO-20906, not BS 7445-1:2003; and noise contours should be reduced.	11	Please see responses to refs 3.1.1, 3.1.5 3.1.10, 3.1.25, 3.1.27, 3.1.72. Noise monitoring was undertaken following methods set out in BS 7445-1:2003 to capture ambient noise conditions at communities within the study area. The aircraft noise model has been validated using measured noise data from permanent and temporary monitoring location based on guidance in ISO020906.	No
3.2.33	Query the location of noise monitoring. With some respondents querying why noise monitors are placed in back gardens.	2	Please see response to ref 3.1.26.	No
3.2.34	Request clarity on the NATS forecast of a decrease in the area affected by aircraft noise.	1	NATS suggested that improvements in airspace design at Luton could reduce the number of people affected by aircraft noise. Additional	No

Ref	Comment	No CC	Response	Change
			details on airspace change can be found on the CAA's airspace change website.	

A4 Flight Paths and Fleet Mix

Table A4.8: Regard had to statutory consultation responses on Flight path and fleet mix - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
4.1.1	Concern that fleet mix is continuing to shift to larger and/or noisier aircrafts. Some respondents specifically concerned about an increase in cargo flights (and other noisier aircraft) operating at night.			9	<p>The majority of aircraft will continue to be narrowbody types but, over time, current generation aircraft will be replaced by newer generation quieter aircraft.</p> <p>The length of the runway limits the scope for widebody aircraft operations but some smaller wide bodied types operating some longer haul routes are expected to be able to use Terminal 2 (T2) when constructed. This is explained in the Updated Aviation Forecasts included in the Draft Need Case.</p> <p>The ability to accommodate more cargo flights will depend on compatibility with the Draft Green Controlled Growth Proposals and within the limits imposed on operations within the night period.</p>	No
4.1.2	Concern that London Luton Airport has no control over			3	Work is ongoing to explore the potential for electric aircraft and	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>updating the fleet mix to a new generation (fuel efficient and/or quieter) fleet.</p>				<p>some prototypes are now flying. The timescale for the introduction of such aircraft into commercial service is unknown, nevertheless our design safeguards for the future use of electric planes by providing a new electricity substation at T2 and safeguarding space on each stand for additional charging equipment.</p> <p>The dominant low fare airlines at the airport replace their aircraft on cycles of between eight to 14 years in order to reduce the costs of maintaining older aircraft. Newer generation aircraft are already starting to be introduced into the airline fleets at the airport. By the time that the Proposed Development delivers any significant uplift in the airport's capacity (so permitting a significant increase in aircraft movements and passengers), many of the existing aircraft will have been replaced or coming to the end of their operating lives.</p> <p>The fleet projections within the Draft Need Case take full</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>account of airline fleet orders and delivery schedules. New aircraft offer lower operating costs to the airlines so it is highly unlikely that replacement will be slowed materially. Some sensitivity testing is being undertaken to ensure that the impacts of any slowing of fleet transition are understood, and this will be included in the application for development consent.</p> <p>Beyond this, through concession agreements, operators will be required to encourage airlines to use fuel efficient/quieter aircraft, using pricing and other strategies.</p>	
4.1.3	Suggest that London Luton Airport commit to the use of electric and/or fuel efficient aircraft. Some respondents cited that this should be a condition for expansion; and the airport should encourage the use of such developing technologies.			10	<p>Please see response to ref 4.1.2.</p> <p>As the owner of the airport, we are committed to reducing greenhouse gas (GHG) emissions as far as practicable. An extensive list of mitigation measures will be included in the scheme, including those which can reduce emissions from airport operations, for example, through less carbon-intensive flight technologies. Further details</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>can be found within the Draft GHG Management Plan in Appendix 12.1 in Volume 3 of the PEIR.</p> <p>Note, current impact assessments for the Proposed Development have not, at this stage, assumed the introduction of electric aircraft.</p> <p>A Green Controlled Growth (GCG) framework which will ensure that the airport operates within particular “limits” is proposed. Limits will be set in respect of air quality, noise, surface access and carbon emissions. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					independent body is proposed to monitor and enforce such "limits".	
4.1.4	Suggest a transition to a quieter fleet. Some respondents cited that this should be a condition for expansion.			7	Please see responses to refs 4.1.1 and 4.1.2.	No
4.1.5	Concern that a transition in fleet mix to new generation (quieter/fuel efficient) aircraft and/or improvements through technological change and use of alternative fuels (including biofuels) will not occur fast enough and/or will not make a difference. Some respondents stated that transition to new generation aircraft will not deliver a significant reduction in emissions and/or noise; and the Applicant should not be considering expansion until the fleet mix has transitioned to new generation aircraft.			9	Please see responses to refs 4.1.1, 4.1.2 and 4.1.3. For the application for development consent, the future fleet mix will be based on analysis of the likely timeframes over which airlines will replace their fleet, taking into account existing airline orders for new aircraft. The dominant low fares airlines at the airport replace their aircraft on cycles of between eight to 14 years in order to reduce the costs of maintaining older aircraft. Newer generation aircraft are already being introduced into the airline fleets at the airport. By the time the Proposed Development delivers any significant uplift in airport capacity (so permitting a significant increase in aircraft movements and passengers),	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>many of the existing aircraft will have been replaced or coming to the end of their operating lives with the airlines in Europe. Further consideration will be given to whether it is appropriate to set targets for the airlines to operate quieter aircraft through the process of developing the Draft Green Controlled Growth Proposals.</p>	
4.1.6	Concern that current aircraft altitude is too low.			9	<p>Separate to our proposals, noise improvements are likely to occur as a result of Civil Aviation Authority's Airspace Modernisation Strategy which sets out the initiatives that the UK industry will deliver to achieve the government's policies of quicker, cleaner, quieter journeys. This may allow for aircraft to climb more quickly due to the lifting of constraints imposed on aircraft from neighbouring airports.</p> <p>The application for development consent will assess the impacts based on current aircraft performance and heights to be conservative. The Proposed</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Development assesses the environmental impacts associated with the current airspace and flight paths, along with current aircraft performance. Adopting this approach will represent the worst case for an environmental assessment.	
4.1.7	Concern about the continued impact and/or disturbance arising from current flight paths, particularly over residential areas.			5	<p>The effects of the Proposed Development including the flight paths are modelled and considered in the PEIR, including the significance of any changes to residential populations.</p> <p>Concerns related to current noise and the implementation of Area Navigation (RNAV) should be addressed to the airport operator, LLAOL.</p> <p>Please also see response to ref 4.1.6.</p>	No
4.1.8	Concern that current aircrafts do not remain on flight paths.			2	The 'flight paths' shown in the 2019 consultation documents were the Noise Preferential Departure Routes and aircraft only need to stay within these until they reach 4,000ft of altitude. Once above this height, aircraft	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>may be given a more direct routing by Air Traffic Control which takes them over the areas referred to by the consultees. This is standard procedure in all UK airspace. It must also be recognised that in some limited cases aircraft may drift from the noise preferential routes due to strong winds and other climatic conditions. These cases are limited and are monitored by the airport.</p>	
4.1.9	<p>Concern that the airspace in south east England is crowded (comprising aircrafts flying from Luton, Heathrow, Gatwick and other London Airports).</p>			1	<p>Adding more capacity to support growth in line with Government Aviation Forecasts remains the targeted outcome from the FASI-S process, which is a Government priority.</p> <p>It is a core requirement that this must be done in such a way as not to lower safety standards, despite more aircraft in the sky. The new technologies being used by aircraft which will enable the airspace redesign will allow Air Traffic Control to more accurately place aircraft in the sky to prevent any reduction in safety.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					In addition to modernising airspace, the FASI-S process seeks to create environmental benefits including the reduction in noise and emissions by allowing airspace to be used more efficiently.	
4.1.10	Concern that fleet mix is currently and will continue to comprise of old generation (noisier/fuel inefficient) aircrafts.			1	Please see responses to refs 4.1.1, 4.1.2 and 4.1.3.	No
4.1.11	Concern that future flight paths are unknown as the airspace redesign has not taken place and/or flight paths from other airport expansions such as Heathrow, Gatwick and Stanstead are not known. Some respondents cited that the assessment of environmental impacts and/or appropriate mitigation would therefore be difficult to determine. Specific concerns also include the uncertainty of impacts on the Chilterns AONB.		Chiltern District Council	3	Due to the timescales over which both airspace change processes will take place the application for development consent will continue to assess the environmental impacts associated with the current airspace and flight paths. Adopting this approach will represent the worst case for environmental impact assessment because the airspace change process, outlined by the CAA in CAP1616, makes clear that airspace changes require their own process of environmental	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>assessment and can only be approved themselves when the effects are net beneficial. Assessments of the impact of potential options for future flight paths associated with AD6 (alterations to the arrival flight paths to the airport) and associated with the full modernisation of airspace in the South East of England (FASI-S) are being undertaken by the airport operator, LLAOL. Whilst the airspace change process is necessarily separate from the DCO process, these separate assessments have taken account of the growth forecasts to be delivered through the DCO in assessing the impact of future airspace change.</p> <p>The impacts of the Proposed Development are considered in the relevant chapters of the PEIR including Chapter 14 Landscape and Visual.</p>	
4.1.12	Suggest that the submission of the application for development consent does not proceed until	Chilterns Conservation Board		1	Please see response to ref 4.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	future flight paths, arising from the AD6 and FASI-S airspace changes have been determined. Some respondents cited that this will allow for coordinated solutions and assessment of cumulative impacts on the Chilterns AONB and surrounding areas from flight paths for Luton and Heathrow.					
4.1.13	Suggest flight paths go over Luton Hoo hotel and the countryside instead of residents of Luton.			1	<p>Changes to flight paths and airspace cannot be made through an application for development consent, and must be made through the CAA's Airspace Change Process (set out in CAP1616).</p> <p>The airport operator, LLAOL, will be responsible for delivering the airspace changes. LLAOL will be consulting extensively on these and has set up relevant stakeholder groups to ensure local authorities are part of the process.</p> <p>Given the complex interactions between the airspace requirements of a wide range of users, including airports, responsibility for coordinating the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>delivery of airspace modernisation has been delegated to the ACOG (Airspace Change Organising Group).</p> <p>ACOG is developing a Masterplan for Airspace Change over the South East of England (known as the FASI-S programme), which will set out the interactions between the differing requirements and how these can be resolved. Until such time as this Masterplan is approved to proceed to the next stage, all further proposals for airspace change at specific airports have been placed on hold by the CAA. Hence the timescale for any specific changes that would be made to departure routes from the airport is not yet clear.</p>	
4.1.14	<p>Suggest a change in flight paths. Some respondents cited that there needs to be an even distribution and/or rotation of flight paths to avoid concentration over one area and provide respite; aircrafts should be diverted to the north;</p>			1	<p>This will be covered by the airspace change process which will be delivered by LLAOL, and not subject to this application for development consent. LLAOL will be consulting on the proposed plans for airspace change and</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	flight paths should follow past trajectories (pre-2015); increase number of landing and departure routes; and landing and take-off should be in the direction of less populated areas.				this feedback can be provided as part of those consultations which are separate from the DCO consultations.	
4.1.15	Suggest a reduction and/or ban on private jets.			2	These form an important economic driver regionally, and have therefore been included in the Draft Need Case and the environmental assessments with the assumption that the number of such movements remains broadly the same as recent years.	No
4.1.16	Concern about the impact of future flight paths, including their positioning and an increase in air traffic/number of flights.			3	Please see response to ref 4.1.13.	No
4.1.17	Concern that fleet mix is continuing to shift to larger and/or noisier aircrafts.	Kings Walden Parish Council		1	Please see responses to refs 4.1.1 and 4.1.2.	No
4.1.18	Aircraft noise over the Chilterns AONB is our main area of concern. The Chilterns Conservation Board will continue	Chilterns Conservation Board		1	Please see responses to refs 4.1.11 and 4.1.13.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	to object to Luton Airport expansion unless it can be demonstrated that there is no harm to the nationally protected landscape of the Chilterns AONB. There is a lack of information on actual future flightpaths and noise implications.					
4.1.19	Suggest that growth should be phased to occur only when technological innovations provide headroom within environmental and noise limits.	Chilterns Conservation Board		1	Please see responses to refs 4.1.1, 4.1.2 and 4.1.3.	No
4.1.20	The timing of the decision on this DCO for Luton Airport expansion is planned for 2021, which is ahead of the FASI-South airspace change process (due to be completed in 2023/4). This means that the Planning Inspectorate is being asked to make a decision on Luton airport expansion without having any certainty about where flightpaths will be and what the noise impact on the Chilterns AONB and local communities will be.	Chilterns Conservation Board		1	Please see response to ref 4.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
4.1.21	LLAL have suggested that their approach will be to undertake sensitivity tests taking into account LLAOLs airspace design options in advance of the DCO examination process. We suggest two minor amendments to the PEIR volume 1 and Explanatory Note on Airspace: In section 2.7 of the PEIR volume 1, it could be noted that the airspace change proposal for wider modernisation (FASI (S) Luton Airport (Arrivals and Departures)) ACP was submitted in December 2018 and is following the CAAs CAP1616 airspace change process. In the section 3 of the Explanatory Note on Airspace, ACOG is identified as overseeing the whole of the AMS programme, whereas in fact it is only co-ordinating certain elements of it.	Civil Aviation Authority			Noted.	Yes
4.1.22	There is concern about the introduction of wide-bodied jets such as the Boeing 787. LLAL has admitted an intention to explore the medium distance market, but has been disinclined to quantify	Slip End Parish Council			Please see response to ref 4.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>this proposed growth. Our experience of the 787 so far is that it has a slower climb rate and is much noisier than the short-haul aircraft at around 3000 feet. We would be grateful for transparency on this issue.</p>					
4.1.23	<p>Due to recent experience, where the Airport has reached its consented annual passenger limit before a transition to new generation (quieter/ fuel efficient) aircraft had taken place, concerns were expressed that the new generation fleet mix may not be delivered over the time frame of the Proposed Development.</p>		Central Bedfordshire Council		<p>Please see responses to refs 4.1.1, 4.1.2 and 4.1.3.</p> <p>It is important to note that the 18 mppa proposal, granted consent in 2014, was on the basis that 18 mppa would not be reached until around 2027/8. However, growth in demand for air travel accelerated across the UK and in the London area in particular, which meant the airport saw passenger growth ahead of the expected delivery of new aircraft. It is still anticipated that these new aircraft will make up a substantial proportion of the airline fleets by 2028. In the short term, due to delivery delays on the new generation Airbus aircraft as well as the grounding of the new generation Boeing-737Max, airlines have not been able to use</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					these aircraft as early as expected.	
4.1.24	The degree of fleet renewal is not described in transparent detail. When read alongside the noise management plan, 3.2.5 this notes that introducing new aircraft types can be fraught with delays.		Dacorum Borough Council		Please see response to ref 4.1.2.	No
4.1.25	While LLA is reliant on the aircraft manufacturers and operators to introduce more efficient aircraft, the LLA is responsible for the expansion. On this basis the Council would like to see more evidence from LLA to justify the now historic case for expansion.		Stevenage Borough Council		The Draft Need Case sets out the case for the Proposed Development.	No
4.1.26	Buckinghamshire County Council and Aylesbury Vale District want to work with the Applicant to ensure that there is coordination on the use of airspace over northern Buckinghamshire and the Chilterns between LLAL, the airport's operators and Heathrow in order to ensure that airspace modernisation benefits secured over Buckinghamshire from		Buckinghamshire County Council and Aylesbury Vale District Council		Please see response to ref 4.1.13.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	potential changes at Heathrow are not undermined by lower altitude aircraft from Luton airport.					
4.1.27	Question if suggestion to increase the take off and approach angles has been discussed with operators as it may not be feasible due to engine lease restrictions.		Stevenage Borough Council		The potential for changing approach and departure profiles will be reviewed as part of the wider airspace modernisation programme covering the whole of South East England. This is being coordinated by the ACOG, with the involvement of National Air Traffic Services and individual airports, reporting to the CAA and the Department for Transport, who will need to approve any change.	No
4.1.28	For the population exposures estimated in the PEIR, CAA would expect airports to adapt flight profiles based on local data and check noise estimates against airport noise measurement for the noise dominant aircraft types. CAA encourages this is done for the ES to ensure consistency with the subsequent Airspace Change Process and to ensure that the noise envelope reflects local	Civil Aviation Authority			Noise predictions are based on local flight data and measured noise data from the airport, as detailed in Chapter 16 Noise and Vibration of the PEIR.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	operations and does not fetter the ACP.					
4.1.29	The [airspace] explanatory note provides an understanding of the timeframes and implications of the proposed airspace modernisation proposals and how these relate to the current and emerging noise assessments to be included within the Environmental Statement submitted as part of the DCO application.		WSP for Host Authorities		Please see response to ref 4.1.11.	No
4.1.30	In addition to airspace change, changes to air traffic control (ATC) operational practices are sometimes required to accommodate new traffic or improve efficiency. Traditionally, the CAA regulated only the safety of such practices, but in October 2018 the Secretary of State gave the CAA a function of deciding whether or not certain ATC operational practices may be implemented (after considering other factors such as noise impact, in addition to safety). Following a consultation in 2019,	Civil Aviation Authority			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	we are shortly to publish our decision-making process for PPRs, which will come into force on 1 February 2020.					
4.1.31	An Advanced Surface Movement and Guidance Control System (ASMGCS) will be required to support this development with full coverage of all manoeuvring areas and aprons. This system will require sensors and masts at various locations. Air Traffic Management (ATM) Tools and Advanced Air Traffic Control Management Tools will be required such as; - Arrival and Departure Management - Airport Collaborative Decision Making Capability. Visual Control Room (VCR) Subject to assessment of sight lines the VCR, may require re-locating. If the current VCR remains in situ, it will require a complete re-fit to support extra ATC positions and Controller Tools. Technical Safeguarding New development will require technical safeguarding to ensure continued and sufficient	NATS En Route Safeguarding			This requirement has been discussed with NATS and changes have been made to the scheme to ensure that additional surface movement guidance equipment is provided. Technical safeguarding is underway to ensure that there is no interruption to Air Traffic Control (ATC) Navigation and Communication systems.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	performance of ATC Navigation and Communication systems.					
4.1.32	The Airport Owner will need to work with the Airport Operator and the local ANSP to ensure that the proposed development can be operated in a safe manner, requirements will include; - Analysis of sight lines of the new development from the VCR with remediation if required. ATC require full visibility of any new development. - Sufficient number of ATC controller positions orientated correctly to service any new development with associated increase in headcount. The current deployment will not support this expansion. - Capability for operational supervision of the ATC service. New local procedures - New procedures with Terminal Control. - New RTF frequencies will be required.	NATS En Route Safeguarding			Analysis of sightlines has been undertaken and discussed with NATS. These are being addressed through the addition of a second Ground Movement Radar. Other points raised are operational and would be subject to contract negotiation with the airport operator in due course.	Yes
4.1.33	LLAL will need to ensure that the design principles that will be used to inform the airspace assessment		WSP for Host Authorities		LLAOL will be responsible for delivering the airspace change and it is expected that this will be	No

Ref	Comment	PC	LA	No PILs	Response	Change
	process developed by the operator (LLAOL), align with a longer-term objective of ensures that benefits arising from airspace change extend beyond 2031.				implemented before 2031 such that any long term changes, as part of FASI-S, will deliver long term capacity for London and the South. The Proposed Development will not alter this.	
4.1.34	Achieving aviation emissions at or below 2005 levels in 2050 will require contributions from all parts of the aviation sector, including from new technologies and aircraft designs, improved airspace management, airline operations, and use of sustainable fuels.		Hertfordshire County Council		<p>Government policy supports the continued growth of aviation to 2050 and has explained in the Sixth Carbon Budget how this is consistent with reaching net zero by the same year.</p> <p>We are committed to playing our part in the decarbonisation of aviation and the UK economy as a whole, for example including through the removal of fossil-fuelled equipment, construction of an energy efficient new terminal building, generation of clean electricity, and supporting the move to electric vehicles and less carbon-intensive flight technologies.</p> <p>The Proposed Development will be delivered within UK Government aviation and climate</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>policy and therefore is deemed compatible with these.</p> <p>The Draft Sustainability Statement also demonstrates how the Proposed Development complies with local and national emissions reductions targets.</p>	
4.1.35	<p>Harrow London Borough Council has been engaging with other airport expansions within the London area, particularly with Heathrow Airport, which is progressing its proposal for a third runway. It is also noted that London City Airport are in the process of updating its Airport Masterplan, which would increase the number of flights operating from this airport. Lastly, it is noted that RAF Northolt (in the London Borough of Hillingdon adjoining Harrow) are also progressing airspace change proposals (albeit not proposing to increase the existing court enforced movement cap). It is clear that within the London context, there are significant proposals to increase airport capacity and change flight</p>		Harrow London Borough Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	paths within what is, in aviation terms, a relatively small area. We are also engaging with the various airspace proposals by airports as part of the Modernising UK airspace process.					
4.1.36	Due to physical constraints the changes envisaged in the flight path review Aviation 2050 are unlikely to affect the first stages of FP08 and FP26, despite the optimism of the consultancy document (p149).	Slip End Parish Council			The FASI-S airspace change process envisages long term changes to airspace well ahead of 2050 and indeed well ahead of the majority of growth under the Proposed Development.	No
4.1.37	Essex County Council notes that for the airspace change proposals as is the case with the DCO for the third runway at London Heathrow and for other airport expansion proposals, the process for securing consent for development and for airspace change are two separate processes and timescales. As a consequence, the core assessments for the DCO are based on existing flightpaths as a worst-case assessment. ECC is also mindful that substantial		Essex County Council		Please see response to ref 4.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	improvement is expected for communities based on NATS initial feasibility work for the future airspace proposals. ECC notes that there is progress being made on the separation of arrival air traffic flows separation between London Luton and London Stansted. ECC look forward to viewing the formal consultation in due course.					
4.1.38	Buckinghamshire County Council and Aylesbury Vale District Council note that this section 42 consultation is not being run concurrently with a consultation on airspace change. Whilst it is recognised that this is due to LLAL s plans running ahead of the national airspace modernisation programme it does make it difficult for Buckinghamshire County Council and Aylesbury Vale District Council, residents and communities to understand what an expanded airport will sound like in the skies above them when these changes are brought in over the next decade. Buckinghamshire County Council		Buckinghamshire County Council and Aylesbury Vale District Council		Please see response to ref 4.1.11.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	and Aylesbury Vale District Council therefore went to reserve their position on the impacts of aircraft noise. They continue to be involved with the airport s engagement on potential changes in airspace through the Liaison Committee its sub groups and the new Noise Envelope Design Group.					
4.1.39	Consider the noise modelling/forecasting to be heavily reliant on assumptions made about the use of quieter 'next generation' aircraft. Question the accuracy of these assumptions and request more detail and less optimistic scenarios.		St Albans District Council		Please see response to ref 4.1.2.	No
4.1.40	The current airspace will not support expansion to 32 million passengers per annum. The Airport Owner will need to ensure in conjunction with the Airport Operator and NATS that suitable airspace is deployed under the FASI and LAMP programmes to support aspirations on runway	NATS En Route Safeguarding			Airspace modernisation is required to enable the growth planned across all London airports, to be accommodated. This is part of the FASI-S airspace modernisation programme, which is a Government priority. It is considered reasonable to base	No

Ref	Comment	PC	LA	No PILs	Response	Change
	movement rates. Interdependencies with other TMA airfields will need to be removed as far as is practical in support.				plans on the assumption that the modernisation will take place in time to support substantial growth at the airport based on the forecasted timelines.	
4.1.41	The noise envelopes proposed as part of the DCO process should enable LLAOL to comply with the requirements of the CAP1616 process and do not unduly restrict scope for development of airspace options in any future ACPs or the ability to coordinate with other airspace change sponsors as part of the UK's airspace modernisation programme.	Civil Aviation Authority			LLAOL are required to ensure that Airspace Change Proposals (ACPs) are assessed in line with CAP1616 guidance. The ES will cover any ACP proposals based on the best available information at the time of undertaking the air noise assessment. The Noise Envelope will contain a review mechanism to ensure that any noise benefits from the ACP are accounted for.	No
4.1.42	The CAA has two separate but related roles concerning airspace. First, we must develop a strategy and plan for the use of UK airspace for air navigation up to 2040, including for the modernisation of such airspace. Our approach to this is detailed in our Airspace Modernisation Strategy (AMS). Second, the CAA makes decisions on airspace	Civil Aviation Authority			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	change proposals. Change sponsors are required to follow our airspace change proposal (ACP) process, which is set out in CAP 1616. Our airspace functions are carried out in such a way as to give effect to our strategy and plan subject to our statutory functions and duties.					
4.1.43	Given the location of London Luton Airport and the distance between it and Harrow, any direct impacts of increased passenger / aircraft movements arising from the proposed expansion are anticipated to be limited to noise from overflying aircraft. At present Harrow is not significantly impacted upon by London Luton flightpaths. We are however aware of the potential for flightpaths to change in the future, particularly as a part of the Governments ongoing process of modernising UK airspace and / or necessitated by proposals being progressed by other airports in the South-East (such as Heathrow). The proposed increase in flights from London Luton arising from		Harrow London Borough Council		Please see response to ref 4.1.13.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the current expansion proposals may also necessitate changes to current flight paths which may impact on Harrow.					
4.1.44	Chiltern District Council welcome further sensitivity analysis on assumptions around future fleet mix. This analysis should include the potential that passenger capacity is reached earlier than expected, as has happened recently, before fleet mix changes have occurred.		Chiltern District Council		The Draft Need Case sets out slower and faster-growth scenarios, including a slower transition to new generation aircraft as part of the faster growth case.	Yes
4.1.45	Chiltern District Council welcome the reduction in noise violation limits in 2020. A programme of reductions based on expected fleet modernisation should be set in this application to encourage operators to update their fleets and discourage operators flying older aircraft from wishing to fly to or from Luton.		Chiltern District Council		Please see responses to refs 4.1.1, 4.1.2 and 4.1.3.	No
4.1.46	Concern about the impact of future flight paths, including an increase in air traffic over		Buckinghamshire County Council and Aylesbury Vale District Council		Please see responses to refs 4.1.11 and 4.1.13.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Buckinghamshire and the Chilterns AONB.					
4.1.47	Consider proposals for a fuel pipeline to counter requirements to move away from fossil fuels and to meet UK legally binding targets on net zero carbon.	Chiltern Conservation Board			Until electric aircraft technology has advanced, we need to plan for aircraft to continue to be fuelled in the current manner. As the aviation fuel industry adopts Sustainable Aviation Fuels these products will be delivered using the same pipeline infrastructure and therefore the fuel pipeline will be part of the solution to de-carbonise air travel.	No
4.1.48	Concern that the Applicant has no control over updating the fleet mix to a new generation (fuel efficient and/or quieter) fleet. This can only be delivered by airline operators.		Central Bedfordshire Council		Please see the responses to refs 4.1.1, 4.1.2 and 4.1.3.	No

Table A4.9: Regard had to statutory consultation responses on Flight paths and fleet mix - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
4.2.1	General support for current flightpaths.	2	Noted.	No
4.2.2	Support future airspace changes. Some respondents state this will allow for a less constrained climb and reduce the impact of aircraft noise.	1	Noted.	No
4.2.3	Support different planes using Luton Airport in the future, particularly support for the use of wider body aircraft.	2	Noted.	No
4.2.4	Consider newer aircrafts to be progressively quieter; some respondents stating that newer aircrafts have a steeper climb which reduces the impact of noise.	3	Noted. Quieter aircraft are being introduced at the airport progressively over time. The ability to climb more steeply is being pursued as part of the ACP. Please also see responses to refs 4.1.1 and 4.1.6.	No
4.2.5	I don't think old aircraft should be phased out unnecessarily and a detailed examination of their design should take place. It may be that a variety of craft are needed to deal with a variety of situations.	1	The fleet mix reflects the likely shift over time as airlines re-fleet as part of their normal operations and strategies.	No
4.2.6	Concern that fleet mix is continuing to shift to larger and/or noisier aircrafts. Some respondents specifically concerned about an increase in cargo flights (and other noisier aircraft) operating at night.	116	Please see response to ref 4.1.1.	No

Ref	Comment	No	CC Response	Change
4.2.7	Concern that London Luton Airport has no control over updating the fleet mix to a new generation (fuel efficient and/or quieter) fleet. Some respondents cited that the update of fleet is in the control of airline operators; the CAA; and aircraft manufacturers. With some respondents querying how London Luton Airport would enforce and/or encourage airlines to use new generation aircraft; and would airline operators be able to deliver new generation aircrafts due to high costs.	85	Please see response to ref 4.1.2.	No
4.2.8	Suggest that London Luton Airport commit to the use of electric and/or fuel efficient aircraft. Some respondents cited that this should be a condition for expansion; and the airport should encourage the use of such developing technologies.	135	Please see response to ref 4.1.3.	No
4.2.9	Query whether all airlines will have fleets of electric aircrafts.	1	Please see response to ref 4.1.2.	No
4.2.10	Consider proposals for a fuel pipeline to counter requirements to move away from fossil fuels and to meet UK targets on net zero carbon. Some respondents cited that if the airport was committed to the use of an all electric fleet there would be no requirement for a pipeline. Furthermore it was cited that the pipeline should be dedicated to environmentally sustainable fuels including biofuel.	25	Please see response to ref 4.1.47.	No

Ref	Comment	No CC	Response	Change
4.2.11	Suggest a transition to a quieter fleet. Some respondents cited that this should be a condition for expansion.	94	Please see responses to refs 4.1.1 and 4.1.2.	No
4.2.12	Suggest steeper trajectories for take off and landing. Some respondents stated that this will reduce the impact of aircraft noise.	8	Please see response to ref 4.1.6.	No
4.2.13	Query regarding the number of helicopters currently permitted to fly; at what height are they allowed to fly; is there a noise limit; and how will this change with the airport expansion.	2	<p>In 2019 there were around 570 helicopter movements, equating to less than one arrival and departure per day on average. Many of the helicopters in the area are overflying and often follow clear landmarks such as motorways and railways as they fly north/south.</p> <p>The fleet mix set out in the Draft Need Case makes provision for 600 helicopter movements per year as currently, which is taken into account in assessment of the Proposed Development. There is no expectation that such movements will increase as a consequence of the Proposed Development. The operation of helicopters is subject to the overarching noise limits in force at the airport.</p>	No
4.2.14	Concern about helicopter flights. Some respondents specifically cited the adverse impact of helicopter noise, including over Harpenden and St Albans.	5	Please see response to ref 4.1.13.	No

Ref	Comment	No	CC Response	Change
4.2.15	Due to recent experience, where the Airport has reached its consented annual passenger limit before a transition to new generation (quieter/fuel efficient) aircraft had taken place, concerns were expressed that the new generation fleet mix may not be delivered over the time frame of the Proposed Development.	6	Please see response to ref 4.1.5. It is important to note that the 18 mppa proposal, granted consent in 2014, was on the basis that 18 mppa would not be reached until around 2027/8. However, growth in demand for air travel accelerated across the UK and in the London area in particular, which meant the airport saw passenger growth ahead of the expected delivery of new aircraft. It is still anticipated that these new aircraft will make up a substantial proportion of the airline fleets by 2028. In the short term, due to delivery delays on the new generation Airbus aircraft as well as the grounding of the new generation Boeing-737Max, airlines have not been able to use these aircraft as early as expected.	No
4.2.16	Concern that a transition in fleet mix to new generation (quieter/fuel efficient) aircraft and/or improvements through technological change and use of alternative fuels (including biofuels) will not occur fast enough and/or will not make a difference. Some respondents stated that transition to new generation aircraft will not deliver a significant reduction in emissions and/or noise; and the Applicant should not be considering expansion until the fleet mix has transitioned to new generation aircraft.	121	Please see responses to refs 4.1.1, 4.1.2 and 4.1.3.	No
4.2.17	Concern about the size and/or type of aircrafts used. Specific concerns cited included increase	17	Please see response to ref 4.1.1.	No

Ref	Comment	No CC	Response	Change
	in the use of larger planes; cargo planes; military planes; and private jets.			
4.2.18	Concern that current aircraft altitude is too low. Specific areas cited included over the M1, Bedford, Bedwell, the Chilterns AONB, Dunsmore, Flamstead, Harpenden, Hertfordshire, Hitchin, Ivinghoe, Letchworth, Marshalswick, Redbourn, Tring, Sandridge, Stevenage, St Albans and Wheathampstead.	203	Please see response to ref 4.1.6.	No
4.2.19	Concern about the continued impact and/or disturbance arising from current flight paths, particularly over residential areas. Some respondents stated that impacts have got worse since the introduction of RNAV; and no mitigation via flight path design has been implemented. Respondents also cited the following negative impacts: quality of life, well-being, physical and mental health, and loss of sleep. Specific areas cited include flight paths over Bedfordshire; Breachwood Green; Buckinghamshire; Caddington; Cottered; Flamstead; Hertfordshire; Ivinghoe; Kensworth; Knebworth; Markyate; Marshalswick; Redbourn; St Albans; Sandridge; Stevenage; Studham; and Wheathampstead.	114	Please see response to ref 4.1.7.	No
4.2.20	Concern that current aircrafts do not remain on flight paths. Some respondents noted that aircrafts overfly homes instead; and since the	44	Please see response to refs 4.1.7 and 4.1.8.	No

Ref	Comment	No	CC Response	Change
	RNAV was introduced the impact on surrounding areas has worsened. Specific areas cited include over homes in Dunstable; Harpenden; Leighton Buzzard; Redbourn; and Welwyn Garden City.			
4.2.21	Concern that the airspace in south east England is crowded (comprising aircrafts flying from Luton, Heathrow, Gatwick and other London Airports). Some respondents considered that this would lead to an increase in risk of accidents.	56	Please see response to ref 4.1.9.	No
4.2.22	Concern that fleet mix is currently and will continue to comprise of old generation (noisier/fuel inefficient) aircrafts.	11	Please see response to to refs 4.1.1, 4.1.2 and 4.1.3.	No
4.2.23	I am concerned about the phasing out of old aircraft too quickly without understanding their design.	1	The inclusion of newer aircraft types, many of which have entered service in recent years, reflects the natural transition of fleets as airlines order new aircraft to replace older versions at the end of their service life. The assessments do not currently assume the use of new aircraft types that may be developed but have not yet been certificated.	No
4.2.24	Concern that future flight paths are unknown as the airspace redesign has not taken place and/or flight paths from other airport expansions such as Heathrow, Gatwick and Stanstead are not known. Some respondents cited that the	66	Please see response to ref 4.1.11.	No

Ref	Comment	No CC	Response	Change
	assessment of environmental impacts and/or appropriate mitigation would therefore be difficult to determine. Specific concerns also include the uncertainty of impacts on the Chilterns AONB.			
4.2.25	Suggest that the submission of the application for development consent does not proceed until future flight paths, arising from the AD6 and FASI-S airspace changes have been determined. Some respondents cited that this will allow for coordinated solutions and assessment of cumulative impacts on the Chilterns AONB and surrounding areas from flight paths for Luton and Heathrow.	8	Please see response to ref 4.1.11.	No
4.2.26	Suggest a reduction and/or elimination of aircrafts flying at low altitudes (including night flights and cargo flights). Some respondents suggested there should be a requirement for higher aircraft altitudes, including when flying over train lines and residential areas.	10	Please see response to ref 4.1.6.	No
4.2.27	Suggest that given requirements for planes to be x meters above sea level and both Stevenage and the airport are already 170 metres above sea level, aircraft should pass over Stevenage at regulation height plus 170 meters. The respondent further suggests that aircraft navigation systems be changed with software updates to account for this.	1	Aircraft overflying Stevenage will be on a specified trajectory to/from the runway and therefore are unlikely to be able to change altitudes because the runway level sets the relevant target heights. This is common across all airports globally.	No

Ref	Comment	No	CC Response	Change
4.2.28	Suggest the use of larger aircrafts. Some respondents cited that this would allow for more passenger choice of airport; and larger range of international destinations.	4	Please see response to ref 4.1.11.	No
4.2.29	Suggest that flight paths avoid rural areas; residential areas; south of Luton; the Chilterns AONB; Harpenden; Hertfordshire; Hemel Hempstead; Hitchin; Leighton Buzzard; Peters Green; Pitstone; Redbourn; Sandridge; St Albans; Stevenage; Studham; Tring; Welwyn Garden City; Wheathampstead.	39	Please see response to ref 4.1.14.	No
4.2.30	Suggest flight paths go over open land (including open land in Bedfordshire); and less populated rural areas.	4	Please see response to ref 4.1.14.	No
4.2.31	Suggest a change in flight paths. Some respondents cited that there needs to be an even distribution and/ or rotation of flight paths to avoid concentration over one area and provide respite; aircrafts should be diverted to the north; flight paths should follow past trajectories (pre-2015); increase number of landing and departure routes; and landing and take-off should be in the direction of less populated areas.	37	Please see response to ref 4.1.14.	No

Ref	Comment	No CC	Response	Change
4.2.32	Suggest the relocation of the London Gliding Club to allow for steeper trajectory of aircrafts flying from London Luton Airport.	3	The interaction with the operations of the London Gliding Club will be considered as part of the wider airspace modernisation exercise.	No
4.2.33	Suggest that there should be an enforceable method of flight path control. Some methods cited include, the setting up of minimal impact routes; and fines for airlines deviating from the flight paths.	7	Aircraft are already required to fly within agreed flight paths, and controls and fines are in place to enforce this. However, once aircraft reach 4,000ft, they are no longer required to keep to the defined flight paths and can be routed away from the defined flight paths by Air Traffic Control. There will be an enforcement mechanism within our GCG framework covering air quality, noise, surface access and carbon emissions.	No
4.2.34	Suggest that a report on the impacts of RNAV are published and recommendations are implemented.	4	This comment relates to a previous flight path change implemented by LLAOL and is unrelated to the Proposed Development.	No
4.2.35	Suggest revisions to the existing runway. Some respondents suggested an adjustment to the angle of the runway to allow for landing towards rural areas.	2	This was considered at an early stage but was considered not to be consistent with making best use of the existing runway. It would also have resulted in encroachment onto Green Belt land as well as bring new areas into the noise contours.	No
4.2.36	Remove stacks, introduce continuous decent from 20,000ft, provided open sky's update Jefferson database to provide multi routes to each airport move or remove DFE (fly to a point). Implement CAA open skys and CAP 1616.	1	Please see response to ref 4.1.14.	No

Ref	Comment	No	CC Response	Change
4.2.37	Suggest there should be flights to more international destinations.	1	<p>Long haul flights are included within the forecasts, as detailed in our Draft Need Case. These will be enabled by improvements in runway performance for new generation widebody aircraft as well as the provision of terminal, apron and taxiway infrastructure to accommodate these activities.</p> <p>Currently the ability to operate long haul flights at the airport is limited in part due to the shorter runway, which will remain, but also by a lack of terminal and apron infrastructure appropriate to handle such flights. The latter issues will be addressed by the second terminal. There is no specific restriction on airlines operating such long haul routes from the airport, but there are Government air service agreements that may limit the number of routes and airlines that can fly to some countries.</p>	No
4.2.38	Concern about safety risks of using drones at/near the airport.	2	This sits outside of the application for development consent, and it is assumed that the evolution of Government controls and regulations around drone flying will apply equally to Luton as other airports.	No
4.2.39	Consider that larger sized aircrafts will be able to carry a higher number of passengers per flight movement.	1	Please see response to ref 4.1.1.	No
4.2.40	Request clarity on how the Applicant will manage the environmental impact of larger planes. Some respondents cited clarification in	1	These will be assessed and managed in line with all movements and will be included in the	No

Ref	Comment	No CC	Response	Change
	regards to how impacts of long-haul flights over the Chilterns AONB will be managed.		assessment of the environmental impact of the Proposed Development as set out in the PEIR.	
4.2.41	Suggest a reduction and/or ban on private jets.	7	Please see response to ref 4.1.15.	No
4.2.42	Concern that future flight paths have not taken the flight paths from other London Airports under consideration.	1	Please see response to ref 4.1.14.	No
4.2.43	Due to physical constraints the changes envisaged in the flight path review Aviation 2050 are unlikely to affect the first stages of FP08 and FP26, despite the optimism of the consultancy document (p149).	1	Please see response to ref 4.1.36.	No
4.2.44	Concern that future paths will be formed of a greater number of short-haul flights travelling to the same destination resulting in empty seats.	1	Airlines, and particularly those operating at Luton, will target selling a high percentage of the seats on their flights. If there is insufficient demand for routes to sustain all frequencies, it would be reasonable to expect the airlines to move their aircraft assets on to routes with greater demand.	No
4.2.45	Concern about the impact of future flight paths, including their positioning and an increase in air traffic/number of flights. Some respondents cited the following negative impacts: on quality of life, well-being, physical and mental health, and loss of sleep. Specific areas cited include future flight paths over: schools; residential areas; Aylesbury; Bedfordshire; Breachwood Green; Buckinghamshire; the Chilterns AONB;	62	Please see response to ref 4.1.11. Potential changes to flight paths are being undertaken separately from the proposed expansion. Consequently, the assessment of aircraft noise is based on the current airspace. Any submissions that are made on potential changes to airspace that may affect noise contours will be considered as a sensitivity test in the ES.	No

Ref	Comment	No	CC Response	Change
	Caddington; Flamstead; Harpenden; Hertfordshire; Hitchin; Leighton Buzzard; Markyate; Pepperstock; Slip End; St Albans; Sandridge; Stevenage; Studham; Wheathampstead.			
4.2.46	Concern that London Luton Airport has not control over future flight paths and/ or airspace design.	4	The airspace change process under FASI-S is a collaborative exercise across all the relevant airports and therefore changes are not simply imposed on each airport. Please see response to ref 4.1.13.	No
4.2.47	Suggest a reduction in landing fees for less polluting aircraft.	1	This is recognised as one of the tools available to airports to help drive their environmental and planning commitments and the airport operator already applies some incentives. The incentivisation of less polluting aircraft is being considered further as part of our GCG approach.	No
4.2.48	Concern that assessments of noise levels and plane frequency are never carried out between June and September and request clarity on proposed flight paths.	1	<p>The standard period for assessing airport noise in the UK is the 92-day period from 16 June to 15 September each year. Therefore all the noise assessments in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR are based on the busiest period of the year. The movement forecasts are broken down from annual to this 92-day period and reflect the peak of movements which occurs at this time of year.</p> <p>The noise impacts are being assessed based on current flight paths to be conservative, accepting</p>	No

Ref	Comment	No CC	Response	Change
			that the flight paths may subsequently require adjustment to comply with the broader Airspace Modernisation programme as detailed in responses to refs 4.1.6 and 4.1.11.	
4.2.49	Tring Town Council welcomes that airspace changes are currently under consideration by the CAA and appreciates that the National Air Traffic Services (NATS) finds that LTN could be a beneficiary of 'reduction in population affected by aircraft noise'. (p149) Indeed, this would be a positive outcome for the Chilterns and its AONB. Certainly if the restrictions on departures from LTN caused by the 'Bovingdon Stack' were eliminated, aircraft could climb more quickly and thus reduce noise pollution. This may not, of course, reduce air quality as if height is being gained more swiftly, then emissions from the aircraft's engines may increase.	1	Noted.	No
4.2.50	The CCG requests recognition of the status of the AONB, the local topography of the Chiltern Hills and responsibilities, including that of Luton Borough Council, under the CROW Act 2000. The Group appreciates that, whilst this guidance document relates to airspace design changes, it is also clearly relevant to airport expansion of this extent and as good practice should be seriously evaluated for implementation soonest.	1	Noted. The status of the AONB is recognised as appropriate in the relevant chapters of the PEIR, in particular Chapter 14 Landscape and Visual .	No

Ref	Comment	No	CC Response	Change
4.2.51	Request clearer details on future and/or current flight paths, including hours and frequency of operation.	8	<p>Details of the operating patterns at the Application Site, including aircraft types and the pattern across the day (including night flying) are provided in the Draft Need Case.</p> <p>Please see response to ref 4.1.11 in respect of future flight paths.</p>	No
4.2.52	Concern that flight paths do not go over Luton and are diverted over other surrounding areas (including over Hertfordshire).	3	Due to the position of the runway, it would not be practical for flights to be easily routed over Luton itself.	No
4.2.53	Suggest a centrally coordinated, strategic plan for how air traffic growth should be allocated between the main airports. Such an approach is currently being used for setting local authority targets for house-building in the south-east and a similar approach would seem to be essential for air traffic capacity expansion.	1	This is not Government policy due to the privatised nature of airports in the UK. However, the passenger forecasts for the application for development consent are cognisant of plans by other airports to also grow and the expansion of these airports is factored into the passenger projections.	No
4.2.54	Consider the introduction of RNAV to be a failure.	2	Concerns related to current noise and the implementation of RNAV must be addressed to the operator specifically as these do not relate to the Proposed Development.	No
4.2.55	Concern that the reason that larger planes have been introduced is due to the failure of LLAOL, LLAL and LBC to regulate growth, so that the fleet would be modernised ready for the increase in flights, not that the increase in flights would precede it. Wilful over-expansion of an	1	Please see responses to refs 4.1.1, 4.1.2 and 4.1.3.	No

Ref	Comment	No CC	Response	Change
	unmitigated fleet evidences a disregard on the part of LLAL and the Airport Operator to reducing emissions. This is also contrary to the climate change policy of Luton Borough Council.			
4.2.56	Suggest that the airport set a baseline of 2019 as the maximum for fuel usage and only increase flights in line with the 2019 baseline.	1	This will be considered as part of the Draft Green Controlled Growth Proposals .	Yes
4.2.57	Suggest that new infrastructure takes into consideration the likely future engine propulsion alternatives to today's fuel.	1	Whilst there remains uncertainty over the exact nature of future fuel options, the Proposed Development incorporates flexibility to ensure new technologies can form an integral part of the scheme.	No
4.2.58	Concern that current flight paths are fixed in an out of date airspace design.	1	Please see response to ref 4.1.11.	No
4.2.59	How will London Luton Airport ensure only fuel-efficient aircraft are used and commit to the future introduction of electric aircraft.	1	Please see response to ref 4.1.3.	No
4.2.60	Suggest that aviation emissions could be reduced by around 20% from today to 2050 through improvements to fuel efficiency, some use of sustainable biofuels, and by limiting demand growth to at most 25% above current levels. This is likely to be cost-saving. There is potential to reduce emissions further with lower levels of demand. Novel fuels (e.g. synthetic carbon-neutral kerosene, algal biofuels) could	1	The Government has set out its strategy for aviation achieving net zero by 2050 in its Jet Zero consultation. This includes the use of Sustainable Aviation Fuels and other new technologies, as well as efficiencies in flight. The application for development consent ensures that the Proposed Development commits and contributes to these initiatives.	No

Ref	Comment	No	CC Response	Change
	allow greater reductions, but their development is highly speculative and should not be relied upon.			
4.2.61	Object to the Proposed Development due to the impact of current and/or future flight paths.	8	Noted.	No
4.2.62	Concern that current flightpath maps have not been included in the main Consultation Document. Whilst the CCG appreciates the points on future airspace changes covered, it is essential for communities to have clarity on the present flightpath situation. As London Luton Airport Ltd. (LLAL) clearly state (p148). 'proposed application will not seek any changes to flightpaths or airspace.', such information is an essential element of this Consultation.	1	Flight path information is included in the Future operations and flight paths section of the Consultation Brochure .	No
4.2.63	Suggest that the Applicant outlines an effective and clear criteria for aircrafts permitted to use the airport and to provide a tangible plan on how net noise will be reduced from today if the Proposed Development is approved to ensure the health and wellbeing of residents in the surrounding areas.	1	Please see response to ref 4.1.2.	No
4.2.64	Concern about the risk of aircraft accidents.	2	The Government sets out policy on the risk of aircraft accidents and has defined Public Safety Zones at airports. This is addressed in Chapter 15 Major Accidents and Disasters of the PEIR.	No

Ref	Comment	No CC	Response	Change
4.2.65	The CCG welcomes that airspace changes are currently under consideration by the Civil Aviation Authority (CAA) and appreciates that the National Air Traffic Services (NATS) finds that LTN could be a beneficiary of 'reduction in population affected by aircraft noise'. (p149). This would be a positive outcome for the Chilterns and its AONB. If restrictions on departures from LTN caused by the 'Bovingdon Stack' were eliminated, aircraft could climb more quickly and thus reduce noise pollution.	1	This is recognised by all parties and will be a consideration by LLAOL as they develop new airspace at the airport as part of the FASI-S process. The public and relevant stakeholders will be invited to take part in consultations on this to look at and comment on options, and to help inform the process of improving airspace. This is separate to this application for development consent.	No
4.2.66	Request clarity on why Luton Airport has only a few departure and landing routes compared to Heathrow.	1	The structure of airspace at Luton is similar to that seen at other airports of comparable size across the UK and with only a single runway. London Heathrow will have more departure and landing routes to allow for different operating modes of its multiple runways.	No
4.2.67	Suggest that flight paths maps are provided within the main consultation document for ease of access.	1	Flight path information is included in the Future operations and flight paths section of the Consultation Brochure .	No
4.2.68	Consider the Proposed Development to be outdated and re-assessment is required due to future transition of zero carbon fleet.	1	Please see response to ref 4.1.3.	No
4.2.69	Question the impacts if electric aircraft are developed.	1	Work is ongoing to explore the potential for electric aircraft and some prototypes are now flying. This means there is little information available on impacts. However it is recognised that electric	No

Ref	Comment	No CC	Response	Change
			aircraft should offer significant improvements in environmental performance in a number of areas.	

A5 Air Quality

Table A5.10: Regard had to statutory consultation responses on Air Quality - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref.	Comment	PC	LA	No PILs	Response	Change
5.1.1	Concern about the impacts on air quality during the construction period. Specific concerns included dust, congestion and pollution from road vehicles and mobile plant. The following locations were specifically mentioned; Luton, Harpenden, surrounding villages to Luton Airport, Wigmore Valley Park and Green Belt areas.			7	Air Quality Chapter 7 of the PEIR includes an assessment of local air quality pollutants. During construction, the assessment considered dust from construction and demolition works. The assessment of dust emissions was used to specify appropriate mitigation for inclusion in the Draft Code of Construction Practice (CoCP) in Appendix 4.2 of Volume 3 of the PEIR. With these measures in place, no likely significant effects were identified. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	No
5.1.2	Concern about the management of air quality during construction, including reporting of emissions and how breaches in acceptable air quality levels would be dealt with (for instance via fines).			2	The management of air quality impacts (dust, emissions and odour) will be controlled via the measures outlined within the CoCP, which will be submitted with the application for development consent; a Draft CoCP is provided in Appendix 4.2 of Volume 3 of the	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					PEIR. This includes details of mitigation and monitoring requirements. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	
5.1.3	Concern about the existing levels of air pollution with current passenger numbers, with impacts on the environment.			2	Chapter 7 Air Quality of the PEIR considers all emissions from aircraft movements for an existing baseline year, future baseline year and future operational scenarios, to determine the effects of the Proposed Development.	No
5.1.4	Concern about the existing levels of air pollution (including CO2, NO2 and PM2.5) from aircrafts and road traffic, with impacts to local communities on health.			20	Chapter 7 Air Quality of the PEIR assesses the air quality impacts of the Proposed Development and sets out how the air quality impacts affect human and ecological health. The air quality assessment in Chapter 7 did not identify any likely significant effects on existing air quality at human receptors. Where required mitigation is proposed to reduce emissions to air. The application for development consent will include a suite of commitments to ensure mitigation	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>is delivered and these will be legal obligations.</p> <p>Measures will be committed to via the Air Quality Plan to minimise emissions during the operational phase; a draft version is included in Appendix 7.2 in Volume 3 of the PEIR. This sets out good practice measures to minimise emissions to air during operation such as, but not limited to: measures to increase travel by public transport; measures to encourage the use of low and zero emission vehicles; provision of a fleet of low or zero emissions ground support equipment; and encouraging airlines to use their newest aircraft.</p> <p>All current air quality monitoring in and around the airport shows that NOx and PM levels are all within UK objectives.</p> <p>A Green Controlled Growth (GCG) framework, which will ensure that the airport operates within particular “limits”, is proposed. One of these limits relates to air quality. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time.</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
					However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such "limits".	
5.1.5	Concern about the existing levels of air pollution, including emissions from aircraft vapour trails (including particulates, carbon dioxide, sulphur oxides and nitrogen) and acid rain. This poses risks to the environment, as well as quality of life and comfort for local communities, even if people are not aware of the impacts. Specifically, concern that expansion would compromise the government’s commitment to net zero carbon emission growth by 2050.			2	Please see response to ref 5.1.4.	No
5.1.6	Concerns about the existing levels of air pollution (including PM2.5) associated with Luton Airport compared to the levels in other parts			11	Please see response to ref 5.1.4. Air quality monitoring is being carried out and will continue to be operated whilst the airport is in operation.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	of the country as well as compared with other airports.					
5.1.7	Concerns about the impacts of fuel dumping and the oily/ film-like deposits left on outdoor surfaces and water bodies as a result.			4	Jettisoning of fuel is an infrequent event which takes place over water or at high altitude, allowing dispersion. Effects are not considered to be significant and have been scoped out of the assessment within the PEIR.	No
5.1.8	Concern that the existing air pollution levels from the current airport operation are unacceptable and in breach of legal limits; NOx levels at the airport site were specifically highlighted. Some respondents noted that LLAL have not taken due consideration of air quality issues (including environmental impacts, health impacts, and smell and taste of aviation fuel) raised by local people to date (including since previous expansion projects have been completed) and therefore further expansion is not appropriate until these issues have been dealt with. Concern that the Proposed Development would worsen air quality			11	Please see response to ref 5.1.4..	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	levels further, with impacts to airport staff, passengers and local residents.					
5.1.9	Suggestion to further develop the proposals to manage and mitigate air pollution during construction in order to minimise adverse air quality impacts.			1	Please see response to ref 5.1.1.	No
5.1.10	Concern that the proposals to mitigate the impacts on air quality through the Future LuToN Impact Reduction Scheme are inadequate.			1	<p>Community First is not intended to mitigate impacts – that is the role of mitigation identified and secured through the Environmental Statement that will be submitted with the application for development consent. The purpose of Community First is to make funds available to community groups and Town and Parish Councils to address local needs in areas of high deprivation or for decarbonisation projects.</p> <p>The area affected by the Proposed Development was determined following the methodology set out in the EIA scoping report which includes all areas potentially affected by the Proposed Development. Where required,</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>mitigation is proposed to reduce emissions to air.</p> <p>The Draft CoCP in Appendix 4.2 and the Draft Air Quality Plan in Appendix 7.2 in Volume 3 of the PEIR provide mitigation appropriate to the level of impact assessed in Chapter 7 Air Quality of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.</p>	
5.1.11	<p>Concern that the proposals to mitigate the impacts on air quality are inadequate and dubious; including concern that zero emission target are unrealistic. Some respondents raised concerns that the air pollution associated with aircrafts is so significant that mitigation measures may not have any measurable effect; particularly as measures are seen to be short term. Specific concerns raised that the inadequacy of proposed mitigation measures will lead to adverse impacts on air quality and associated impacts to health (including heart attacks, strokes and death) and wellbeing for local communities, due to the increases in</p>			8	Please see response to ref 5.1.4.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	flights and road traffic as a result of the Proposed Development. The following locations were specifically mentioned: Hertfordshire, Wigmore Park, Stevenage and adjoining villages.					
5.1.12	Concern that the proposals to mitigate the impacts on air quality are inadequate and dubious, including criticism that the consultation documents do not provide sufficient information of mitigation measures or strong enough means of enforcement; and furthermore, that claims that 'there will be no significant impact on existing air quality during construction and operation' are not valid.		Stevenage Borough Council	2	<p>Please see response to ref 5.1.4.</p> <p>An assessment against compliance with UK legislated air quality standards is included in Chapter 7 Air Quality of the PEIR. The assessment includes all related emissions from airport operations, including aircraft, and vehicle traffic on the local road network. An assessment of the significance of the increase in pollutant concentrations predicted as a result of the Proposed Development is also included in the PEIR, following best practice guidance. Where required, mitigation is proposed to reduce emissions to air.</p> <p>To minimise emissions during construction the Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR sets out control and monitoring measures that contractors will be required to</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>implement. It will be a legal requirement for the contractor to comply with the CoCP under the DCO. The Draft Air Quality Plan in Appendix 7.2 in Volume 3 of the PEIR sets out operational measures. The measures in the Air Quality Plan will be secured under the DCO.</p> <p>The significance criteria used for the air quality assessment follows best practice guidance and is detailed in Air Quality Methodology and Data in Appendix 7.1 in Volume 3 of the PEIR.</p>	
5.1.13	<p>Concern that the proposals to mitigate impacts on air quality are ineffective and insufficient, as adverse impacts (including health and quality of life) and damage to the environment are inevitable due to the scale of the Proposed Development (including increases in flights and road traffic) and complexity of construction arrangements. Some respondents noted concern that mitigating air quality impacts during construction will still result in an airport that</p>			13	<p>Please see response to ref 5.1.4. Mitigation measures will be secured via the DCO, compliance with which will be a legal requirement.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	produces substantially more air pollution due to increased number of flights and increased traffic, and the mitigation measures during operation will not be sufficient to manage this; particularly as mitigation measures rely on behavioural changes from airport passengers, employees and aircraft operators that are outside the direct control of LLAL, and specifically do not seek to address aircraft pollutions. In addition, some respondents raised concern that there was no obligation for LLAL to implement the mitigation measures proposed.					
5.1.14	Concern that the proposals to mitigate impacts on air quality are ineffective and insufficient, and that the consultation documents do not contain enough detailed information or certainty on mitigation proposals.			5	Please see response to ref 5.1.4 and 5.1.12.	No
5.1.15	Concern that the proposals to mitigate impacts on air quality are ineffective and insufficient.			1	Please see response to ref 5.1.4 and 5.1.12.	No
5.1.16	Consider that the Development Proposal is unnecessary and			6	Noted. Please see Need case and forecasts topic responses.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	therefore the proposals to mitigate air quality during construction and operation, and benefit the local landscape are unnecessary.					
5.1.17	Suggestion to mitigate air quality impacts during the operation of the Proposed Development through measures including: good air pollution measurement especially VOCs and promoting cleaner aircraft and methods to reduce emissions.		Stevenage Borough Council	2	<p>All suggestions are welcomed, and many have been incorporated into the Proposed Development.</p> <p>We have set ambitious targets to increase the share of trips to the airport by public transport.</p> <p>Our proposed GCG approach will set “limits” for air quality, monitoring, and enforcement which will be overseen by an independent body.</p> <p>We are also proposing Community First which will make funds available to community groups and Town and Parish Councils to address local needs in areas of high deprivation or for decarbonisation projects.</p> <p>The fleet mix forecasts used for assessment are based on the current expectations as to the modernisation of the aircraft fleet. Our core assessments are based on known types of aircraft now entering service, but sensitivity</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>tests will be carried out to consider the effect of electric aircraft or other future types entering the fleets, further information can be found in the Draft Needs Case. This will inform the setting of GCG limits. We will set ambitious targets for aircraft noise and carbon emissions and, in this respect, the type of aircraft become less important than the target.</p> <p>During operation, control measures outlined in the Draft Air Quality Plan in Appendix 7.4 of Volume 3 of the PEIR will be implemented. This sets out good practice measures to minimise emissions to air during operation such as, but not limited to: measures to increase travel by public transport; measures to encourage the use of low and zero emission vehicles; provision of a fleet of low or zero emissions ground support equipment; airlines will be encouraged to use their newest aircraft.</p>	
5.1.18	Concern about potential increases in air pollution (including PM2.5) from the Proposed Development, with		Stevenage Borough Council	20	Please see response to ref 5.1.4.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>impacts to quality of life (including smell and taste of aviation fuel), wellbeing and health (including respiratory illness, lung cancer, heart disease, brain tumours, stunted child development and death), which have not been given due consideration and were noted to disproportionately affect people with protected characteristics (including disability, BAME, elderly and children); some respondents specifically raised impacts to sensitive receptors including schools and residential areas. Some respondents requested information on the forecast likely impacts to health as a result of the Proposed Development. The following locations were specifically mentioned: Luton, Luton Hoo, Farley Hill, Wigmore, St Anne's, Breachwood Green, St Albans, Harpenden, Stevenage, Leighton Buzzard, Letchworth Garden City, Flamstead, Hertfordshire, Bedfordshire.</p>		St Albans District Council			
5.1.19	<p>Suggestion that further/ongoing air quality modelling and monitoring should be undertaken including national projections of emissions and rural background concentrations, to establish accurate levels of pollution</p>		<p>Stevenage Borough Council</p> <p>WSP for Host Authorities</p>	3	Please see response to ref 5.1.4.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	and subsequently inform appropriate measures to reduce impacts.		Essex County Council			
5.1.20	Suggestion that an independent organisation should be established to monitor air quality impacts and to audit the modelling and monitoring of air quality undertaken by LLAL to date.		Stevenage Borough Council	2	A GCG framework which will ensure that the airport operates within particular “limits” is proposed. Limits will be set in respect of air quality, noise, surface access and carbon emissions. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.	No
5.1.21	Suggestion that further air quality monitoring should be undertaken for emissions including NOx, CO2 and particulates.	Slip End Parish Council		3	A network of air quality monitoring stations has been used to establish the baseline air quality within the study area. This includes air quality monitoring sites managed by us, LLAOL and the local authorities.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>This network provides a suitable spatial coverage for verifying air quality modelling.</p> <p>All of the results and locations of the local authority monitoring sites are reported annually and published online through their websites. A new air quality monitoring station was established in June 2019 at Wigmore Valley Park. The station is measuring a range of potential pollutants wider than that monitored by any other major airport in the UK.</p> <p>The air quality assessment has also used modelled data from the National Atmospheric Emissions Inventory (NAEI) over a 60km by 50km grid area to capture all background emissions in the study area. This data is verified using ambient air quality monitoring and includes pollutants relevant to the air quality study.</p> <p>The results are provided in Chapter 7 Air Quality of the PEIR.</p>	
5.1.22	Suggestion that ongoing air quality monitoring should be undertaken for			1	Please see response to ref 5.1.4 and 5.1.21.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	scope 1-3 emissions and included in an impact assessment to inform the management and mitigation of impacts during construction and operation for all elements of the Proposed Development, including modifications to local roads.					
5.1.23	Suggestion that there should be greater transparency in the methods for monitoring and modelling emissions prior to the Proposed Development as well as during construction and operation; this should be included in the ES.	Civil Aviation Authority	WSP for Host Authorities	1	Please see response to ref 5.1.4 and 5.1.21.	No
5.1.24	Concern that impacts to air quality from road traffic will be worsened by the Proposed Development, including potential breaches in air pollution limits and impacts to Air Quality Management Areas via pollutants including PM10, PM2.5 and NOx. The A1, M1, A505, A602 and A414 were specifically highlighted as key routes to the airport that are likely to be significantly affected with adverse air quality impacts expected on local residents (including health impacts on respiratory illnesses and deaths),		North Hertfordshire District Council	14	The assessment of air quality impacts includes consideration of road traffic changes as a result of the construction and operation of the Proposed Development. The spatial scope of the assessment and ecological sites in the study area is described in Chapter 7 Air Quality of the PEIR. Analysis of existing passenger numbers suggests that there is a limited volume of airport related traffic travelling to or from the east of the airport via roads such as the	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>schools, businesses and wildlife. In addition, proposed additional traffic lights and alterations to local roads, including Upper Tilehouse Street (Hitchin) Turners Road North (Luton) and Vauxhall Way (Luton), and alterations to roundabouts (specifically: Pirton Road/Moormead Hill, Park Way/Upper Tilehouse Street, Park Way/Stevenage Road, Wigmore Lane/Crawley Green, Lalleford/Eaton Green, Crawley Green/Airport Way) were highlighted with concerns of increased traffic impacting local air quality. Some respondents requested clarity on modelling and the predicted additional vehicle movements as a result of the Proposed Development, including the proportion of vehicles that are HGV. The following locations were specifically mentioned: Hertfordshire, Bedfordshire, Hitchin (including Willow Road, Charlton Road and Moormead Hill), Luton, Hertford, Harpenden, St Albans, Hemel Hempstead, Slip End and London Hoo Elite Hotels.</p>				<p>A1(M), A505 and A602. Similarly, in the future major growth is not predicted from areas to the east of Luton with the majority of airport related traffic forecasted to access the airport from the M1. With this in mind the airport does not currently propose to extend the scope of improvements beyond the measures that are proposed and described in the Getting To and From the Airport – Our Emerging Transport Strategy (SAETS).</p> <p>The Affected Road Network (ARN) modelled in the air quality assessment, is defined using best practice guidance as described in Chapter 7 Air Quality of the PEIR and shown in Figure 7.1 in Volume 4 of the PEIR. The A414 was not captured in the ARN modelled.</p> <p>Please also see response to ref 5.1.4.</p>	
5.1.25	Concern that impacts to air quality from road traffic will be worsened by			3	Please see response to ref 5.1.24.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	increased staff required during the construction and operation of the Proposed Development.					
5.1.26	Concern that the proposals for additional car parking will directly lead to increased road traffic to the airport, with adverse impacts to air quality on the surrounding areas.			1	Please see response to ref 5.1.24.	No
5.1.27	The Chilterns Beechwoods Special Area of Conservation (SAC) is in close proximity to motorways and major roads which are likely to experience increased traffic from the expansion of Luton Airport. The Aston Rowant SAC is possibly the only SAC in the UK, which is actually severed by a motorway, with the vast cutting of the M40 motorway constructed through this nature reserve in the 1960s. The M25 also cuts through the Chilterns through the AONB. Increased traffic for Luton Airport could have an effect on air quality, noise and habitats. Air pollution and effects on sensitive habitats and protected sites of national and international importance and must be carefully addressed through	Chilterns Conservation Board		1	Please see response to ref 5.1.24. A habitat assessment screening report is included in the Draft Habitat Regulations Assessment (HRA) No Significant Effects Report (NSER) in Appendix 8.3 of Volume 3 of the PEIR. Table 3.1 of the HRA sets out the vulnerability of each of the relevant SACs. The assessment concludes that Chilterns Breechwoods SAC and Wormley Hoddesdonpark Woods SAC are not at increased risk of air pollution and deposition of air-borne pollutants as a result of the Proposed Development due to the distances involved. With regards to the Aston Rowant SAC, the assessment concludes that there are no air quality impacts as a	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	Environmental Impact Assessment and Habitat Regulations Assessment. Currently the PEIR is very thin on air quality effects on habitats including nitrogen deposition. It refers to looking only at sensitive ecological receptors identified within 2km of the main application site; this is not sufficient given the long reach of airport journeys.				result of the Proposed Development as the section of M40 that bisects the SAC is not part of the ARN for the Proposed Development.	
5.1.28	Concern that traffic levels are already high in areas surrounding the airport, with breaches of level air pollution levels and impacts to local residents.			6	Please see response to ref 5.1.4.. All relevant pollutants are assessed including particulate matter from brake and tyre wear. Where required, mitigation is proposed to reduce emissions to air.	No
5.1.29	Concern that the Proposed Development will result in increased air pollution (including CO2, NOx, SO2 and VOCs) and should not be taken forward due to impacts to the natural environment and wildlife locally, regionally and nationally; and that insufficient consideration is being given to these impacts. Specifically, impacts to the Chilterns AONB (including Icknield Way), impacts to calcareous grassland (including			11	Please see response to ref 5.1.4 and 5.1.24. Chapter 7 Air Quality of the PEIR includes assessment of the air quality impacts of the Proposed Development to sensitive ecological receptors, including Sites of Special Scientific Interest (SSSIs). The assessment concludes that air quality impacts on ecological	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	Galley and Warden Hill SSSI), loss of trees and potential habitat severance/degradation were highlighted. Some respondents requested greater clarity on the air quality impacts to the environment from the Proposed Development, whilst noting that the current landscape proposals are insufficient to mitigate impacts. In addition, some respondents highlighted that the Proposed Development is in contradiction to Government and other national organisations' advice to reduce emissions, including the use of more sustainable transport modes personally. The following locations were specifically mentioned: Luton, Dunstable, Kensworth, Sandridge, Hitchin, Hertford, Hertfordshire.				receptors are considered to be not significant.	
5.1.30	Consider that the Proposed Development is unnecessary and should not be taken forward due to expected adverse impacts to air quality, with at least one new breach of legal limits expected. Some respondents noted that the Proposed Development is centred on economic gain and does not appropriately consider air quality and the impacts			7	Noted. Please see response to ref Please see response to ref 5.1.4. Please also see Need Case and Forecasts topic responses.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	that greater levels of pollution would have on the environment and local residents (including health and death). Overall, the benefits of the Proposed Development do not outweigh the adverse impacts to air quality.					
5.1.31	Concern over the airfield proposals, layout for the airport expansion and replacement of Wigmore Park, with impacts including potential increases in exposure to air pollution particularly due to location of children's play area and recreational park adjacent to airport.			5	Please see response to ref 5.1.4. Please also see Wigmore Valley Park topic responses.	No
5.1.32	The Air Quality monitoring appears to focus on Air Quality Management Areas (monitoring cars in already polluted urban areas) and lacks consideration of effects of air pollution on natural habitats. See for more information PlantLife's report We Need to Talk About Nitrogen. This is especially important for the SSSIs, and it is critically important for the Chiltern Beechwoods Special Area of Conservation which is an internally important biodiversity designation. All three of the Special Areas of	Chilterns Conservation Board		1	Please see response to ref 5.1.4 and 5.1.27. Chapter 8 Biodiversity of the PEIR assesses all potential impacts to biodiversity as a result of the Proposed Development, including air quality and noise. Chapter 7 Air Quality of the PEIR includes the ecological receptors modelled for effects through changes in Air Quality. This includes details of the receptors considered. Where required, mitigation is	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>Conservation in the Chilterns AONB (Chilterns Beechwoods SAC, the Aston Rowant SAC and Hartslock Wood SAC have already breached their critical loads for air pollution. For example, see Natural England, Supplementary Advice for Chiltern Beechwoods SAC, Nov 2018: "The supporting habitat of this feature is considered sensitive to changes in air quality and is currently exceeding the critical load for nitrogen (October 2018). This habitat type is considered sensitive to changes in air quality. Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.'</p>				<p>recommended to reduce emissions to air.</p> <p>Air quality monitoring is being carried out and will continue whilst the airport is in operation.</p> <p>The Draft HRA NSER (Appendix 8.3 of Volume 3 of the PEIR) also considers the appropriate designated sites within a sufficient distance from the airport, including those related to the ARN. This includes appropriate consideration of air quality.</p>	
5.1.33	<p>Notes the assessment should consider changes in air quality and vibration which may affect the fabric at Someries Castle, where likely significant effects may occur. In addition, Luton Hoo Elite Hotels questions whether similar impacts to</p>			1	<p>Please see response to ref 5.1.4.</p> <p>Somerries Castle and Luton Hoo locations have been included in the air quality assessment, as they may be sensitive to acid erosion from air pollutants. While there are no significant sources of acid</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	fabrics may be experienced as a result of air pollution at the hotel.				emissions related to the Proposed Development, Someries Castle and Luton Hoo have been included to determine the change in air pollutant concentrations. The assessment provided in Appendix 7.1 in Volume 3 of the PEIR concludes that the changes to NO ₂ , PM ₁₀ and PM _{2.5} pollutant concentrations at these locations are predicted to be negligible, and therefore the effects are predicted to be not significant. No air quality mitigation measures are identified specifically for these heritage assets.	
5.1.34	Concern that increases in public transport use of all types will still lead to increases in air pollution.			1	Please see response to ref 5.1.4. Chapter 21 In-combination and Cumulative Effects of the PEIR discusses cumulative effects. Where required, mitigation is proposed to reduce emissions to air.	No
5.1.35	Concern about the impacts on air quality during the construction period over 14 years.	Kings Walden Parish Council		1	Please see response to ref 5.1.1 and 5.1.2.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
5.1.36	There is no evidence provided to demonstrate that the significant increase in density of emissions producing aircraft will not cause significant degradation to air-quality, affecting airport staff, and passengers.	Kings Walden Parish Council		1	Please see response to ref 5.1.4.	No
5.1.37	The Air Quality monitoring appears to focus on Air Quality Management Areas (monitoring cars in already polluted urban areas) and lacks consideration of effects of air pollution on natural habitats.	Chilterns Conservation Board		1	Please see response to ref 5.1.21. Air quality impacts on sensitive ecological receptors have been assessed in Chapter 8 Biodiversity of the PEIR and found to be insignificant.	No
5.1.38	Air pollution and effects on sensitive habitats and protected sites of national and international importance and must be carefully addressed through Environmental Impact Assessment and Habitat Regulations Assessment. Currently the PEIR is very thin on air quality effects on habitats including nitrogen deposition. It refers to looking only at sensitive ecological receptors identified within 2km of the main application site; this is not sufficient given the long reach of airport journeys.	Chilterns Conservation Board		1	Please see response to ref 5.1.4 and 5.1.21.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
5.1.39	Concern that the impacts to air quality from the Proposed Development are greater than set out in the consultation material; this is as a result of both increases in numbers of flights and increases in road traffic accessing the airport, as well as construction activities.		St Albans District Council		Please see response to ref 5.1.4 and 5.1.17.	No
5.1.40	Public Health England's position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposures of non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental	Public Health England			Please see response to ref 5.1.4 and 5.1.24.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	and health impact assessment, and development consent.					
5.1.41	Natural England note: to inform the air quality assessment, LLAL will need to know where existing passengers travel from, and what the mode share is. This will allow the analyses to set out what the likely increases are from different parts of the country, which is a useful starting point for considering whether there is a likelihood of impacts beyond the immediate area around the airport: although clearly those sites closest will be most impacted. Natural England advise that appropriate thresholds should be used for alone and in-combination assessments, such as 1% threshold increase of the critical levels and loads, and an appropriate further threshold (for example, 0.1%) for considering impacts in combination or cumulatively (for both Sites of Special Scientific Interest (SSSI s) and European designated sites as appropriate).	Natural England			Please see response to ref 5.1.4. The criteria for air quality impact assessments are set out in Air Quality Methodology and Data in Appendix 7.1 in Volume 3 of the PEIR. The significance criteria used for the air quality assessment follows best practice guidance.	No
5.1.42	The developer will need to consider the outcome of the Dutch Nitrogen	Natural England			Noted.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>case 293/17 Court of Justice of the European Union Cooperation Mobilisation for the Environment v Verenigin Leefmilieu (Dutch Nitrogen) in terms of the reliance of the air quality assessment on future technological advances which are anticipated to reduced harmful emissions. The requirement for certainty as to the confidence on which these measures can be relied upon was a key point of discussion in this ruling. The applicant and the competent authority should ensure that they seek appropriate legal advice on this (and other relevant) ruling. When considering this matter, you may wish to review other similar projects, which may be helpful but should not necessarily offer a precedent for how this ruling should be applied to this case.</p>					
5.1.43	<p>Natural England's Air Quality Distance Criteria for airports, in line with the expert opinion of the Inter-agency Air Pollution Group, is 5km, plus consideration of effects on nearby roads. Importantly, airports may have air pollution impacts at a greater distance than 5km through effects on</p>	Natural England			<p>Chapter 7 Air Quality of the PEIR assesses the air quality impacts of the Proposed Development and sets out how the air quality impacts affect human and ecological health. The spatial scope of the assessment and ecological sites in</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	the road network, and this needs to be taken into account within a detailed air quality assessment.				the study area is described in Section 7.3 in Chapter 7 of the PEIR, using best practice guidance. It details that ecological sites within 200m of the ARN (which extends beyond the 15km by 15km grid area) have been assessed. Where required, mitigation is proposed to reduce emissions to air.	
5.1.44	Concern about the cumulative impact on air quality from the Proposed Development and any other planned major projects in proximity to the affected areas, as well as existing operations from other airports including Heathrow.	Natural England			Please see response to ref 5.1.4. Chapter 21 In-combination and Cumulative Effects of the PEIR discusses cumulative effects. Where required, mitigation is proposed to reduce emissions to air.	No
5.1.45	The PEIR is not clear on what monitoring arrangements are proposed, monitoring methods and potential additional adaptive measures that could be implemented to achieve the predicted effects and assumed targets will need to be included as part of the ES, for example to ensure targets for reducing emissions to air are achieved. - The PEIR recommends that a separate section within the ES		WSP for Host Authorities		Please see response to ref 5.1.21. A GCG framework which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to air quality. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>is provided to make it clear what monitoring is to be carried out during construction and operational phases. This should set out monitoring methods and potential additional adaptive measures that could be implemented to ensure predicted effects are not exceeded and assumed targets with mitigation are achieved. This would often take the form of a mitigation route map. - By way of comparison against other schemes, it is noted that Heathrow proposes to adopt an Environmentally Managed Growth (EMG) approach to mitigation which outlines how it will monitor and report its performance in relation to the noise, air quality, surface access and carbon targets set out within the Airport NPS and how growth will be regulated to ensure performance against key targets is achieved. LLAL may also wish to consider whether as part of its mitigation and compensation proposals how it would seek to address any unforeseen impacts that may arise beyond those that will be mitigated or compensated through the DCO requirements or obligations.</p>				<p>additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the "limit". An independent body is proposed to monitor and enforce such "limits".</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
5.1.46	<p>The operation of the Proposed Development is likely to cause an increase in air pollution via increased road and air traffic over and through the Chilterns Area of Outstanding Natural Beauty (AONB). The SSSI falls within the 15km x 15km grid within which ecological receptors were considered within the EIA Scoping Report, however outside of the 2km search area (DEFRA and EA guidance) from the Main Application site. Nevertheless, it is unclear why these SSSI calcareous grasslands (or indeed non-SSSI calcareous grasslands) were scoped out, due to their sensitivity to increases in air pollution, or why Natural England's Impact Risk Zones were not considered. We again advise that a clear list of ecological receptors considered, and screened out of impact assessments, should be provided to ensure that sensitive features are not missed through use of standard methodology.</p>	Natural England			<p>Please see response to ref 5.1.4, 5.1.29 and 5.1.32.</p> <p>Please also see Natural Environment topic responses.</p>	No
5.1.47	<p>We are also concerned about the emissions monitoring strategy, which is heavily reliant on the new fixed</p>	Slip End Parish Council			Please see response to ref 5.1.21.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	monitoring station at Wigmore, operative since June this year, and roving data collection for a limited range of variables. Given that 70% of aircraft take-offs are westerly over the course of the year, it is a major oversight to not monitor emissions west of the airport. The nearest fixed monitoring station for particulate matter (PM10/PM2.5) and CO2 is in Berkhamsted, 18km to the southwest of the runway. This means there is no western data available for the 15x15 sq km sample grid employed in your study (PEIR vol 5.6.2).					
5.1.48	There is a strong focus on ensuring the impacts of the Project are in compliance with the legal limits set in EU law. However, the analysis indicates that they will cause at least one new breach of legal limits.	Public Health England			Please see response to ref 5.1.4.	No
5.1.49	We agree with the approach that the Air Quality Assessment to determine the population affected by significant concentrations will be considered in the Health and Community Assessment (Chapter 15 Health and Community) and included in the ES.	Public Health England			Noted.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	The ES should include the most recent air quality monitoring data.					
5.1.50	We recommend Luton should seek to improve upon baseline, help secure compliance with air quality limits as quickly as possible, and help go beyond existing EU air quality limits, please see our position on this below.	Public Health England			Please see response to ref 5.1.4 and 5.1.20.	No
5.1.51	As mentioned above, the operation of the proposed development is likely to cause an increase in air pollution via increased road and air traffic over and through the Chilterns Area of Outstanding Natural Beauty. The expected impacts would be increased noise reducing its tranquillity and increases in air pollution.	Natural England			Please see response to ref 5.1.4.	No
5.1.52	The potential for calcareous grassland habitats, such as that seen at Galley and Warden Hills SSSI to be impacted by increases in air pollution.	Natural England			Please see response to ref 5.1.4 and 5.1.29.	No
5.1.53	The PEIR states the modelling represented a worst-case assessment for air quality to predict possible significant impacts. We recommend the justification for this is provided in	Public Health England			Please see response to ref 5.1.3.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	the ES. We acknowledge the emissions modelling incorporates proposals for low emission vehicles. We welcome this approach but recommend the ES includes the methodology for baseline and worst-case scenarios in case the vehicle fleet is not replaced with low emission technology.					
5.1.54	Air Quality Referring to the Aviation National Policy Statement in which Luton Airport is classified as a major airport in the South East, section 5.6 states that without effective mitigation, expansion is likely to increase congestion on existing routes and have environmental impacts such as increased noise and emissions	Natural England			Regard has been given to the Aviation National Policy Statement in developing proposals. Effective mitigation measures have been identified as set out in Chapter 7 Air Quality of the PEIR.	No

Table A5.11: Regard had to statutory consultation responses on Air Quality - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
5.2.1	Concern about the impacts on air quality during the construction period. Specific concerns included dust, congestion and pollution from road vehicles and mobile plant. The following locations were specifically mentioned; Luton, Harpenden, surrounding villages to Luton Airport, Wigmore Valley Park and Green Belt areas.	57	Please see response to ref 5.1.1.	No
5.2.2	Concern about the management of air quality during construction, including reporting of emissions and how breaches in acceptable air quality levels would be dealt with (for instance via fines). Some respondents raised concern that electric or alternative fuel vehicles will not be available or feasible to use for construction traffic as a mitigation measure for air quality during construction.	3	Please see response to ref 5.1.2. Defra (Department for Environment, Food and Rural Affairs) emission factors were used for the road vehicle emissions, including the construction vehicles. These emission factors are based on Defra vehicle fleet projections up to 2030. The assessment does not use electric or alternative vehicle proportions beyond the Defra predicted proportions. The 2030 emission factors have also been used for the 2039 and 2043 scenarios, which is considered conservative because electric or alternative vehicle proportions are expected to increase in the future.	No
5.2.3	Concern about the existing levels of air pollution with current passenger numbers, with impacts on the environment. Some respondents raised specific concerns that current flights often run at lower than full capacity; therefore, the air and noise impacts are	5	Please see response to refs 5.1.3. Load factors, or the percentage of available seats filled on an aircraft, are at the high end of industry standards at Luton Airport as a result of the	No

Ref	Comment	No CC	Response	Change
	<p>disproportionate to current passenger numbers. Suggestion that further monitoring is needed and that ultimately existing air pollution levels need to be reduced and appropriately managed before any expansion can be considered.</p>		<p>dominance of low fares carriers. Airlines will never achieve consistent 100% load factors (i.e., filling every seat all the time) for a variety of reasons. Airlines sell some flexible tickets for business passengers, to allow them to return early if their meetings finish early, or switch to later flights if their meetings overrun and this requires some seats to be kept free to allow for passengers to move between flights. Throughout the year there are periods with greater demand (for example school holidays) and periods with lower demand (but still with sufficient demand to make flights commercially viable) and passengers cannot be shifted easily between these to allow load factors to be more balanced across the year or season, though airlines need to offer a consistent schedule to meet the needs of all passengers. The same can be true across a week, with some days more popular for certain destinations than others and passengers cannot be forced to move from one flight to another as this may not meet their own needs. The airlines at Luton will actively seek to sell as many of their seats as possible as this is a core element of their business model, but there will always be occasions when demand for a particular flight on a particular day is not high enough to fill the whole aircraft.</p>	

Ref	Comment	No CC	Response	Change
5.2.4	<p>Concern about the existing levels of air pollution (including CO₂, NO₂ and PM_{2.5}) from aircrafts and road traffic, with impacts to local communities on health (including respiratory illnesses, lung diseases, cardiovascular diseases, Parkinson's, diabetes, strokes, septicaemia, fluid and electrolyte disorders, skin infections, urinary tract infections and death), associated impacts to NHS service, quality of life, visible black dust, fuel slicks, smell and taste of aircraft fuel, as well as wider impact to animal and plant life (including within the Chiltern AONB). Respondents specifically highlighted 86 deaths linked to poor air quality in Luton, with 1,004 associated life-years lost and an overall higher percentage of adult deaths attributed to air pollution than the national average (5.8% as compared to 5.1%). Some respondents highlighted impacts to sensitive receptors including schools. The following locations were specifically mentioned: St Albans, Harpenden, Luton, Lalleford Road (Luton), Breachwood Green, Stevenage, Studham, Kensworth, Caddington, Flamstead, Childwick Conservation Area, Hertfordshire.</p>	137	<p>Please see response to ref 5.1.4.</p> <p>The air quality impacts on the health of local communities have been considered in Chapter 13 Health and Community of the PEIR.</p> <p>The impacts from jettisoning of fuel from aircraft will not be considered, following agreement in the scoping opinion. Due to the infrequency of these events, it is considered that there is no potential significant effect from these activities.</p> <p>The potential odour impacts as a result of aircraft emission and from potential odours from the works at the historical landfill have been assessed in Chapter 7 Air Quality of the PEIR. With good practice measures set out within the Draft CoCP (at Appendix 4.2 of Volume 3 of the PEIR) and the Draft Air Quality Plan (at Appendix 7.1 of Volume 3 of the PEIR), no likely significant effects were identified.</p> <p>The details of the receptors included in the air quality assessment and the study area are provided in Chapter 7 Air Quality and Air Quality Methodology and Data in Appendix 7.1 of the PEIR.</p>	No
5.2.5	<p>Concerns about the existing levels of air pollution (including PM_{2.5}) associated with Luton Airport compared to the levels in other parts of the country as well as compared with other airports, in part due to</p>	67	<p>Please see response to ref 5.1.4.</p> <p>The study area has been clearly defined and justified in Chapter 7 Air Quality of the PEIR to account for airport emission sources, aircraft</p>	No

Ref	Comment	No CC	Response	Change
	<p>flying at lower altitudes (between 3-4000 ft for arrivals and some 4-6000 ft, avoiding the 'Bovingdon Hold' for departure) and therefore affecting a larger area (up to 30-40 miles from the airport). Impacts include smell and taste of aircraft fuel, which prevents local residents from opening windows and enjoying gardens; some respondents noted that impacts are compounded by those of other airport operations including Heathrow and Stansted. Some respondents raised specific concerns with regards to low flying planes and those taking off/landing at the western part of the airport; and that impacts are being exacerbated by wind and low clouds. The following locations were specifically mentioned: Wigmore, Wigmore Park, Harpenden, Markyate, Redbourn, Sandridge, Stevenage, Hertfordshire.</p>		<p>emissions during arrival and departure up to an altitude of 457m, and the affected road network as detailed in Chapter 7 of the PEIR.</p> <p>Air Quality Methodology and Data in Appendix 7.1 of Volume 3 of the PEIR sets out that 305m (1,000ft) is the typical altitude for ground-level impacts from aircraft emissions, following best practice guidance. Therefore, the dispersion modelling assessment has been undertaken for the flightpath up to a height of 457m (1,500ft), which is taken as a slightly conservative (pessimistic) cut-off of the emissions.</p>	
5.2.6	<p>Concerns about the impacts of fuel dumping on health of local residents underneath the flight paths for Luton Airport, specifically including adverse impacts for asthma sufferers and children. Some respondents noted concern that increases in the numbers of flights will lead to worsening impacts on health from increased discharge of aircraft fuel.</p>	4	Please see response to ref 5.1.7.	No
5.2.7	<p>Concerns about the impacts of fuel dumping and the oily/film-like deposits left on outdoor surfaces and water bodies as a result. The following locations were specifically mentioned; the Chilterns, Harpenden and Breachwood Green (Hitchin).</p>	7	Please see response to ref 5.1.7.	No

Ref	Comment	No CC	Response	Change
5.2.8	Concern that the impacts to air quality from the Proposed Development are greater than set out in the consultation material; this is as a result of both increases in numbers of flights and increases in road traffic accessing the airport, as well as construction activities. Furthermore, some respondents raised concern that the proposed mitigation measures would not be sufficient; and this is of particular concern given the existing poor air quality levels in Luton and areas surrounding the airport, which are noted to be higher than other areas in the East of England as well as in breach of EU and WHO safe limits.	29	Please see responses to refs 5.1.4 and 5.1.17.	No
5.2.9	Concern that no Air Quality Environmental Impact Assessment (EIA) is included in the consultation material and that information provided on air quality impacts is too vague; respondents highlighted that due to this, the current and predicted future emissions related to the expansion of the airport and associated road traffic, are not known. Some respondents noted that the effects of air pollution (specifically particulate and ultrafine particulates were highlighted) on sensitive habitats and protected ecological sites, as well as heritage sites and National Trust properties should be considered in a future EIA.	20	Chapter 7 Air Quality of the PEIR provides a preliminary assessment of the effects of the Proposed Development on air quality. This includes emissions from road traffic and particulate matter emissions.	No
5.2.10	Suggestion that the current levels of air pollution should be mitigated by increased landscape planting and greenery.	3	Noted. During operation, control measures outlined in the Draft Air Quality Plan in Appendix 7.2 of	No

Ref	Comment	No CC	Response	Change
			Volume 3 of the PEIR will be implemented. This sets out good practice measures to minimise emissions to air during operation such as (but not limited to): measures to increase travel by public transport; measures to encourage the use of low and zero emission vehicles; provision of a fleet of low or zero emissions ground support equipment; airlines will be encouraged to use their newest aircraft. These measures are considered to be potentially more effective and appropriate than using green infrastructure to mitigate air quality impacts.	
5.2.11	Concern that the existing air pollution levels from the current airport operation are unacceptable and in breach of legal limits; NOx levels at the airport site were specifically highlighted. Some respondents noted that LLAL have not taken due consideration of air quality issues (including environmental impacts, health impacts, and smell and taste of aviation fuel) raised by local people to date (including since previous expansion projects have been completed) and therefore further expansion is not appropriate until these issues have been dealt with. Concern that the Proposed Development would worsen air quality levels further, with impacts to airport staff, passengers and local residents.	61	Please see response to ref 5.1.4.	No
5.2.12	Concern that an expansion of Luton Airport would result in adverse impacts on air quality, contrary to	31	Chapter 7 Air Quality of the PEIR provides a preliminary assessment of the effects of the	No

Ref	Comment	No CC	Response	Change
	what is reported in the consultation documents. Some respondents noted that statements on impacts to air quality during construction and operation were not supported by figures within the consultation documents.		Proposed Development on air quality, including as a result of construction and operation for pollutants relevant to the air quality study (NO ₂ , PM ₁₀ and PM _{2.5}).	
5.2.13	Concern raised highlighting that results from air quality monitoring are averaged over 24hr period and this leads to under-reporting of high pollution levels during the day. Some respondents noted that the levels of 'acceptable' air pollution continue to change; and questioned why Luton does not qualify as an Air Quality Management Area.	4	Please see responses to refs 5.1.4 and 5.1.12. Where air quality standards are predicted not to be met, Local Authorities must declare the area as an Air Quality Management Area (AQMA). There are three AQMAs declared in Luton however there are no AQMAs near to the airport; these are detailed in Air Quality Chapter 7 of the PEIR.	No
5.2.14	Respondents request greater clarity on monitoring that is being undertaken, including information on the location of monitoring sites; information on time and duration of monitoring; information on how exceedances in acceptable levels will be managed; and clearer reporting on the current emissions associated with Luton Airport. The following locations were specifically mentioned: Markyate, Wigmore, Vauxhall Park, St Albans, Marshalswick, Sandridge and Harpenden, as well as areas of natural habitat.	27	Please see response to ref 5.1.21.	No
5.2.15	Concern on the sites and methods used for monitoring and modelling, including an overreliance on the fixed air quality monitoring (AQM) site at	8	Please see response to ref 5.1.21.	No

Ref	Comment	No CC	Response	Change
	Wigmore Park which does not capture impacts to air quality outside of the airport site. Specific concern was noted on wind direction changes potential to disperse air pollution away from the Wigmore Park AQM; and that the Wigmore Park AQM is a fixed height and therefore does not record gases of different densities at different levels.			
5.2.16	Concern that there is no Air Quality Environmental Impact Assessment in the consultation documents to verify the air quality impacts from aircrafts, ground operations at the airport and road vehicles accessing Luton Airport. Some respondents requested more clarity on likely increases in air pollution as a result of the Proposed Development. Specific concern was raised on the impact of air pollution on airport employees and passengers.	19	Please see responses to refs 5.1.4, 5.1.12 and 5.2.9.	No
5.2.17	Suggestion to mitigate air quality during construction for the Proposed Development including ancillary highway works, in order to minimise emissions and dust. Some respondents noted that air pollution impacts from mobile plant during construction could be minimised by the use of consolidated logistics centres off site.	4	Please see response to ref 5.1.1.	No
5.2.18	Suggestion to further develop the proposals to manage and mitigate air pollution during construction and operation in order to minimise adverse air quality impacts. Some respondents specifically noted	10	Please see response to ref 5.1.1. During operation, control measures outlined in the Draft Air Quality Plan in Appendix 7.2 of	No

Ref	Comment	No CC	Response	Change
	mitigation measures including the use of electric vehicles; provision of a park-and-ride tram system; carbon filters; active air quality monitoring; mandatory compliance with emission regulations; and additional funding for respiratory illnesses.		Volume 3 of the PEIR will be implemented. This sets out good practice measures to minimise emissions to air during operation such as, but not limited to: measures to increase travel by public transport; measures to encourage the use of low and zero emission vehicles; provision of a fleet of low or zero emissions ground support equipment; airlines will be encouraged to use their newest aircraft.	
5.2.19	Concern that the proposals to mitigate the impacts on air quality through the Future LuToN Impact Reduction Scheme are inadequate, including criticism that the scheme does not appropriately address health impact; does not consider immediate neighbours to the airport sufficiently and prioritises those in the adjacent three counties; and does not appropriately assess impacts on local transport. Some respondents noted that regardless of any mitigation measures, an expansion of the airport will lead to increased air pollution.	60	Please see response to ref 5.1.10.. Chapter 7 Air Quality of the PEIR provides a preliminary assessment of the effects as a result of the construction and operation of the Proposed Development for pollutants relevant to the air quality study. The study area has been clearly defined and justified in Chapter 7 Air Quality of the PEIR to account for airport emission sources, aircraft emissions during arrival and departure up to an altitude of 457m, and the ARN as detailed in Section 7.5 of Chapter 7 Air Quality of the PEIR.	No
5.2.20	Concern that the proposals to mitigate the impacts on air quality are inadequate and dubious; including concern that zero emission target are unrealistic. Some respondents raised concerns that the air pollution associated with aircrafts is so significant that mitigation measures may not have any measurable	118	Please see response to ref 5.1.4.	No

Ref	Comment	No CC	Response	Change
	effect; particularly as measures are seen to be short term. Specific concerns raised that the inadequacy of proposed mitigation measures will lead to adverse impacts on air quality and associated impacts to health (including heart attacks, strokes and death) and wellbeing for local communities, due to the increases in flights and road traffic as a result of the Proposed Development. The following locations were specifically mentioned: Hertfordshire, Wigmore Park, Stevenage and adjoining villages.			
5.2.21	Concern that the proposals to mitigate the impacts on air quality are inadequate and dubious, including criticism that the consultation documents do not provide sufficient information of mitigation measures or strong enough means of enforcement; and furthermore, that claims that ‘there will be no significant impact on existing air quality during construction and operation’ are not valid. Some respondents raised specific concern that current data collected on air quality (used to inform predictions and mitigation measures) was selective and purposefully avoids the areas with the poorest air quality.	41	Please see responses to refs 5.1.12 and 5.1.21.	No
5.2.22	Concern that the modelling and monitoring of particulates is under reported and that no proposals for the management of this type of air pollution is outlined in the consultation documents.	2	Please see response to ref 5.1.21. Chapter 7 Air Quality of the PEIR includes an assessment of PM _{2.5} and PM ₁₀ . Where required mitigation is proposed to reduce emissions to air,	No

Ref	Comment	No CC	Response	Change
			as set out in the Draft Air Quality Plan in Appendix 7.2 of Volume 3 of the PEIR.	
5.2.23	Concern that the proposals to mitigate impacts on air quality are ineffective and insufficient, as adverse impacts (including health and quality of life) and damage to the environment are inevitable due to the scale of the Proposed Development (including increases in flights and road traffic) and complexity of construction arrangements. Some respondents noted concern that mitigating air quality impacts during construction will still result in an airport that produces substantially more air pollution due to increased number of flights and increased traffic, and the mitigation measures during operation will not be sufficient to manage this; particularly as mitigation measures rely on behavioural changes from airport passengers, employees and aircraft operators that are outside the direct control of LLAL, and specifically do not seek to address aircraft pollutions. In addition, some respondents raised concern that there was no obligation for LLAL to implement the mitigation measures proposed.	191	Please see response to ref 5.1.4.	No
5.2.24	Concern that the proposals to mitigate impacts on air quality are ineffective and insufficient, and that the consultation documents do not contain enough detailed information or certainty on mitigation proposals. Specific mitigation measures highlighted as ineffective or insufficient include: monitoring air	39	Please see response to ref 5.1.4 and 5.1.12.	No

Ref	Comment	No CC	Response	Change
	<p>pollution, carbon off setting, encouraging airlines to use more fuel efficient aircrafts, encouraging contractors to use latest specification HGVs, use of electric vehicles on site, discouraging passenger / employee road vehicle access, offering noise insulation to local residents but no equivalent for air pollution, working with the National Air Traffic Service to minimise hold times, use of the draft Code of Construction Practice and tree planting. In addition, some respondents raised concerns that contractors will 'cut corners' and not carry out mitigation plans properly. Some respondents stated that using more fuel efficient aircrafts as a justification to increase flight numbers is a flawed approach, and reductions in flights should still be sought to reduce air pollution.</p>			
5.2.25	<p>Concern that the proposals to mitigate impacts on air quality are ineffective and insufficient and have not taken due consideration of feedback from local residents, including suggestions for a realignment of the runway to minimise impacts to the surrounding local areas and communities, and to consider air quality impacts from take-off / landing on Hertfordshire. Some respondents noted that there was a lack of information on air quality impacts to local roads during construction and operations, including Eaton Green Road and roads between Luton and Hertfordshire towns.</p>	5	<p>Please see response to refs 5.1.4, 5.1.12 and 5.1.17.</p> <p>Please also refer to the Design topic responses.</p>	No

Ref	Comment	No CC	Response	Change
5.2.26	Concern that the proposals to mitigate impacts on air quality are ineffective and insufficient, as air pollution targets are not set at appropriate levels; some respondents noted that the targets should aim to be below the current legislative limits as these are likely to change soon anyway. Some respondents noted that air quality levels are already in exceedance of acceptable levels and any expansion will worsen this.	4	Please see response to refs 5.1.12. Chapter 7 Air Quality of the PEIR considers current legislated limits in the Air Quality Standard Regulations, rather than prospective limits. However, the aspirations of the Bill are considered in the mitigation provided in the Draft Air Quality Plan in Appendix 7.2 in Volume 3 of the PEIR, which looks to reduce impacts, even at locations where the limits are not predicted to be exceeded.	No
5.2.27	Consider that the Development Proposal is unnecessary and therefore the proposals to mitigate air quality during construction and operation, and benefit the local landscape are unnecessary. Some respondents predicted that the popularity of air travel will decrease in future as people become increasingly aware of the environmental and air quality impacts, meaning that expansion will ultimately be unnecessary. Some respondents noted that the only way to fully mitigate air quality impacts is to avoid increase to the number of flights.	74	Please see response to 5.1.17. Please also refer to Need Case and Forecasts topic responses.	No
5.2.28	Suggestion to mitigate air quality impacts during the operation of the Proposed Development through measures including: use of electric aircrafts, use of air filters, reductions in road traffic accessing the airport, introduction of more restrictive limits for air quality, improved monitoring and reporting on emissions	48	Please see response to ref 5.1.17.	No

Ref	Comment	No CC	Response	Change
	(including Volatile Organic Compounds (VOCs)), establishment of a new independent body to manage air quality impacts and improved compensation for affected local residents and adjacent Local Authorities. The following locations were specifically mentioned: Stevenage, St Albans, Caddington and Slip End (Luton).			
5.2.29	Concern about potential increases in air pollution (including PM2.5) from the Proposed Development, with impacts to quality of life (including smell and taste of aviation fuel), wellbeing and health (including respiratory illness, lung cancer, heart disease, brain tumours, stunted child development and death), which have not been given due consideration and were noted to disproportionately affect people with protected characteristics (including disability, BAME, elderly and children); some respondents specifically raised impacts to sensitive receptors including schools and residential areas. Some respondents requested information on the forecast likely impacts to health as a result of the Proposed Development. The following locations were specifically mentioned: Luton, Luton Hoo, Farley Hill, Wigmore, St Anne's, Breachwood Green, St Albans, Harpenden, Stevenage, Leighton Buzzard, Letchworth Garden City, Flamstead, Hertfordshire, Bedfordshire.	248	Please see response to ref 5.1.4.	No
5.2.30	In order to reduce emissions while on the stand the aircraft and the aircrafts Auxiliary Power Unit (APU)	1	The Draft Air Quality Plan in Appendix 7.2 of Volume 3 of the PEIR sets out measures to	No

Ref	Comment	No CC	Response	Change
	<p>should be switched off and the aircraft connected to ground power and air conditioning derived from the terminal. The major manufacturers of aircraft (Airbus, Boeing and Bombardier) have all assured Unite that the functionality of the aircraft, on the stand, should not be adversely affected, by the reliance on ground power and there is absolutely no need for the engines or the APU to be used, unless such ground power is unavailable.</p>		<p>minimise emissions during the operation phase. Measures include providing fixed electrical ground power at the stands so aircraft can minimise the use of their auxiliary engines when on the ground.</p>	
5.2.31	<p>Suggestion to mitigate air quality during operation by reducing aircraft taxiing and re-orienting flight paths (including criticism of RNAV); some respondents noted that changes to the proposed layout should be considered to facilitate this if necessary, as well as increased use of tow trucks as an alternative to aircraft taxiing. In addition, some respondents suggested that reducing aircraft taxiing should be included in contracts with airline operators. The following locations were specifically mentioned: Wheathampstead, Bedfordshire.</p>	13	<p>Please see response to ref 5.1.4.</p>	No
5.2.32	<p>Suggestion that the Proposed Development should be put on hold until the air quality impacts from the current operation of the airport are appropriately addressed and reduced. The following measures were identified to reduce current air quality impacts: reduction in number of flights, improved monitoring and reporting on emissions, introduction of new flight path routes, obtaining permission for aircrafts to climb</p>	18	<p>Please see response to ref 5.1.4 and 5.1.21.</p>	No

Ref	Comment	No CC	Response	Change
	faster and adopting WHO air pollution limits for PM2.5.			
5.2.33	Suggestion that further/ongoing air quality modelling and monitoring should be undertaken including national projections of emissions and rural background concentrations, to establish accurate levels of pollution and subsequently inform appropriate measures to reduce impacts; one respondent suggested that airport employees and contractors should be provided with protective equipment and offered regular health checks. Some respondents suggested that the costs of such measures should be met by air passengers or aircraft operators. Several respondents requested that firm commitments are made to air quality targets with methods of monitoring confirmed prior to development consent being granted.	6	Please see response to ref 5.1.4 and 5.1.21.	No
5.2.34	The Study Area should be chosen to reflect the area over which significant air quality effects arising from the Proposed Development may occur, taking into account prevailing winds and aircraft movements at low altitudes, and including whether engine braking is used or not. The study of Air Quality impacts should include full assessment of Local Nature Sites where significant impacts are likely. Any assessment of health impacts of Air Quality should be cross-referred to the relevant WHO guidelines in relation to the hazards of emissions including particulates at	1	Please see response to ref 5.1.4. Chapter 5 Approach to the Assessment of the PEIR sets out how the study area has been determined. The latest UK air quality objectives have been used in the assessment.	No

Ref	Comment	No CC	Response	Change
	receptors in a zone of likely impact bearing in mind flight paths and aircraft altitudes as well as surface transport traffic patterns. The Air Quality Assessment also needs to include likely deposits of pollutants into rivers and waterways including runoff from the site. There is no worst-case analysis of the impacts on Air Quality caused by cars idling in traffic jams caused by increased surface transport loading.			
5.2.35	Suggestion that an independent organisation should be established to monitor air quality impacts and to audit the modelling and monitoring of air quality undertaken by LLAL to date. Some respondents suggested that any findings of air quality breaches from the independent organisation should be able to put the Proposed Development on hold.	6	Please see response to ref 5.1.20.	No
5.2.36	Suggestion that further air quality monitoring should be undertaken for emissions including NOx, CO2 and particulates. The following locations were mentioned for monitoring stations: feeder roads to the airport (including Junction 10a), locations underneath flight paths, airport passenger drop-off zone, coach/bus station and villages close to the runway.	8	Please see response to ref 5.1.21.	No
5.2.37	Suggestion that ongoing air quality monitoring should be undertaken for scope 1-3 emissions and included in an impact assessment to inform the management and mitigation of impacts during construction and operation for all elements of the Proposed	4	Please see response to ref 5.1.4.	No

Ref	Comment	No CC	Response	Change
	Development, including modifications to local roads. Some respondents suggested that a full life-cycle assessment should be carried out and that assessments should include impacts to affected populations and sensitive receptors including schools and nurseries. Other respondents requested that the ES includes the methodology for baseline and worst-case scenario air quality modelling, as well as most recent air quality monitoring data.			
5.2.38	Suggestion that legally binding air pollution limits should be established with the Secretary of State, with a pre-agreed procedure in place to reduce the number of flights to legal levels in the event of limits being breached; furthermore, airlines with lower air pollution levels should be prioritised in these events. Some respondents suggested that the Proposed Development should not go forwards unless adherence with such limits can be guaranteed in advance and that similar levels should be established for surface transport associated with the airport; overall the Proposed Development should seek net reductions in emissions.	5	Please see response to ref 5.1.20.	No
5.2.39	Suggestion that there should be greater transparency in the methods for monitoring and modelling emissions prior to the Proposed Development as well as during construction and operation; this should be included in the ES. In addition, some respondents requested information on potential adaptive measures	8	Please see response to ref 5.1.4 and 5.1.21. The point regarding technology is noted and will be considered for future monitoring.	No

Ref	Comment	No CC	Response	Change
	that could be implemented to ensure forecast impacts are not exceeded. One respondent suggested that Internet of Things technology could be used to allow greater monitoring of a wider range of factors.			
5.2.40	Support for proposals to mitigate impacts to air quality during construction and operation, including particular support for measures to improve housing stock/noise insulation, reduce aircraft taxiing, minimising auxiliary power unit aircraft usage, and installation of air quality monitoring systems across the airport and surrounding transport network.	45	Noted.	No
5.2.41	Concern that impacts to air quality from road traffic will be worsened by the Proposed Development, including potential breaches in air pollution limits and impacts to Air Quality Management Areas via pollutants including PM10, PM2.5 and NOx. The A1, M1, A505, A602 and A414 were specifically highlighted as key routes to the airport that are likely to be significantly affected with adverse air quality impacts expected on local residents (including health impacts on respiratory illnesses and deaths), schools, businesses and wildlife. In addition, proposed additional traffic lights and alterations to local roads, including Upper Tilehouse Street (Hitchin) Turners Road North (Luton) and Vauxhall Way (Luton), and alterations to roundabouts (specifically: Pirton Road/Moormead Hill, Park Way/Upper Tilehouse Street, Park Way/Stevenage Road, Wigmore	178	Please see response to ref 5.1.24.	No

Ref	Comment	No CC	Response	Change
	Lane/Crawley Green, Lalleford/Eaton Green, Crawley Green/Airport Way) were highlighted with concerns of increased traffic impacting local air quality. Some respondents requested clarity on modelling and the predicted additional vehicle movements as a result of the Proposed Development, including the proportion of vehicles that are HGV. The following locations were specifically mentioned: Hertfordshire, Bedfordshire, Hitchin (including Willow Road, Charlton Road and Moorhead Hill), Luton, Hertford, Harpenden, St Albans, Hemel Hempstead, Slip End and London Hoo Elite Hotels.			
5.2.42	Concern that impacts to air quality from road traffic will be worsened by increased staff required during the construction and operation of the Proposed Development; even if staff public/sustainable transport use is to increase proportionally, there will still be a greater number of staff travelling by private vehicles than currently. Some respondents highlighted that unemployment in Luton is not high and therefore employees are likely to be commuting from surrounding areas, which will result in impacts to wider areas from the airport.	7	Please see response to ref 5.1.4.	No
5.2.43	Concern that the proposals for additional car parking will directly lead to increased road traffic to the airport, with adverse impacts to air quality on the surrounding areas. Some respondents suggested that steps should be taken to reduced private vehicle	31	Please see response to ref 5.1.24.	No

Ref	Comment	No CC	Response	Change
	access to the airport, rather than encouraging this mode of transport by the provision of additional car parking.			
5.2.44	Concern that traffic levels are already high in areas surrounding the airport, with breaches of level air pollution levels and impacts to local residents. Furthermore, concern raised that there would be increases in road traffic without the Proposed Development, and therefore the combination effects with the Proposed Development on air quality are expected to be significant. Some respondents noted that the expected increase in use of electric vehicles and autonomous vehicles may reduce these impacts; however, others noted that even the use of electric vehicles would not eliminate particulates from brakes and tyres. The following locations were specifically mentioned: Luton, St Albans, Bedford, Hitchin, Hertfordshire, Wigmore, Green Belt areas, Chiltern AONB, A1 and M1.	42	Please see response to ref 5.1.4 and 5.1.24.	No
5.2.45	Support for additional car parking in line with forecast growth in demand; however, concern raised on potential impacts to air quality from increased road traffic to the airport. Suggestion that measures are required to protect airport employees and passengers from pollutants, specifically in locations with coaches, cars and airside vehicles.	1	Please see response to ref 5.1.4 and 5.1.24.	No

Ref	Comment	No CC	Response	Change
5.2.46	Note LBC's previous opposition to Central Bedfordshire Council plans for an A6 link road to the M1 where several Councillors considered that the council estates of Marsh Farm would suffer pollution and extra traffic due to this road, yet LBC supports its own plans which will increase traffic and air pollution to neighbouring wards.	2	Noted.	No
5.2.47	Put people's health before burning more fossil fuels. For several years, studies by Kings College in London have warned that people living on main roads, or children attending schools on main roads, are more vulnerable to asthma, heart attacks or strokes, and hundreds may be affected on days where air pollution levels are high. Luton needs real-time announcements and displays to alert people on such days. People driving in pollution corridors are also vulnerable, this includes airport passengers, and thousands of airport workers who will also experience pollution at the airport. The Defra monitor on the main E-W route, the A505, often shows NO2 at 3-4 times the legal levels.	1	Please see response to ref 5.1.4 and 5.1.24.	No
5.2.48	Concern that the Proposed Development will result in increased air pollution (including CO2, NOx, SO2 and VOCs) and should not be taken forward due to impacts to the natural environment and wildlife locally, regionally and nationally; and that insufficient consideration is being given to these impacts. Specifically, impacts to the Chilterns AONB (including	178	Please see response to ref 5.1.4 and 5.1.24.	No

Ref	Comment	No CC	Response	Change
	<p>Icknield Way), impacts to calcareous grassland (including Galley and Warden Hill SSSI), loss of trees and potential habitat severance/ degradation, as well as wider impacts to climate change, were highlighted. Some respondents requested greater clarity on the air quality impacts to the environment from the Proposed Development, whilst noting that the current landscape proposals are insufficient to mitigate impacts. In addition, some respondents highlighted that the Proposed Development is in contradiction to Government and other national organisations' advice to reduce emissions, including the use of more sustainable transport modes personally. The following locations were specifically mentioned: Luton, Dunstable, Kensworth, Sandridge, Hitchin, Hertford, Hertfordshire.</p>			
5.2.49	<p>Consider that the Proposed Development is unnecessary and should not be taken forward due to expected adverse impacts to air quality, with at least one new breach of legal limits expected. Some respondents noted that the Proposed Development is centred on economic gain and does not appropriately consider air quality and the impacts that greater levels of pollution would have on the environment and local residents (including health and death). Overall, the benefits of the Proposed Development do not outweigh the adverse impacts to air quality. The following locations were specifically mentioned: Luton, Leighton Buzzard, Hitchin, Dacorum, Whitwell,</p>	157	<p>Please see response to ref 5.1.4. Please also refer to Need Case and Forecasts topic responses.</p>	No

Ref	Comment	No CC	Response	Change
	Redbourn, Hertfordshire, Bedfordshire, Buckinghamshire, Cambridgeshire.			
5.2.50	Concern over the airfield proposals, layout for the airport expansion and replacement of Wigmore Park, with impacts including potential increases in exposure to air pollution particularly due to location of children's play area and recreational park adjacent to airport; location of the new fuel storage area; additional flight paths over residential areas (with associated impacts to health); use of larger planes with greater polluting potential in new layout; and greater flight capacity leading to increase aircraft idling on the airfield. Some respondents noted that the landscape proposals are insufficient to provide mitigation against increase air pollution from the Proposed Development. In addition, some respondents noted that the location of Luton airport within a valley is not a suitable site for expansion and therefore no expansion layout would be appropriate. The following locations were specifically mentioned: Wigmore, Chilterns AONB.	54	Please see response to ref 5.1.4. Please also refer to the Design and Wigmore Valley Park topic responses.	No
5.2.51	Concern that impacts to air quality will be worsened by the construction works for the Proposed Development and that impacts to health, quality of life (including smell and taste of aviation fuel) and congestion will be long lasting. Some respondents stated that regardless of phasing arrangements, there will still be an overall increase in air pollution.	17	Please see responses to refs 5.1.1 and 5.1.2.	No

Ref	Comment	No CC	Response	Change
5.2.52	Concern about the cumulative impact on air quality from the Proposed Development and any other planned major projects in proximity to the affected areas, as well as existing operations from other airports including Heathrow.	2	Please see response to ref 5.1.4.	No
5.2.53	The Chilterns Countryside Group welcomes that airspace changes are currently under consideration by the Civil Aviation Authority (CAA) and appreciates that the National Air Traffic Services (NATS) finds that LTN could be a beneficiary of 'reduction in population affected by aircraft noise'. (p149) Indeed, this would be a positive outcome for the Chilterns and its AONB. Certainly if the restrictions on departures from LTN caused by the 'Bovingdon Stack' were eliminated, aircraft could climb more quickly and thus reduce noise pollution. This may not, of course, reduce air quality as if height is being gained more swiftly, then emissions from the aircraft's engines may increase.	1	Please see response to ref 5.1.4. Please also see Flight Paths and Fleet Mix topic responses.	No
5.2.54	Support for the Proposed Development overall, but concern raised on air quality impacts; respondents highlighted that more was needed to mitigate these impacts.	1	Please see response to ref 5.1.4.	No
5.2.55	Concern that increases in public transport use of all types will still lead to increases in air pollution; furthermore, increased public transport use does not	19	Please see response to ref 5.1.4.	No

Ref	Comment	No CC	Response	Change
	address pollution from aircrafts. In addition, specific concern the proposals for the Terminal 2 coach station will lead to adverse impacts to air quality due to increased demand and pollution from idling vehicles. Some respondents suggested that measures should be taken to reduce emissions from surface transport and further improve public transport links to reduce private vehicle use. Some respondents specifically highlighted impacts to Gypsy Lane and nearby sensitive receptors including schools.			
5.2.56	Concern that neighbouring Local Authorities have not been appropriately consulted on the Proposed Development with regards to air quality impacts. In addition, concern that neighbouring Local Authorities do not have any level of control over air pollution from Luton Airport, or means to sufficiently mitigate these impacts within their local areas.	2	Local Authorities from around the airport have been invited to attend the air quality technical working group to discuss the effects and mitigation proposals. Statutory consultation was also undertaken in 2019 where local authorities had the opportunity to submit comments. Additional comments can also be submitted as part of this stage of consultation. We will have due regard to all comments made during the statutory consultation period.	No
5.2.57	Concern that the Proposed Development will result in increased air pollution, which will make Luton an undesirable place to live and in turn this will lead to falling house prices.	2	Please see response to ref 5.1.4.	No

A6 Natural Environment and Landscape

Table A6.12: Regard had to statutory consultation responses on Natural environment and Landscape - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.1	Concern that the Proposed Development (including preparatory works) will lead to adverse impacts to biodiversity via habitat destruction including loss of trees, ancient woodland, calcareous grasslands, chalk grasslands and chalk streams, and other environmental impacts including increased air, light and noise pollution that may lead to further loss of habitats and species. Some respondents noted that habitats and species lost may be irreplaceable and therefore there will be significant and long-lasting damage and/or for habitats that may be replaced or translocated, it may take a long time for full establishment and there potentially establishment may fail. It was noted that a previously agricultural field will not be appropriate to support the diverse habitats to be translocated or re-established.	Natural England		8	<p>The Proposed Development has been informed by the EIA process and where possible designed to avoid or reduce adverse effects on valued ecological features and deliver benefits for biodiversity in accordance with policy and best practice. This covers construction and operation and is supported by an extensive ecological survey programme covering all relevant species of wildlife.</p> <p>Chapter 8 Biodiversity of the PEIR sets out the assessment of all potential impacts to biodiversity as a result of the Proposed Development, including air quality and noise. This identifies that the Proposed Development has no significant adverse effects on any of the assessed species or SSSI.</p> <p>The Draft Habitat Regulations Assessment (HRA) No Significant Effects Report (NSER) Report in Appendix 8.3 of Volume 3 of the PEIR also considers the appropriate designated sites within a sufficient</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Specific concern was raised on impacts to the wildlife and loss of habitats within Wigmore Park County Wildlife Site (CWS), Chilterns AONB and Galley and Warden Hills SSSI, including wetlands, orchids and birds. The following locations were specifically mentioned: West Hertfordshire, Luton Hoo Estate.</p>				<p>distance from the Proposed Development.</p> <p>Our ambition is for the proposed development to deliver 10% biodiversity net gain through the extensive landscaping and habitat creation proposals incorporated within the scheme, details of how these habitats will be created and managed are set out in the Draft Landscape and Biodiversity Management Plan (LBMP) in Appendix 8.2 in Volume 3 of the PEIR. Version 3.0 of the Defra Biodiversity Metric has been used to calculate the amount of habitat creation that needs to be included within the scheme design to mitigate the loss of habitats. The Defra metric takes account of the biodiversity value of those habitats lost to the scheme and the time lag between this habitat loss and the establishment of newly created habitats to a level at which they provide an equivalent biodiversity resource. Habitat creation areas are detailed in Landscape Mitigation Plans in Figures 14.11 to 14.13 in Volume 4 of the PEIR.</p> <p>Where translocation of species is proposed these will follow best practice methodologies and will incorporate a</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>period of post-translocation monitoring, and remedial actions as appropriate, to ensure the success of the translocations.</p> <p>We have changed our design to retain as much of the existing Wigmore Valley Park as possible, but the majority of the current Wigmore Park CWS will be lost as a result of the Proposed Development. We have designed the new open space so that it offers greater opportunity to support biodiversity, including orchids. Once established, this area will also mitigate for the loss of habitats within the current CWS currently used for foraging, dispersal and shelter by a range of species of wildlife, along with the habitat creation areas.</p> <p>The Proposed Development has no direct effects on any SSSI including Galley and Warden Hills SSSI, and those recently redesignated as SSSIs. Given the interest features of SSSIs in the wider area and their distance from the Proposed Development, it has been concluded that both the construction and operation of the Proposed Development will not result in any significant effects upon these sites,</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>including through air quality effects where the sites are within 200m of the affected road network.</p> <p>No significant direct or indirect effects are anticipated on the biodiversity within Luton Hoo Estate.</p> <p>Almost all aspects of the Proposed Development within West Hertfordshire comprises habitat creation and enhancement, and replacement open space.</p>	
6.1.2	Oppose the Proposed Development on the grounds that any expansion will have significant impacts to biodiversity and local wildlife habitats.			1	Please see response to ref 6.1.1.	No
6.1.3	Concern that the Proposed Development (including associated proposals to the road network) will lead to increased road traffic in the areas surrounding the airport, with associated impacts on noise and air pollution which are likely to have detrimental impacts on local habitats and wildlife.			1	Chapter 8 Biodiversity of the PEIR assesses all potential impacts to biodiversity as a result of the Proposed Development, including air quality and noise. Chapter 7 Air Quality of the PEIR includes the ecological receptors modelled for effects through changes in Air Quality. This includes details of the receptors considered. Where required, mitigation is recommended to reduce emissions to air.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Air quality monitoring is being carried out and will continue whilst the airport is in operation.</p> <p>The Draft HRA NSER in Appendix 8.3 of Volume 3 of the PEIR also considers the appropriate designated sites within a sufficient distance from the airport, including those related to the affected road network. This includes appropriate consideration of air quality.</p> <p>Please also refer to Air Quality topic responses.</p>	
6.1.4	Luton Hoo Estate's park is of considerable ecological importance, particularly habitats situated around the lakes. From the consultation materials, it is difficult to accurately assess the full extent of the impacts but based on experience from other airports, it is concluded that the proposals will undermine Elite Hotels work on the Estate and could downgrade the ecological importance of the Estate.			1	<p>Please also see Air Quality (particularly refs 5.1.4 and 5.1.33).</p> <p>Chapter 8 Biodiversity of the PEIR assesses all potential impacts to biodiversity as a result of the Proposed Development, including air quality and noise. Chapter 7 Air Quality of the PEIR includes the ecological receptors modelled for effects through changes in Air Quality. This includes details of the receptors considered. Where required, mitigation is recommended to reduce emissions to air.</p>	No
6.1.5	Concern that the construction and operation of the Proposed			6	Please see response to ref 6.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Development will lead to a deterioration of the local landscape, ecosystems, plant biodiversity and wildlife.					
6.1.6	Concern that the benefits of the Proposed Development (including increased employment opportunities) would be outweighed by the detrimental impacts to the local wildlife and biodiversity.			1	Please see response to ref 6.1.1. Please also refer to Employment and Economics topic responses.	No
6.1.7	Concern that the Proposed Development does not appropriately consider the risk of bird strike within the landscape proposals. Request for clarification on expected bird strike risk and how this will be managed and mitigated.			2	The requirement to minimise the attraction of birds and wildlife in accordance with CAP771 will be taken into account at the detailed design stage. Our landscape proposals have been designed carefully to ensure there is not a significant change in the bird strike risk for aircraft. For example, we have avoided large blocks of woodland which may encourage flocks of wood pigeon or creation of large waterbodies which could attract waterfowl. A Draft Bird Strike Risk Assessment Report has been prepared in Appendix 8.4 of Volume 3 of the PEIR.	No

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.8	<p>As part of a previous planning application for proposals at the Estate in 2006 for the Orangery and to inform the accompanying EIA Environmental Statement, Luton Hoo undertook ecological studies which revealed the presence of two protected species on the Estate: bats (various species) and Great Crested Newts (in one of the water bodies). In addition the Estate was recognised for its importance to bird life, particularly in connection with the woodland, lakes and river corridor areas. As part of the above proposals, the Estate entered into a legally binding Obligation to prepare an Ecological Management Plan in parallel with the Conservation and Golf Course Management Plans. The Estate contains a number of County Wildlife sites and the purpose of the plan was to seek to maximise biodiversity bird and insect life, and elsewhere to develop habitats for reptiles and amphibians.</p>			1	<p>The potential effects on protected species have been assessed as part of the Proposed Development following a range of appropriate surveys and desk based studies. As set out in the Ecology Baseline Reports in Appendix 8.1 in Volume 3 of the PEIR, no great crested newts were found to be present and so this species will not be affected by the Proposed Development. Effects on bats, reptiles, invertebrates, other amphibians and birds have been assessed and the conclusion is that following appropriate mitigation, no significant effects are anticipated.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.9	Concern that the Proposed Development will lead to increased air, light and noise pollution as well as traffic congestion and visual intrusion, which will negatively impact the Chilterns Area of Outstanding Natural Beauty (AONB) and the proposed addition of AONB; and that there will be impacts to the experiences of the AONB including its tranquillity. In addition, concern that the PEIR does not appropriately consider the AONB, and the proposed mitigation measures are insufficient. Criticism that statutory obligations to protect and conserve the AONB (as per Countryside and Rights of Way Act 2000) are not given due consideration; furthermore, the proposals are not in line with CAA guidance from 2017 which states that airspace routes below 7,000ft should seek to avoid flying over AONBs. It is noted that the cumulative impacts of airport expansions (including Heathrow and RAF Northolt) on the AONB	Chiltern Conservation Board Natural England	Chiltern District Council Central Bedfordshire Council	1	<p>Please see response to ref 6.1.1.</p> <p>Effects on the aesthetic and perceptual qualities of the Chilterns Area of Outstanding Natural Beauty (AONB) are considered in Chapter 14 Landscape and Visual of the PEIR and will be further described in the ES.</p> <p>As part of the Government's Airspace Modernisation programme, which is separate to the Proposed Development, the desirability of avoiding overflying the AONB will be considered, in line with the guidance set out in the Civil Aviation Authority (CAA)'s CAP1616.</p> <p>Please also see Noise, Flight paths and Fleet Mix, and Air Quality topic responses.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	needs to be considered. Suggestion that a Landscape and Visual Impact Assessment and a Traffic Assessment should be carried out to determine the impacts to the AONB and wider green spaces.					
6.1.10	No clear evidence of airport expansion being within environmental limits or providing net gain for the Chilterns AONB. All impacts on the Chilterns AONB appear to be negative rather than positive. Aircraft noise over the Chilterns AONB is our main area of concern. The Chilterns Conservation Board will continue to object to Luton Airport expansion unless it can be demonstrated that there is no harm to the nationally protected landscape of the Chilterns AONB. There is a lack of information on actual future flightpaths and noise implications.	Chilterns Conservation Board		1	Please see response to ref 6.1.1 and 6.1.9. Please also refer to Noise and Flight paths and Fleet Mix topic responses.	No
6.1.11	The area east of Luton, including land within the airport's proposed development boundary, is	Chilterns Conservation Board		1	We have adopted the position taken by North Hertfordshire District Council (NHDC) in its Local Plan process	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>candidate land for AONB boundary review. It has been proposed by the Chilterns Conservation Board for inclusion in the Chilterns AONB, in a still live application made to Natural England in 2013. The area to the east of Luton is a potential candidate for extension of the AONB based on criteria published by Natural England relating to landscape quality, scenic quality and relative wildness, relative tranquillity and cultural heritage (Guidance for assessing landscapes for designation as National Park or AONB, 2011). In September 2010 the North Herts DC cabinet passed a resolution to support consideration of the area as AONB. The area has a clear affinity with the rest of the Chilterns. It contains clearly recognisable Chilterns features such as chalk streams and associated dry valleys and small settlements, with isolated farms and dwellings with red brick and flint as dominant building materials. The woodland cover is</p>				<p>regarding the weight to be given to the application by Chilterns Conservation Board to extend the Chilterns AONB boundary south of the A505. Based on our understanding of the current status of the application, Natural England has yet to undertake an initial assessment of whether the application could satisfy the designation criteria or to indicate when that may occur. An initial assessment may conclude that Natural England do not wish to start a formal process to consider the evidence. Even if Natural England does proceed, the process can take a number of years and it may decide to alter the boundaries from those proposed by Chilterns Conservation Board in its application. On this basis, it is considered no additional planning status or weight should be given to the proposed areas as a result of the extension request when considering the application for development consent for the Proposed Development. Additionally, it is not considered appropriate to put the decision on the application for development consent on hold pending the boundary review process, given the uncertainties outlined above.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>good, with much of it being Ancient Woodland. It is of the same high quality as landscape in the AONB, the current boundary is arbitrary, following the A505 road and not natural features. A decision should not be taken to build an expanded airport on this land pending the AONB boundary review process, and Glover Report's Chilterns National Park recommendation. The Planning Inspectorate in their scoping opinion comment stated that 'The assessment in the ES should take into account the proposed designation and any significant effects that may occur.' The subsequent approach taken in the PEIR is to ignore this: 'A 'search area' is identified in the request for a boundary extension to the Chilterns AONB. It is considered premature to consider the effects on any AONB boundary extension as it is early in any application process.' We disagree with this approach and recommend this is addressed in the ES.</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.12	Following the mitigation hierarchy (avoid, reduce, compensate), funding should be directed for residual harm to the Chilterns AONB. This could fund environmental and community initiatives, including Chalkscapes, and be similar to the '3.75m AONB enhancement fund set up by Network Rail and run by the Chilterns Conservation Board to address the impacts of Great Western Rail electrification.	Chilterns Conservation Board		1	<p>In our last consultation we set out how we wanted to share the benefits of airport growth with neighbouring communities and proposed a new fund which we called FIRST. The aim of this was to make funds available to our neighbours to use for projects related to either, Community, Environment, or Access.</p> <p>We still propose to establish a similar fund, but having reflected on it we feel it could be put to more direct beneficial use, in line with our social and environmental ethos, by targeting areas of high deprivation in the region and by helping to finance local decarbonisation projects. As well as fitting better with our own values, we also believe this approach is better aligned with the national levelling up and decarbonisation agendas promoted by the government. To better reflect this revised approach we have renamed the fund 'Community First'.</p> <p>In order to maximise independence and transparency we propose that the fund should be independently administered. We believe the best way to do this</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>would be to make it available to community groups and Town and Parish Councils through our existing independently administered Community Funding Programme.</p> <p>We propose that Community First will provide £1 in funding for every additional passenger above the passenger cap current at the time that our DCO is consented. The available total Community First fund has the potential to raise up to £13m per year.</p> <p>The fund will be available to communities in Central Bedfordshire, North Hertfordshire, St Albans, Dacorum, Stevenage, Welwyn, Hatfield, eastern parts of the former Aylesbury Vale district and parts of East Hertfordshire.</p>	
6.1.13	The new Chilterns AONB Management Plan 2019-2024 was adopted in February 2019 and may be a material consideration when assessing planning proposals (as set out in Government's PPG para 040 on the Natural Environment). A number of detailed Chilterns	Chilterns Conservation Board		1	<p>Please see responses to refs 6.1.1 and 6.1.9.</p> <p>It is acknowledged that the Chilterns AONB Management Plan may be important and relevant to the Secretary of State's consideration of the application for development consent in so far as the Proposed Development has an impact on the AONB. Due</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>AONB Management Plan objectives and policies are relevant to the proposed expansion of Luton Airport including DO1, DO2, DP1, DP2, DP4 and in particular DP12. The PEIR does not adequately consider the Chilterns AONB. It fails to identify many of the ways that the Future Luton proposals will detract from the AONB. For example, Chilterns Conservation Board has not been included as a stakeholder for the noise and vibration element of the PEIR, despite the Chilterns AONB being directly under the Luton's flightpaths, including the final approach for landing and take-off. By only inviting local authority stakeholders, residential amenity is driving the work, to the detriment of noise considerations in the nationally protected landscape. The PEIR addresses AONB tranquillity only in the landscape chapter, but this chapter has no mitigation proposals around noise. The Planning Inspectorate's Scoping Opinion comment that 'the</p>				<p>consideration has been given to these matters as part of the EIA process, preliminary findings of which are set out in the Chilterns AONB Sensitivity Test in Appendix 14.9 in Volume 3 of the PEIR.</p> <p>There has been engagement with the Chilterns Conservation Board on landscape impact matters since the 2019 consultation and we will seek further engagement.</p> <p>Chapter 14 Landscape and Visual of the PEIR considers tranquillity as part of the assessment of effects on landscape receptors (specifically where identifying the value of a landscape receptor and when considering the magnitude of landscape impacts on that receptor). This includes considering tranquillity in areas within the Chilterns AONB where aircraft would be below 7,000 ft. (above mean sea level (AMSL)). This approach reflects the guidance set out in 'CAP1616: Airspace change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information' (CAP1616).</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>assessment of impacts to tranquillity should include consideration of effects to the Chilterns AONB' is contested in the PEIR (appendix 17 page 30) and it appears at this stage that the recommendation is being ignored and 'there is no intention to do a conduct an assessment of impacts on tranquillity' (page 40). The cumulative effects assessment in PEIR Table 20-8 discounts most of the large scale proposals in and near the Chilterns AONB. This means that cumulative impacts (e.g., noise, traffic, water abstraction from the chalk aquifer) on the nationally protected landscape of the Chilterns AONB of major schemes like HS2, Heathrow Third Runway and major house growth at Aylesbury and Hemel Hempstead are being ignored.</p>				<p>In line with Planning Inspectorate guidance presented within Advice Note 17, the list of cumulative schemes considered within the PEIR has been established on the basis of whether the Zone of Influence of the Proposed Development overlaps with those of other cumulative developments. It is recognised that whilst other developments will have impacts on the Chilterns AONB, the PEIR only considers cumulative effects, where there is a potential for those effects to increase or combine due to the effects of the Proposed Development. The cumulative impacts of the Proposed Development are considered in Chapter 21 In-Combination and Cumulative Effects Assessment of the PEIR in accordance with the relevant EIA Regulations.</p>	
6.1.14	<p>The vast engine ground running bay located on raised ground with its monolithic fortress-like wall will dominate views from the north and east which is candidate-AONB land.</p>	Chilterns Conservation Board		1	<p>Please see response to ref 6.1.1.</p> <p>Chapter 14 Landscape and Visual of the PEIR considers the impact of the Proposed Development on visual amenity experienced by people to the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					north and east of the airport. A sensitivity test of the proposed boundary extension to the AONB is included in the Chilterns AONB Sensitivity Test in Appendix 14.9 in Volume 3 of the PEIR. The sensitivity test is based on the 'search area' extents shown in the Chilterns Conservation Board application to Natural England.	
6.1.15	The Planning Inspectorate's Scoping Opinion comment that 'the assessment of impacts to tranquillity should include consideration of effects to the Chilterns AONB' is contested in the PEIR (appendix 17 page 30) and it appears at this stage that the recommendation is being ignored and 'there is no intention to do a conduct an assessment of impacts on tranquillity' (page 40). The cumulative effects assessment in PEIR Table 20-8 discounts most of the large scale proposals in and near the Chilterns AONB. This means that cumulative impacts (e.g., noise, traffic, water abstraction from the chalk aquifer) on the nationally protected landscape of the	Chilterns Conservation Board		1	Please see responses to refs 6.1.1 and 6.1.9. Please also see Noise and Flight paths and Fleet Mix topic responses. Chapter 14 Landscape and Visual of the PEIR includes the Landscape and Visual Impact Assessment (LVIA) which considers tranquillity when undertaking the assessment of effects on landscape receptors (specifically where identifying the value of a landscape receptor and when considering the magnitude of landscape impacts on that receptor). This includes considering tranquillity in areas within the Chilterns AONB where aircraft would be below 7,000 ft. (above mean sea level (AMSL)). This approach reflects the guidance set out in CAP1616.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Chilterns AONB of major schemes like HS2, Heathrow Third Runway and major house growth at Aylesbury and Hemel Hempstead are being ignored.				The cumulative impacts of the Proposed Development are considered in Chapter 21 In-Combination and Cumulative Effects Assessment of the PEIR in accordance with the relevant EIA Regulations.	
6.1.16	Concern that the Proposed Development will lead to loss of open space within Luton.		Host Authorities Central Bedfordshire Council	5	<p>We are committed to providing open space for the public to enjoy that is more attractive and more usable to a wider range of people than the publicly accessible areas currently available. We have worked hard to ensure that what we offer is not only of a very high quality but is also larger in size - the Proposed Development includes a 10% larger land area for a new Wigmore Valley Park that is much better connected to the existing areas of open space.</p> <p>The landscape mitigation is described in Chapter 14 Landscape and Visual of the PEIR and shown in Figures 14.9 and 14.10 of Volume 4 the PEIR. Commitments to deliver landscape and open space mitigation will be secured via the DCO, compliance with which will be a legal requirement.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.17	Concern that the Proposed Development will result in the loss of agricultural land.		North Hertfordshire District Council	3	<p>We own all of the agricultural land in North Hertfordshire that is to be used to replace affected open space and do not propose to commence works in these areas before the end of the existing farm tenancy.</p> <p>Chapter 6 Agricultural Land Quality and Farm Holdings of the PEIR includes an assessment of the operational impacts of the Proposed Development on agricultural land quality, soil resources and farm holdings.</p>	No
6.1.18	LGC has farm tenancies operating across all its landholdings, including Copt Hall and Someries Farm, which operates on land south of the Airport up to the Airport's southern boundary.			1	Noted.	No
6.1.19	Concern that the Proposed Development (including preparatory works and associated highway works) will result in the loss of green space, including publicly accessible parks with trees and hedgerows, as well as			11	Please see responses to ref 6.1.1 and 6.1.16.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Sites of Special Scientific Interest (SSSI), Nature Reserves and Country Wildlife Sites (CWS); with impacts on the local environment, biodiversity, drainage, pollution, quality of life for local communities, health and cultural heritage.					
6.1.20	Concern that the landscape proposals are inadequate and dubious, when compared to the scale of the Proposed Development and its impact.			14	<p>Landscaping is an important part of the Proposed Development.</p> <p>Chapter 8 Biodiversity and Chapter 14 Landscape and Visual in the PEIR provide assessments of impacts on the natural environment and sets out mitigation measures to prevent, reduce or offset any significant impacts.</p> <p>The Proposed Development is targeting a delivery of 10% biodiversity net gain through the extensive landscaping and habitat creation proposals incorporated.</p>	No
6.1.21	Consider the open space replacement proposals are unnecessary because the Proposed Development should not go ahead.			9	Noted. Please also refer to Need Case and Forecasts topic responses.	No

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.22	Concern that the Proposed Development will have adverse visual impacts on the surrounding area, landscape and countryside (including the Chilterns AONB), which have the potential to impact on the rural character of these places. It is noted that visual intrusion is already an issue from the current airport operation, and any expansion will make this worse. Request for further clarity on how visual impacts and light pollution will be managed, including the cumulative impacts from other airports and the development of New Century Park. Suggestion that individual views from residential homes, Luton Hoo Estate and long-distance views from the Chilterns AONB should be considered in a Visual Impact Assessment.	Chilterns Conservation Board Natural England	Central Bedfordshire Council	7	Please see responses to refs 6.1.9 and 6.1.15.	No
6.1.23	Mitigate significant environment effects on views and visual amenity experienced by people living or using the rights of way in the surrounding area. It is unclear			1	Please see response to ref 6.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	why such landscape/biodiversity mitigation cannot be addressed within the Airport's expanded operational area, or through offsetting the impacts on other land within the Airport's ownership.					
6.1.24	Concern that the preparatory and construction works will have adverse visual impacts on the surrounding area.			4	<p>Chapter 14 Landscape and Visual of the PEIR provides an assessment of both construction and operational impacts on the natural environment and sets out mitigation measures to prevent, reduce or offset any significant impacts.</p> <p>The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR sets out measures specific to construction. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.</p>	No
6.1.25	The DCO make some unspecific and improperly evidenced comments about its impact on soil and geology, water resources, waste and resources, health and community, biodiversity, landscape and visual impacts, and cultural heritage. You admit that there will be	Kings Walden Parish Council		1	Please see response to ref 6.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	specific negative impacts on landscape, and that wildlife sites will be either obliterated or significantly impacted. Relocation risks loss. Various vague and unspecific measures are described to minimise ecological damage, but it is clear that the potential for such damage is significant. More details should be provided as to how you will protect against ecological damage.					
6.1.26	Concern that the proposals to mitigate environmental impacts from the Proposed Development (including the Future LuToN Impact Reduction Scheme and use of the FIRST fund) during the construction and operation phases are inadequate and dubious, given the scale and severity of environmental impacts expected.			5	Please see responses to refs 6.1.1 and 6.1.12.	No
6.1.27	Suggestion that the existing habitats and biodiversity should be protected and enhanced regardless of any expansion.			2	We are consulting on our proposal to expand the airport and are proposing biodiversity and habitat improvement in that context. It is outside the scope of our application for development consent	No

Ref	Comment	PC	LA	No PILs	Response	Change
					to provide biodiversity and habitat improvements without expansion.	
6.1.28	The apparent multi-purpose of on-site open spaces in terms of habitat mitigation and public use is unclear.	Natural England			<p>The area of replacement open space will be accessible to the public just as the existing Wigmore Valley Park currently is. Most other mitigation areas will be developed and managed as wildlife areas. Landscape and biodiversity monitoring measures will be in place to ensure the future establishment of all mitigation planting, including that in areas both open and not open to the public. Areas within public use will still provide valuable habitat for species, with creation of pathways through the open space helping steer the recreational pressure away from peripheral habitats. Having the replacement open space and habitat creation areas in close proximity provides improved connectivity across the whole area.</p> <p>Please also refer to Wigmore Valley Park topic responses.</p>	No
6.1.29	It would be a responsible and positive move if the council were to propose more projects to restore what was lost somewhere			1	Please see responses to refs 6.1.1 and 6.1.12.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	else and provide a pot of money to further improve biodiversity and create habitat connectivity in the town to mitigate effects further. This would help improve the town's air pollution problem, lack of green spaces, increase biodiversity, help combat climate change and improve the mental health and wellbeing of the town's inhabitants.					
6.1.30	Suggestion that as many trees as possible should be planted as part of the Proposed Development and in the wider area, in order to maximise opportunities for ecological connectivity, increase CO2 absorption, mitigate noise and air pollution and to protect the setting of heritage assets in proximity to the airport; this should be based on ecology surveys to ensure no harm to other habitats.			3	<p>Landscaping works and tree planting comprises only part of the measures that will be introduced to prevent, reduce or offset significant environmental effects from the Proposed Development.</p> <p>The Draft LBMP in Appendix 8.2 in Volume 3 of the PEIR sets out that the number of trees to be planted has been developed for biodiversity reasons and also landscape and visual mitigation.</p>	No
6.1.31	Suggestion that enhanced landscaping should be incorporated into the Proposed			3	Please see response to ref 6.1.206.1.20.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Development and surrounding area.					
6.1.32	Suggestion that an independent review of the Environmental Impact Assessment (EIA) including impacts to public health and a Landscape and Visual Impact Assessment, should be undertaken to ensure accuracy of expected impacts and appropriateness of proposed mitigation measures.	Kings Walden Parish Council		1	<p>As reported in Chapter 14 Landscape and Visual of the PEIR the impact assessment has been carried out in accordance with all relevant legislation by competent practitioners.</p> <p>The scope of the EIA has been agreed with the Planning Inspectorate through the formal scoping process.</p> <p>The EIA will be submitted to the Planning Inspectorate to consider as part of the examination of the application for development consent and will be ultimately determined by the Secretary of State for Transport. Both of these public bodies are independent from the applicant.</p>	No
6.1.33	Suggestion that proposals for mitigating the impacts to soils and geology, water resources, waste and resources, health and community, biodiversity, landscape and visual impacts, and cultural heritage, appropriate expert specialists should be employed to ensure mitigation		Hertfordshire County Council	2	<p>The DCO, if granted, would be subject to requirements (similar to planning conditions) that would be legally binding.</p> <p>We are also proposing a GCG framework which will be a legally binding, independently monitored, framework which will ensure that the airport operates within particular environmental “limits”.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	proposals follow legal requirement and are to the highest standards.				<p>The CoCP will contain a suite of mitigation and management measures to ensure that the environmental impacts of construction, including earthworks and landscaping, are avoided where possible and otherwise minimised. It will be a legal requirement for the contractor to comply with the CoCP under the DCO. A Draft CoCP is provided in Appendix 4.2 of the Volume 3 of the PEIR.</p> <p>Ecological clerks of works will be required as part of the CoCP and where specific protected species mitigation is required, appropriate development licences from Natural England will be necessary, under which works will be conducted by suitably qualified and licenced ecologists specific to the species. The Draft LBMP in Appendix 8.2 of Volume 3 of the PEIR will also require the supervision of suitably qualified ecologists throughout the life of the plan.</p>	
6.1.34	Support for the landscape and open space proposals.			5	Noted.	No
6.1.35	Support for the proposals for mitigating the impacts to soils and			2	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	geology, water resources, waste and resources, health and community, biodiversity, landscape and visual impacts, and cultural heritage.					
6.1.36	Concern that the proposals to mitigate increased noise pollution are ineffective and insufficient as they do not provide any protection to wildlife or preserve the tranquillity of landscapes, including the Chilterns AONB.	Chilterns Conservation Board		1	Please see responses to refs 6.1.1, 6.1.9 and 6.1.15. Please also refer to Noise topic responses.	No
6.1.37	You admit that there will be specific negative impacts on landscape, and that wildlife sites will be either obliterated or significantly impacted.	Kings Walden Parish Council		1	Please see response to ref 6.1.1.	No
6.1.38	It is clear from the detail in the DCO that there will be substantial loss of valuable habitat, landscapes, wildlife and plants such as orchids which cannot simply be re-sited. We do not see any meaningful mitigation for this.	Kings Walden Parish Council		1	Please see response to ref 6.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.39	Landscaping must consider the views from all high ground surrounding the airport.	Kings Walden Parish Council		1	Chapter 14 Landscape and Visual of the PEIR includes the LVIA. This is based on the scoping for the impact assessment that was agreed with the Planning Inspectorate.	No
6.1.40	As a nationally protected landscape on the doorstep of London and many large settlements, the tranquillity of the Chilterns AONB is of national importance, not just to residents, but visitors and tourists enjoying the outdoors too. It will not be possible for the Planning Inspectorate to exercise its statutory duty of regard to the Chilterns AONB in these circumstances (required under Countryside and Rights of Way Act 2000 section 85). The process should await the comprehensive review of London's airspace conducted through the FASI-S airspace change process. This will allow coordinated solutions and assessments of cumulative impacts on the Chilterns AONB of	Chilterns Conservation Board		1	<p>Please see the response to refs 6.1.1 and 6.1.9.</p> <p>Please also refer to Flightpaths and Fleet Mix topic responses.</p> <p>The cumulative impacts of the Proposed Development are considered in Chapter 21 In-Combination and Cumulative Effects Assessment of the PEIR in accordance with the relevant EIA Regulations.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	flightpaths for Luton, Heathrow and RAF Northolt.					
6.1.41	The PEIR does not adequately consider the Chilterns AONB. It fails to identify many of the ways that the Future Luton proposals will detract from the AONB.	Chilterns Conservation Board		1	Please see responses to refs 6.1.1, 6.1.9 and 6.1.11.	No
6.1.42	The airport's footprint is roughly doubling in size and breaching into unspoilt landscape to the east of the existing airport. This land is candidate-AONB land and should be avoided.	Chilterns Conservation Board		1	<p>Please see response to ref 6.1.11</p> <p>In order to demonstrate that the potential impacts of the range of options were fully considered and appraised, a three-stage option appraisal process known as the 'sift process', was used. The most recent sift report is appended to the Works Description Report, and previous sift reports can be found on the Luton Rising website. These identify the appraisal criteria, methodology, outcomes and recommendations, and document a structured, multi-stage process of options appraisal which helped to identify which options should be taken forward or no longer considered for design development.</p> <p>Overall, the outcomes of the [final] Sift 3 reinforced the conclusions of Sift 2. A two terminal solution to the north of the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					runway being the preferred option to be taken forward to statutory consultation. It is the most beneficial in relation to strategic fit, economic benefits, deliverability, operational viability and cost benefit. Remaining options were therefore discounted at this stage.	
6.1.43	We agree with the comments made by the Chilterns Conservation Board outlined in Table 16-3 of the PEIR that the Chilterns Beechwoods Special Area of Conservation (SAC) is in close proximity to motorways and major roads which are likely to experience increased traffic from the expansion of Luton Airport. We are therefore pleased that 16.14.3 of the PEIR recognises that the HRA will include an assessment of potential impacts upon Chilterns Beechwoods SAC.	Natural England			Noted. A Draft HRA NSER is included in Appendix 8.3 of Volume 3 of the PEIR.	No
6.1.44	Habitats Regulations Assessment PEIR Vol 1 4.7.6 states that An HRA screening assessment has been undertaken as part of the scoping exercise and determined	Natural England			Noted. A Draft HRA NSER is included in Appendix 8.3 of Volume 3 of the PEIR. This updated HRA includes consideration of potential pathways	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>that there are no likely significant effects on Natura 2000 sites as a result of the Proposed Development and therefore, an appropriate assessment is not required under the Habitats Regulations In 5.2.2 of Appendix C within Appendix 1-1 of the PEIR, the HRA screening assessment does not consider any pathways between the development site and Chilterns Beechwoods SAC. We note in section 16.14.3 of the PEIR that the screening will be updated to reflect an assessment of the potential impacts on Chilterns Beechwoods SAC in terms of air quality. We look forward to reviewing a revised screening assessment, which takes air quality into account. Designated Sites Galley and Warden Hills SSSI has a 5km Impact Risk Zone for aviation proposals, which falls on the edge of main application site. 16.6.8 of the PEIR states that Given the designated features of these statutory sites and their distance from the Proposed Development</p>				<p>between the Proposed Development site and the relevant sites within the National Site Network (previously known as Natura 2000 sites) and takes account of potential air quality changes.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	it is not anticipated that the construction or operation of the Proposed Development will result in significant effects upon statutory designated nature conservation sites. However, the rationale behind this statement is not outlined.					
6.1.45	Green Infrastructure Natural England welcomes that the proposals seek to deliver multi-functional green infrastructure Particularly since Wigmore Valley Park forms part of Luton Green Infrastructure Network (17.6.14 of PEIR Vol 1). We note that the Bedfordshire and Luton strategic GI Plan labels the area around Luton urban area including open space around Luton Airport as a GI priority area. Further, as mentioned above, the GI Plan for Luton) indicates that Wigmore Valley Park forms part of Luton GI Network 2014. Multi-functional green infrastructure (GI) can perform a range of functions including improved flood risk management, provision of accessible green space, climate	Natural England			Please see response to ref 6.1.28. Natural England's plans and strategies will be considered in designing Green Infrastructure included in the Proposed Development.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	change adaptation and biodiversity enhancement. The proposed development is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. Whilst Natural England welcomes the green infrastructure (GI) element of the proposal as set out on the illustrative masterplan. We have the following comments: the use of open space to provide for mitigation and compensation (including biodiversity net gain), wildlife and public use, and GI is confusing, and could be clarified within the PEIR.					
6.1.46	Concern that the proposed fuel pipeline will disturb and/or lead to the destruction of local habitats and wildlife, during both the construction and operation periods as ongoing maintenance of the pipeline will be required; and that there may be risks of contamination and pollution from leaks, as well as potential subsidence. Concern that the benefits of the proposed fuel	Chilterns Conservation Board			<p>The proposal is to build a short spur connection, between the existing fuel pipeline and the proposed fuel storage facility at the airport.</p> <p>It is proposed the short pipeline be installed below ground to minimise the damage to biodiversity. The habitats above the pipeline route will be restored on completion of construction, and as such there will be no visible trace of the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>pipeline (i.e., removal of fuel tankers from the roads and reductions in carbon emissions) cannot outweigh the impacts to loss of habitats. Suggestion that a full assessment is required to establish the impacts this proposal would have on habitats and species.</p>				<p>pipeline, apart from pipeline markers, after installation.</p> <p>Assessment of the potential impacts of the pipeline on biodiversity are considered as part of Chapter 8 Biodiversity of the PEIR.</p>	
6.1.47	<p>The interest features of the Chilterns Beechwoods SAC, namely the Asperulo-Fagetum beech forests; semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (including important orchid sites); and (habitat of i.e., Broadleaved deciduous woodland) <i>Lucanus cervus</i> - Stag beetle, are all sensitive to Nitrogen. We would like to point out that both the Asperulo-Fagetum beech forests and the broadleaved deciduous woodlands are already exceeding their critical loads. This should be recognised within the revised HRA.</p>	Natural England			<p>Noted. An updated Draft HRA NSER is available at Appendix 8.3 of Volume 3 of the PEIR.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.48	<p>For the ecological receptors considered so far, we note that the maximum modelled changes to NOx pollutant concentrations remain below the air quality objectives set out in legislation. We also note that 5.8.42 PEIR Vol 1 states the assessment has shown the total NOx concentrations at the ecological receptors do not exceed the air quality standard of 30g/m as an annual mean. This result is the same for the 2024 scenario, and the 2039 scenario (PEIR 5.8.51). We note from the EIA Scoping Report that ecological receptors were considered within a 15km by 15km grid area centred on the Main Application Site and additional roads outside of this area which exceed the DMRB screening criteria, a clear list of ecological receptors considered, and screened out, should be provided to ensure that sensitive features are not missed through use of standard methodology.</p>	Natural England			<p>Chapter 8 Biodiversity of the PEIR sets out the assessment of all potential impacts to biodiversity as a result of the Proposed Development, and Chapter 7 Air Quality of the PEIR includes the ecological receptors modelled for effects through changes in Air Quality. This includes details of the receptors considered. Note also that the scope of the EIA, including the ecological receptors to be considered, was agreed with the Planning Inspectorate. Final responses to all comments received during Scoping will be provided in an appropriate format in the ES.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.49	We note that the AONB Management Plan also mentions Airport expansion and increased over-flying as a key issue for the Chilterns landscape.	Natural England			Noted.	No
6.1.50	Soils We note from page 131 of the Guide to Statutory Consultation that Approximately half of the agricultural land to be built on is classified as Best and Most Versatile agricultural land, which is of high value for agricultural use. Therefore, the proposed development would inevitably result in the loss of this agricultural land resource, which is considered to be a significant effect. Please note that 5.115 of the Aviation National Policy Statement states that the applicant should take into account the economic and other benefits of best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, the applicant should seek to use areas of poorer quality land in preference	Natural England			Chapter 6 Agricultural Land Quality and Farm Holdings of the PEIR includes an assessment of the operational impacts of the Proposed Development on agricultural land quality, soil resources and farm holdings.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	to that of a higher quality. The applicant should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed. Natural England draws your attention to the following land quality and soil considerations: 1. Based on the information provided with the planning application, it appears that the proposed development comprises approximately 57.6ha classified as best and most versatile (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system).					
6.1.51	We support your proposals to introduce a new funding scheme for local authorities to deliver specific impact reduction measures across the three surrounding counties of Bedfordshire, Buckinghamshire and Hertfordshire. However, we are unsure whether this funding initiative will also deliver the anticipated biodiversity net gains from the airport expansion project. It is also unclear whether	Natural England			Noted. Please see response to ref 6.1.12 for more information about our proposals for Community First. All replacement open space to be created is shown on Figures 4.2 and 4.3 in Volume 4 of the PEIR. Meanwhile all landscape and ecological mitigation areas are identified on Figures 14.11 to 14.13 in Volume 4 to the PEIR. Biodiversity Net Gain is not limited to discrete areas but is a target across the Proposed Development; Biodiversity Net	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the extensive new planting, including hedgerows and trees, both off the site and in the new parkland falls under mitigation, compensation or biodiversity net gain. Biodiversity Net Gain can only be achieved once the mitigation works have been accounted for. It cannot be achieved in areas where adverse impacts cannot be avoided.				Gain calculations will be submitted as part of the application for development consent.	
6.1.52	Any hedgerow or landscaping redevelopment on or around the airport should contain only those species not conducive to the attraction of birds or wildlife, so as to minimise the risk of bird or wildlife strike.	Civil Aviation Authority			Please see response to ref 6.1.7.	No
6.1.53	Bats With respect to 16.10.12 we note the lag time between the impact upon the bats foraging/commuting habitats and the establishment of the habitat creation measures to mitigate these effects, which is of concern. Particularly, since we note that a variety of bat species were surveyed: common Pipistrellus	Natural England			Noted. Where impacts upon protected species have been identified, the mitigation strategies will be agreed with Natural England and licences will be obtained to permit the proposed works.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>pipistrellus, soprano Pipistrellus pygmaeus and Nathusius pipistrelle, Pipistrellus nathusii, noctule Nyctalus noctula, Leisler's bat Nyctalus leisleri, serotine, Myotis species, brown longeared Plectotus auritus and barbastelle Barbastella barbastelleus, and that the roosting and foraging habitats for bats will be destroyed. Natural England's standing advice provides guidance on how protected species should be dealt with in the planning system. Please see Annex I for information regarding licensing protected species for NSIP applications. We provide advice and Letters of No Impediment through our licensing team.</p>					
6.1.54	<p>The current green infrastructure plan does not consider the role and function of green infrastructure and links to wider Green infrastructure strategies. We advise that a more comprehensive GI plan or strategy is developed (with findings integrated into the</p>	Natural England			<p>A Green Infrastructure Plan is not to be prepared for the Proposed Development; this falls within the remit of the Local Authority.</p> <p>The landscape and biodiversity mitigation provided as part of the Proposed Development has been designed to integrate into the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>landscape and biodiversity management plan) for the airport and its mitigation/compensation/enhancement areas, considering the role that GI can play as a living network at local and landscape scale, and giving consideration to its multi-functional benefits e.g. access to nature and educational value for local communities, air quality regulation, water management, water quality, water supply, noise regulation, carbon storage and pollination.</p>				<p>surroundings, has been assessed and will be managed in accordance with relevant policy and legislation as described in the Draft LBMP in Appendix 8.2 of Volume 3 of the PEIR.</p>	
6.1.55	<p>Paragraph 17.6.1 of the PEIR identifies a 5km study area extending from the perimeter of the Main Application Site. Given the sensitive landscape areas this study area must be extended in order to fully understand the landscape and visual impact of the proposal and to inform the identification of suitable mitigation measures required for the wider landscape area. Input from CBCs Landscape Officer should be sought to inform the extension of the study area.</p>		Central Bedfordshire Council		<p>Chapter 14 Landscape and Visual of the PEIR sets out the justification for the proposed study area.</p> <p>We have liaised with Central Bedfordshire Council (CBC) since the 2019 consultation and will continue to do so. The Study Area for the LVIA has been discussed and agreed with the LVIA Working Group, which includes the CBC Landscape Officer.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
6.1.56	DP14 within the current AONB Management Plan states Avoid new or upgraded infrastructure (roads, railways, airports, pylons, masts etc.) which harm the AONB landscape, nature, air quality, tranquillity or the visitor experience. It also states that airport expansion at Heathrow and Luton could result in more aircraft over-flying the AONB and harm its tranquillity. The effects on the Chilterns AONB must be assessed in full and cumulatively with other projects early in the decision-making process. Natural England agree with the potential impacts to the Chilterns AONB as described in the Management Plan. Natural England also advise that other projects which may impact the statutory purpose of the AONB should be scoped into your cumulative impacts assessments.	Natural England			<p>Noted. Please see response to ref 6.1.9.</p> <p>All relevant local policies have been considered in designing the Proposed Development.</p> <p>The long and short lists of cumulative schemes assessed within the PEIR are provided within Appendices to Chapter 21 In-combination and Cumulative Effects, in Volume 3 of the PEIR. The list of cumulative schemes has been consulted on with host authorities through the Planning Officers Coordination Group. Final responses to all comments received during Scoping will be provided in an appropriate format in the ES.</p>	No
6.1.57	We note that the need for a cumulative assessment including Heathrow airport has already been suggested at the scoping	Natural England			Please see responses to refs 6.1.1 and 6.1.9.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>stage: The assessment should take into account the cumulative effects of the proposed development together with the expansion of other airports, in the South East. The ES should consider cumulative impacts where significant effects could occur, including impacts to the Chilterns AONB. However, the need to consider cumulative impacts on the Chilterns AONB arising from the expansion at Heathrow airport have not been included in Table 20-8: Summary of key environmental issues to be considered in the CEA. We advise that this potential impact is factored into your assessments. Please note that paragraph 172 of the National Planning Policy Framework states that Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. This policy should be explicitly referenced within the</p>				<p>The cumulative impacts of the Proposed Development are considered in Chapter 21 In-combination and Cumulative Effects Assessment of the PEIR in accordance with the relevant EIA Regulations.</p> <p>It is not appropriate to assess the impacts of the Proposed Development cumulatively with the potential expansion of Heathrow Airport because this is not a consented scheme.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>upcoming ES. We advise that the Chilterns Conservation Board remain to be consulted by the determining authority about this scheme. The Board's contribution will, we believe, be necessary for a full understanding about how the airport expansion scheme would impact on the Chilterns AONB, given their detailed knowledge of the area, its special qualities, other major development pressures and its potential susceptibility to this sort of development.</p>					
6.1.58	<p>The plan or strategy could also consider its role in improving the operation and enhancing the resilience of the airport and its associated operations. We note that a particular focus on the role of GI is in relation to climate change mitigation and adaptation; health and wellbeing benefits for local communities; and the benefits for biodiversity. On the latter, it should consider how biodiversity and wider environmental net gains can be maximised through good design</p>	Natural England			Please see responses to refs 6.1.1 and 6.1.54.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>of green infrastructure and links with wider networks, and whether innovative approaches such as green walls and roofs could be incorporated into the design. We advise that it will be important to consider the context for GI and focus on connectivity and links with wider GI networks. Above we note the links to local GI Strategies, and we further suggest your engagement with neighbouring authorities and stakeholders such as Local Nature Partnerships, Health and Wellbeing Boards and Local Enterprise Partnerships when developing the green infrastructure plan or strategy.</p>					
6.1.59	<p>Natural England is currently developing a national framework of green infrastructure standards, building on commitments in the 25 year environment plan. These include principles for good green Infrastructure, focusing on themes of partnership; stewardship; planning and design; and multifunctional benefits that meet the needs of</p>	Natural England			<p>Relevant principles, plans and strategies have been considered in designing landscape and biodiversity mitigation included in the Proposed Development. Natural England have been engaged through the biodiversity EIA working group. Local groups have also been and continue to be consulted.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>local communities. Whilst these are still under development, we would encourage Luton Airport to consider these four themes in its green infrastructure planning. Existing standards such as the Accessible Natural Greenspace Standards can be applied when assessing provision of accessible natural greenspace. We would advise close collaboration with local stakeholders to ensure that the planned GI, particularly in relation to mitigating the impacts on Wigmore Valley Park, will meet the needs of the local community. Additional evidence and case studies on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web pages.</p>					
6.1.60	<p>In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management.</p>	Natural England			<p>A Draft Soil Management Plan is provided at Appendix 6.6 in Volume 3 of the PEIR. This will be included as part of the CoCP. It will be a legal requirement for the contractor to comply with the CoCP under the DCO. The Soil Management Plan is consistent with good practice set out in Defra's 'Code of</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	4. Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled and how to make best use of the different soils on site. Further guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks) and we recommend that this is followed.				Practice for the Sustainable Management and Use of Soil on Construction Sites’.	
6.1.61	Support that a full Landscape and Visual Impact Assessment of the Proposed Development will be carried out and included in the ES.	Natural England			Noted.	No
6.1.62	Clarity is required with regard to what projects are to be considered in the assessment of cumulative impacts. The PIER does not identify how comments raised in the Scoping Opinion have been addressed in relation		WSP for Host Authorities		Please see response to ref 6.1.56. Final responses to all comments received during Scoping will be provided in an appropriate format in the ES. This additional round of statutory consultation also allows stakeholders to review and	No

Ref	Comment	PC	LA	No PILs	Response	Change
	biodiversity, comprehensive assessment in relation to local plans and the 5-year criteria				comment on any further information provided within the PEIR.	
6.1.63	The Guide to Statutory Consultation states that some adverse impacts would be unavoidable. We understand this primarily relates to the loss of a County Wildlife Site, an area of primary importance to orchid species, and potential but unknown hydrological impacts to ancient woodland. Whilst Natural England welcomes your ambitions to deliver a 10% biodiversity net gain, it is also important to recognise that biodiversity net gain will be difficult to achieve considering these likely unavoidable, and adverse, impacts. Ancient woodland is an irreplaceable habitat and so out of scope for Biodiversity Net Gain.	Natural England			Noted.	No
6.1.64	The Guide to Statutory Consultation goes on to contradict itself on page 134, where it is stated with mitigation	Natural England			Chapter 8 Biodiversity of the PEIR, sets out that the primary area of biodiversity mitigation and enhancement is in the area to the east of the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>in place, including the provision of replacement habitats and planting, it is considered that significant adverse effects on biodiversity can be avoided. However, the loss of two mature ash trees would be unavoidable under our proposals. Within the PEIR, Volume 1, Section 16.1.4 Natural England supports that the Biodiversity Net Gain calculation is being undertaken using the Defra metric (Ref 16.2), with an aspiration to deliver a 10% net gain. However, we also note your ambition to provide new open space at least 10% larger than the current provision and as good in terms of usefulness, attractiveness, quality and accessibility. Although, it is unclear whether the 10% increase in open space is expected to contribute towards biodiversity net gain. Note that 10% open space does not mean a 10% biodiversity net gain is achieved. It is clear from the consultation documents, that the intention for this open space is blurred between providing</p>				<p>replacement open space. However, it is acknowledged that some benefit to biodiversity is expected to be delivered through habitat provided as part of the replacement open space, predominantly through woodland planting and mosaic habitat that replicates that present within the CWS.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	accessible green space to people, and providing meaningful mitigation, and compensation or net gains for ecology.					
6.1.65	In section 4.12.1 in Table 16-3 of PEIR Vol 1, Natural England agree with the Inspectorate s comments regarding the sensitivity of the River Lea and nearby chalk streams. Table 11-7 of the PEIR states that the River Lea, River Mimram and local springs as surface water features identified as potential receptors to the development. The importance off all three features is classified as medium. The evidence within the PEIR does not carry certainty that the groundwater supply and principle chalk aquifer will not be contaminated by leachate from the former landfill, when piling works are carried out: We await the publication of the Detailed Quantitative Risk Assessment, which will assess the risk to groundwater.	Natural England			<p>A substantial amount of ground investigation has been undertaken, including monitoring of groundwater in the chalk beneath and surrounding the Proposed Development. This work has indicated that the former landfill in its current state is not adversely affecting groundwater conditions in the area. In order to ensure the Proposed Development does not change this, a Remediation Strategy has been developed and can be found in Appendix 17.3 of Volume 3 of the PEIR. This includes details of measures to be undertaken to prevent any contaminants in the former landfill migrating into the groundwater in the underlying chalk. Amendments to earthworks design also reduces the volume of landfill required to be excavated and therefore associated impacts.</p> <p>A Foundations Works Risk Assessment (FWRA), a Groundwater Monitoring Plan, and a Remediation Options Appraisal (ROA) will form part of the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Remediation Strategy and be submitted as part of the application for development consent the FWRA assesses the risks from piling and provides an evaluation of the most appropriate technique to be adopted to ensure that any contamination present is not. The appointed contractor will agree the groundwater monitoring plan which will continue through construction and into the operational period of the Proposed Development.	
6.1.66	The application of the Mitigation Hierarchy on and off site, including how a Biodiversity Net Gain will be provided, is unclear	Natural England			<p>Please see response to ref 6.1.1.</p> <p>The calculation and an associated explanatory report along with all measures for the establishment and long term management of habitats will be detailed within the detailed LBMP which will be submitted as part of the ES. A Draft LBMP can be found in Appendix 8.2 of Volume 3 of the PEIR.</p> <p>Biodiversity Net Gain calculations will be submitted as part of the application for development consent.</p>	No
6.1.67	The increased overflying of the Chilterns Area of Outstanding	Natural England			Please see responses to refs 6.1.1, 6.1.9, 6.1.11 and 6.1.15.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Natural Beauty (both more flights and potentially new flight corridors) may impact adversely on the area's statutory purpose of conserving and enhancing natural beauty.					
6.1.68	Ancient woodland is an irreplaceable habitat and so out of scope for Biodiversity Net Gain.	Natural England			Noted.	No
6.1.69	As a final point, NE would like the opportunity to comment on the Landscape and Visual Impact assessment (17.14.1 of the PIER) and advise that this should consider potential visual impacts on the Chilterns AONB, and viewpoints from long distance trails within the Chilterns.	Natural England			Please see response to ref 6.1.1.	No

Table A6.13: Regard had to statutory consultation responses on Natural environment and Landscape - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
6.2.1	<p>Concern that the Proposed Development (including preparatory works) will lead to adverse impacts to biodiversity via habitat destruction including loss of trees, ancient woodland, calcareous grasslands, chalk grasslands and chalk streams, and other environmental impacts including increased air, light and noise pollution that may lead to further loss of habitats and species. Some respondents noted that habitats and species lost may be irreplaceable and therefore there will be significant and long-lasting damage and/or for habitats that may be replaced or translocated, it may take a long time for full establishment and there potentially establishment may fail. It was noted that a previously agricultural field will not be appropriate to support the diverse habitats to be translocated or re-established. Specific concern was raised on impacts to the wildlife and loss of habitats within Wigmore Park County Wildlife Site (CWS), Chilterns AONB and Galley and Warden Hills SSSI, including wetlands, orchids and birds. The following locations were specifically mentioned: West Hertfordshire, Luton Hoo Estate.</p>	170	Please see response to ref 6.1.1.	No
6.2.2	<p>Concern that the proposed fuel pipeline will disturb and/or lead to the destruction of local habitats and wildlife, during both the construction and operation periods as ongoing maintenance of the pipeline will be required; and that there may be risks of contamination and pollution from leaks, as well as potential subsidence. Concern that the benefits of the proposed fuel pipeline (i.e., removal of fuel tankers from</p>	14	The proposals have been informed by the EIA process and where possible designed to avoid or reduce adverse effects on valued ecological features and deliver benefits for biodiversity in accordance with policy and best practice. Our ambition is for the proposed development to deliver 10%	No

Ref	Comment	No CC	Response	Change
	<p>the roads and reductions in carbon emissions) cannot outweigh the impacts to loss of habitats. Suggestion that a full assessment is required to establish the impacts this proposal would have on habitats and species.</p>		<p>biodiversity net gain through the extensive landscaping and habitat creation proposals incorporated within the scheme.</p> <p>It is proposed that the pipeline be fitted with a sophisticated and sensitive leak detection system which can detect and pinpoint the location of leaks within minutes of them occurring, which includes detection of deliberate interference. Furthermore, an aerial inspection will take place every two weeks to look for any unauthorised or suspicious activity along the route of the line. Monthly checks will also be undertaken on vulnerable locations and an annual line walk of the pipeline's entire length will be carried out. If a leak is detected there is an existing Emergency procedure in place.</p> <p>The LBMP to be submitted with the application for development consent will provide the prescriptions for the creation/enhancement, long term management and monitoring and remediation requirements to achieve the target habitat conditions as described within the net gain metric. The LBMP will also detail the mechanism and responsibility for the long term management of the proposed habitats. A Draft LBMP is included within Appendix 8.2 of Volume 3 of the PEIR.</p>	

Ref	Comment	No CC	Response	Change
6.2.3	Oppose the Proposed Development on the grounds that any expansion will have significant impacts to biodiversity and local wildlife habitats, including loss of habitats within Wigmore Park County Wildlife Site (CWS), as well as to the Chiltern AONB. The only way to have any benefits to the environment will include not expanding the airport.	11	Please see response to ref 6.1.1.	No
6.2.4	Concern that the Proposed Development (including associated proposals to the road network) will lead to increased road traffic in the areas surrounding the airport, with associated impacts on noise and air pollution which are likely to have detrimental impacts on local habitats and wildlife. In addition, concern that upgrades to roads to the east of the airport will negatively impact the rural character of the areas that they pass through, and the patterns of ancient roads. Suggestion that a full assessment is required to establish the road traffic impacts on local wildlife in the area.	8	Please see response to ref 6.1.3 in respect of the potential air quality impacts on biodiversity. Please also see Air Quality topic responses. The potential impacts of the Proposed Development, including of the proposed road mitigation scheme, on the surrounding landscape have been carefully assessed in Chapter 14 Landscape and Visual of the PEIR.	No
6.2.5	Appendix 16-1 Ecology Baseline Report includes a report of invertebrate surveys undertaken in 2018. That report indicates that: The overall assessment of the Luton Airport survey area is of a site of high importance for invertebrate conservation at the county level. Key Habitats for open habitat invertebrates are (i) arable margins, field edges and field corners, (ii) disturbed areas with much bare ground, and sparsely developed ruderal vegetation, and (iii) short, flower-rich grasslands. The loss of all or part of fields F9 and F11, as designated in the invertebrate survey report, therefore appears to include areas which are considered by	1	The invertebrate assemblage present on the site have been classed as being of County level importance within the Chapter 8 Biodiversity in the PEIR, as recognised by the surveys conducted.	No

Ref	Comment	No CC	Response	Change
	the applicant's consultants to be of county level importance, but which have been assessed for the EIA (Environmental Impact Assessment) as being of low importance.			
6.2.6	The development site itself, and the areas to the east, give significant opportunities for habitat creation. The long term value of the created habitat will be reliant on the management proposals put forward. Unfortunately, the Draft Outline Landscape and Biodiversity Management Plan is rather skeletal in its current form, and it is impossible at present to determine what the long term value of the created habitats will be. The proposals include sections with high public access requirements. Such areas may well be suitable for the creation of the habitats identified as priorities in the invertebrate survey. However, the proposals will need to make a realistic assessment of the limitations that high public access will place on habitat value overall.	1	Please see response to ref 6.1.1. The Outline LBMP previously issued was an outline version intended to provide a framework for further development. This document has been updated and reissued as a Draft LBMP in Appendix 8.2 of Volume 3 of the PEIR, including more details than that previously issued. Measures are included to limit effects on habitats created as a result of disturbance and footfall, such as designing planting within mitigation areas to segregate the footpaths from the verges.	Yes
6.2.7	Concern that the construction and operation of the Proposed Development will lead to a deterioration of the local landscape, ecosystems, plant biodiversity and wildlife (including barn owls, hedgehog, badgers, rabbits, insects, toads, frogs, newts, birds, bat roosts and bird migration routes), which are already under threat from the existing airport operation and will be further damaged from increasing air and noise pollution. Specific concern raised for impacts during breeding seasons for local wildlife, as well as during the interim period before mitigation is established. Concern raised that the landscape proposals will allow the introduction of non-native invasive species	92	Please see response to ref 6.1.1.	No

Ref	Comment	No CC	Response	Change
	<p>which will have negative impacts on existing wildlife; and that hedgerow proposals are insufficient. In addition to natural wildlife, concern is raised for animals at Whipsnade Zoo. Suggestion that a full assessment is required to establish the impacts this proposal would have on wildlife in the area.</p>			
6.2.8	<p>Concern that the benefits of the Proposed Development (including increased employment opportunities) would be outweighed by the detrimental impacts to the local wildlife and biodiversity, from construction activities, destruction of habitat and increased air, light and noise pollution from increased numbers of flights and contribution to climate change. Suggestion that funding could be better invested in maintaining local wildlife. In addition, concern that the Proposed Development is based wholly on financial gain, without proper regard for environmental and local wildlife impacts.</p>	14	<p>Please see response to ref 6.1.1.</p> <p>The Proposed Development would result in direct effects on biodiversity during site clearance, and indirect effects due to disturbance. Best practice construction environmental management measures will be employed to minimise disturbance during construction, as described in the Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO. Furthermore, detailed mitigation strategies will be developed that outline species specific mitigation measures during construction, along with, where relevant, protected species Natural England development licences.</p> <p>With substantial habitat replacement provided by the Proposed Development and mitigation in place, these effects are not anticipated to be significant once habitats provided have matured.</p>	No

Ref	Comment	No CC	Response	Change
6.2.9	Concern that the Proposed Development does not appropriately consider the risk of bird strike (including from swans, herons and Canada geese) within the landscape proposals, including inappropriate location of trees. Request for clarification on expected bird strike risk and how this will be managed and mitigated.	3	Please see response to ref 6.1.7.	No
6.2.10	Concern that the Proposed Development will lead to increased air, light and noise pollution as well as traffic congestion and visual intrusion, which will negatively impact the Chilterns Area of Outstanding Natural Beauty (AONB) and the proposed addition of AONB; and that there will be impacts to the experiences of the AONB including its tranquillity. In addition, concern that the PEIR does not appropriately consider the AONB, and the proposed mitigation measures are insufficient. Criticism that statutory obligations to protect and conserve the AONB (as per Countryside and Rights of Way Act 2000) are not given due consideration; furthermore, the proposals are not in line with CAA guidance from 2017 which states that airspace routes below 7,000ft should seek to avoid flying over AONBs. It is noted that the cumulative impacts of airport expansions (including Heathrow and RAF Northolt) on the AONB needs to be considered. Suggestion that a Landscape and Visual Impact Assessment and a Traffic Assessment should be carried out to determine the impacts to the AONB and wider green spaces.	25	Please see responses to refs 6.1.1, 6.1.9 and 6.1.15.	No

Ref	Comment	No CC	Response	Change
6.2.11	<p>The National Trust is the owner and custodian of extensive tracts of open downland, woodland and common land located to the west of Luton, as well as a number of heritage assets. Our portfolio stretches from Whipsnade in Bedfordshire across parts of Hertfordshire and into Buckinghamshire and much of this land is designated for its landscape and biodiversity importance. The Trust's principal landholdings are identified on the attached plan and include the following properties: Ashridge Estate and Ivinghoe Beacon Dunstable Downs, Chilterns Gateway and Whipsnade Estate Coombe Hill/Low Scrubs Pulpit Hill The largest of these is Ashridge Estate which comprises some 5000 acres of countryside, including ancient woodlands and commons. Dunstable Downs is the highest point in Bedfordshire and Dunstable and Whipsnade Downs, Ivinghoe Hills, Ashridge Commons and Woods are all designated SSSIs, and all four landholdings lie within the Chilterns AONB. Parts of both Coombe Hill and Pulpit Hill are also designated SSSIs. Together, these special places offer access to miles of footpaths with expansive views across the Vale of Aylesbury, including the Icknield Way which starts at Ivinghoe Beacon. Panoramic views are also available from Coombe Hill, which is the highest point on the Chilterns, whilst from Pulpit Hill there is access to an Iron Age hillfort and to The Ridgeway National Trail. All are valued as much as places of refuge and tranquillity as for the rare species of fauna and flora which flourish on the Downs.</p>	1	<p>Noted. Please see responses to refs 6.1.1 and 6.1.24.</p> <p>A LVIA is provided in Appendices 14.4 and 14.5 in Volume 3 of the PEIR the purpose of the LVIA is to identify the likely significant effects of the Proposed Development on landscape and visual receptors.</p> <p>The landscape and visual receptors identified as potentially sensitive to change from the Proposed Development during the construction and/or operational phase are identified in Chapter 14 Landscape and Visual of the PEIR. It is considered that any effect on the landscape within the listed assets and/or views experienced by those at the listed assets would not be significant.</p>	No

Ref	Comment	No CC	Response	Change
6.2.12	The Trust is committed to the protection of these spaces, and to the quality of experience they offer to visitors. We welcome the inclusion of environmental information in the Preliminary Environmental Information Report, however, the initial assessments of focus on monitoring and mitigation measures to protect residential properties and adjacent sensitivities, and very little information is available relating to other sensitivities that may be affected by aircraft noise arising from the proposed increase in flight numbers. In particular, we are concerned about possible noise and air quality impacts at our sites, and about greenhouse gas emissions.	1	The PEIR includes an assessment of all potential environmental impacts of the Proposed Development, including air quality in Chapter 7 Air Quality , noise and vibration in Chapter 16 Noise and Vibration and Greenhouse Gases in Chapter 12 Greenhouse Gases .	No
6.2.13	Concern that the Proposed Development will lead to a reduction in open space within Luton. Criticism that the assumptions of the SIFT process are incorrect and result in greater losses to green space than necessary.	63	Please see response to ref 6.1.16.	No
6.2.14	Concern that the Proposed Development will result in the loss of productive, high quality agricultural land, with impacts to food production; some respondents raised concerns that such land would be taken without payment to the current landowners. In addition to the loss of agricultural land, some respondents highlighted losses of trees and hedgerow associated with fields which provide habitats for birds and other wildlife. Specific concern raised that the mitigation measures proposed, including the reuse of soils, are insufficient to address loss of agricultural land. Concern that agricultural land and livestock in proximity to the airport will suffer from increased air and noise pollution as a result	35	Please see responses to refs 6.1.1, 6.1.17 and 6.1.50.	No

Ref	Comment	No CC	Response	Change
	of the Proposed Development. Suggestion that alternative sites should be considered.			
6.2.15	Concern that the Proposed Development (including preparatory works and associated highway works) will result in the loss of green space, including publicly accessible parks with trees and hedgerows, as well as Sites of Special Scientific Interest (SSSI), Nature Reserves and Country Wildlife Sites (CWS); with impacts on the local environment, biodiversity, drainage, pollution, quality of life for local communities, health and cultural heritage. Specific concern is raised on the impacts that this will have on the wider landscape of the areas surrounding the airport, including visual impacts and deterioration of the countryside; in addition, concern was raised on the cumulative impacts of the Proposed Development, increased housing development and New Century Park development. The proposed mitigation measures, including the replacement green space for Wigmore Park, were generally considered as insufficient partly as these proposals do not create any new areas of green space but rather utilise existing. The following locations were specifically mentioned: Wigmore Park, Luton, Stevenage, Hertfordshire.	160	<p>Please see response to ref 6.1.1 and 6.1.16.</p> <p>No effects on SSSIs or Local and National Nature Reserves are predicted as a result of the Proposed Development. The effects on CWS and biodiversity are described in Chapter 8 Biodiversity of the PEIR.</p> <p>The effects on visual amenity experienced in views from the surrounding area are described in Chapter 14 Landscape and Visual of the PEIR.</p>	No
6.2.16	Concern that the landscape proposals are inadequate and dubious, when compared to the scale of the Proposed Development and its impact. Comments specifically covered, including landscape proposals are:	207	<p>Please see response to ref 6.1.206.1.20</p> <p>A 15m buffer to Ancient Woodland reflects Natural England and the Forestry Commission's Standing Advice on Ancient Woodland and Veteran Trees.</p>	No

Ref	Comment	No CC	Response	Change
	<p>- 'greenwashing' and do not go beyond statutory requirements;</p> <p>- will not reduce air, light and noise pollution levels, or outweigh other associated irreversible environmental damage (including impact to soils and biodiversity);</p> <p>- insufficient to manage increased visual intrusion;</p> <p>- a 15m buffer zone is insufficient to protect ancient woodland and that replacement planting for trees, orchids, hedgerow and other vegetation lost is inadequate and will take a long time to establish.</p> <p>Specific concern raised that the areas between Wandon End and Darley Hill will not be subject to landscaping within the Proposed Development.</p>		<p>Our ambition is for the proposed development to deliver 10% biodiversity net gain through the extensive landscaping and habitat creation proposals incorporated within the scheme, details of how these habitats will be created and managed are set out in the Draft LBMP in Appendix 8.2 in Volume 3 of the PEIR.</p> <p>The LVIA provided in Appendices 14.4 and 14.5 in Volume 3 of the PEIR has not identified a need for landscaping between Wandon End and Darley.</p> <p>The landscape proposals have been developed in collaboration with stakeholders to mitigate significant adverse effects on environmental receptors, notably effects on landscape, visual amenity and biodiversity. The landscape-based mitigation measures take into consideration public and stakeholder feedback.</p>	
6.2.17	<p>Concern that the landscape and open space replacement proposals are inadequate, including that 10% increase in public open space is insufficient and that the proposals do not appropriately serve the local community as the replacement open space will be subject to air and noise pollution with impacts to quality of life and health; suggestion that a Legal Covenant should be provided to ensure that areas for landscape and open space mitigation are not subject to further expansion in the future. Concern</p>	40	<p>Please see response to ref 6.1.16.</p> <p>Please also refer to Land and Compensation topic responses.</p> <p>The landscape proposals have been developed in collaboration with stakeholder feedback to mitigate significant adverse effects on environmental receptors, notably effects on landscape, visual amenity and</p>	No

Ref	Comment	No CC	Response	Change
	that the landscape proposals will not be delivered due to lack of funding at a later date. In addition, some respondents noted that the landscape proposals only benefit residential areas immediately adjacent to the airport and not those further away that will still be impacted by the Proposed Development, including Hertfordshire, Hitchin, Stevenage and Wheathampstead; specific concern was highlighted for Fairlands Valley Park lake in Stevenage.		biodiversity. The landscape-based mitigation measures take into consideration public and stakeholder feedback.	
6.2.18	Concern that the landscape and open space replacement proposals are inadequate, including that they are not in keeping with the Chiltern chalk landscape and will lead to adverse impacts on woodland and chalk grassland; in addition, concern that it is not possible to integrate airport within a natural landscape due to the significant urbanising influences of such a facility. Concern that there is an over-use of scrub planting within the proposals, which will have limited ecological value; and that biodiversity net gain will not be achieved. Suggestion for increase diversity in planting mix, including deciduous trees, hedgerow and a variety of grasses; and to relocate mature trees where possible in favour of planting new trees. Request for greater clarity on the details of the landscape planting proposals, with more visual material and confirmation on timescales for delivery of the proposals; clarity on the landscape mitigation proposals; and clarity on the quantity of trees to be lost. The following locations were specifically mentioned: Harpenden.	24	Please see response to ref 6.1.1.	No

Ref	Comment	No CC	Response	Change
6.2.19	Consider the open space replacement proposals are unnecessary because the Proposed Development should not go ahead.	131	Noted.	No
6.2.20	Concern that the Proposed Development will have adverse visual impacts on the surrounding area, landscape and countryside (including the Chilterns AONB), which have the potential to impact on the rural character of these places. It is noted that visual intrusion is already an issue from the current airport operation, and any expansion will make this worse. Request for further clarity on how visual impacts and light pollution will be managed, including the cumulative impacts from other airports and the development of New Century Park. Suggestion that individual views from residential homes, Luton Hoo Estate and long-distance views from the Chilterns AONB should be considered in a Visual Impact Assessment. The following locations were specifically mentioned: Hitchin, Harpenden, Letchworth, St Albans, Hertfordshire.	49	Please see response to ref 6.1.1.	No
6.2.21	Concern that the preparatory and construction works will have adverse visual impacts on the surrounding area, and that temporary landscape screening is not provided to mitigate this. Specific concern was raised on the visual impacts of temporary night-time lighting during the construction phase, with potential associated impacts to local ecology including that within the Luton Hoo Estate.	1	<p>Please see responses to refs 6.1.1 and 6.1.24.</p> <p>The visual impact of preparatory and construction activities is considered within the LVIA is provided in Appendices 14.4 and 14.5 in Volume 3 of the PEIR.</p> <p>Good practice measures to protect the landscape and visual amenity are set out and explained in the Draft CoCP in</p>	No

Ref	Comment	No CC	Response	Change
			<p>Appendix 4.2 of Volume 3 of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.</p> <p>The CoCP includes requirements for controls on lighting/illumination to limit visual intrusion or any adverse effect on sensitive ecology, including adherence to relevant guidance such as The Institution of Lighting Professionals, Guidance note 8: Bats and artificial lighting GN08:2018.</p>	
6.2.22	<p>Concern that the proposals to mitigate environmental impacts from the Proposed Development (including the Future LuToN Impact Reduction Scheme and use of the FIRST fund) during the construction and operation phases are inadequate and dubious, given the scale and severity of environmental impacts expected including loss of green spaces; loss of trees; digging up the local park / County Wildlife Site (CWS) and disrupting ecology. Specific concern was raised that the proposed mitigation measures will not be carried out due to lack of care from LLAL. Some respondents noted that any expansion to the airport will have detrimental impacts on the environment; and that mitigating impacts will still always be worse than ensuring these impacts do not occur in the first instance. In addition, concern that the consultation material does not contain sufficient information on the true impacts to the natural environment and mitigation measures to be employed.</p>	68	Please see responses to refs 6.1.1 and 6.1.12.	No

Ref	Comment	No CC	Response	Change
6.2.23	Concern that the proposals to mitigate environmental impacts during all phases of development and future uses of the Proposed Development are ineffective and insufficient; and that the consultation material does not contain sufficient information on the true impacts to the natural environment and local wildlife from the Proposed Development or specific details on the mitigation measures to be employed. Specific concern was raised on proposed mitigation measures for: digging up the local park / County Wildlife Site (CWS) and disrupting ecology; earthwork operations; increases in road journeys; increases in rail journeys; increases in numbers of flights; increases in noise and air pollution; and increases in use of local resources, including water.	2	Please see response to ref 6.1.1.	No
6.2.24	Concern that not enough consideration has been given to the environmental impacts of the Proposed Development or methods by which to mitigate these impacts. Concern raised that the current airport operation already results in environmental damage, which needs to be addressed, and any expansion would lead to further adverse impacts. Suggestion that more could be done to offset the environmental impacts and involve local wildlife charities.	16	Please see response to ref 6.1.1. This additional round of statutory consultation provides a further opportunity for local wildlife charities to comment on our proposals.	Yes
6.2.25	Suggestion that the Proposed Development should promote significant improvements in biodiversity both on and off site, including support and protection for newts, frogs, ducks, swans, slow worms, bees, animals living underground, hawthorn, oak, silver birch, beech, bramble, scotts pine, dandelion, clover, timothy grass, meadow fescue,	29	Please see response to ref 6.1.1. Our landscape proposals have been designed carefully to ensure there is not a significant change in the bird strike risk for aircraft utilising. For example we have	No

Ref	Comment	No CC	Response	Change
	wildflowers purple moor grass, ball ruses, reeds and other native wildlife; this will include maximising re-wilding where possible and ensuring there is an appropriate water supply, amongst other measures. In addition, consideration should be given to local wildlife within farms. Suggestion that a local community wildlife centre should be created including provision for education on habitat and species protection; and suggestion to create areas of meadows, water bodies and wetland with hides for observing wildlife.		avoided large blocks of woodland which may encourage flocks of wood pigeon or creation of large waterbodies which could attract waterfowl. Large areas of neutral meadows grassland are included within the landscape proposals. All measures for the establishment and long term management of habitats are detailed within the detailed Draft LBMP in Appendix 8.2 of Volume 3 of the PEIR.	
6.2.26	Suggestion that the existing habitats and biodiversity should be protected and enhanced regardless of any expansion, including ensuring that the landscape proposals tie into existing networks of green corridors to allow for wildlife movements and ecological connectivity. In addition, suggestion that where existing wildlife and vegetation are proposed to be relocated, that further measures are put in place to ensure that they thrive; including safe transportation of animals (including toad tunnels) and consideration of temporary relocation during construction. Some respondents suggested additional tree (including mix with mature trees) and hedgerow planting is needed and that this should take place as soon as possible within the proposed phases of development to ensure wildlife biodiversity retention.	24	We are consulting on our proposal to expand the airport, and the biodiversity and habitat enhancements we are proposing as part of that. It is outside the scope of our application to provide these enhancements without the proposed expansion. Nevertheless, the suggestions here have been considered in developing our proposals.	
6.2.27	Suggestion that the existing habitats and biodiversity should be protected and enhanced with a commitment to	9	Please see response to ref 6.1.1.	No

Ref	Comment	No CC	Response	Change
	<p>biodiversity net gain assessed against a nationally recognised methodology; and to ensure any lost habitats are replaced and to maximise opportunities for habitat creation in new environments, including balancing ponds. It was noted that biodiversity net gain is likely to become a legal requirement for new developments, as a result of the new Environment Bill. In addition, it was highlighted that County Wildlife Sites (CWS), chalk landscapes and ancient woodland should be retained and not adversely affected. Suggestion that a fund should be set up for further biodiversity improvements in the wider area, including in commons, heaths, parks, allotments and orchards. Request for greater clarity on the mitigation hierarchy for on and off-site delivery, and how biodiversity net gain will be achieved.</p>		<p>A Biodiversity Net Gain calculation has been undertaken using the Defra metric version 3.0, and we have an aspiration to deliver 10% net gain. This is consistent with the Environment Bill which received royal assent as of 9 November 2021 and will become the Environment Act 2021. It includes a mandate for at least 10% biodiversity increase for projects, including for NSIPs and will apply to submissions from 2023. Prior to the date this becomes law in England, the aspiration for 10% gain goes beyond what is currently required of NSIPs, which are currently exempt from the 10% target set by the draft Environment Bill.</p> <p>Biodiversity Net Gain calculations will be submitted as part of the application for development consent.</p>	
6.2.28	<p>Because the metric calculations have not been included in the consultation, we can't calculate what level of additional enhancement measures will have to be secured. There are existing wildlife sites within the surrounding area which could have their condition enhanced, and therefore contribute to achieving net gain. For those enhancements to be considered in the metric calculation it will be necessary for there to be reasonable certainty that condition improvements can genuinely be secured, and we would urge the proposers to reach agreements with the owners</p>	1	Noted. Please see response to ref 6.1.1.	No

Ref	Comment	No CC	Response	Change
	before any enhancements are included in future iterations of the metric calculations.			
6.2.29	Suggestion that the Proposed Development should incorporate green roofs/roof gardens on all buildings, to maximise opportunities for ecological connectivity, water attenuation, noise mitigation and CO2 absorption.	3	Noted. Green roofs/roof gardens will be considered at the detailed design stage.	No
6.2.30	Suggestion that as many trees as possible should be planted as part of the Proposed Development and in the wider area, in order to maximise opportunities for ecological connectivity, increase CO2 absorption, mitigate noise and air pollution and to protect the setting of heritage assets in proximity to the airport; this should be based on ecology surveys to ensure no harm to other habitats. Suggestion that native, mature trees (including oak, ash sycamore, hawthorn, oak, silver birch, beech and evergreen) should be planted to maximise benefits; additional land should be purchased for this purpose if required. Suggestion that funding allocated to the Three Counties as well as funds to undertake the Proposed Development could be used for this purpose. Suggestion that tree planting is an opportunity to engage local residents, Woodland Trust, Local Wildlife Trust, Friends of Wigmore and Bedfordshire Natural History Society. A specific suggestion raised that more trees should be planted for every meter of land dug up to lay the fuel pipeline. Another specific suggestion raised that a snow slope could be created to plant trees on. The following locations were specifically mentioned for increased tree planting: airport boundary, land to the north of the runway,	90	Please see response to ref 6.1.30. The landscape proposals seek to mitigate significant environmental effects determined through the EIA process. All of the suggestions have been considered and several were discussed with officers from the host authorities. Whilst it was determined that some of the suggestions would be inappropriate others will be considered further.	No

Ref	Comment	No CC	Response	Change
	car parking to the north-east of the new terminal, Luton town, local parks, access routes to the airport, Breachwood Green, Darly Hall.			
6.2.31	Suggestion that enhanced landscaping should be incorporated into the Proposed Development and surrounding area to make it greener and more natural, as well as to provide mitigation against noise pollution. It was noted that existing green spaces should be protected as a priority, maintenance of any landscape areas should be an integral part of the proposals to ensure that they are sustained for the long-term.	25	Please see responses to refs 6.1.16 and 6.1.20. We will ensure landscape areas are maintained into the future. Requirements for landscape maintenance are set out in the Draft LBMP in Appendix 8.2 in Volume 3 of the PEIR.	No
6.2.32	Suggestion that the Proposed Development should not be taken forward, and instead the airport site should be turned into a green space and/or allowed to re-wild and/or be used for food production.	10	Noted.	No
6.2.33	Suggestion that the area used for laying the fuel pipeline should be appropriately restored and dedicated to ecological enhancements, with a net gain in biodiversity from such works. In addition, landscape planting should afford visual screening of the affected area. In addition, suggestion that a 'cut-and-cover' method should be used for the pipeline rather than overland.	7	Noted.	No
6.2.34	Suggestion that the Chilterns Area of Outstanding Natural Beauty (AONB) and Wigmore Valley should be protected from adverse impacts of the Proposed Development, with recognition of the local topography with regards to	4	Please see responses to refs 6.1.1 and 6.1.9.	No

Ref	Comment	No CC	Response	Change
	flightpaths and the responsibilities to protect and conserve the AONB outlined under the Countryside and Rights of Way Act 2000. Consideration should be given to the cumulative impacts of the Proposed Development with potential Heathrow airport expansion, HS2 and other major infrastructure that have the potential to reduce the sense of tranquillity and diminish the special setting of the AONB. Suggestion that a key means of protecting the AONB is to avoid flightpaths over it.		Please also refer to Noise and Flight paths and Fleet Mix topic responses.	
6.2.35	Suggestion that landscape and open space improvements should be carried out despite expansion. In addition, some respondents noted that the Proposed Development is not sufficient to justify removal and replacement of Wigmore Park, particularly in the current climate crisis. Suggestion that enhancements could be carried out off-site, including at Therfield Heath.	7	Please see response to ref 6.1.26.	No
6.2.36	Suggestion that the landscape and open space proposals need to be designed with consideration of environmental needs and impacts to local communities, and that an assessment should be undertaken to determine the degree of growth in the airport operation that Luton and the surrounding areas can sustain without an unacceptable loss of amenity and change to the character, tranquillity and nature of the environment. This includes demonstrating that the replacement for Wigmore Park will be sufficiently future-proofed such that any further future expansion plans would not impact on this amenity. In addition, request for further	5	Agreed. Please see responses to refs 6.1.1, 6.1.16 and 6.1.20. Please also refer to Wigmore Valley Park topic responses.	No

Ref	Comment	No CC	Response	Change
	detailed information on the landscape proposals for the south, east and north-east areas of the airport site.			
6.2.37	Suggestion to plant more trees and vegetation in the vicinity of the airport and to design the earthworks to mitigate expected increases in noise, light and air pollution, as well as to provide visual screening. Landscape proposals should aim to increase the attractiveness of the airport and surrounding area, considering wider views from higher land. In addition, suggestion that tree planting mix should focus on indigenous species and those that can help to filter out pollution. The following locations were specifically mentioned for mitigation measures: airport boundary, land to the north of the runway, land to the south of the airport, noise bunds along the runway, new car park, Breachwood Green, Luton Hoo.	28	Please see response to ref 6.1.30.	No
6.2.38	Suggestion that an independent review of the Environmental Impact Assessment (EIA) including impacts to public health and a Landscape and Visual Impact Assessment, should be undertaken to ensure accuracy of expected impacts and appropriateness of proposed mitigation measures. A number of respondents requested that the Proposed Development is put on hold until such a review is carried out. In addition, LLAL should provide funding for the review to be undertaken.	3	Please see response to ref 6.1.32. A LVIA is provided in Appendices 14.4 and 14.5 in Volume 3 of the PEIR.	No
6.2.39	Suggestion that proposals for mitigating the impacts to soils and geology, water resources, waste and resources, health and community, biodiversity, landscape and visual impacts,	7	Please see response to ref 6.1.32.	No

Ref	Comment	No CC	Response	Change
	and cultural heritage, appropriate expert specialists should be employed to ensure mitigation proposals follow legal requirement and are to the highest standards.			
6.2.40	Support for the proposals for enhanced green areas as part of the Proposed Development, including the replacement of Wigmore Valley Park rather than a loss of this amenity, as well as creation of new green spaces proposed. It was noted that the replacement green spaces are sufficient as replacement for previous green spaces lost. Support for the approach taken towards biodiversity with target of 10% biodiversity net gain.	14	Noted.	No
6.2.41	Support for the landscape and open space proposals; specific support was highlighted for the retention of soil resources on site, reprovision of public open space to compensate for the loss of Wigmore Valley Park, enhanced play provision, increase in public open space by 10%, allocation of funds for long-term maintenance of replacement public open space, and provision of additional trees and hedgerow both on and off site. It was noted that landscape and open space are important for local communities and the proposals have taken this into account; some respondents noted that proposals must be carried out as described in order to achieve benefits for wildlife and communities. Appreciation noted that the feedback from the 2018 consultation has been appropriately considered and proposals updated in response. Suggestion that a free permit could be provided for residents within a	147	Noted.	No

Ref	Comment	No CC	Response	Change
	certain distance, for parking by the replacement open space.			
6.2.42	Support for the proposals for mitigating the impacts to soils and geology, water resources, waste and resources, health and community, biodiversity, landscape and visual impacts, and cultural heritage. Specific support was highlighted for off-site enhancements to designated sites and contributions to local biodiversity projects. Some respondents noted that proposals must be carried out as described in order to achieve appropriate levels of mitigation and benefits.	31	Noted.	No
6.2.43	We are concerned that the current assessment may have undervalued the impact of the proposals. For example, on Page 650 of the PEIR it is reported that the loss of arable field margins and their associated arable plants will have a low impact. However, Appendix 16-1 Ecology Baseline Report, includes a report of invertebrate surveys undertaken in 2018. That report indicates that: The overall assessment of the Luton Airport survey area is of a site of high importance for invertebrate conservation at the county level. Key Habitats for open habitat invertebrates are (i) arable margins, field edges and field corners, (ii) disturbed areas with much bare ground, and sparsely developed ruderal vegetation, and (iii) short, flower-rich grasslands. The loss of all or part of fields F9 and F11, as designated in the invertebrate survey report, therefore appears to include areas which are considered by the applicant's consultants to be of county level importance, but which have been assessed for the EIA (Environmental Impact Assessment)	1	Noted. The purpose of the PEIR is to report the preliminary assessment of potential impacts and proposed mitigation measures. We will be using version 3.0 of the Defra Biodiversity Metric to calculate the amount of habitat creation that needs to be included within the scheme design in order to mitigate the loss of habitats (previously version 2.0 was used) and provision for species will be incorporated into this. The biodiversity metric and report will be published with the ES.	No

Ref	Comment	No CC	Response	Change
	<p>as being of low importance. The correct assessment of the importance of these areas is likely to have a significant impact on the value of biodiversity units when calculating losses through the Defra metric. Similarly, without the metrics being available, it is not possible to ascertain what existing value has been given to the areas proposed for compensatory habitat. However, if an approach has been taken of assuming a low value, in line with the EIA but contrary to the assessment of county level importance in the invertebrate report, then the metric will significantly over-report the uplift in value in the compensatory habitat, and insufficient habitat will be provided to reach the proposed level of net gain."</p>			
6.2.44	<p>Planning policy currently specifically requires all developments to provide a net gain for wildlife. Paragraph 170 of the National Planning Policy Framework (NPPF) says that: Planning policies and decisions should contribute to and enhance the natural and local environment by: [] d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; Paragraph 174 of the NPPF states that these gains must be measurable. The Environment Bill, which passed its second reading in the House of Commons, but which fell foul of the prorogation of Parliament, sought to legally mandate that net gain. The recent consultation on implementation of this mandated net gain proposed that a minimum of 10% increase in identified units of biodiversity would be an appropriate level for developments to secure.</p>	1	Please see responses to refs 6.1.1 and 6.2.27.	No

Ref	Comment	No CC	Response	Change
	<p>Defra has devised a revised methodology for assessing the impacts and gains for biodiversity associated with development proposals. Appendix 1 is an extract from the statement of case submitted by Natural England, the government's conservation advisors, to the inquiry into the Bicester to Bedford section of East West Rail. Their submission sets out clearly the need for a major transport infrastructure project to achieve net gain for biodiversity. Network Rail have subsequently agreed that a net gain target will be applied to that section of the railway improvements. LALL's Guide to Statutory Consultation states that Overall, our ambition is for the proposed development to deliver 10% biodiversity net gain through the extensive landscaping and habitat creation proposals incorporated within the scheme. Merely stating an ambition is not sufficient for a proposal to be compliant. There needs to be a confirmed aim; a mechanism for delivery; monitoring proposals; and an acceptable means for additional compensation should monitoring show that the aim has not been achieved. This issue is highlighted again in the Preliminary Environmental Information Report (PEIR) volume 1, which states: 16.1.4 To provide a high-level quantification of the level of biodiversity that will be lost to the Proposed Development and the habitat creation/enhancement requirement, Biodiversity Net Gain calculation is being undertaken using the Defra metric (Ref 16.2), with an aspiration to deliver a 10% net gain. This aspiration is consistent with the government's response to the net gain policy consultation (Ref 16.3) which states we maintain the view that 10% strikes the right balance</p>			

Ref	Comment	No CC	Response	Change
	between government ambition for development and the pressing need to reverse environmental decline. Again, the aspiration of delivering a net gain of 10% is not consistent with the government is quoted response.			
6.2.45	On page 134 of the Guide to Statutory Consultation it is stated that: In addition to these mitigation measures, we are exploring potential enhancement measures. These include: Off-site enhancement of designated sites within Luton, Bedfordshire and Hertfordshire Contributions to local biodiversity projects Enhancement of species-poor/defunct hedgerows and woodland creation to improve connectivity within the wider landscape It is our understanding from our engagement with the earlier consultation process that these measures have been proposed because the enhancements set out in the consultation are insufficient to provide net gain for biodiversity. If that is correct and given our concern that the existing biodiversity value of the site is undervalued, these enhancement measures will need to be secured before the proposal is finally brought forward, and at a level sufficient to demonstrate that genuine, measurable net gain will result.	1	Noted.	No
6.2.46	Monitoring proposals are outlined in the Draft Outline Landscape and Biodiversity Management Plan (Appendix 16 2), and the potential need for remedial action as a result of monitoring is recognised, but the plan indicates that the monitoring proposals have yet to be drawn up. The plan also only refers to LLAL and their contractors having roles in the monitoring process. We would expect the Local	1	Please see response to ref 6.1.1. The LBMP to be submitted with the application for development consent will provide the prescriptions for the creation/enhancement, long term management and monitoring and remediation requirements to achieve the	No

Ref	Comment	No CC	Response	Change
	<p>Authorities to have a role, required by condition or agreement, in ensuring that monitoring identifies the necessary remedial works, and that such works are carried out and themselves successful. The PEIR volume 1, as quoted above, refers to the use of Defra's Biodiversity metric to assess the plans likelihood of achieving a 10% net gain for biodiversity, and Appendix 16-2 implies that the metric will be used iteratively to assess success, and to evaluate further compensation if subsequently required. We welcome the proposed use of the metric, which is a sensible approach to ensuring that the net gain is measurable, as required by the NPPF (e.g., paragraph 175). However, we are concerned that the statutory consultation includes proposals that set out the extent of predicted impact on biodiversity receptors and propose mitigation and compensation which have been informed by the use of the metric, without including the calculations themselves. This makes it impossible for consultees to assess whether appropriate approaches have been taken to reach the level of net gain aspired to, and whether the metric calculations have been applied correctly.</p>		<p>target habitat conditions as described within the net gain metric. The LBMP will also detail the mechanism and responsibility for the long term management of the proposed habitats. A Draft LBMP is included within Appendix 8.2 of Volume 3 of the PEIR.</p>	
6.2.47	<p>We note that areas of calcareous grassland are proposed to be created, and that these are indicated as being managed with low intensity grazing. We would like to highlight that under grazing of chalk grassland is often a significant factor in such habitat becoming unfavourable and would urge that the ability to have higher intensity grazing in the future should be built into the management proposals.</p>	1	<p>The management of the calcareous grasslands is captured within the Draft LBMP in Appendix 8.2 of Volume 3 of the PEIR, where recommendations are made for appropriate grazing levels. The LBMP includes regular reviews and therefore potential needs for adjustment of managements, including grazing levels and</p>	No

Ref	Comment	No CC	Response	Change
			species used, can be incorporated as needed.	
6.2.48	Concern that the proposals to mitigate increased noise pollution are ineffective and insufficient as they do not provide any protection to wildlife or preserve the tranquillity of landscapes, including the Chilterns AONB.	20	Please see responses to refs 6.1.1, 6.1.9 and 6.1.15.	No
6.2.49	Concern that the Proposed Development will have adverse impacts on the local water network, with reduced water in local watercourses (including the River Lea and Chiltern chalk streams) leading to adverse impacts on river biodiversity. Suggestion that an assessment should be carried out to determine likely impacts to these watercourses.	1	The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR outlines how surface water and water used within the airport will be captured, treated and either reused to minimise the volume and rate of potable water used by the airport during expansion or disposed of in a manner that does not impact existing surface and groundwater conditions.	No
6.2.50	Concern that there is an over emphasis on landscape proposals as part of the Proposed Development; this is primarily an airport expansion scheme and landscape proposals should be secondary to that. Suggest that the proposals should be revised with a focus on ensuring the effective and efficient operation of the airport.	1	Landscape proposals are an important part of our Proposed Development. Chapter 14 Landscape and Visual of the PEIR assesses the landscape and visual impacts of the Proposed Development. Through that process mitigations including landscaping proposals have been identified to mitigate for the impact of the Proposed Development. The PEIR provides an assessment of all potential environmental impacts of the	No

Ref	Comment	No CC	Response	Change
			scheme, and a wide range of mitigation is proposed of which landscaping is just one element.	

A7 Historic Environment

Table A7.14: Regard had to statutory consultation responses on Historic environment - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
7.1.1	Concern that the Proposed Development will result in further adverse impacts to Luton Hoo and its historic setting during operation (including increased visual intrusion of airport buildings and increased noise); but that the PEIR assessment does not identify impacts during construction, which is in contradiction to Guide to Statutory Consultation (page 138).			1	<p>Chapter 10 Cultural Heritage of the PEIR provides an assessment on impacts to heritage. Further information on the potential impacts to Luton Hoo Estate and Someries Castle, including impacts arising from changes within their setting, will be included in the ES submitted with the application for development consent. The Proposed Development has been designed to minimise changes to the settings of heritage assets and minimise impacts.</p> <p>Chapter 10 Cultural Heritage of the PEIR details the methodology for the assessment on cultural heritage assets in the vicinity of the Proposed Development, supported by local and national policy and guidance, and as agreed with local planning officers. It includes an assessment of both construction and operational effects. The purpose of the assessment is to determine the likely significant effects (whether beneficial or adverse) to identified sensitive receptors in the vicinity of the Proposed Development, taking into account the influence of each stage of development and interactions with other effects e.g. noise and light. Assets will be excluded from the ES if significant effects are not anticipated.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR concludes that there would be a moderate adverse effect which is significant to Luton Hoo Registered Park and Garden (RPG) during the construction and operation of the Proposed Development, arising from new built form on the park's visual setting and a slight change in noise levels. There are currently no suitable measures to mitigate visual and noise impacts to the RPG and care will be taken to ensure that mitigation proposals do not result in impacts to the asset. If suitable measures are identified during statutory consultation, these will be included in the ES.</p> <p>Where significant environmental effects have been identified, relevant mitigation will be proposed and outlined in the Cultural Heritage Management Plan to accompany the application for development consent. A Draft Cultural Heritage Management Plan can be found in Appendix 10.6 of Volume 3 of the PEIR.</p>	
7.1.2	Concern that the Proposed Development will result in adverse impacts to listed buildings in the surrounding areas, including Luton Hoo (Grade I listed).			1	An assessment of potential impacts has been carried out for designated heritage assets within a 2km study area, including Luton Hoo and Someries Castle, and for non-designated heritage assets within a 1km study area, as agreed with the relevant local authority archaeologists. Further study areas of 250m surrounding the Affected Road Network (ARN) and a wider study area	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>(beyond the 2km study area) have also been assessed for impacts to designated heritage assets arising from changes within their setting.</p> <p>Our design has taken into consideration the cultural heritage assets in the surrounding area in order to minimise any harm to their significance. We will also enhance the historic landscape by including provision for the planting of hedgerows and hedgerow trees that are in-keeping with the historic landscape character of the area.</p> <p>The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR concludes there would be no significant effect to Someries Castle and a significant effect to Luton Hoo RPG during construction and operation of the Proposed Development.</p> <p>For more information in respect of Luton Hoo please see response to ref 7.1.8.</p>	
7.1.3	Concern that the Proposed Development will result in adverse impacts to Someries Castle (Scheduled Monument).			1	<p>The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR identifies the potential impacts to Someries Castle, including impacts arising from changes within its setting, noise and vibration, during the construction and operation of the Proposed Development. The effects during construction and operation are assessed to be minor adverse and not significant.</p> <p>The Proposed Development has been designed in order to minimise the impact on the historic</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					environment, including Someries Castle. The majority of the proposed buildings and structures will be concentrated to the north of the existing runway in order to minimise change within the setting of Someries Castle. The location of the fire training ground has been redesigned and located further away to minimise change within the setting of Someries Castle.	
7.1.4	The rural/semi-rural setting of Luton Hoo makes an important contribution to the significance of the site. As a whole, the Luton Hoo Estate is of high significance and is predominantly of architectural, historic and artistic significance. It has illustrative value and there is also the potential for archaeological significance if there are surviving remnants of the earlier building that was on the site.			1	<p>Noted. The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR includes an assessment of the potential impact on Luton Hoo Estate as a whole, as an historic country estate and heritage asset.</p> <p>The Desk Based Assessment, which is presented as Appendix 10.1 of Volume 3 of the PEIR, describes the archaeological and historical baseline of the Proposed Development site and study areas and provides an assessment of the heritage significance of designated and non-designated heritage assets, including those within the Luton Hoo Estate.</p>	No
7.1.5	During the operation of the Proposed Development, it is anticipated that the setting of the RPG and associated assets will experience some adverse effects. The PEIR concludes that the adverse effects would be significant in EIA terms.			1	The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR identifies a moderate adverse effect to the setting of Luton Hoo Registered Park and Garden (RPG) during operation as a result of an increase in daytime and night-time noise levels. Mitigation is not proposed in Chapter 10 Cultural Heritage of the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	These adverse effects need to be given great weight in the determination of the DCO application. No potential additional mitigation measures are proposed to address any of these adverse effects.				PEIR as there are currently no suitable measures to mitigate noise impacts to the RPG. If suitable measures are identified during statutory consultation, these will be included in the ES.	
7.1.6	There are several heritage designations within the Luton Hoo estate, including the Plain, as well as Home Farm and the Adam stable block. At the strategic level (Central Bedfordshire Council's adopted South Local Development Framework, 2004 and saved 2007), the site is within the Green Belt and designated an Area of Great Landscape Value. Parts of the site are designated County Wildlife Sites with most of these in wooded areas. The parkland and its buildings and structures, therefore, are recognised as being of significance from local, through strategic to the national level. A report on the history of the Luton Hoo landscape carried out by specialists in historic and Brownian landscapes, stated: Luton Hoo is chiefly valuable as a landscape laid			1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	out by Capability Brown (only at Blenheim was Brown paid more).					
7.1.7	Although changing fashions in the landscape movement have left their mark at Luton Hoo, the underlying Brownian influence and essential structure prevails. The landscape at the Estate is therefore highly significant as a national, perhaps international, historic resource and the design involvement of Robert Adam and Capability Brown at the site mean it is of exceptional heritage importance.			1	Noted.	No
7.1.8	The Estate originally dates from 18th century and historically had an expansive rural setting. There have been changes to its setting such as the boundaries of the park have been eroded (even in more recent times, such as by the Capability Green development). In particular, the encroachment of Luton town, road infrastructure and the development of Luton Airport are notable changes to its setting. The Estate is largely enclosed by tree belts, so the extent of visibility of			1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	these external changes is limited to certain areas.					
7.1.9	Heritage effects as noted in national policy (NPPF para. 193), great weight should be given to the conservation of designated heritage assets when considering the impact of proposed development and there is the statutory duty (under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990) for local planning authorities, or the Secretary of State, to have special regard to the desirability of preserving a listed building or its setting or any features of special historic or architectural interest which it possesses. It is therefore important that the Luton Hoo Estate site is given appropriate material weight in terms of the effects of the proposed airport expansion, particularly due to the combination of its notable importance as a result of highly graded designated heritage assets on the site and its proximity to the Airport.			1	Please see response to ref 7.1.1. The heritage significance of heritage assets, including significance deriving from their setting, has been articulated in the Desk Based Assessment included in Appendix 10.1 of Volume 3 of the PEIR. The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR assigns the highest level of heritage value (sensitivity) to Luton Hoo RPG in accordance with the criteria set out in Table 10.7 of Chapter 10 Cultural Heritage of the PEIR.	No

Ref	Comment	PC	LA	No PILs	Response	Change
7.1.10	The response to the scoping report issued on behalf of the Host Authorities, included in the Scoping Opinion response, notes the importance of the current use at Luton Hoo, the importance of its tranquil location to its operation as well as the existing effect of the Airport on its setting. The Opinion states: The hotel is recognised at the optimum viable use for the mansion and parkland and is recognised as a key business in Central Bedfordshire. Beyond its historic significance, the parkland possesses a visual tranquillity which is a significant asset to the offer of the hotel.			1	Noted.	No
7.1.11	In relation to methodology, we welcome the statement that the value criteria will be assessed using professional judgement and consultation on an individual asset basis. It also notes the assessment of effect would be made prior to mitigation and after mitigation. A section is included on the baseline conditions. This provides a short, summary of the significance of the	Historic England			Please see response to refs 7.1.1 and 7.1.9.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>area in time periods however it does not convey the significance of the heritage assets. There is a section on the designated heritage assets lists a number of assets but again does not convey their significance in any detail. There is a discussion on embedded and good practice mitigation measures. These include the planting of traditional hedgerows to restore the historic landscape character, evidence to support this and to illustrate the mitigation effect should be provided. We note the design has been undertaken with consideration of screening receptors, including Someries Castle, from ground noise. The preliminary assessment notes how the gazetteer of designated heritage assets states if further assessment is required (we assume that the statement an asset is included in the assessment means further work will be done). At 18.8 a preliminary assessment narrative is provided.</p>					
7.1.12	<p>In relation to mitigation, it states that this is covered in the Historic Environment Management Plan, appendix 18-4. However, at present</p>	Historic England			Where significant environmental effects have been identified, relevant mitigation will be proposed and outlined in the Cultural Heritage Management Plan to accompany the application	No

Ref	Comment	PC	LA	No PILs	Response	Change
	this only covers archaeological mitigation, and it should be expanded.				for development consent. A Draft Cultural Heritage Management Plan can be found in Appendix 10.6 of Volume 3 of the PEIR.	
7.1.13	The cultural heritage is dealt with in Chapter 18 of the PEIR which it states provides a preliminary assessment of likely significant effects during construction and operation. It sets out relevant legislation, policy and guidance. It also references the Airports National Policy Statement (June 2018) and how the preliminary cultural heritage assessment responds to this in Table 18-1. (It states a response to all national and local planning policy will be covered in the Environmental Statement.) The table sets out how the environmental statement should provide a description of the significance of the heritage assets affected and the contribution their setting makes to that significance. However, although the PEIR references the relevant designations of heritage assets, there is no detailed consideration of significance or how setting contributes to this significance in the PEIR. This should be fully set out in the Environmental	Historic England			The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF), with particular regard given to establishing the significance of designated and non-designated assets and their settings. Guidance published by Historic England which has been used for assessing the setting of heritage assets is detailed in Appendix 10.1 of the PEIR and itemised in Chapter 10. Please also see response to ref 7.1.9.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Statement. The Airports National Policy Statement also states that detailed studies will be required on those heritage assets affected by environmental impacts and indirect impacts.					
7.1.14	Support for the approach to the assessment of heritage impacts, with use of the standardised EIA matrices to support a non-technical narrative based on professional judgement and the concepts of benefit, harm and loss as set out in the NPPF. In addition, support that the assessment will be cross-referenced to other assessments, including air quality, noise, vibration, landscape and visual; suggestion that light impacts should also be considered and cross-referenced.	Historic England		0	Noted. The heritage assessment in the ES will cross-reference data from other chapters, including landscape, air quality and noise chapters	No
7.1.15	The [Consultation] Guide also explains how major earthworks would be required at the airport with large numbers of vehicle movements to import up to 4 million cubic metres of material. To mitigate these impacts extensive new planting is proposed. The summary of the	Historic England		0	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>landscape and visual impact in the Guide notes that the land to the south and east of the airport is predominantly rural with several features valued for their amenity, heritage or ecological value. It continues that the proposals would substantially alter the landform east of the airport and introduce a built form which would be prominent in views from several locations, including potential light spill, page 135. Mitigation measures include using appropriate form, finishes and materials for buildings which are in scale to the existing airport buildings, siting car parks on lower ground and additional hedgerows to reinstate historic field patterns and directional lighting, page 136.</p>					
7.1.16	<p>With regard to Luton Hoo, the scoping opinion comment expects the whole of Luton Hoo to be taken into account in the assessment and that visual representations are provided to illustrate the impacts on the mansion and the registered park and garden. Luton Hoo registered park and garden is considered in its entirety however we recommend a</p>	Historic England			Please see response to ref 7.1.1 and 7.1.6.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>more holistic approach is given to the assessment of this historic estate to include all the designated heritage assets within this and to recognise the cumulative significance of the assets which together comprise a historic country estate. The approach to assessment which looks at each asset type in turn is not helpful in conveying the significance of Luton Hoo and there should be a place in the Environment Statement where this is drawn together. As with Someries Castle, a number of wireframes have been produced. Again, these are helpful but photomontages and further supporting information should be produced for the Environmental Statement.</p>					
7.1.17	<p>Luton Hoo is considered in the operational phase due to the increase in noise levels and visibility of parts of the site which is an asset of high value. We welcome its inclusion. Again, we have concerns that there is not considered to be a significant effect during construction. This seems to contradict the statement in the Guide to Statutory</p>	Historic England			<p>Please see response to ref 7.1.1 and 7.1.10.</p> <p>The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR concludes there would be a moderate adverse effect to Luton Hoo RPG during the construction and operation of the Proposed Development, arising from new built form into the park's visual setting and a slight change in noise levels. There are currently no suitable measures to mitigate visual and noise</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Consultation, page 138. Although detailed information is not available at this stage, there would appear to be potential for significant effects during construction.				impacts to the RPG and care will be taken to ensure that mitigation proposals do not result in impacts to the asset. If suitable measures are identified during statutory consultation, these will be included in the ES.	
7.1.18	<p>There are key views from the registered landscape towards the existing airport and views of the airport from the upper floors on the mansion. Some of the existing airport buildings are very prominent in these views and detract from the setting and significance of the designated heritage assets. The wirelines show an increase in visible development at the airport which would result in further harm.</p> <p>These effects are likely to be as a result of the new built development, car parking and changes to the landform proposed at the airport site, the visual effects of construction infrastructure, aircraft and other traffic movements and environmental impacts from aircraft and traffic noise and lighting</p>	Historic England			Noted. Please see response to ref 7.1.6.	No
7.1.19	We would also emphasise that the assessment should consider the	Historic England			Please see response to ref 7.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>impact of development on the use of Luton Hoo, and other assets, in a manner which is consistent with their conservation. The desirability of this is set out in the Framework.</p> <p>Development affecting the setting of heritage assets can have an impact on the use and viability of assets and any detrimental impact on this would clearly be undesirable.</p>					
7.1.20	The table also refers to Chapter 9 for mitigation measures relating to noise at Luton Hoo. It would be helpful for these to be set out in the cultural heritage chapter with appropriate cross referencing.	Historic England			The ES will cross-reference data from other chapters, including landscape, air quality and noise chapters, in order to assess potential impacts arising from changes to the setting of Luton Hoo Estate.	No
7.1.21	We would also emphasise the setting is defined in the National Planning Policy Framework as the way in which a heritage asset is experienced. This is a broad definition which encompasses more than individual viewpoints.	Historic England			The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR has been carried out in accordance with the requirements of the NPPF, with particular regard given to establishing the significance of designated and non-designated assets and their settings. Guidance published by Historic England which has been used for assessing the setting of heritage assets is detailed in Appendix 10.1 of the PEIR and itemised in Chapter 10 Cultural Heritage .	No

Ref	Comment	PC	LA	No PILs	Response	Change
7.1.22	The development has the potential to impact on heritage assets over a large area due to the scale of development proposed at the existing airport site, the proposed highways works which cover a wider area and the potential noise implications from the increase in air traffic.	Historic England			Please see response to ref 7.1.2.	No
7.1.23	The accompanying documentation states the heritage assets in the study area include one scheduled monument, Someries Castle; two registered parks and gardens and 5 conservation areas together with a number of listed buildings (Guide to Statutory Consultation, page 137).	Historic England			Noted.	No
7.1.24	As we explained in our earlier responses, Historic England is primarily concerned with the impact of the proposed development on the highly graded heritage assets. Within the vicinity of the development site, we have identified Someries Castle and the historic country estate of Luton Hoo which contains numerous designated heritage assets. The Preliminary Environmental Impact	Historic England			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Report (PEIR) also identifies the Church of St Mary in Luton and the Church of St Mary in Kings Walden, both grade I, and The Old Homestead, listed grade II* within the main study area. There are other highly graded assets affected by the proposed highways interventions and within the wider study area. We note the wider study area follows the noise contours that show the increase in airborne noise and we welcome this approach.</p>					
7.1.25	<p>The Guide to Statutory Consultation states the preliminary assessment identifies there is potential for significant effects on Someries Castle and Luton Hoo as the construction and operation of the airport is likely to detract from the rural setting of these heritage assets, page 138. These effects are likely to be as a result of the new built development, car parking and changes to the landform proposed at the airport site, the visual effects of construction infrastructure, aircraft and other traffic movements and</p>	Historic England			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	environmental impacts from aircraft and traffic noise and lighting.					
7.1.26	There is a table setting out the Scoping Opinion comment and how it is addressed in the PEIR, table 18-3. This covers a number of points on which we would like to comment: It notes that the study area will continue to be reviewed as further surveys and assessments are carried out. We would be pleased to be kept informed of this in relation to cultural heritage.	Historic England			Noted.	No
7.1.27	Specific reference is made to Someries Castle. It notes the assessment should consider changes in air quality and vibration which may affect the fabric where likely significant effects may occur. The scoping comment recommends visual representations are provided to illustrate the impact on the setting of Someries Castle. The wireline images are a helpful indication of the extent of development at this stage. We consider that additional visual material in the form of photomontages is essential to allow	Historic England			<p>The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR identifies impacts during operation as well as construction, including air quality and noise impacts on Someries Castle.</p> <p>The preliminary assessment available is considered adequate to identify significant environmental effects. Further information on the potential impacts Someries Castle, including impacts arising from changes within its setting, will be included in the ES submitted with the application for development consent.</p> <p>A number of visual representations that illustrate the impact on the settings of Someries Castle are included in Appendix 14.7 of Volume 3 of the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the impact of the development to be assessed and these should be included within the Environmental Statement. These should be accompanied by a narrative setting out the significance and the impact of the development upon this as discussed below.				PEIR and additional narrative to accompany the visualisations will be submitted with the ES.	
7.1.28	Somerles Castle is described as included during the construction phase but that no significant impact is expected during the operational phase. This does not appear to correlate with the preliminary assessment, or our assessment of the impact based on the wirelines and we recommend the operational phase is included.	Historic England			The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR identifies the potential impacts to Somerles Castle, including impacts arising from changes within its setting, noise and vibration, during the construction and operation of the Proposed Development. The effects during construction and operation are assessed to be minor adverse and not significant. This is because the majority of the proposed buildings and structures would be concentrated to the north of the existing runway, resulting in minimal change within the setting of Somerles Castle.	No
7.1.29	The preliminary assessment considers that there would be a temporary minor adverse effect, which is not significant, to Somerles Castle during the construction phase. This seems to contradict the position in the gazetteer where it	Historic England			Please see response to ref 7.1.28. Chapter 7 Air Quality of the PEIR has assessed there would be negligible change in pollutant concentrations and no significant effects during operation. As such, the operational Proposed Development is unlikely to result in significant effects to Somerles Castle.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	appears to be included in the assessment and the statement in the Guide to Statutory Consultation referred to above, page 138. It states that the effects during operation would not be significant. On the basis of the extent of development illustrated in the wirelines we consider the effects would be significance, particularly when combined with the increase in air traffic. We recommend that this is properly assessed.					
7.1.30	Kings Walden church and the Old Homestead are assessed as experiencing adverse effect, but this is not expected to be significant, it is therefore excluded. We would be keen to understand how this conclusion has been reached as this is not explained in the documentation.	Historic England			The Desk Based Assessment included in Appendix 10.1 of Volume 3 of the PEIR assessed that the settings of Kings Walden Church and Old Homestead did not extend into the Proposed Development site and as such significant effects were not anticipated and they were not included in the PEIR. Further narrative explaining the scoping of these assets will be included in the Desk Based Assessment for the ES.	No
7.1.31	The gazetteer of heritage assets also includes a table, 3, which lists assets that are going to experience a significant increase in noise. This includes the registered landscape	Historic England			All heritage assets within the study areas are listed in the Cultural Heritage Gazetteer which is presented in Appendix 10.2 of Volume 3 of the PEIR.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	and stables at Luton Hoo, the garden centre, stables and gates, walls and railings at London Road Lodge. However, there are other designated heritage assets within the registered landscape including the grade I mansion. It is unclear why these are not specifically listed.					
7.1.32	The Guide to Statutory Consultation includes a section on noise and vibration. It is proposed that households which would experience significant effects as a result of aircraft noise would be eligible for noise insulation. If the mansion and other historic buildings at Luton Hoo are considered to experience significant effects and therefore noise insulation may be proposed. The installation of insulation is likely to require listed building consent. Clearly any alterations to the listed buildings which would result in harm to their significance would be undesirable. We recommend other methods of mitigation are explored and if insulation is proposed the impact of this on the significance of the buildings should be considered	Historic England			The preliminary assessment set out in Chapter 10 Cultural Heritage of the PEIR identifies a moderate adverse effect to the setting of Luton Hoo RPG during operation as a result of an increase in daytime and night-time noise levels. Mitigation is not proposed for this heritage asset in Chapter 10 Cultural Heritage of the PEIR as there are currently no suitable measures to mitigate noise impacts to the RPG. If suitable measures are identified during statutory consultation, these will be included in the ES. If insulation forms part of a recommended mitigation strategy, the requirement for Listed Building Consent would be stated.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	in the context of any benefits it may bring in mitigating noise levels.					
7.1.33	The airport occupies an open and elevated (skyline) location and the highly obtrusive impact of existing buildings and structures (notably the Easy Jet hangars WSW of the proposed terminal building) upon key views from principal rooms of the east front of the Luton Hoo Estate mansion, overlooking the lake, is apparent upon inspection, and is also apparent, even in glimpsed views through strong leaf cover, within the hotel grounds. As noted in the PEIR, there is currently visibility of the Airport from the main house and grounds and the proposed development would increase this visibility. The Zone of Theoretical Visibility and photomontages included in the PEIR are clear that there will be visibility of the proposal at the Estate, particularly in the area around the main house to the north. This is presumed to be a daytime and nighttime effect due to lighting. This would further erode the tranquil and rural context of the Estate, affecting both the setting and			1	Please see response to ref 7.1.1 and 7.1.4.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>significance of heritage assets as well as the experience of guests. There is the potential for physical effects as a result of the increase in pollution, negative effects to setting primarily from an increase in noise and visibility of aircraft and airport buildings/infrastructure, as well as the potential for a knock-on effect on guest numbers and therefore the viability of the hotel and associated heritage effects regarding the long-term use and maintenance of the site;</p>					

Table A7.15: Regard had to statutory consultation responses on Historic environment - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
7.2.1	Concern that the Proposed Development will lead to adverse impacts on the historic and cultural heritage of the surrounding area, during construction and operation including: increased noise, air and light pollution of heritage assets; increased visual impacts on heritage assets from construction activities and new development extents; deterioration of rural setting of Luton Hoo and Someries Castle.	7	The proposed design has taken into consideration the cultural heritage assets in the surrounding area in order to minimise any harm to their significance. This is discussed in more detail in Chapter 10 Cultural Heritage of the PEIR. Surveys and assessments are currently being undertaken to identify the level of impact of the Proposed Development on the historic environment and more details will be included in the ES. Where significant environmental effects have been identified, relevant mitigation will be proposed and outlined in the Cultural Heritage Management Plan to accompany the application for development consent. A Draft Cultural Heritage Management Plan can be found in Appendix 10.6 of Volume 3 of the PEIR.	No
7.2.2	Concern that the Proposed Development will result in adverse impacts to listed buildings in the surrounding area, with impacts including downturn in visitors, concerts, events and lack of future interest as location for film making. Furthermore, concern that the PEIR does not consider all listed buildings and scheduled monuments affected by the Proposed Development, excluding those affected by the proposed highway interventions and those in the wider area (including highly graded assets). Request for further clarification on how assessments of impacts to listed buildings has	2	Please see response to ref 7.1.7. The Desk Based Assessment included in Appendix 10.1 of Volume 3 of the PEIR sets out potential impacts to listed buildings in the 2km study area, including the 250m study area around highways interventions and a wider study area (> 2km) for heritage assets that may be affected by aural and visual intrusion. The assessment of likely impact has been informed by the nature of the Proposed Development in that area, the setting of the individual heritage assets, and the extent to which this setting extends into the Proposed Development area, resulting	No

Ref	Comment	No CC	Response	Change
	<p>been determined. The following heritage assets were specifically mentioned: Someries Castle, Luton Hoo (numerous assets: Luton Hoo, the stables, structures in formal gardens, various lodges and ancillary buildings), Church of St Mary (Luton), Church of St Mary (Kings Walden), St Paul's Walden Bury, The Old Homestead, and Wandon End House.</p>		<p>in change to the asset's setting. Additional commentary explaining this process will be included in the Desk Based Assessment for the ES.</p>	
7.2.3	<p>Concern that the Proposed Development will result in adverse impacts to Someries Castle and its historic setting during the construction phases; the severity is noted as 'temporary minor adverse', which is in contradiction to Guide to Statutory Consultation (page 138) and not in compliance with the Listed Buildings and Conservation Areas Act (1990) or the NPPF (para 189-196). In addition, concern that the PEIR assessment does not identify impacts during operation; this is considered to be inaccurate based on the scale of development illustrated by the wireline images. Furthermore, consideration should be given to the operational impacts to Someries castle including air quality and vibration impacts on fabric. Further consideration should be given to mitigation measures for Someries Castle. Request for photomontages to be included within the ES, alongside narrative setting out the impacts of the Proposed Development.</p>	3	<p>Please see response to refs 7.1.1, 7.1.8, 7.1.27, 7.1.28, 7.1.29 and 7.1.32.</p>	No

Ref	Comment	No CC	Response	Change
7.2.4	Suggestion to preserve and enhance heritage assets and their settings, within the surrounding area, including: embedding Someries Castle into a community and cultural viewing area; and additional funding for Someries Castle to improve the visitor experience. In addition, request for the Historic Environment Management Plan in the PEIR to be expanded to consider mitigation for all heritage assets and not just archaeology.	5	Please see response to ref 7.2.1. The Draft Cultural Heritage Management Plan in Appendix 10.6 of Volume 3 of the PEIR sets out current proposals for cultural heritage assets. Opportunities to enhance the setting of heritage assets will be discussed with Local Authority Heritage Officers and Historic England.	No
7.2.5	Concern that the airport is already too large with significant impacts on the historic towns, villages and countryside that surround it; the airport has not contributed to the local heritage of these areas.	5	Please see response to ref 7.2.1.	No
7.2.6	Concern that the PEIR concludes that there would be significant adverse impacts to the historic environment and sufficient mitigation measures are not identified to address these impacts. Specifically, concern that archaeological evaluations highlight the potential for below ground archaeology, and that it has not been determined whether impacts from the Proposed Development can be mitigated.	2	Chapter 10 Cultural Heritage of the PEIR assesses the potential impact to buried archaeological remains and recommends mitigation measures. These measures are detailed in the Draft Cultural Heritage Management Plan in Appendix 10.6 of Volume 3 of the PEIR. Further evaluation is being carried out to inform the ES and the results of the evaluation will inform the mitigation strategies in the final Cultural Heritage Management Plan which will be submitted with the ES and secured via the requirements of the development consent approval.	No
7.2.7	Luton does not have a historic or cultural heritage environment.	2	The Central Bedfordshire and Luton Historic Environment Record has been consulted for	No

Ref	Comment	No CC	Response	Change
			information relating to non-designated heritage assets and previous fieldwork events.	

A8 Water and Drainage

Table A8.16: Regard had to statutory consultation responses on Water and drainage - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
8.1.1	Concern that the drainage and utilities requirements of the Proposed Development are not clearly set out and that impacts from climate change, including new weather patterns, have not been given due consideration within proposals.			2	<p>As outlined in the Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR, the drainage design has been designed with the use of a 40% climate change allowance to account for the future impacts of climate change. The Drainage Design Statement has been developed in consultation with the Environment Agency, Lead Local Flood Authorities, Affinity Water, Thames Water and Veolia Water. A record of stakeholder engagement is provided in Chapter 20 Water Resources & Flood Risk of the PEIR.</p> <p>The Flood Risk Assessment in Appendix 20.1 of Volume 3 of the PEIR assesses flood risk from all sources. Flood risk resilience, design exceedance and the impacts of climate change have (40% allowance for climate change has been applied to the drainage design) and will continue to be routinely applied to all flood risk related design and assessment.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Furthermore, Chapter 20 Water Resources & Flood Risk of the PEIR outlines how the Proposed Development provides a system that can collect and manage the surface water runoff, including that generated by extreme rainfall events without putting airport users or local residents at any increased risk of flooding. Principles of sustainable drainage have been applied and this is demonstrated with the preferential use of infiltration drainage. This ensures that water is not directed to rivers, stream or sewers at increased rates and volumes. Instead, it is allowed to infiltrate into the underlying strata, mimicking natural conditions, while also ensuring that groundwater catchments and their conditions are taken into account.</p> <p>Chapter 20 Water Resources & Flood Risk of the PEIR also includes an assessment of in-combination climate change effects which considers water resources and flooding.</p>	
8.1.2	Concern that the drainage and utilities proposals are ineffective and insufficient, including in			3	Please see response to ref 8.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	respect of climate change mitigation.					
8.1.3	Consider that the Proposed Development is unnecessary and should not be taken forward; the drainage strategy has not been agreed and there is no need to destroy the natural drainage system, and green spaces in the area. Therefore, the drainage and utilities proposals are not required.			9	<p>The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR has been developed in consultation with the Environment Agency, Lead Local Flood Authorities, Affinity Water, Thames Water and Veolia Water. A record of stakeholder engagement is provided in Chapter 20 Water Resources & Flood Risk in Section 20.4 of the PEIR.</p> <p>Please also see the Need Case and Forecast topic.</p>	No
8.1.4	Concern that artificial drainage measures proposed will not be effective in flood prevention or for replenishing aquifers.			3	<p>A Hydrogeological Characterisation Report in Appendix 20.3 of Volume 3 the PEIR provides a detailed hydrogeological baseline and looks at the impact of the Proposed Development on the underlying chalk aquifer.</p> <p>A detailed assessment of the impacts of the discharge from the Proposed Development on the underlying aquifer will be undertaken to inform the ES. This will be supported by a Hydrogeological Risk Assessment that</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					will form an appendix to Chapter 20 Water Resources and Flood Risk of the ES.	
8.1.5	Concern that there will be adverse impacts on the drainage system from heavier and more frequent rainfall events as a result of climate change.			1	Please see response to ref 8.1.1.	No
8.1.6	Concern that there will be adverse impacts to water quality from contamination associated with the Proposed Development.			3	The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR contains a description of the operational drainage design which will be implemented to manage surface water run-off and pollution risk across the Application Site. The drainage design ensures that any surface water run-off that triggers defined contaminant levels (to be agreed with the Environment Agency) will be treated to reach appropriate levels prior to discharging to soakaways on site. The drainage design also includes measures to manage spillage risk under normal conditions and in the event of extreme rainfall events.	No
8.1.7	It is uncertain whether the groundwater supply and principle chalk aquifer will be contaminated	Natural England			A substantial amount of ground investigation has been undertaken, including monitoring of groundwater in	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>by leachate from the former landfill.</p>				<p>the chalk beneath and surrounding the Proposed Development. This work has indicated that the former landfill in its current state is not adversely affecting groundwater conditions in the area. In order to ensure the Proposed Development does not change this, a Remediation Strategy has been developed and is contained in Appendix 17.5 of Volume 3 of the PEIR. This includes details of measures to be undertaken to prevent contaminants in the former landfill migrating into the groundwater in the underlying chalk, during the construction phase. Amendments to earthworks design also reduces the volume of landfill required to be excavated and therefore associated impacts.</p> <p>A groundwater monitoring plan, and a remediation options appraisal (ROA) will form part of the Remediation Strategy and a Foundations Works Risk Assessment (FWRA) that will be submitted as part of the application for development consent. The FWRA assesses the risks from piling and provides an evaluation of the most appropriate piling technique to be</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					adopted to ensure that contamination present is not mobilised. The appointed contractor will agree the groundwater monitoring plan which will continue through construction and into the operational period of the Proposed Development. These measures will ensure that no new pathways are created and that contaminants are not inadvertently mobilised to the groundwater as part of the development works.	
8.1.8	There are significant hazards in relation to any drainage migration paths which come into contact with landfill material moved from the previous Eaton Green site. Leachate can be exceedingly hazardous and will migrate through fissures to contaminate water courses beyond the immediate area. We do not see evidence of adequate risk analysis.	Kings Walden Parish Council		1	Please see response to ref 8.1.7.	No
8.1.9	Increased environmental impact - water quality The development will increase the amount of land surfaces			1	A series of technical meetings have been held with the Environment Agency, Thames Water and Affinity Water to discuss the proposals and	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>within the Airport and Elite Hotels is concerned at the potential for additional run-off including pollutants such as spilt fuel, de-icing fluid, chemicals used in aircraft washing and maintenance. This has been experienced in the past with the last occasion in 2012. Greater clarity and reassurance are required by Elite Hotels on the extent of any such risks to prevent future occurrences.</p>				<p>outline the far reaching water strategy being developed to support the Proposed Development. The strategy is outlined in the Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR. This places a premium on collecting all water runoff and water used within the airport buildings and treating it. Treatment will be on site by the airport's own treatment facility. The water generated by the facility will be able to be used across a range of airport operations and will significantly reduce the airports reliance on the public water supply network. The quality of the water from the facility will be strictly monitored and will be discharged to help maintain the existing surface and groundwater regime. The impact of infiltrating treated effluent on the existing groundwater regime is being analysed using a hydrological risk assessment in conjunction with groundwater quality modelling. This will inform the final treatment process proposed in the treatment plant. The aspiration is that continued discussions with Environment Agency, Thames Water and Affinity Water will help the airport develop a water management strategy</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					that is welcomed by these key stakeholders and which is mutually beneficial.	
8.1.10	<p>The PEIR identifies 'no likely significant adverse effects' both for construction and operation in relation to water resources. We question this. It just focuses on avoiding contamination and misses consideration of water abstraction. It mentions the River Mimram but not the River Ver. The impacts on the biodiversity and function of Chilterns chalk streams should be assessed, with careful scrutiny of where additional water supply for the expanded airport will come from. Chalk streams are an internationally rare habitat that are suffering from over-abstraction, which is decreasing flows, causing chronic declines in biodiversity and shortening their functional length. The River Ver, Upper River Lea & R. Mimram are chalk streams. Water is abstracted from the Upper Ver catchment at Kensworth to supply Luton with its public water supply.</p>	Chilterns Conservation Board		1	<p>Please see response to refs 8.1.6 and 8.1.9.</p> <p>As set out in Chapter 20 Water Resources & Flood Risk, the River Lee, River Mimram and River Hiz are chalk streams within the study area of the Proposed Development. The River Ver is also a chalk stream but is not within the study area of the Proposed Development as it is located to the west of the River Lee (Lea) and so there is no hydraulic link between the airport and the River Ver.</p> <p>A Water Framework Directive Compliance Assessment (WFD) is set out in Appendix 20.2 in Volume 3 of the PEIR. The WFD details impacts to all groundwater and surface water bodies (including the chalk streams within the study area). The WFD concludes that there will be no significant impacts on the chalk streams from the Proposed Development.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>The Ver catchment is already over-abstracted, the Ver's riverbed is consistently dry for half of its former functional length and rarely flows within the AONB. The R. Mimram and Upper Lea are also detrimentally impacted by abstraction and suffer from low flows in their headwaters. The expansion of Luton Airport cannot be allowed to put any further water demands on these chalk stream catchments.</p>				<p>The drainage strategy maximizes the reuse of grey water and rainwater harvesting in a way that is rarely seen in the UK. The intended strategy will remove the airport's need on relying on potable water where non potable water will suffice and will result in a net reduction in the use in potable water by the airport. This will aim to ensure that there will not be an increase in abstraction caused by the Proposed Development.</p> <p>A Water Cycle Strategy will be prepared to inform the ES that will assess the impacts of the Proposed Development on local water abstractions in further detail.</p> <p>Stakeholder engagement is also being undertaken with Affinity Water to confirm water use requirements for the Proposed Development. A record of stakeholder engagement undertaken to inform the PEIR is provided in Chapter 20 Water Resources & Flood Risk of the PEIR.</p>	
8.1.11	<p>Suggestion that more needs to be done to future proof the proposals for water and drainage, to ensure</p>			1	<p>Please see response to ref 8.1.1.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	that adequate water systems are maintained; this is specifically in relation to more extreme storm events and additional pressures on resources as a result of climate change.					
8.1.12	Suggestion that more could be done to reuse and recycle grey water and rainwater within the operation of the Proposed Development (as well as the current airport operation) for non-potable uses, including for toilet facilities, fire management and landscape irrigation.			1	<p>The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR has been developed to provide a system that can collect and manage the surface water runoff generated by extreme rainfall events without putting airport users or local residents at any increased risk of flooding. The strategy also helps the airport to fulfil its ambitious sustainability goals by developing a water reuse capability which significantly reduces the airport's demand from the public water supply network, during the construction and operation of the Proposed Development. The inclusion of a Water Treatment Plant into the scheme provides the opportunity for the airport to help improve the quality of the local water environment.</p> <p>The identification of these measures and the production of these documents has been completed in close liaison</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>with Affinity Water to capture any potential impacts on water supply within Luton.</p> <p>A full description of the grey water recycling and rainwater harvesting measures incorporated in the design will be provided in the Drainage Design Statement and Water Cycle Strategy which will be appended to the ES to be submitted with the application for development consent.</p>	
8.1.13	Support for the drainage and utilities proposals.			1	Noted.	No
8.1.14	Proposals are weak on grey water recycling and rainwater harvesting. Statements in the PEIR like 'Measures to maximise water reuse, such as greywater reuse and rainwater harvesting are also being considered' do not inspire confidence. These options should be mandatory within the design to reduce water usage and safeguard Chiltern's chalk streams.	Chilterns Conservation Board		1	Please see response to ref 8.1.12.	No

Ref	Comment	PC	LA	No PILs	Response	Change
8.1.15	<p>Thames Water have contacted the developer in an attempt to agree a position for surface water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either: - all surface water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution</p>	Thames Water			<p>We will continue to seek to engage with Thames Water. The Proposed Development does not include housing.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Team prior to the application approval.</p>					
8.1.16	<p>Affinity requests that LLAL adopts a holistic approach to considering the impact on Affinity's water supply infrastructure and undertaking including the impact of other related developments and growth of the ribbon developments in the local area as a result of the proposed development, acknowledging that we are in a seriously water stressed area. An early understanding of the programme of works is required alongside an understanding of the water supply network to ensure Affinity's</p>	Affinity Water			<p>Please see response to ref 8.1.9.</p> <p>Stakeholder engagement has been undertaken with Affinity Water to present the Drainage Design Statement (Appendix 20.4 of Volume 3 of the PEIR) and programme of works. As reported in Chapter 20 Water Resources & Flood Risk of the PEIR, Affinity Water have provided agreement in principle to the drainage design and have confirmed that they will supply water to the Proposed Development during construction and operation. Affinity Water have also agreed to provide additional details on</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>customers are continually supplied with high quality drinking water. The planned expansion footprint may encroach on or impact several of Affinity's assets to the North and East of the current airport boundary. These may require diversion or protection subject to the final development plans. Access will be required at all times both during and post construction to Affinity assets. We understand that because of the planned passenger increases until 2039 there will be a requirement to increase supplies to 31.54 l/s average and 39.96l/s peak. We shall require confirmation of the quantity of non-domestic water included within this assessment so we can consider the arrangements required. The additional supplies will require reinforcement in our network and may require enhancement in the overall supplies as we are approaching capacity in the area, we are undertaking reinforcements in the area for other development needs and</p>				<p>existing Affinity Water assets to inform the assessment of impacts on Affinity Water network to be undertaken in the Water Cycle Strategy to inform the ES.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	suggest where possible these should be considered together. We anticipate there may be impacts on network resilience arising from the proposed development. We currently have multiple ways of providing water to household and non-household properties using different pipes and the number of options available to us could be reduced. This impact could extend 3-4km outside of the proposed development.					
8.1.17	Following initial investigations, Thames Water has identified an inability of the existing SURFACE WATER infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position for surface water networks but have been unable to do so in the time available. Following initial investigations, Thames Water has identified an inability of the existing foul water network infrastructure to accommodate the needs of this	Thames Water			Please see response to ref 8.1.9. Chapter 20 Water Resources & Flood Risk of the PEIR outlines the stakeholder engagement undertaken with Thames Water confirming that Thames Water have been provided with an overview of the Drainage Design Statement and the Proposed Development design. Thames Water has accepted the Drainage Design Statement in principle and also confirmed that foul and surface water discharge to the Thames Water network can be considered as part of the Proposed Development noting that	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available				<p>Thames Water requirements for water quality and quantity must be complied with.</p> <p>The reliance of the airport's developing drainage strategy on the existing Thames Water sewerage infrastructure recognises the pressure the existing system is under. The aspiration is that continued discussions with Thames Water in conjunction with consultation with the Lead Local Flood Authorities and the Environment Agency will help the airport develop and finalise a water management strategy that is welcomed by these key stakeholders and which is mutually beneficial.</p>	
8.1.18	Paragraph 2.5.157 What is the reasoning behind discharging treated effluent into the Thames Water network? - Paragraph 3.3.46 ""The preferred catchment area was considered to include the new hard standing only."" It states in paragraph 2.5.30 ""The Proposed Development would divert the southern, runway soakaways (approximately 133 hectares of total impermeable catchment area) into a new	Environment Agency			The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR outlines the drainage design that will be implemented at each phase of the development. The main infrastructure (including the new Water Treatment Plant, attenuation tanks and infiltration tanks) will not be implemented until the beginning of Phase 2. At this point, the treated effluent from the Water Treatment Plant will not be discharged into the Thames Water network as the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>surface water network with a surface water treatment plant prior to discharge to ground through controlled infiltration in line with sustainable drainage principles." So, there will be elements of the old drainage system incorporated into the new system? - Is there/will there be a surface water quality monitoring program that forms part of the Environmental Statement? Will the data from this be available for review? Will there be a Water Framework Directive assessment with the Environmental Statement that includes surface water bodies?</p>				<p>objective is to reuse 100% of the treated effluent as recycled water and the system includes new infiltration basins for overflow.</p> <p>Until then, in Phase 1, all passenger increases will need to be accommodated using the existing infrastructure which includes the central soakaway and the Affinity and Thames Water networks. Discussions are ongoing with Thames Water and Affinity Water to confirm that the increase in passenger numbers in Phase 1 can be accommodated using the existing infrastructure. Early discussions with Thames Water suggest that the Thames Water forecasts for foul water discharge and passenger number increases account for the Proposed Development forecasts, as outlined in Chapter 20 Water resources & Flood Risk of the PEIR. The drainage design at Phase 1 will also examine the practicalities of a rainwater harvesting and recycling strategy which will minimise the overall discharge into the existing central soakaway and Thames Water network</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>and reduce demand for potable water supply from Affinity Water.</p> <p>During Phase 1, a new car park is proposed to the north east of the airport. Surface water will discharge to the Thames Water network to the north of the site which eventually discharges into the northern soakaway. To help eliminate the increased discharge rate into the Thames Water network, an attenuation tank is proposed below the car park to remove the risk of flooding and release water at a controlled rate.</p> <p>The existing central soakaway will be removed in Phase 2 as the proposed Water Treatment Plant, attenuation tanks and infiltration tanks will then be installed.</p> <p>It should be noted that the northern soakaway will not be diverted into the scheme and will remain in place.</p> <p>In Phase 2, the implementation of the new drainage design will include the live monitoring of potentially polluted surface water runoff to ensure that appropriate treatment is implemented</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>(through the Water Treatment Plant) prior to discharge of runoff to ground.</p> <p>It should be noted that the Proposed Development does not include proposals for any surface water quality monitoring of the River Lee, River Mimram and River Hiz as there will be no discharge of surface water runoff to these watercourses.</p> <p>A draft Water Framework Directive Compliance Assessment can be found at Appendix 20.2 of Volume 3 of the PEIR. This includes all surface water and groundwater bodies in the Proposed Development study area.</p>	
8.1.19	Thames Water advise that if this report (Preliminary Environmental Information Report, dated October 2019) was to be submitted as supporting evidence for a third party planning application, it is likely we would make the following comments: The report does not clearly identify the proposed discharge rates for foul and surface water. As such it is likely we would seek	Thames Water			<p>Please see response to ref 8.1.17.</p> <p>The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR outlines the discharge rates for foul and surface water.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	a foul water and a surface water condition as per the above.					
8.1.20	<p>Discharging large quantities of treated water into a Principal Aquifer (within a drinking water protected area) is considered to present a potential risk, and the proposal needs to be fully justified with respect to all options for surface water and sewage disposal; we do not feel that the PEIR deals with this adequately. We understand that the current soakaway located to the north of Luton airport will be retained and that it will continue to discharge untreated, potentially contaminated, surface water directly into the Chalk. We do not feel the reasoning for retaining the northern soakaway has been adequately explained at this time.</p> <p>The current Airport Drainage is unsatisfactory, with untreated Surface water impacted with dissolved phase de-icing agents and hydrocarbons which is</p>	Environment Agency			<p>Please see response to ref 8.1.9 and 8.1.18.</p> <p>A detailed assessment of the impacts of the Proposed Development on groundwater quality will be undertaken to inform the ES. This will be supported by a Hydrogeological Risk Assessment that will form an appendix to Chapter 20 Water Resources and Flood Risk of the ES.</p> <p>Drainage design includes real time monitoring of contaminants, as described in the Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR. The Drainage Design Statement also outlines how the existing drainage infrastructure will be used in the drainage design for the Proposed Development.</p> <p>With regards to the existing northern soakaway, this is outside the scope of the Proposed Development; therefore, there is no proposed change to this</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	currently being discharged directly to groundwater.				infrastructure as a result of the Proposed Development.	
8.1.21	[Ground Source Heat Pumps] GSHPs can potentially impact on groundwater resources by localised over abstraction and changing groundwater flow patterns. They can also alter groundwater quality by causing turbidity, creating preferential pathways for contaminant migration and cause temperature changes within an aquifer unit.	Environment Agency			Ground source heat pump systems implemented as part of the Proposed Development will utilise technology that will not have direct impact on the groundwater existing regime. As the proposals for these develop any potential impacts will be monitored and appropriate mitigation implemented as necessary.	No
8.1.22	Concerns relating to the potential presence of perfluorinated compounds (including PFOA and PFOS) in soil and groundwater in the vicinity of the fire training facility in area D. The potential for these compounds in area D was highlighted in the desk study findings and whilst two GIs have been completed in area D, we do not feel that these have specifically targeted fire training activities and the handling of firefighting foams in this area as a potential source of contamination.	Environment Agency			As outlined in the Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR any drainage associated with the Fire Training Ground will be self-contained. During fire training activities, surface water runoff will be diverted to a holding tank and will not drain to ground under any circumstances. Effluent generated from fire activities (containing foam and hydrocarbon breakdown constituents) will be either directed into the existing public foul sewerage system (subject to the necessary consents) or tankered away for	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Our understanding of presence and behaviour of perfluorinated compounds, particularly their persistence in groundwater, has increased since the completion of the GIs in this area and we note that these compounds have been identified in groundwater elsewhere beneath the proposed development area and the existing airport. If a source for perfluorinated compounds exists in the fire training area it must be identified and remediated as part of the proposed development works.</p>				<p>appropriate treatment. Under no circumstances will runoff from the Fire Training Ground discharge to the underlying aquifer.</p>	
8.1.23	<p>It is likely, due to possible settlement in the re-engineered landfill, that any structures built in this area will require piled foundations that may penetrate into the saturated zone of the Chalk. A foundation works risk assessment, including a groundwater monitoring plan to monitor groundwater quality before, during and after the completion of piling works will be required. We are comfortable with the next steps with respect to the</p>	Environment Agency			<p>Please see response to ref 8.1.7.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	remediation design, including the development of a remediation options appraisal (ROA) and remediation strategy and agree that these need to be submitted as part of the DCO application.					
8.1.24	<p>Construction phase surface water drainage will need to be carefully managed to avoid infiltration through potentially contaminated soils. Given the duration of some of the construction activities (years) there may be the need to install specific temporary infrastructure (such as areas of impermeable hardstanding, water treatment plants, infiltration / discharge points) to enable the construction to proceed and some of these items will require an Environmental Permit issued by ourselves.</p> <p>We maintain our position of agreement in principle to the proposed scheme subject to the applicant demonstrating that proposed discharge will not have a detrimental impact on groundwater quality in the Chalk</p>	Environment Agency			<p>The Draft CoCP in Appendix 4.2 in Volume 3 of the PEIR outlines the requirement for the lead contractors to prepare a Construction Surface Water Management Strategy (CSWMS) as part of their Environmental Management System (EMS) to protect the quality of surface water resources during construction. It will be a legal requirement for the contractor to comply with the CoCP under the development consent approval.</p> <p>This strategy will focus on protecting the existing water environment. Stakeholder engagement will be continued by the contractor to ensure the strategy continues to meet expectations.</p> <p>Discussions with the Environment Agency permitting team are ongoing with regards to the permit application. A record of stakeholder engagement is</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	underlying the site. Based on recent discussions and the information presented in the PEIR we understand that the drainage design and particularly the hydrogeological assessments required to support the proposal are developing through an ongoing process.				provided in Chapter 20 Water Resources & Flood Risk of the PEIR. A detailed assessment of the impacts of the Proposed Development on groundwater quality will be undertaken to inform the ES. This will be supported by a Hydrogeological Risk Assessment that will form an appendix to Chapter 20 Water Resources and Flood Risk of the ES.	
8.1.25	The information presented in the PIER provides relatively limited information with respect to the design of the infiltration basins. We understand that specific GI will be conducted to investigate the soakage properties of the Chalk in the two proposed locations. In addition to this, we feel that additional assessment for the potential for Chalk dissolution and the formation of preferential flow pathways beneath the infiltration basins will be required; the Chalk is a soft, soluble, limestone that is prone to developing solution features. We are concerned that preferential flow pathways could develop	Environment Agency			A Hydrogeological Characterisation Report in Appendix 20.3 of Volume 3 the PEIR provides a detailed hydrogeological baseline and assessment of the impact of the Proposed Development on groundwater levels and quality (including dissolution features). The report appropriately assesses the properties of the chalk and concludes that Proposed Development will not impact on the groundwater environment, but groundwater level monitoring is recommended throughout construction and operation. Discussions with the Environment Agency permitting team are ongoing and a hydrogeological risk assessment	No

Ref	Comment	PC	LA	No PILs	Response	Change
	beneath the infiltration basins resulting in the loss of contaminant attenuation capacity by the unsaturated zone being bypassed. If there is a risk that solution features could form as a result of increase infiltration there may be a requirement to modify the ground conditions beneath the infiltration basins.				<p>is being prepared to support the permit application and confirm no detrimental impact on groundwater quality in the chalk underlying the site. The hydrogeological risk assessment will form an appendix to the ES which will be submitted with the application for development consent.</p> <p>The Drainage Design Statement in Appendix 20.5 of Volume 3 of the PEIR justifies the drainage design proposals utilised for the Proposed Development. A detailed assessment of the impacts of the Proposed Development on groundwater quality will be undertaken to inform the ES. This will be supported by a Hydrogeological Risk Assessment that will form an appendix to Chapter 20 Water Resources and Flood Risk of the ES.</p>	
8.1.26	Given that the scheme will be discharging treated surface water and sewage into the Principal Aquifer within a drinking water protected zone, the quality of the treatment will need to be to a very high standard, and we note that the applicant has not yet	Environment Agency			<p>Please see response to ref 8.1.25.</p> <p>A detailed assessment of the impacts of the discharge from the Proposed Development on the underlying aquifer will be undertaken to inform the ES. This will be supported by a Hydrogeological Risk Assessment that</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>proposed their treatment targets which will need to be based on quantitative groundwater modelling. The Hydrogeological Characterisation report presented as Appendix 11-1 of the PEIR states that all civil works and excavations will be designed to avoid maximum groundwater levels (based on the hydrogeological modelling described in this appendix) such that groundwater is not intercepted during the construction or operation of the site. We note that the maximum groundwater level event (plus a 40% allowance for climatic change) plus a minimum one meter unsaturated zone has been used to arrive at the base elevation for the infiltration basins; this will provide very limited opportunity for any attenuation of discharged contaminants in the unsaturated zone during potentially the most extreme rainfall / groundwater level event. We feel that the applicant should revisit the current design to see if a greater</p>				<p>will form an appendix to Chapter 20 Water Resources and Flood Risk of the ES.</p> <p>The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR outlines the design requirements for the Water Treatment Plan included as part of the drainage design for the Proposed Development.</p> <p>The design team undertook a comprehensive design review of the Proposed Development design which has included consideration of the design and location of the infiltration basins.</p> <p>In advance of Phase 2, a list of hazardous substances will be established, the hydrology studies will be reconfirmed and the processes of the Water Treatment Plant determined. The hydrologists will establish current acceptable effluent chemical composition which will define the potential future monitoring targets.</p> <p>The Hydrogeological Characterisation Report in Appendix 20.3 of Volume 3 in the PEIR explains</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	unsaturated zone can be accommodated.				how the unsaturated zone has been considered within groundwater assessments, and concludes that the unsaturated zones beneath both the proposed infiltration basins are sufficient to accommodate the recharge mound.	
8.1.27	We manage and control leakage and pressure to customers across leakage zones that are well understood; the reconfiguration of our network is likely to impact on this management. LLAL are intending to treat much of the black water and other water on the development and reuse 30% of this. We shall be seeking assurances that the water will not enter the Affinity water supply network and that the residual water does not contaminate the catchment and aquifer for the abstracted water supplies. The proposed development has an increased fire demand that we understand is to be satisfied using storage tanks that are refilled from the Affinity supplies. LLAL are reminded that there are	Affinity Water			Please see response to ref 8.1.9. The application for development consent will contain Protective Provisions, to ensure the protection of electricity, gas, water and sewage undertakers.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>limits to the obligations upon Affinity to supply such water and we shall want to discuss the reliance LLAL will be placing upon these supplies and other means of satisfying such requirements. The construction water is likely to put considerable additional demand upon the Affinity supplies. Affinity has limited obligations to make such a supply available and would like to discuss with LLAL how this demand may be satisfied. We note that the scheme development and construction report commit to where possible using construction techniques that minimise water consumption. We would like to have a better understanding of these.</p>					
8.1.28	<p>The proposed development falls within the Mimram and Lee surface water catchments. The development could have a negative impact upon the quantity or quality of groundwater in those catchments. Of particular concern to quality and human health is the mechanism of the water entering</p>	Affinity Water			<p>Please see response to ref 8.1.9 in respect of engagement and water quality, 8.1.22 in respect of the Fire Training Ground and 8.1.24 in respect of management of water resources during construction.</p> <p>The Drainage Design Statement in Appendix 20.4 of Volume 3 of the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the ground at the soakaway / below ground infiltration system; the safeguards to prevent pollutants entering the ground water including the de-icing compounds and the fire training centre; the impacts of the recharge processes occurring through unsaturated zones with existing contamination; and the protection measures proposed during the construction of the proposed development. We have an obligation to ensure the water quality does not deteriorate and wish to be consulted to ensure long term pollution does not occur to the aquifer. Pile foundations are proposed through the existing and fill site to support the new buildings and the Luton DAT extension. The method of piling and any such other activities shall require Affinity's agreement along with the Environment Agency in order to ensure they do not impact upon the underlying groundwater. The proposed development includes the abandonment of some of the existing soakaways and taking</p>				<p>PEIR outlines the design requirements for live monitoring of contaminants and the Water Treatment Plant that will be installed to treat potentially contaminated water prior to discharge to ground.</p> <p>Chapter 20 Water Resources & Flood Risk of the PEIR provides a record of the stakeholder engagement undertaken with Affinity Water.</p> <p>A detailed assessment of the impacts of the discharge from the Proposed Development on the underlying aquifer will be undertaken to inform the ES. This will be supported by a Hydrogeological Risk Assessment that will form an appendix to the Water Resources and Flood Risk of the ES.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the water into the new surface water management system. This is considered to be a reasonable improvement and in line with planning policy. We remain concerned about any residual contaminants that have been permeated the surrounding ground and would like assurance that these will be stabilised. The proposed development and existing airport are at the apex of 2 catchments; the Lee and Mimram. The proposed water strategy will change the water balance and bias this to the Mimram. We would like to discuss opportunities with LLAL and the Environment Agency for water to be returned to the River Lee, where it is currently abstracted.</p>					
8.1.29	<p>The developer has stated that contaminated surface waters discharge to a combined network. There is no combined network in the area, they are separate foul and surface water systems. It is therefore vital that the developer identifies to Thames Water what</p>	Thames Water			Please see response to ref 8.1.17 and 8.1.18	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the proposed discharge rates and points of connection to the network will be. We also wish to draw the developer's attention to the fact that any contaminated surface waters discharging to the network will require a trade effluent agreement.					
8.1.30	Water Quality The assessment within the PEIR states that there will be no significant impact on public health arising from water contamination and the methodological approach taken appears to be reasonable. The treatment and processing of some of the material from the former landfill at the proposed airport site will remove a source of potential contamination and capping the remaining part of this area will reduce the potential pathway to any remaining contamination.	Public Health England			Noted.	No
8.1.31	In section 4.12.1 in Table 16-3 of PEIR Vol 1, Natural England agree with the Inspectorate's comments regarding the	Natural England			Please see response to ref 8.1.7 and 8.1.18. A detailed assessment of the impacts of the discharge from the Proposed	No

Ref	Comment	PC	LA	No PILs	Response	Change
	sensitivity of the River Lea and nearby chalk streams. Table 11-7 of the PEIR states that the River Lea, River Mimram and local springs as surface water features identified as potential receptors to the development. The importance of all three features is classified as medium. The evidence within the PEIR does not carry certainty that the groundwater supply and principle chalk aquifer will not be contaminated by leachate from the former landfill, when piling works are carried out: We await the publication of the Detailed Quantitative Risk Assessment, which will assess the risk to groundwater.				<p>Development on the underlying aquifer will be undertaken to inform the ES. This will be supported by a Hydrogeological Risk Assessment that will form an appendix to the Water Resources and Flood Risk chapter of the ES and a Foundations Works Risk Assessment (FWRA) which will form an appendix to the Soils and Geology chapter of the ES. The FWRA will detail measures to ensure that no new pathways are created and that contaminants are not inadvertently mobilised to the groundwater as part of the development works.</p> <p>A Detailed Quantitative Risk Assessment - Controlled Waters is provided in Appendix 17.4 in Volume 3 of the PEIR and sets out the expected impacts to groundwater.</p>	
8.1.32	<p>Whilst reviewing the PIER the following items/queries were noted:</p> <p>A significant catchment area of the current airport drains to Airport Way surface water network, which in turn drains to Luton Hoo Lakes.</p>	Environment Agency			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
8.1.33	Overall, on present information, Affinity does not consider that LLAL has demonstrated that it can resolve all of Affinity's concerns regarding the impact of its proposed development on Affinity's water infrastructure and its undertaking. In this regard, it is essential to stress that the impact on Affinity's undertaking and infrastructure must be looked at in a holistic way and not on a piecemeal basis. Furthermore, the impact on Affinity does not just relate to the narrow question of whether the final infrastructure proposals are acceptable but also a range of issues relating to delivery mechanisms, impact on existing proposals and interaction with other projects and nearby developments which the expansion may facilitate.	Affinity Water			<p>Please see response to ref 8.1.17.</p> <p>Stakeholder engagement with Affinity Water will continue to inform the ES and ensure a holistic understanding of the potential impacts of the Proposed Development on the Affinity Water network.</p>	No
8.1.34	Affinity will be implementing license abatement variations at the local ground water pumping stations as part of the sustainability reductions and other requirements agreed with the Environment Agency. This	Affinity Water			<p>Please see response to ref 8.1.9.</p> <p>A Hydrogeological Characterisation Report in Appendix 20.3 of Volume 3 of the PEIR provides a detailed hydrogeological baseline and assessment of the impact of the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	could affect the groundwater flow direction and should be considered within the modelling LLAL undertake of the Environmental Impacts.				<p>Proposed Development on groundwater flow and levels.</p> <p>A detailed assessment of the impacts of the discharge from the Proposed Development on the underlying aquifer will be undertaken to inform the ES. This will be supported by a Hydrogeological Risk Assessment that will form an appendix to Chapter 20 Water Resources and Flood Risk of the ES. The scope and methodology of the Hydrogeological Risk Assessment will be agreed with relevant stakeholders.</p>	
8.1.35	We support the sustainability aspirations of LLAL and would like to work with you to make water related matters as sustainable as reasonable. We would expect to have a minimum target for water consumption from the Affinity network not to have a net increase from the current levels. As LLAL will be aware, we are in a seriously water stressed area. Affinity are committed to creating water saving sustainable communities. We are working with other water companies and	Affinity Water			Please see response to ref 8.1.9.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	partners on national and/or regional campaigns and also targeted community engagement. We would like to extend this to working with LLAL and their partners to reduce demand and to continue to support growth in the local area.					
8.1.36	We note in order to accommodate the seasonal constraints there is a consideration that some of the enabling activities that are currently in the consultation may be undertaken using separate, parallel planning applications. Should this be the selected route we wish to be consulted on any applications and any representations we make on the DCO akin into consideration within these planning applications.	Affinity Water			<p>A record of stakeholder engagement undertaken with Affinity Water to inform the PEIR is provided in Chapter 20 Water Resources & Flood Risk of the PEIR. Stakeholder engagement will continue to inform the ES and will be undertaken to by the contractor post submission of the application for development consent.</p> <p>At present, there is no intention to submit a planning application for any preparatory works in advance of the application for development consent.</p>	No
8.1.37	Affinity wishes to work with LLAL to determine the scope of its infrastructure affected, to influence the detailed solutions proposed, to develop the outline	Affinity Water			Stakeholder engagement with Affinity Water will continue to inform the ES and ensure a holistic understanding of the potential impacts of the Proposed	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>work programme for the order which works to Affinity Infrastructure would be undertaken to ensure impacts can be managed to an acceptable level and to agree how appropriate provisions and protections can be put in place through private legal agreement and protections in the DCO. Affinity are seeking the opportunity to agree the approach to be taken on cost recover. We need to better understand when and how engagement with us on design and delivery of water infrastructure diversions and alterations will be carried out and how our costs incurred in that process will be met.</p>				Development on the Affinity Water network.	
8.1.38	A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'.	Thames Water			Stakeholder engagement will be undertaken with Thames Water to inform the ES and this will determine consent requirements. If required, trade effluent consents will be obtained by the contractor after submission of the application for development consent.	No

Ref	Comment	PC	LA	No PILs	Response	Change
8.1.39	<p>Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either: - 1. All wastewater network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid</p>	Thames Water			Please see response to ref 8.1.9 and 8.1.18.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	sewage flooding and/or potential pollution incidents.					
8.1.40	<p>Ancient Woodland We note the potential for hydrological changes to the ancient woodland at Winch Hill Wood CWS/LWS within the application boundary in area Z5.3. We note that these hydrological changes may occur from surface run-off and earthworks. In section 16.8.28 Table 16-8 it is stated that mitigation may be possible. Whereas a contradictory point made in 16.10.2 states that this risk represents a residual adverse effect on this county value site that would result in a minor adverse effect, which is not significant. We advise that the potential impact to ancient woodland is clarified. Particularly in light of 17.7.1, which confusingly states that the design of the Proposed Development has evolved to avoid impacts upon the Ancient Woodland at Winch Hill Wood.</p>	Natural England			<p>An assessment of the potential impacts of the Proposed Development on the ancient woodland at Winch Hill has been undertaken and is set out in in Chapter 8 Biodiversity of the PEIR. This considers the potential for excavation to alter the surface and groundwater regime of the Winch Hill Wood and has concluded that the proposed excavation will neither change surface or groundwater catchments nor will it affect the relationship of the wood with the local groundwater regime as no significant draw down of groundwater levels has been identified.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
8.1.41	The current airport drainage is unsatisfactory, with untreated surface water impacted with dissolved phase de-icing agents and hydrocarbons which is currently being discharged directly to groundwater. As such, the proposed redevelopment of the airport presents a significant opportunity to improve this situation.	Environment Agency			The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR recognises the limited effectiveness of the existing systems on the Application Site and adopts an approach that can provide water quality benefits when the on-site Water Treatment Plant is operable.	No
8.1.42	Table 8.11 in Chapter 8 Greenhouse Gases makes reference to ground source heat pumps (GSHP) as a sustainable means of potentially heating and cooling the new terminal buildings. We note that this was an isolated reference to GSHP in the PEIR and that no specific details with respect to how a GSHP scheme could be implemented was provided. However, please note GSHP schemes typically require a groundwater abstraction license and certain designs require an Environmental Permit.	Environment Agency			Please see response to ref 8.1.21. Discussion on all aspects of the scheme that require on Environmental Permitting will continue through the engagement process.	No

Ref	Comment	PC	LA	No PILs	Response	Change
8.1.43	If a source for perfluorinated compounds exists in the fire training area it must be identified and remediated as part of the proposed development works.	Environment Agency			Please see response to ref 8.1.22.	No
8.1.44	It appears that the proposed development would be built over the newly culverted section of the River Lea. If this is the case a Food Risk Activity Permit will be required for the works.	Environment Agency			Permitting and consenting activities will continue to be taken forward, including as part of the detailed design stage after the submission of the proposed application for development consent.	No
8.1.45	Affinity objects to LLAL's proposals as currently drafted as they do not provide adequate protection for the water catchment and its water infrastructure. Going forward, Affinity is seeking meaningful and timely engagement from LLAL given the importance of a holistic approach to the design solutions and the wide range of issues to be resolved.	Affinity Water			<p>Please see response to ref 8.1.9.</p> <p>Chapter 20 Water Resources & Flood Risk sets out impacts to water catchments and infrastructure.</p> <p>Stakeholder engagement with Affinity Water will continue to inform the ES and ensure a holistic understanding of the potential impacts of the Proposed Development on the Affinity Water network.</p>	No

Table A8.17: Regard had to statutory consultation responses on Water and drainage - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
8.2.1	<p>Concern that the area surrounding Luton airport is a dry area with already high water demand, and any expansion would lead to additional pressure on this resource due to increased population and more businesses, as well as increased water demand from the airport, requiring increased water extraction; this will result in a failing network with water shortages and adverse impacts to quality of life, health and wellbeing for local residents. Some respondents noted that the River Ver, River Lea, and other rare local chalk streams and waterways already run dry at times due to water abstraction, and at other times can become filled with sewerage, with impacts to local wildlife and fisheries; concern that this will be further exacerbated by the Proposed Development, in combination with other pressures including increased demand for housing in the region, leading to overall degradation of ground water supply. LLAL should be seeking to reduce current water usage rather than increasing via expansion. The following locations were specifically mentioned: the Three Counties, Bedfordshire, Hertfordshire, Buckinghamshire, North Hertfordshire, St Albans, Whitwell.</p>	73	<p>Please see response to ref 8.1.4.</p> <p>The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR identifies measures to maximise the reuse of grey water and rainwater harvesting in a way that is rarely seen in the UK, and minimise water consumption associated with the Proposed Development during operation. The intended strategy will remove the airport's need on relying on potable water where non potable water will suffice and will result in a net reduction in the use in potable water by the airport. Consequently, there will be a significant reduction in the requirement to increase abstraction from the public water supply.</p> <p>The final Drainage Design Statement and a Water Cycle Strategy for the Proposed Development will be prepared to inform the ES and will include an assessment of the potential impacts of the Proposed Development on local water supply (considering the use of measures to maximise reuse and minimise consumption).</p> <p>The identification of these measures and the production of these documents has been completed in close liaison with Affinity Water to capture any potential impacts on water supply within Luton.</p> <p>Surface water quality will be monitored and treated if necessary, prior to discharge. The surface water quality of the area will be improved with the current proposals.</p>	No

Ref	Comment	No CC	Response	Change
			Discussions with the utilities companies are ongoing and in anticipation of water supply and water treatment challenges, the current design includes on site water treatment facilities and water re-cycling to reduce current water supply requirements. A summary of the discussions with the utility companies is provided in Chapter 20 Water Resource & Flood Risk of the PEIR.	
8.2.2	Concern that no analysis has been done of LLAL's increased water use during drought periods and potential impact this will have on local communities, and no mitigation measures beyond water restrictions, have been set out.	40	A Water Cycle Strategy will be prepared to inform the ES to assess how potential water use associated with the Proposed Development will affect water resources and infrastructure considering potential impacts of climate change, including potential decreases in annual and summer precipitation rates and potential drought periods. Please also refer to the Climate Change and Carbon topic.	No
8.2.3	Concern that there is potential for increased flooding from green spaces becoming hard-surfaced with impacts to water flow rates/directions and the local environment, including re-emergence of the River Kym beneath the airport and less water reaching the Chilterns chalk aquifer. The following locations were specifically mentioned: Luton Hoo Estate.	40	Please see response to ref 8.1.1. The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR and Flood Risk Assessment in Appendix 20.1 of Volume 3 take account of the increase in impermeable surface area associated with the Proposed Development. This has not identified any potential impacts on the River Kym and the Luton Hoo Estate (including the Thames Water discharge to the River Lee (or Lea)). A Hydrogeological Characterisation Report in Appendix 20.3 of Volume 3 the PEIR provides a detailed	

Ref	Comment	No CC	Response	Change
			hydrogeological baseline and looks at the impact of the Proposed Development on the underlying chalk aquifer.	
8.2.4	<p>Concern that the Proposed Development will disturb the previous Eaton Green landfill site beneath Wigmore Valley Park via excavation and piling, which may expose and mobilise existing contamination and introduce new pollution pathways into underlying groundwater and local waterways, including the River Ver, River Mimram and River Lea, as well as potential changes in levels of the water table. Concern that insufficient mitigation has been set out. This is of particular concern given the existing poor quality of ground water in the local area. Further negative impacts may arise from the transportation of material across long distances. Furthermore, concern that the consultation material does not provide sufficient information on likelihood and severity of impacts to the water environment, water catchment and water infrastructure, or outline adequate mitigation. Mitigation measures must be appropriate from the commencement of the Proposed Development to avoid adverse impacts. The following locations were specifically mentioned: North Hertfordshire.</p>	61	Please see response to ref 8.1.7.	No
8.2.5	<p>Concern that the drainage and utilities proposals are inadequate, including that Luton is located at</p>	9	Please see response to ref 8.1.1.	No

Ref	Comment	No CC	Response	Change
	<p>a low level compared to the wider region but that the airport is comparatively high, and therefore the town will be susceptible to increased surface water runoff from the Proposed Development, and that there are insufficient mitigation measures outlined to protect local people, employees, visitors, schools and shops. Furthermore, concern that basing surface water drainage and flood mitigation proposals on 1 in 100year storm events is not sufficient due to increasing magnitude of storm events as a result of climate change, and that instead 1 in 200 or 1 in 500year events should be used, or a sensitivity test should be applied for +40% increase in rainfall intensity.</p>			
8.2.6	<p>Concern that the drainage and utilities proposals are ineffective and insufficient, including concern that proposals are not viable or adequately integrated with other systems (including road run-off, wastewater, water recycling, rainwater harvesting and natural environment) and there are no back-ups if something does not work properly. Some respondents noted that insufficient consideration has been given to sustainability within these proposals and that significant infrastructure improvements are required to meet the current needs of the airport, let alone the needs with the Proposed</p>	8	Please see response to ref 8.1.12.	No

Ref	Comment	No CC	Response	Change
	Development. Criticism that the proposals do not go beyond legal duties.			
8.2.7	Consider that the Proposed Development is unnecessary and should not be taken forward; the drainage strategy has not been agreed and there is no need to destroy the natural drainage system, and green spaces in the area. Therefore, the drainage and utilities proposals are not required.	54	Please also see Need Case and Forecasts topic.	No
8.2.8	Concern that artificial drainage measures proposed will not be effective in flood prevention or for replenishing aquifers; including specific concern that the proposals will move surface water away from the airport site at too fast a rate, causing flooding in the local area (with areas of low porosity clay) and nearby villages. In addition, concern that there are existing flood risk issues (including flooding of the airport approach road underneath the runway) that need to be appropriately resolved before considering expansion. Suggestion that flood risk mitigation measures should seek to utilise sustainable drainage methods as much as possible, in favour of man-made features with hard surfaces, including soakaways. The following locations were specifically mentioned: Wigmore.	35	Please see response to ref 8.1.1.	No

Ref	Comment	No CC	Response	Change
8.2.9	Concern that modelling and calculations on flood modelling are inaccurate and therefore the proposed mitigation measures are not sufficient. In addition, concern that no flood modelling has been carried out for the neighbouring Lea Valley.	4	<p>The design and assessment calculations for drainage are based on industry standard processes that have been found to be used to deliver safe and sustainable development across England.</p> <p>Fluvial hydraulic modelling of the River Lee (or Lea) has not been undertaken as the Proposed Development does not take place within an area that will affect the physical conditions in the river channel or floodplain. Furthermore, the drainage strategy maintains the rate and volume of water reaching the river via the existing Thames Water public sewerage system.</p>	No
8.2.10	Concern that there will be adverse impacts on the drainage system during construction, particularly from surface water run-off and groundwater contamination. Specifically, concern raised that contractors may not abide by the construction mitigation measures identified.	3	<p>Please see response to ref 8.1.6.</p> <p>The contractors responsible for undertaking the construction will be guided by the CoCP on how to manage working areas to minimise the risk of polluting matter leaving these areas and reaching surface and groundwater receptors. It will be a legal requirement for the contractor to comply with the CoCP under the development consent approval.</p> <p>As detailed in the Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR safeguards that the construction stage will be undertaken in an appropriate manner include:</p> <ol style="list-style-type: none"> a. assurances from the successful contractor that they will uphold the principles outlined in the CoCP; 	No

Ref	Comment	No CC	Response	Change
			<ul style="list-style-type: none"> b. monitoring of the surface and groundwater receptors to identify any movement of contaminants off site; and c. the site inspection on a regular basis by the representatives from the scheme designers, the airport owners and operators and regulatory bodies such as the Environment Agency. 	
8.2.11	<p>Concern that there will be adverse impacts on the drainage system from heavier and more frequent rainfall events as a result of climate change; and therefore, the proposals do not address future requirements. Suggestion that improved water run-off management is needed, including management of pollutants in surface water; as well as the use of gravity sewers instead of pumped sewers, which are more costly and less sustainable.</p>	5	Please see response to ref 8.1.1.	No
8.2.12	<p>Concern that there will be adverse impacts to water quality from contamination associated with the Proposed Development, including impacts to the chalk aquifer, mis-management of foul water, location of fuel storage adjacent to water facilities, use of infiltration basins and use of soakaways into chalk. Concern raised that there are existing water quality issues at the River Lea, River Ver and River Mimram and other local waterways with high infiltration rates and contaminants including rubber, oil and fuel from</p>	27	Please see response to ref 8.1.6, 8.1.7, 8.1.9 and 8.1.22.	No

Ref	Comment	No CC	Response	Change
	Luton airport runway, which could be worsened by the Proposed Development; no contaminants should be allowed to enter rivers or ground water systems. In addition, concern that hydrocarbon separators and oil interceptors are not sufficient mitigation measures. Request for further information on the onsite water treatment plant, and clarity on the responsibility of water quality run-off monitoring.			
8.2.13	Concern raised on historic land contamination from ammunition manufacturing in the Second World War; and that there is potential for this contamination to enter local waterways.	1	Please see response to ref 8.1.7. The potential for historical land uses to introduce contamination risk to controlled waters has been examined through risk assessment process in accordance with statutory guidance; a detailed Controlled Waters Risk Assessment will be prepared to support the ES and submitted with the application for development consent.	No
8.2.14	Concern that there will be adverse impacts on local rivers (including rare chalk streams and rivers, and River Lea, River Ver and River Mimram) and their water quality as a result of the Proposed Development, including associated impacts to groundwater and aquifers, as well as knock-on impacts further downstream and damage to ecosystems. In addition, concern raised on impacts of surface water run-off from the airport to rivers and queries on any proposals for treating such run-off, and whether any	7	Please see response to refs 8.1.6 and 8.1.9.	No

Ref	Comment	No CC	Response	Change
	proposals for flood betterment of rivers was being considered.			
8.2.15	Concern that the earthworks proposals are likely to lead to adverse impacts to groundwater and local rivers (including the River Lea and River Mimram). Concern raised that works would impact the water table and soil structure. In particular, the excavation and transportation of hazardous waste away from the site was highlighted as a concern, due to the potential for dispersal of contaminants which may end up in the local water network; this poses potential risks to local communities.	4	Please see response to ref 8.1.6. The Detailed Quantitative Risk Assessments informed by the results from the Ground Investigation have been used to determine the risk posed by existing contamination during the construction phase to both controlled waters and human health. A Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR has been prepared which details appropriate environmental management, monitoring and controls to be in place during construction to control/prevent release of contamination to wider environment via air/water, this includes measures to be in place during transportation of wastes off-site. It will be a legal requirement for the contractor to comply with the CoCP under the development consent approval. Remediation works have been also been designed to reduce volume of waste requiring off-site disposal.	No
8.2.16	Concern that proposals for reuse and recycling of grey water and rainwater are not ambitious enough, and clarification requested on which water will receive treatment in the water treatment plant. In addition, concern that management of other wastewater (including foul water) will be insufficient and will negatively impact the local sewer network.	5	Please see response to ref 8.1.12.	No

Ref	Comment	No CC	Response	Change
8.2.17	Suggestion that further engagement is needed with water supply companies, including concern that potential increased surface water run-off may impact their infrastructure and operations, and that adequate protection has not been proposed. In addition, criticism that a holistic approach to proposals has not been taken, considering all existing infrastructure. Specific concern was raised that Thames Water has been taken over by another company that may not have the correct expertise to respond to proposals.	3	Please see response to ref 8.1.9.	No
8.2.18	Suggestion that more needs to be done to future proof the proposals for water and drainage, to ensure that adequate water systems are maintained; this is specifically in relation to more extreme storm events and additional pressures on resources as a result of climate change. Specific suggestions listed include: building larger drainage pipes with thicker walls, and better provision for management of surface water.	10	Please see response to ref 8.1.1.	No
8.2.19	Suggestion that an appropriate system is required for the safe disposal of foul water and toxic waste, in a manner that will not contaminate local watercourses. In addition, suggestion that SUDS should be mandatory.	3	Please see response to ref 8.1.9.	No

Ref	Comment	No CC	Response	Change
8.2.20	Suggestion that more could be done to reuse and recycle grey water and rainwater within the operation of the Proposed Development (as well as the current airport operation) for non-potable uses, including for toilet facilities, fire management and landscape irrigation. Measures suggested include reedbeds for filtering grey water, roof rainwater harvesting, airfield vehicle washdown water harvesting and larger rainwater harvesting tank; these measures should be mandatory to reduce water usage and protect natural resources including the Chiltern chalk streams. In addition, suggestion that the proposed proportion of grey water to be reused should be increased beyond the current 30% target.	31	Please see response to ref 8.1.12.	No
8.2.21	Suggestion that a reservoir, small lake or pools should be incorporated into the proposals for flood mitigation and ecological enhancement; these should be incorporated into the landscape as much as possible and may include other features such as fountains. Suggestion that adjacent to the access road to the airport could be an appropriate location.	3	Noted. The implementation of open water bodies as part of the Proposed Development requires careful consideration and is limited due to the risk that airports pose to birds and that birds pose to aircraft. As such there is a need to limit the attractiveness of the site to birds.	No
8.2.22	Support for the drainage and utilities proposals; specific support was highlighted for proposals to reuse water, compliance with SUDS, improved water filtering, sustainable approach to reducing	35	Noted.	No

Ref	Comment	No CC	Response	Change
	water contamination, incorporation of permeable surfaces where possible, use of heat pumps and overall, the use of technologies that have been proven to be effective. In addition, support noted on the design proposals being based on 1 in 100 year storm events. Maintaining appropriate servicing of existing facilities and regularly monitoring water pollution were highlighted as priorities.			
8.2.23	Concern that the commitments outlined in the consultation documents are not sufficient to minimise risk to drainage and utilities, and protect the health and wellbeing of local communities with regards to these risks. In addition, concern raised that similar measures were not already in place at the airport and therefore questioned LLAL's commitment to environmental issues.	2	The Drainage Design Statement in Appendix 20.4 of Volume 3 of the PEIR sets out that the Proposed Development has been designed to allow the airport to be resilient to extreme flood conditions, while also recognising potential risks outside the airport. Where risks have been identified a framework for additional analysis and an approach to mitigation will be provided in the ES, which will be submitted with the application for development consent.	No
8.2.24	Recognise that the PEIR commits to the completion of both a WFD Compliance Assessment and a Water Cycle Strategy for inclusion in the final Environmental Statement. In accordance with the requirement of NPPF for development to deliver a measurable net gain to biodiversity, the decision maker will have to be satisfied that all predicted impacts of abstraction on the river system of the local and wider area are fully understood and quantified so that they	1	Please see the Natural Environment topic with regards to biodiversity net gain. The Water Framework Directive compliance assessment and Water Cycle Strategy will support the ES submitted as part of the application for development consent.	No

Ref	Comment	No CC	Response	Change
	can evaluate whether those impacts can be adequately and measurably avoided, mitigated or compensated to secure net gain. Without this information, NPPF para 175 gives clear direction that applications must not be approved"			
8.2.25	Do not see evidence that Highways England will accept additional connection to its network for treated surface drainage and treated sewerage, leading to concerns over contamination of waterways if these are dispersed via soakaways,	1	Discussions with National Highways will be undertaken through the detailed design stage.	No
8.2.26	Suggestion that additional funding should be dedicated to drainage, including highway drainage improvements in proximity to the airport. The following roads for improvement were specifically mentioned: Kimpton Road and Breachwood Green	2	Engagement with the Lead Local Highway, the Local Highway Authority and Thames Water will continue through the detailed design stage with regards to any drainage requirements for the off-site highway interventions.	No
8.2.27	Suggestion that additional surveying is required, including soil and geological surveys to understand the impacts of additional surface water run-off. Specific concern was raised on drainage issues with regards to the area for the replacement park. In addition, suggestion that new utilities should not be located within previously undisturbed land.	3	Please see response to ref 8.2.26.	No

L2 Due regard tables for employment and economics; design; Wigmore Valley Park; impacts on local communities; passenger experience; surface access; land and compensation; construction and phasing; planning; and consultation

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Table A9.1: Explanation of table headings

Table A9.2: Regard had to statutory consultation responses on Employment and economics - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Table A9.3: Regard had to statutory consultation responses on Employment and economics - Planning Act 2008: Section 47 – Duty to consult local community

Table A10.1: Regard had to statutory consultation responses on the Design - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Table A10.2: Regard had to statutory consultation responses on the Design - Planning Act 2008: Section 47 – Duty to consult local community

Table A11.1: Regard had to statutory consultation responses on Wigmore Valley Park - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Table A11.2: Regard had to statutory consultation responses on Wigmore Valley Park - Planning Act 2008: Section 47 – Duty to consult local community

Table A12.1: Regard had to statutory consultation responses on Impacts on local communities - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Table A12.2: Regard had to statutory consultation responses on Impacts on local communities - Planning Act 2008: Section 47 – Duty to consult local community

Table A13.1: Regard had to statutory consultation responses on Passenger experience - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Table A13.2: Regard had to statutory consultation responses on Passenger experience - Planning Act 2008: Section 47 – Duty to consult local community

Table A14.1: Regard had to statutory consultation responses on Surface access - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Table A14.2: Regard had to statutory consultation responses on Surface access - Planning Act 2008: Section 47 – Duty to consult local community

Table A15.1: Regard had to statutory consultation responses on Land and compensation - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Table A15.2: Regard had to statutory consultation responses on Land and compensation - Planning Act 2008: Section 47 – Duty to consult local community

Table A16.1: Regard had to statutory consultation responses on Construction and phasing - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Table A16.2: Regard had to statutory consultation responses on Construction and phasing - Planning Act 2008: Section 47 – Duty to consult local community

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Table A17.2: Regard had to statutory consultation responses on Planning - Planning Act 2008: Section 47 – Duty to consult local community

Table A18.1: Regard had to statutory consultation responses on Consultation - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with an interest in the land

Table A18.2: Regard had to statutory consultation responses on Consultation - Planning Act 2008: Section 47 – Duty to consult local community

Appendix A

The following tables describe all comments received during the 2019 Statutory Consultation, by stakeholder type and the project's response to them. The table headings are explained in the table below.

Table A9.1: Explanation of table headings

Table Header	Key	Description
PC	Prescribed Consultee	Organisations identified as Prescribed Consultees under the Planning Act 2008: Section 42 – Prescribed consultees and The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009: Schedule 1
LA	Local Authority	Local authorities as prescribed under Section 43 of the Planning Act 2008
PIL	Persons with an Interest in the Land	Persons with an interest in the land as prescribed under Section 44 of the Planning Act 2008
CC	Community Consultee	Community Consultees with whom we have a duty to consult as prescribed under Section 47 of the Planning Act 2008
No. CC	Number of Community Consultees	Count of Community Consultees
No. PIL	Number of Persons with an Interest in the Land	Count of Persons with an Interest in the Land
C	Change	Describes whether there has been a change to the project in response to the comment (Y = Yes / N= No)

A9 Employment and Economics

Table A9.2: Regard had to statutory consultation responses on Employment and economics - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.1	The Proposed Development will not have any economic benefits. Respondents consider there would be no benefits either locally, regionally, and/or nationally. Specific locations that would not benefit from the Proposed Development including: Luton, Hertfordshire, Bedfordshire, Midlands, Harpenden, Wigmore, Vauxhall, local schools, other locations underneath the flight path; and less affluent surrounding areas.			26	<p>With expansion to 32 mppa, the airport's economic impact will increase considerably. The number of direct airport-related jobs is expected to increase by 4,500 by the time the airport is handling 32 mppa.</p> <p>When indirect and induced jobs are considered, the total number of new jobs would be 4,800 in Luton, 6,600 in the three counties, and a total of 12,100 across the UK. The contribution of the airport's operation to the UK economy would also increase by over £1.6 billion by the time the airport is handling 32 mppa. Of this increase, £1 billion in total would be realised within the three counties region.</p> <p>Further information is set out in the Draft Need Case, Draft Employment and Training Strategy (ETS) and Chapter 11 Employment and Economics of</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Volume 3 of the PEIR available as part of this consultation.	
9.1.2	The projected economic benefits of the Proposed Development have not been assessed in comparison to the environmental cost of expansion. Any economic benefits are outweighed by environmental costs locally, regionally and nationally.		North Hertfordshire District Council	17	The PEIR provides preliminary assessments of a wide range environmental effects, including economic benefits. This document must be viewed as a whole and not considered in piecemeal fashion. The findings of the PEIR will be updated in an ES prior to the submission of the application for development consent. It will then be for the Planning Inspectorate to consider the balance between the costs and benefits of the Proposed Development based on the evidence submitted with the application.	No
9.1.3	The local area has a low unemployment rate and as a result there is no need for the additional jobs that the airport will create in future.			1	There remain significant pockets of deprivation and unemployment within Luton and surrounding areas where additional employment opportunities would clearly be beneficial. The economic contribution from an expanded airport would make a significant contribution towards the 'Luton 2040' target of ensuring that no-	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>one in the Borough is living in poverty. Job generation is also a central theme of many of the other economic development strategies of stakeholders in the Three Counties area.</p> <p>There is significant out-commuting from the area currently and it would be desirable if local residents were able to access good quality employment opportunities closer to home, such as those that will develop at and around the airport.</p> <p>The area will experience population growth in the future, and it will be important to encourage investment in the economy to ensure that there are employment opportunities to support this growth.</p> <p>There is always natural change in the economy over time with some sectors growing and others declining. People will move between sectors and occupations and will seek out new opportunities, such as those potentially offered by the airport's development.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>It should also be recognised that opportunities will come forward over a significant period of time, which will allow the labour market to adjust the airport's growth and development.</p> <p>We have worked with a wide range of stakeholders, and will continue to do so, to develop the Draft ETS to support the airport's development and create an environment in which people in the Three Counties can effectively access opportunities in both the construction and operational phases of the development.</p>	
9.1.4	<p>There are alternative methods to maximise employment, skills and training opportunities to benefit neighbouring communities which do not require expansion. This includes investing the funding in other development projects and/or sectors including public transport (including electrification of the rail infrastructure), the renovation of Luton, green infrastructure,</p>			19	<p>The benefits of expanding the airport are set out in the Draft Need Case. In addition, the construction and operation of the airport will provide future employees with key transferable skills, for example in construction, engineering, green technology and customer service.</p> <p>It is acknowledged that there are other ways to improve the local economy, however the Proposed</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	renewable and/or green energy, carbon offsetting the existing airport facilities, green industry hub within the enterprise zone, tree planting, electric vehicles, green aviation technology and local libraries.				Development offers the best opportunity to achieve these goals. The Proposed Development will also be complementary to other major regeneration and placemaking programmes (such as the Enterprise Zone and Hat District), transport schemes and business support in the borough. The expansion will provide additional jobs and skills/training support above and beyond these programmes to support local employment and opportunities for residents.	
9.1.5	The Proposed Development should prioritise recruitment of local residents.			1	We agree. This is something that is addressed in the Draft ETS . A key principle of the Draft ETS is that any activity will seek to add value to what is already being undertaken at the airport and further afield rather than duplicating existing activity. The mechanisms around how this might best be achieved are the subject of ongoing research and further information will be included in the documents submitted with	No

Ref	Comment	PC	LA	No PILs	Response	Change
					the application for development consent.	
9.1.6	The Proposed Development should support and promote the development of apprenticeship programmes to support the construction and operational phases.			4	We agree. The Draft ETS identifies the potential role of apprenticeships within a wide range of initiatives to improve access to job opportunities. Apprenticeships will continue to be explored with local authorities and potential delivery partners.	No
9.1.7	Local recruitment and employment should be encouraged and enabled for jobs created from the Proposed Development.			5	We agree. The Draft ETS identifies opportunities to encourage local recruitment, including working with local stakeholders and organisations.	No
9.1.8	The Proposed Development should encourage high quality and responsible employers to operate at the airport, offering fair remuneration and working conditions for employees.			2	We agree. The Draft ETS looks to provide leadership and promote standards around these issues. This is currently being explored further to address the fact that there are many different employers of staff that work at the airport rather than all staff being directly employed by the airport operator.	No
9.1.9	Establish a local innovation centre, including training			1	This is outside the scope of the Proposed Development. However,	No

Ref	Comment	PC	LA	No PILs	Response	Change
	facilities, to research and develop new technologies, with a focus on green/sustainable technologies, to support the Proposed Development and any associated services.				we are currently considering how the wider economic benefits of the Proposed Development can be maximised locally (such as its ability to attract investment and support innovation cluster development, for example).	
9.1.10	The cost of the Proposed Development is considered to be unnecessary and unjustified given the downturn in airline travel. There is insufficient information on how the Proposed Development will be funded. Furthermore, the high costs of the Proposed Development in addition to other infrastructure projects in the area (e.g., DART, road improvements etc.) will fall on local communities and may be detrimental to the local economy.			9	<p>The need for the scheme including demand forecasts and how these account for changing in travel behaviour are set out in the Need Case topic responses, with further detail provided in the Draft Need Case consultation document.</p> <p>Funding is not expected to be provided by a single party but by multiple parties who are interested in different aspects of the proposal. We do not intend there to be any direct contribution from Luton Borough Council (LBC) or any impact upon local Council Taxpayers, as there are numerous models available for the funding, financing and procurement of the works which are likely to be spread over a period of up to 20 years. Given the attractiveness of the proposition and the range of</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>delivery models available, we have every confidence that the Proposed Development is deliverable. Further details on the financial aspects of the Proposed Development will be set out in the Funding Statement, which will be submitted with the application for development consent.</p> <p>Further detail on how other infrastructure schemes will be funded including the Luton DART and road improvements are addressed in our responses to ref 9.1.46 and 9.1.47.</p>	
9.1.11	More detail is needed on the targets, commitments, monitoring and governance processes that would be adopted to maximise benefits arising from the Proposed Development.			3	<p>The airport is central to the local economy and is an important connectivity asset for the broader region it serves including the Oxford-Cambridge Arc. It will also support regeneration and levelling up in Luton and neighbouring areas where levels of deprivation are below average.</p> <p>Luton is the UK's only major airport wholly owned by the local council, and we are committed to reinvesting the benefits of growth back to the community. Please see</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>response to ref 9.1.17 for further details on our proposals for Community First. There are significant dividends that are returned to LBC, our shareholder, along with numerous grants to Community Funding Programmes.</p> <p>The Draft ETS seeks to create an environment so that local people can take up the jobs created as a result of the Proposed Development.</p>	
9.1.12	<p>The number of forecast jobs and employment opportunities are overestimated, and the data behind the claimed job increases needs to be made clearer. The stated benefits do not reflect changing trends within the industry which favour new technology (e.g., increased automation, AI technology etc).</p>			1	<p>A detailed analysis of employment impacts has been undertaken and is set out in Chapter 11 Employment and Economics of Volume 3 of the PEIR. The assessment of jobs is based on industry best practice methodologies. This accounts for future trends and future productivity increases. The assessment indicates that there will be an increase in jobs at a local, regional, and national level associated with the Proposed Development. This assessment has been updated and is included in the Draft Need Case and in</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Chapter 11 Employment and Economics of the PEIR.	
9.1.13	The economic benefits of the Proposed Development are outweighed by other factors, including impact on character/amenity of Luton and surrounding area, quality of life for residents (especially those located within the flight path), pressures on small businesses from national retailers, and impact on health and wellbeing.			1	Please see response to ref 9.1.2.	No
9.1.14	The Proposed Development will result in positive economic benefits on the local area, regionally and/or nationally. Specifically, the Proposed Development will result in positive economic impacts for the local area, including job creation, growth of local businesses and increased investment in the local area.		Buckinghamshire County Council and Aylesbury Vale District Council Stevenage Borough Council Dacorum Borough Council Milton Keynes Council	13	The respondent's support has been noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.15	Engage with local educational institutions (ranging from primary levels through to tertiary levels) and community organisations to promote education and employment opportunities associated with Luton Airport.			6	We have worked with a wide range of educational institutions and training providers to develop the Draft ETS to support the airport's development and enable people to effectively access opportunities in both the construction and operational phases of the development. We will continue to engage with a wide range of stakeholders as we finalise the ETS as part of the application for development consent.	No
9.1.16	The Proposed Development will not benefit local residents. Concerns that any new employment opportunities are largely related to "casual work"/zero-hour contracts and that the Proposed Development will create or exacerbate poor working conditions of these workers			13	The Proposed Development will create new jobs at a local, regional and national level. The Proposed Development will support highly productive and high-wage jobs. In addition, the airport provides training opportunities to support the upskilling of its workers. We are continuing to work with stakeholders in developing the Draft ETS so that it contains a strategy to ensure minimum work standards, and that job opportunities are accessible to the local community.	No

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.17	The applicant should implement initiatives to ensure economic benefits are shared locally and regionally.		Stevenage Borough Council	1	We are proposing to implement such initiatives. Our Community First scheme will make funds available to community groups and Town and Parish Councils to address local needs in areas of high deprivation or for decarbonisation projects. The fund will be available to communities in Central Bedfordshire, North Hertfordshire, St Albans, Dacorum, Stevenage, Welwyn, Hatfield, eastern parts of the former Aylesbury Vale district and parts of East Hertfordshire.	No
9.1.18	<p>The benefits of expansion nationally, regionally and locally must be balanced against environmental and social disbenefits nationally, regionally, locally and indeed globally. These include the following. None of these disbenefits are recognised or given weight in LLAL's analysis.</p> <ul style="list-style-type: none"> impacts of airport expansion on the global climate; impacts on the Chilterns AONB and candidate AONB 	Chilterns Conservation Board		1	<p>Our response to ref 9.1.2 provides further details of how the benefits and disbenefits of the Proposed Development will be considered.</p> <p>The need for the Proposed Development including how this aligns with addressing climate change and the transition to net zero are set out in the Need Case topic responses, with further detail provided in the Draft Need Case.</p> <p>The impact of the Proposed Development on the Chilterns</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>land to the east of Luton including airport expansion harming the tranquillity and desirability of the Chilterns AONB as a destination, so has local economic costs;</p> <ul style="list-style-type: none"> • impacts on public open space at Wigmore Valley Park; • providing international flights to overseas holiday destinations loses money to the UK economy that would come from staycations. The money is spent overseas; • international tourists arriving at Luton are not likely to linger locally and spend here, but travel on to London and elsewhere; and • people making an ethical choice to spend leisure time in the Chilterns (e.g. a long weekend in the Chilterns instead of flying abroad on a city break), will have their enjoyment diminished by LLAL's expansion. 				<p>AONB and candidate AONB is considered in the Landscape and Natural Environment topic response.</p> <p>The impact of the Proposed Development on public open space at Wigmore Valley Park is covered in the Wigmore Valley Park topic responses.</p> <p>In relation to the issue of outbound tourism, it is noted that it is not UK Government policy to limit outbound leisure travel from the UK. The Government has stated previously in the Aviation Policy Framework (2013) <i>“that the evidence available to us does not show that a decrease in the number of UK residents flying abroad for their holidays would have an overall benefit for the UK economy.”</i></p> <p>This highlights the vital role outbound tourism plays in strengthening quality of life in the UK, underpinning the UK's attractiveness as a place to live and work. In this context it is important to note that over 50% of passengers at the airport in 2019</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>were travelling to visit friends or relatives. Further detail on this is provided in the Need Case topic responses and the Draft Need Case.</p> <p>For concerns regarding the impacts on the experience/enjoyment of the Chilterns please refer to Chapter 14 Landscape and Visual of the PEIR.</p>	
9.1.19	<p>Local employment: For your growth to be sustainable we would hope that you can put in place local employment schemes to ensure that you are recruiting, training and skilling the local communities. We would hope that the local authorities, if they support this application, put in place accommodating planning measures to ensure that the necessary ancillary growth (housing, education, health, wellbeing facilities etc) are also provided. By helping the local communities to grow some of the impacts will be mitigated</p>			1	Please see response to ref 9.1.5.	No

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.20	<p>Job creation and attracting economic investment, is welcomed, particularly if it results in employees working in businesses. However, an expanded Airport may also give rise to pressures on the local economy, such as employment and housing shortfalls which could disadvantage the hotel. Arguably this could all mean a reduction in guests and potentially threaten the longer-term viability of the hotel with the associated consequences to the local economy, as well as the potential impact on the viability of the hotel for its current 5* use, with potential implications for its long term occupation, maintenance and use, should these impacts have an effect on guest numbers (such as the impact of night time noise due to the limitations in increasing noise insulation at Luton Hoo as well as the impact on the daytime experience of guests).</p>			1	<p>Please see response to ref 9.1.11. We will continue to work with all landowners potentially affected by the Proposed Development.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.21	<p>Replacement car parking to mitigate the loss of CP9 and CP10 Car Parks CP9 and CP10 comprise of 807 spaces, of which 686 spaces are currently used by TUI Group in relation to its head office at nearby Wigmore House. The proposed airport expansion will result in the loss of a majority of spaces. TUIs head office is a major local employer, if staff are not able to park within close proximity of the office it is likely to result in a significant loss of staff and create challenges in recruiting replacement staff. If the office has insufficient car parking to meet staff needs TUI may need to consider relocation to alternative premises. Any such relocation would likely involve considering locations at other airports and could potentially result in a significant loss of local jobs.</p>			1	<p>Any TUI related car parking spaces No affected by the Proposed Development would be replaced as per the existing provision, in locations which are in close proximity to the current car park locations.</p>	No
9.1.22	<p>We are also concerned that the proposals contain no detail of the proposed cost of</p>			1	<p>Viability assessments have been undertaken and a Funding Statement will be submitted with</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	development. Without a thorough assessment of the build cost it is simply not possible to evaluate whether the construction will deliver value for money for its intended users.				the application for development consent. The viability assessment has taken into account current user charges at the airport and the impact that any increases might have on the projections of future demand. Please also see response to ref 9.1.10.	
9.1.23	The GDP benefits are likely to be overstated because it is more likely that additional jobs would be a migration of jobs from one part of the country (probably the north) to another.	Kings Walden Parish Council		1	A preliminary view on the extent of displacement of economic benefits is included in Chapter 11 Employment and Economics of the PEIR.	No
9.1.24	The number and type of forecast jobs are overestimated and exaggerated. Any increase to employment opportunities are of little to no benefit to the local, regional or national economy. Some respondents suggest that the data used to estimate proposed job increases be clarified and made available to the public for review.			1	Please see response to ref 9.1.12.	No

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.25	There are no benefits that could not be delivered by increased capacity at more suitable sites. Luton Borough Council has a poor track record of sharing airport revenues outside its boundaries and current grants to impacted villages are miniscule.	Kings Walden Parish Council		1	Please refer to the Need Case topic responses in relation to alternatives to the Proposed Development. The airport has a strong track record of sharing airport revenues outside its boundaries. Please see responses to refs 9.1.11 and 9.1.17.	No
9.1.26	There are better employment initiatives not requiring airport expansion such as developing technologies for more carbon capture and storage and efficient recycling, which are more sustainable than aviation expansion.	Kings Walden Parish Council		1	Please see response to ref 9.1.4.	No
9.1.27	The Proposed Development will not bring employment benefits suggested to the local community. Concern that new employment opportunities resulting from the Proposed Development will not benefit local residents.	Kings Walden Parish Council	Central Bedfordshire Council	1	The Proposed Development will create new jobs at a local, regional and national level as set out in the response to ref 9.1.1. The Draft ETS provides a strategy to ensure minimum work standards, and that job opportunities are accessible to the local community.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Please see responses to refs 9.1.3 and 9.1.5 for further details.	
9.1.28	<p>Initial Response EEH recognises the economic significance of the United Kingdom's aviation network. The ability to connect regions economically has enabled trade links to be established both domestically and internationally. Such linkages support economic activity across the region and beyond and bring significant benefits to our businesses and residents. Luton Airport's growth in recent years has benefited the local economy directly in terms of employment opportunities and the funding generated for investment in locally provided services. The proposed expansion of the airport will create the opportunity to build on those foundations and thereby generate further benefits for the local economy and its residents. In addition, increased capacity at Luton Airport will offer additional opportunities for</p>	England's Economic Heartland			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	residents and businesses within the region to use their local airport, thereby potentially providing relief to other parts of the wider South East airport system.					
9.1.29	Bedfordshire Police are happy to be engaged with the expansion proposals for the Airport but, as mentioned above, without sufficient additional resource/funding to support such a large expansion and the inevitable demand increases on the Police Force we would need to oppose the proposals being put forward.	Bedfordshire Police and Crime Commissioner			Noted.	No
9.1.30	The Employment and Skills strategy (which is not yet even in draft form), bringing forward a comprehensive monitoring, mitigation and compensation strategy [including exploring how to apply the principles of environmentally managed growth (growth conditional upon environmental and other limits/targets/parameters being		Hertfordshire County Council		The Draft ETS identifies proposals to create an environment in which the local community can benefit from the employment opportunities created by the Proposed Development, during both construction and operation.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	met) and unforeseen local impacts mitigation];					
9.1.31	Whilst we acknowledge that there may be some economic benefits that would come with the growth of London Luton Airport any benefits do need to be balanced against the environmental impact any expansion would have on the neighbouring district areas. The Employment and Skills Strategy (all of which require more detailed assessments) needs to bring forward a comprehensive monitoring, mitigation and compensation strategy which are of key importance to North Hertfordshire as well as the purpose and management of the relocated park.		North Hertfordshire District Council		Please see response to ref 9.1.2. The Draft ETS identifies key actions to support access to jobs opportunities and development of skills for the local community.	No
9.1.32	The ETS should be sufficiently robust to provide skills and training packages for local residents in Luton and the wider area; and provide preferential access to jobs for those undergoing training.		WSP for Host Authorities		The Draft ETS sets out proposals to create an environment in which the local community can benefit from the employment opportunities created by the Proposed Development, during both construction and operation. These	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Additionally, measures to secure increased housing demand for future employees migrating to the area in the administrative boundary of Luton should be set out and discussed. Support the direction of travel of the ETS but note further detail will follow as the process continues. The employment and skills programmes must reflect and coordinate with the following Central Bedfordshire documents: Vision 5050. All Age Skills Strategy. Economic Insight and Economic Strategy. ""The authority would expect the Employment Strategy to be progressed with input from CBC Officers from the Investment, Employment and Skills Team, and take full account of the points raised in our appendix. It is considered that the most appropriate means to secure the ETS is through the Section 106 and this should include employment opportunities during the construction phase and also the operational phase.</p>				<p>proposals were developed in consultation with local stakeholders and are based on a review of key local policy documents.</p> <p>Consideration is being given as to how commitments in the Draft ETS can be secured where appropriate and this will be subject to further discussion with relevant stakeholders.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>A good example of a Local Employment Scheme that has been secured through the DCO process is for Covanta Energy Ltd. (CBC reference CB/13/00726/DCO). This would be a useful starting point to inform the ETS. The proposals would place significant additional pressure on housing demand in the wider area and this matter needs to be considered as part of the DCO process.</p>					
9.1.33	<p>The Outline Employment and Training Strategy dated October 2019 sets out the principal aims of the full Employment and Training Strategy (ETS) which will be developed as the proposed scheme is refined. The authority would expect the Employment Strategy to be progressed with input from CBC Officers from the Investment, Employment and Skills Team, and take full account of the points raised in the Economic Regeneration section of Appendix A. It is considered that</p>		Central Bedfordshire Council		Please see response to ref 9.1.34.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the most appropriate means to secure the ETS is through the Section 106 and this should include employment opportunities during the construction phase and also the operational phase. A good example of a Local Employment Scheme that has been secured through the DCO process is for Covanta Energy Ltd. (CBC reference CB/13/00726/DCO). This would be a useful starting point to inform the ETS. The ETS should be sufficiently robust to provide skills and training packages for local residents in Luton and the wider area; and provide preferential access to jobs for those undergoing training. A further concern relating to employment opportunities is the increased number of jobs and the fact this attracts new residents to the area. Whilst the authority would seek to ensure local jobs for local people through the ETS, it is acknowledged that not all jobs</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	would be fulfilled by local residents.					
9.1.34	Unfortunately, at present, only a very small part of LLAL's Community Funding Programme, about 0.35%, is made available through the Near Neighbour Fund to provide grants to support community groups outside of Luton. This appears inequitable, particularly when some neighbouring communities are substantially affected by noise and environmental impacts of the airport.		Dacorum Borough Council		Please see response to ref 9.1.26.	No
	The Economy and Local Employment: 1. We acknowledge the economic and employment benefits of having an international airport nearby. In addition to the direct and indirect jobs which derive from the airport's operation, the variety of airport-related jobs available is broad and we welcome a wide variety of highly skilled jobs such as engineering		Dacorum Borough Council		Noted.	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>etc., which airport activity and business brings to the area. 2. We acknowledge and support the fact that further development at the airport is highly likely to generate additional local employment and business for the Borough and will continue to be an important factor in encouraging businesses with international trade links to locate to the area.</p>					
9.1.35	<p>The Council appreciates that further to the last consultation more specific information is provided on the economic benefits and how these are broken down at local authority level (i.e., the number of jobs within each area that both directly and indirectly relate to the airport currently and the proposed numbers if this application is successful). This will enable residents to make an informed view on the proposals, taking into account key economic evidence based predictions.</p>		Stevenage Borough Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.36	We must say that our Councillors were somewhat unhappy with the response to questions provided by a LLAL representative at the joint briefing provided in Aylesbury on 23 September 2019. Having reviewed the consultation material it is evident though that LLAL does plan to spread the potential benefits of airport expansion with surrounding communities.		Buckinghamshire County Council and Aylesbury Vale District Council		Please see response to ref 9.1.17.	No
9.1.37	A published Planning Policy Compliance document should be produced. Need to set out proactive policies for maximising local economic development impacts. LLAL should look to good practice at other airports such as particularly Stanstead and Heathrow Economic benefits should be broken down by LA area rather than combined for Luton and the three counties.		Host Authorities		<p>Planning policy compliance will be considered in the Planning Statement submitted with the application for development consent.</p> <p>Please see response to ref 9.1.11 for further details on how we propose to maximise the local benefits of the Proposed Development.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.38	Highway Investment. The wider economic benefits realised by the proposed expansion is likely to galvanise New Century Park and require land use reconfiguration within the Enterprise Zone in the form of new offices and light industrial development that are associated with the proposed second terminal. I can confirm that the proposals for Century Park Access Road and A505 Vauxhall Way were included in the first 5-year Major Road Network Investment Programme submitted to DfT in July 2019. An announcement on the funding for these two schemes is awaited. Whilst it is reasonable to plan on the basis that both schemes are delivered the promoter should set out the implications for their proposal of one or other (or indeed both) not securing funding from DfT.	England's Economic Heartland			The Airport Access Road has been included as a part of the Proposed Development.	No
9.1.39	The Proposed Development will have an adverse impact on the local tourism industry.	Chiltern Conservation Board			Chapter 11 Economics and Employment of the PEIR notes the Proposed Development will	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>enable more visitors to come to the UK. These visitors would support GDP and employment via an expenditure injection into the economy.</p> <p>The ETS submitted with the application for development consent will outline initiatives to support the local tourism and hospitality sector through employment and training schemes. Those initiatives and engagement with training providers in hospitality and tourism can have wider-reaching benefits beyond the airport and support additional opportunities across the study area. A Draft ETS is available as part of this consultation, it will be further developed after the consultation.</p> <p>Please see response to ref 9.1.18.</p>	
9.1.40	It is fundamentally important that LLAL provides greater detail of the specific local advantages of the airport beyond Luton itself, when developing its detailed economic impact assessment to		Dacorum Borough Council		Please see response to ref 9.1.18.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	accompany the DCO proposals. This will aid local communities to better understand and balance the benefits and impacts of growth at the airport.					
9.1.41	In this context, Dacorum Borough Council welcomes recently proposed improvements to the Community Funding Programme and would wish to see LLAL give further consideration to its development which better reflects the impacts of the airport on neighbouring communities, rather than just Luton.		Dacorum Borough Council		Please see response to ref 9.1.26.	No
9.1.42	The ETS should be sufficiently robust to provide skills and training packages for local residents in Luton and the wider area; and provide preferential access to jobs for those undergoing training.		Central Bedfordshire Council		Please see responses to ref 9.1.5, 9.1.6, 9.1.7 and 9.1.15	No
9.1.43	The Council notes that the extent of community benefits which derive to Luton Borough residents as a result of the		Dacorum Borough Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	airport are significant in both the commercial returns and Community Partnership Funding made available to the Luton community. This is to be welcomed in many respects, but the impacts of the airport are not confined to Luton Borough.					
9.1.44	We welcome the Three Counties approach (Beds, Bucks and Herts) taken in considering the economic benefits which expansion may bring. Prospective supportive by the Councils will to a large extent depend on job, skills and business benefits in Buckinghamshire which would be created by expansion. We note the encouraging job creation numbers: 5,600 additional direct jobs at the airport, 9,000 net additional indirect and induced jobs across the three counties and around 13,800 temporary construction jobs to 2036		Buckinghamshire County Council and Aylesbury Vale District Council		Noted. Please see response to ref 9.1.1 for updated job estimates.	No

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.45	WSP note that it is unclear whether funding is already identified for the delivery of the East Luton highway improvements and whether it is realistic to assume these will be completed for the without airport expansion scenario.		WSP for Host Authorities		<p>It has been agreed with LBC officers that for modelling purposes the East Luton highway improvement schemes can be part of the Do Minimum scenario.</p> <p>Analysis of existing passenger numbers suggests that there is a limited volume of airport related traffic travelling to or from the east of the airport via roads such as the A1(M), A505 and A602. Similarly, in the future, major growth is not predicted from areas to the east of Luton with the majority of airport related traffic forecasted to access the airport from the M1.</p>	No
9.1.46	There is no reference to the emerging strategy for the A505 and the potential draw this may have across the region for access to the airport. WSP note that the modelling assumes that by 2024 the improvements to the A505 and related junctions proposed by the East Luton Study will have been implemented, but note that funding has yet to be identified for delivery of these		WSP for Host Authorities		<p>Please see response to ref 9.1.45.</p> <p>We are awaiting publication of the East Luton Study by Hertfordshire County Council. Upon publication we will consider its contents.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	improvements and whether this is a reasonable assumption to make for 2024 is unclear.					
9.1.47	The authority would expect the Employment Strategy to be progressed with input from CBC Officers from the Investment, Employment and Skills Team, and take full account of the points raised in our appendix. It is considered that the most appropriate means to secure the ETS is through the Section 106 and this should include employment opportunities during the construction phase and also the operational phase. A good example of a Local Employment Scheme that has been secured through the DCO process is for Covanta Energy Ltd. (CBC reference CB/13/00726/DCO). This would be a useful place to start with the ETS.		WSP for Host Authorities		Please see response to ref 9.1.35.	No
9.1.48	The following CBC services must be engaged with in the development of the ETS and its		WSP for Host Authorities		Please see response to ref 9.1.35.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>delivery: Business and Investment Team (social value, business support, inward investment); Employment and Skills Strategy Team. Bedfordshire Employment Skills Service (Adult Learning). CBC expect to see a strategy and programme that: - Provides details of job numbers, types, skills requirements, lead-in times and opportunities. - Is underpinned by a strong understanding of local supply chains both existing and potential. - Is embedded and complements existing provision such as that already provided by adult learning teams. - Targets schemes to capacity build local businesses and supply chains to enable them to access opportunities. - Delivers school engagement which links in with existing provision (e.g. current Careers Enterprise Company). - Maximises both construction and end use employment opportunities, embedding employment and skills clauses</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	in contracts and agreements where possible.					
9.1.49	Other diversified investments would serve neighbouring communities well, whilst the proposed expansion will go a long way towards destroying the fabric of local communities, their health, happiness and the environment. More vision is needed that has real consideration for the environment and greater community.			1	Please see response to ref 9.1.4.	No
9.1.50	Any expansion would need to be funded by borrowing and for a project of this size (I have heard estimates in the order of £2.5bn) and one reliant on future revenues based on unproven forecasts; the cost of borrowing would be high. If one accepts the assumptions of time taken to complete the construction and growth in passenger numbers (which I don't anyway) made in the proposals and the existing			1	Please see response to ref 9.1.24.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	revenue to Luton of £3/passenger a simple calculation clearly shows that the increased revenues will not even be sufficient to pay the annual interest on the borrowing.					
9.1.51	I think economic case is overstated and optimistic			1	Please see response to ref 9.1.1.	No
9.1.52	I am sceptical about the increase in employment suggested. Ask anyone in retail - an increase in footfall does not directly correlate to an increase in staff.			1	Please see responses to ref 9.1.12 and 9.1.25.	No
9.1.53	The benefits are based on project passenger growth forecast that will only come into existence after a 14-year construction period. No-one can any confidence in the accuracy of such forecasts. It is mathematical illiteracy			1	Please see response to ref 9.1.26.	No
9.1.54	Question the real benefits and outcomes if they were to proceed.			1	Please see responses to ref 9.1.1, 9.1.2, 9.1.12 and 9.1.13.	No

Ref	Comment	PC	LA	No PILs	Response	Change
9.1.55	The economic assessment as part of the proposal does not follow good practice for economic assessment (e.g. as used in the Green Book). The number of jobs lost is not quantified: The additional local congestion and noise precludes the development of a number of small enterprises in North Hertfordshire and parts of Bedfordshire. This should be properly documented.			1	Please see responses to ref 9.1.12 and 9.1.13.	No
9.1.56	Most jobs created will be low income - catering, cleaning etc. This is unlikely to create the economic benefits claimed in the report. If you don't earn much, you have little to spend - in fact likely to be a bigger drain on local resources (needing housing benefits etc, pressure on social housing).			1	Please see response to ref 9.1.8.	No
9.1.57	I believe your projections to be highly inflated and optimistic given that there is no guarantee that the passenger numbers will			1	Please see response to ref 9.1.26.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	increase by the amount you have stated.					
9.1.58	As far as I can see from the consultation document, the national and regional benefits claimed are highly speculative. More importantly could equally well be applied to any other airport in the South East and UK. Therefore, they should be claimed as exclusive to Luton and for this reason totally disregarded.			1	Please see response to ref 9.1.1.	No
9.1.59	"Aviation at the heart of UK Economic Success... growing tourism" DOT Report 12/18. How does UK Citizens going on holiday abroad including weekend breaks all over Europe improve the UK economy? Expansion unnecessary and undesirable.			1	Please see response ref 9.1.19.	No
9.1.60	LLAL and LBC should not expect Luton and Bedfordshire residences to pay for the expansion through higher taxes.			1	Please see response to ref 9.1.10.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	The airport revenue should go against tax in a rebate.					
9.1.61	No mention of the amount of funds from the current users.			1	Please see response to ref 9.1.10.	No
9.1.62	Risk to Luton taxpayers - spending a lot of money to prepare for expansion before government policy on this has been decided is risky.			1	The Proposed Development is in line with Government policy on making best use of existing runways. Please see response to ref 9.1.10 for further details on the funding arrangements for the Proposed Development.	No
9.1.63	easyJet remains committed to generating employment opportunities as well as connectivity into Luton.			1	Noted.	No

Table A9.3: Regard had to statutory consultation responses on Employment and economics - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
9.2.1	The Proposed Development will not have any economic benefits. Respondents consider there would be no benefits either locally, regionally, and/or nationally. Specific locations that would not benefit from the Proposed Development include: Luton, Hertfordshire, Bedfordshire, Midlands, Harpenden, Wigmore, Vauxhall, local schools, other locations underneath the flight path; and less affluent surrounding areas.	229	Please see response to ref 9.1.1.	No
9.2.2	The projected economic benefits of the Proposed Development have not been assessed in comparison to the environmental cost of expansion. Any economic benefits are outweighed by environmental costs locally, regionally and nationally.	373	Please see response to ref 9.1.2.	No
9.2.3	The Proposed Development is not necessary therefore considering options to maximise employment, skills and training opportunities within the local community is irrelevant.	1	Please see response to ref 9.1.4.	No
9.2.4	The local area has a low unemployment rate and as a result there is no need for the additional jobs that the airport will create in future. Some respondents are concerned that the staffing requirements resulting from the Proposed	33	Please see response to ref 9.1.3.	No

Ref	Comment	No CC	Response	Change
	Development will need to be outsourced those living outside of the local area which is likely to create/exacerbate adverse traffic effects from commuters and place further pressure on the local housing market. The Proposed Development is not needed to maximise employment, skills and training opportunities to benefit neighbouring communities and will have negligible benefits locally, regionally and nationally.			
9.2.5	There are alternative methods to maximise employment, skills and training opportunities to benefit neighbouring communities which do not require expansion. This includes investing the funding in other development projects and/or sectors including public transport (including electrification of the rail infrastructure), the renovation of Luton, green infrastructure, renewable and/or green energy, carbon offsetting the existing airport facilities, green industry hub within the enterprise zone, tree planting, electric vehicles, green aviation technology and local libraries.	279	Please see responses to ref 9.1.1 and 9.1.4.	No
9.2.6	The Proposed Development should prioritise recruitment of local residents. Suggestions to encourage and promote local recruitment include: utilising both traditional methods and new technology to publicise employment opportunities and contracts, dedicated airport careers office and	34	Please see responses to ref 9.1.5, 9.1.6 and 9.1.7.	No

Ref	Comment	No CC	Response	Change
	website, a local training centre, job fairs/road shows, increased advertising along public transport routes, prioritising local residents for jobs.			
9.2.7	The Proposed Development should support and promote the development of apprenticeship programmes to support the construction and operational phases. Respondents suggest targeting apprenticeship programmes toward local residents and neighbouring communities.	57	Please see response to ref 9.1.6.	No
9.2.8	Local recruitment and employment should be encouraged and enabled for jobs created from the Proposed Development. Respondents suggest a quota on local employees, targeting local school leavers, local job seekers, and working with local job centres to target local unemployed residents.	99	Please see response to ref 9.1.5, 9.1.7 and 9.1.15.	No
9.2.9	The Proposed Development should not proceed therefore there is no need to consider methods to maximise employment, skills and training opportunities for neighbouring communities.	4	Noted.	Yes
9.2.10	New or extended services ancillary to the main functions of the airport should be located outside of Luton including office space for airlines, commercial services etc.	1	Services such as operational offices for airlines and other services directly related to the operation of the airport does not necessarily have to be in close proximity to the airport. As identified in the Draft Need Case the supply chain that supports this economic activity is much more widely spread	No

Ref	Comment	No CC	Response	Change
			across areas around the airport and well beyond Luton.	
9.2.11	The Proposed Development should encourage high quality and responsible employers to operate at the airport, offering fair remuneration and working conditions for employees. Respondents have expressed concerns regarding the existing poor working conditions at the airport, specifically for those employees considered to be in "casual"/"unskilled" work. Some respondents considered the Proposed Development may exacerbate these issues. Some respondents also suggested the perception of airport jobs should be improved.	27	Please see responses to ref 9.1.8 and 9.1.16.	No
9.2.12	The Proposed Development should utilise the local supply chain and prioritise local businesses to deliver airport services to increase employment opportunities for local and neighbouring communities. Suggestions include prioritising local contractors/vendors for airport services, subsidised rent of commercial spaces for existing businesses and new businesses/start-ups etc.	11	Please see response to ref 9.1.1. Mechanisms for securing these benefits locally are currently being explored.	No
9.2.13	Further stakeholder engagement is required to inform ways to maximise employment, skills and training opportunities for neighbouring communities. Further engagement with groups including local parish councils, local councils, local	10	In developing the Draft ETS we have undertaken engagement with a variety of stakeholders. Further engagement will be undertaken to finalise the ETS	No

Ref	Comment	No CC	Response	Change
	business groups, educational institutions, and Job Centre. A residents association or "Citizen's assembly" comprising of members from local communities to work with local councils to help guide further stakeholder engagement and future decision making was also suggested.		in advance of the application for development consent being submitted.	
9.2.14	Establish a local innovation centre, including training facilities, to research and develop new technologies, with a focus on green/sustainable technologies, to support the Proposed Development and any associated services.	8	Please see response to ref 9.1.9.	No
9.2.15	Due to a downturn in air travel the Proposed Development is not viable and/or unnecessary and therefore suggested employment benefits have been over exaggerated. Additionally, some respondents considered the Proposed Development may have a detrimental impact on employment locally, regionally and nationally.	17	Please see response to ref 9.1.10 in relation to why we consider the Proposed Development to be viable and necessary. Our response to ref 9.1.1 provides further details on the positive impact the Proposed Development will have on employment locally, regionally, and nationally.	Yes
9.2.16	Remove barriers to employment to support to local job seekers/trainees/employees, including by providing free/subsidised transport to airport facilities and related businesses, and free/subsidised childcare.	3	These are recognised as important issues and are the subject of further consideration in the Draft ETS .	No
9.2.17	Ensure employment opportunities are available to everyone including deprived communities, under	3	This is central to the Draft ETS . Please see response to ref 9.1.5 for further details.	No

Ref	Comment	No CC	Response	Change
	represented groups, women, disabled people, youth, ethnic minorities, groups whose first language is not English and lower income families.			
9.2.18	The cost of the Proposed Development is considered to be unnecessary and unjustified given the downturn in airline travel. There is insufficient information on how the Proposed Development will be funded. Furthermore, the high costs of the Proposed Development in addition to other infrastructure projects in the area (e.g. DART, road improvements etc.) will fall on local communities and may be detrimental to the local economy.	61	Please see response to ref 9.1.10.	Yes
9.2.19	More detail is needed on the targets, commitments, monitoring and governance processes that would be adopted to maximise benefits arising from the Proposed Development.	9	Please see response to ref 9.1.11.	No
9.2.20	The number of forecast jobs and employment opportunities are overestimated, and the data behind the claimed job increases needs to be made clearer. The stated benefits do not reflect changing trends within the industry which favour new technology (e.g. increased automation, AI technology etc).	7	Please see response to ref 9.1.12.	No
9.2.21	The economic benefits of the Proposed Development are outweighed by other factors,	3	Please see response to ref 9.1.13.	No

Ref	Comment	No CC	Response	Change
	including impact on character/amenity of Luton and surrounding area, quality of life for residents (especially those located within the flight path), pressures on small businesses from national retailers, and impact on health and wellbeing.			
9.2.22	The information used to assess the Proposed Development does not indicate that economic growth is predicated on expansion of the existing airport facilities. Respondents believe pursuing the expansion of the airport facilities will exacerbate existing adverse impacts from the airport facility resulting in minimal economic benefits. Further investigation into other variables including adverse impacts on the character/amenity of Luton, quality of life for residents (especially those located within the flight path, other development (e.g. highways improvements, Century Park etc., Brexit, pressures on small businesses from national retailers, health and wellbeing etc. is required to provide an accurate assessment of the economic benefits of the Proposed Development.	6	Please see responses to ref 9.1.13 and 9.1.25.	No
9.2.23	The Proposed Development will not have any economic benefits. Respondents consider there would be no benefits either locally, regionally, and/or nationally. Specific locations that would not benefit from the Proposed Development include: Luton and surrounding areas; locations	43	Please see response to ref 9.1.1.	No

Ref	Comment	No CC	Response	Change
	underneath the flight path and less affluent surrounding areas.			
9.2.24	The Proposed Development will result in positive economic benefits on the local area, regionally and/or nationally. Specifically, the Proposed Development will result in positive economic impacts for the local area, including job creation, growth of local businesses and increased investment in the local area.	580	Noted.	No
9.2.25	The Proposed Development will not bring employment benefits suggested to the local community. Concern that new employment opportunities resulting from the Proposed Development will not benefit local residents. Concern that any new employment opportunities are largely related to “casual work”/zero-hour contracts and that the Proposed Development will create or exacerbate poor working conditions for these workers.	9	Please see response to ref 9.1.16.	No
9.2.27	Engage with local educational institutions (ranging from primary levels through to tertiary levels) and community organisations to promote education and employment opportunities associated with Luton Airport. Specific educational institutions and organisations include: University of Bedfordshire, University of Hertfordshire, Barnfield College, Cranfield, Online Courses, FE Colleges, British	126	Please see responses to ref 9.1.7 and 9.1.17.	No

Ref	Comment	No CC	Response	Change
	Chamber of Commerce, Federation of Small Businesses, Local Enterprise Partnerships, Bucks Business First, Stepping Stones, Voluntary Action Leicestershire (VAL), Luton Rights, Luton Irish Forum, Luton BID, Groundwork, Penrose, SMEP, Department of Education.			
9.2.28	Suggest alternative areas for investment which would be more beneficial and more sustainable. Suggestions include public transport climate change mitigation, and/or sustainable/green industries.	31	<p>Government policy supports airports making best use of their runways because of the economic benefits of air transport as set out in the Draft Need Case.</p> <p>As part of the Proposed Development improvements to public transport and sustainability measures are proposed to mitigate any potential impact of expansion. More broadly, how the wider economic benefits of the Proposed Development, such as its ability to attract investment and support innovation cluster development, are maximised locally is currently being considered.</p>	No
9.2.29	The Proposed Development will not benefit local residents. Concerns that any new employment opportunities are largely related to "casual work"/zero-hour contracts and that the Proposed Development will create or exacerbate poor working conditions of these workers	161	Please see responses to ref 9.1.8 and 9.1.16.	No
9.2.30	The applicant should implement initiatives to ensure economic benefits are shared locally and	38	Please see response to ref 9.1.17.	No

Ref	Comment	No CC	Response	Change
	regionally. Respondents would like profits from the Proposed Development to be invested back into the local area to support community facilities, improving local amenities, improving local schools, local services (e.g., police), local charities and non-profit organisations, Parish Councils, other infrastructure, community projects, economic development of existing businesses/industries and development of new employment opportunities for local communities. Further information is required to demonstrate how funds will be divested into the community. in areas such as Hertfordshire, Bedfordshire, Buckinghamshire, Wigmore, St Albans and locations within the flight path.			
9.2.31	The number and type of forecast jobs are overestimated and exaggerated. Any increase to employment opportunities is of little to no benefit to the local, regional or national economy. Some respondents suggest that the data used to estimate proposed job increases be clarified and made available to the public for review.	23	Please see response to ref 9.1.25.	Yes

A10 The Design

Table A10.1: Regard had to statutory consultation responses on the Design - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
10.1.1	There is merit in installing a new fuel pipeline to deliver fuel. The benefits of the proposed new fuel pipeline include safety, efficiency, sustainable, environmentally friendly, reduced traffic movements.	Highways England ¹		17	Noted.	No
10.1.2	Object to the Proposed Development, therefore any comments on the Masterplan are unnecessary.			10	Noted.	No
10.1.3	Supports plans to redevelop the existing terminal as a part of the wider development.			3	Noted. The Proposed Development includes an extension to Terminal 1.	No
10.1.4	Supports the proposed plans to develop Terminal 2 and associated facilities/amenities such as Luton DART, forecourt and coach station.			3	Noted.	No
10.1.5	Consider incorporating solar energy, wind energy, heat reclaim and storage			3	The Proposed Design already incorporated solar and geothermal energy. In response to feedback, we	No

¹ Since the 2019 consultation Highways England has changed its name to National Highways.

Ref	Comment	PC	LA	No PILs	Response	Change
	to help power the airport and associated facilities.				have updated the design to include more sustainability measures, such as designing Terminal 2 to BREEAM Excellent and Passivhaus principles. More information can be found in the Draft Sustainability Statement .	
10.1.6	The Proposed Development is not considered to meet the requirements of a modern-day airport facility and will not meet the demands of increased passengers. Respondents suggest any proposal should include more environmentally sustainable design.			3	The new terminal provides spatial capacity to accommodate 12 million passengers per annum in accordance with international design standards and as benchmarked against other airports with a similar airlines and fleet mix. Please see response to ref 10.1.5 in respect of sustainability measures.	Yes
10.1.7	Support for the proposed new fuel pipeline to deliver fuel if it can be constructed to ensure the protection and safety of the environment and local community.			6	Noted.	No
10.1.8	Concerns regarding the safety and security risks associated with the proposed fuel pipeline. Request further information on the safety measures to be implemented to avoid risk of terrorism, leakages, fire/explosion			4	The national fuel pipeline already exists to supply fuel to other locations throughout the UK. The proposal is to build a short spur connection, between the existing fuel pipeline and the proposed fuel storage facility at the airport.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	hazards, and nuisance to the local community (noise, smell).				It is proposed that the pipeline be fitted with a sophisticated and sensitive leak detection system which can detect and pinpoint the location of leaks within minutes of them occurring, which includes detection of deliberate interference. If a leak is detected there is an existing emergency procedure in place.	
10.1.9	Oppose proposal to deliver fuel by a new fuel pipeline and proposed fuel storage.			2	Noted. We have considered this matter carefully and believe that the inclusion of the pipeline provides environmental benefits including a reduction in traffic by removing fuel trucks from local roads.	No
10.1.10	Objects to the details of the proposed masterplan, specifically the size, scale and location of the expansion. Some respondents were specifically concerned that there is insufficient space to accommodate the proposed expansion and increased number of flights and passengers.			2	<p>The location of the Proposed Development has been carefully selected through a three stage sift process whilst ensuring compliance with Government policy to make best use of the existing single runway.</p> <p>We have incorporated flexibility into our design to allow incremental growth which responds to passenger demand, for example we have adjusted our second terminal to be modular. The scale of the development has also been designed and benchmarked</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>against other UK airports of similar scale and intended airline users.</p> <p>The most recent sift report is appended to the Works Description Report (WDR), and previous sift reports can be found on the Luton Rising website.</p>	
10.1.11	<p>Permanently linking the airport to a piped supply of aviation fuel seems counter to requirements to move away from fossil fuels and meet UK targets on net zero carbon. Suggestions to explore more sustainable alternatives to development that support the use of fossil fuels to support the air travel industry such as electrification.</p>			1	<p>We have held discussions with the fuel companies in respect of Sustainable Aviation Fuels (SAFs). The rollout of these is expected to be led by the fuel refining companies and aircraft manufacturing companies. As SAFs become viable the percentage of SAF blended with the fuel received via the pipeline will increase. The fuel pipeline will therefore be part of the solution to decarbonise air travel.</p> <p>Whilst electric aircraft are being developed now, commercially, and operationally viable electric aircraft will not be available for some time. Nevertheless, our design safeguards for the future use of electric planes by providing a new electricity substation at Terminal 2 and safeguarding space on each stand for additional charging equipment.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					The use of hydrogen as aviation fuel for aircraft is currently in early developmental stages. However, our design does not preclude its use in the future.	
10.1.12	Objects to the proposed plans to redevelop the existing terminal facilities. The Proposed Development will result in an overcrowded airport facility that will put pressure on the local area. Respondents suggest repurposing the airport including renewable energy production (solar power farm, wind farm), rewilding/green space.			6	Please see the responses to ref 10.1.5 and 10.1.10.	Yes
10.1.13	Do not consider building a second runway.			1	<p>At this current time, we have no intention of progressing a second runway.</p> <p>The proposed design is based on existing Government policy to make best use of the airport's existing single runway. This approach is consistent with our vision for sustainable growth and in line with emerging Government policy and wider objectives. During the sifting process, sub-options of a realigned, extended, or new second runway were reviewed. These options</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>performed significantly less well against the Strategic Fit criteria than the options which maintained the existing runway. These sub-options were assessed as ‘Large Adverse’ in terms of consistency with emerging Government policy for aviation, national planning policy and in terms of deliverability and cost (reference Luton Rising Sift 1 Report, Final, dated February 2019).</p> <p>As such, we will not be progressing with a second runway.</p> <p>The most recent sift report is appended to the WDR, and previous sift reports can be found on the Luton Rising website.</p>	
10.1.14	Concerns regarding the location of the proposed pipeline route through the Chilterns AONB or candidate AONB land and the adverse effects to this area resulting from the pipeline.	Chilterns Conservation Board		1	<p>The pipeline route does not cross the Chilterns AONB but is within Green Belt land and candidate Chilterns AONB.</p> <p>The national fuel pipeline already exists to supply fuel to other locations throughout the UK. The proposal is to build a short spur connection, between the existing fuel pipeline and the proposed fuel storage facility at the airport.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Careful consideration has been given to addressing the protections of the Green Belt around Luton and adjacent to the airport. In response to the concerns raised at the 2019 consultation we have given careful consideration to the optimal arrangements for the Proposed Development. Apart from the proposed new installation at the connection to the fuel pipeline for which very special circumstances will be demonstrated, the proposed fuel pipeline does not result in built development encroaching on Green Belt boundaries adjacent to the airport.	
10.1.15	Opposes the proposed plans to develop Terminal 2 and associated facilities/amenities such as Luton DART, forecourt and coach station.			2	Noted.	No
10.1.16	We support well considered works that improve the existing terminal without impacting on the surrounding areas.	Kings Walden Parish Council		1	Noted.	No
10.1.17	Concerns that the visualisations of the Proposed Development are unrealistic,			1	The visualisations of the Proposed Development are indicative only. The detailed design of the terminal will be undertaken after the application for	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	and the terminal as built will be lower quality.				development consent has been submitted. The DCO will likely include provisions requiring consultation with the Local Planning Authorities on the exterior facades of the development.	
10.1.18	It is ill conceived and in the wrong place for easy access.			1	Please see response to ref 10.1.10.	No
10.1.19	Suggest the existing runway should be moved or reorientated.			1	The Proposed Development has been carefully selected following a three stage sift process which did consider options to re-orientate and/or extend the existing runway. However, these options were discounted. The proposed development is aligned to Government policy of making best use of existing runways. The most recent sift report is appended to the WDR , and previous sift reports can be found on the Luton Rising website.	No
10.1.20	Support or suggest a second runway or extension of the existing runway.			1	Please see responses to ref 10.1.13 and ref 10.1.19. Whilst no extension to the current runway is proposed, improvements to the existing runway including improved	No

Ref	Comment	PC	LA	No PILs	Response	Change
					taxiways are included in the Proposed Development.	
10.1.21	Kings Walden Parish Council supports an underground pipeline but is concerned at the proposed storage facility. Bulk storage should be avoided. The pipeline should be capable of delivering fuel on an as needed basis. You need to supply an independently assessed risk analysis.	Kings Walden Parish Council		1	<p>The pipeline delivers various types of fuel to different locations and is not dedicated to the airport. It is anticipated that, batches of fuel will be delivered via the pipeline every 3-5 days and will be stored in the fuel storage facility. Fuel from the storage facility will then be pumped to the apron via a different system as required.</p> <p>The siting of the proposed fuel storage facility is in accordance with the advice from Health and Safety Executive (HSE) Planning Advice for Developments near Hazardous Installations (PADHI) and outside the runway strip, approach/take off controlled airspace areas (funnels). Safe buffer distance is maintained from residential properties and areas used by public as required by PADHI, Major Accident Hazards (COMAH) regulation, and Dangerous Substances and Explosive Atmospheres regulations.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
10.1.22	2.5.140-141 This paragraph discusses the potential reduction in the number of fuel tanker delivery movements to the airport owing to the provision of a hydrant fuelling system for the new Terminal 2 and connection to an existing fuel main. The reduction in the number of deliveries is questioned because the existing delivery process and capacity to Terminal 1 is unchanged. Therefore, it is suggested that there will not be an increase in delivery movements arising from the development rather than an overall decrease.	Civil Aviation Authority			The Proposed Development includes the option to provide a pipeline link between the proposed new fuel storage facility and the existing facilities and this is the preferred option. Further assessment will be undertaken and reported in the ES submitted with the application for development consent.	No
10.1.23	Incidents and Accidents The PEIR includes a methodological assessment of potential significant environmental impacts arising from the hazards of a major accident or disaster, and proposed mitigation measures. The ES should contain further detail in respect to the planned risk assessment and proposed mitigation measures once the project detail is finalised.	Public Health England			Further assessment will be reported in the ES submitted with the application for development consent. Further information can also be found in the Chapter 15 Major Accidents and Disasters of the PEIR.	No

Ref	Comment	PC	LA	No PILs	Response	Change
10.1.24	In Chapter 19 of the PEIR volume 1, in relation to aviation security, it should be noted that it is important that security managers work closely with project managers and designers to ensure that the relevant threats and risks are understood, and the right security outcomes are delivered through design. Guidance to airport operators is offered in the Department for Transport publication Aviation Security in Airport Development 2017.	Civil Aviation Authority			Noted. The detailed design of facilities and associated procedures will be in accordance with prevailing legislation, guidelines and local practice, and only after full engagement with the relevant authorities.	No
10.1.25	Fig.3.4 Zone 2 The European Action Plan for the Prevention of Runway Incursions (EAPPRI) V3.0 contains recommendations for aerodrome design in that new infrastructure and changes to existing infrastructure should be designed to reduce the likelihood of runway incursions. The scheme development proposal shows two new rapid exit turn-offs from the runway intersecting with existing taxiway infrastructure which have the potential to introduce a complex and possibly confusing design at both the east and west ends of the runways. This design should be fully assessed against the EAPPRI recommendations	Civil Aviation Authority			Noted. The details of the taxiway junctions will be subject to further assessment prior to submission of the application for development consent.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	to ensure that it does not increase the likelihood of a runway incursion.					
10.1.26	The Luton DART and the Terminal 2 public transport facilities, including the coach station will be essential to the achievement of the forecast sustainable transport mode share.	Highways England			Noted.	No
10.1.27	As a matter of practicality, we support the logic of developing a second terminal, to enable passenger growth, allowing that growth to be phased and delivered in a way which minimises disruption to existing airport operations during construction.		Dacorum Borough Council		Noted.	No
10.1.28	Fuel Farm The new fuel farm will fall within the Control of Major Accident Hazard Regulations (COMAH) 2015. The COMAH regulations are enforced by the Competent Authority, the Environment Agency and Health and Safety Executive. When the Operator of the facility is known, they should contact the Competent Authority for pre-application discussions. This development must comply with	Environment Agency			All relevant consents that are required and which cannot be consented through the DCO will be sought.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Environmental Permitting (England and Wales Regulations 2016 (as amended), and it is likely that it will require an Environmental Permit issued by the Environment Agency prior to commencement. The applicant is advised to seek enhanced pre-application advice through the appropriate preapplication forum to discuss the issues likely to be raised.					
10.1.29	Accessibility 4.1 EU Regulation EC1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air states in the recitals that - In deciding on the design of new airports and terminals, and as part of major refurbishments, managing bodies of airports should, where possible, take into account the needs of disabled persons and persons with reduced mobility. Similarly, air carriers should, where possible, take such needs into account when deciding on the design of new and newly refurbished aircraft. As a result, it would be useful for Luton to consider the evidence that such matters have been considered. 4.2 Under CAA guidance document,	Civil Aviation Authority			The Proposed Development will be designed in full compliance with the Disability Discrimination Act 1995 and related legislation. Additionally, airports are legally required to provide assistance to Persons of Restricted Mobility at any stage of the passenger journey from arrival at the airport to the aircraft seat and the airport will continue to comply with all such obligations.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	CAP1228, UK airports with more than 150,000 passengers a year must consult with disability organisations, through setting up an advisory forum. This could include consultation with disability organisations regarding accessibility of infrastructure, including in relation to the new terminal building. Aviation Security					
10.1.30	This paragraph refers to it not being possible to retrofit a hydrant system to the existing Terminal 1 stands. It is suggested that this could be achieved if the phasing of the introduction of new T2 stands is enough to allow phased closure of T1 stands to enable construction. It is suggested that this is explored the retrofitting of a hydrant system to T1, if possible, would reduce the number of fuel delivery movements to the airport.	Civil Aviation Authority			Various options have been investigated to bring a hydrant supply to the T1 area. However, retrofitting in the existing apron is outside of the scope of the application for development consent.	No
10.1.31	The scheme intends to provide one access from the relocated fire training ground to the runway, directed towards the eastern end of the runway. It is suggested that separate accesses towards both ends of the runway could	Civil Aviation Authority			Noted. The Proposed Development has been updated to incorporate access towards both ends of the runway from the Fire Training Ground (FTG).	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	be provided, thereby minimising response times.					
10.1.32	This proposal to permanently plumb-in the airport to a piped supply of aviation fuel seems counter to requirements to move away from fossil fuels and find zero-carbon aviation technologies in order to meet UK legally binding targets on net zero-carbon. CCB's position would also depend on where the pipeline would travel and whether it is through the Chilterns AONB or candidate AONB land. Wherever it is located, the impacts of constructing and operating the pipeline would need full assessment to consider for instance impacts on species, habitats, hedgerows and greenfield land, impacts on the chalk aquifer (including pipeline construction methods and risks of fuel contamination of soils and groundwater), adequacy of restoration plans after pipeline construction, and whether any visible traces would be left above ground.	Chilterns Conservation Board		1	Please see responses to refs 10.1.8 and 10.1.9. Please refer to Natural Environment topic in respect of impacts on habitats and restoration after the pipeline has been constructed.	No
10.1.33	The relocation of the long-term car park will be a hideous eyesore and source of pollution for the duration of	Kings Walden Parish Council		1	Please see the response to ref 10.1.10.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the development order. As it is temporary and preparatory it will take away an existing green space and be unshielded by any landscaping.					

Table A10.2: Regard had to statutory consultation responses on the Design - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
10.2.1	There is merit in installing a new fuel pipeline to deliver fuel. The benefits of the proposed new fuel pipeline include safety, efficiency, sustainable, environmentally friendly, reduced traffic movements.	319	Noted.	No
10.2.2	Object to the Proposed Development, therefore any comments on the Masterplan are unnecessary.	118	Noted.	No
10.2.3	Supports plans to redevelop the existing terminal as a part of the wider development. The following specific suggestions were made: roof repairs, structural repairs, utilities repairs, expanded or improved retail/hospitality services, reduction in retail services, increased seating, high quality design, iconic design features, visual enhancements (including art), public amenities, improved accessibility, renewable energy, improved airport services, triple glazing and sufficient fire exits.	79	Noted. The Proposed Development includes an extension of Terminal 1 to provide additional capacity beyond the current planning cap. Detailed design suggestions will be considered at the detailed design stage.	No
10.2.4	Supports the proposed plans to develop Terminal 2 and associated facilities/amenities such as Luton DART, forecourt and coach station.	101	Noted.	No
10.2.5	Consider incorporating solar energy, wind energy, heat reclaim and storage to help power the airport and associated facilities.	32	Please see response to ref 10.1.5.	Yes

Ref	Comment	No CC	Response	Change
10.2.6	The Proposed Development is not considered to meet the requirements of a modern-day airport facility and will not meet the demands of increased passengers. Respondents suggest any proposal should include more environmentally sustainable design.	19	Please see response to ref 10.1.6.	Yes
10.2.7	Suggest existing terminal and facilities should be demolished and rebuilt, rather than redeveloped and expanded	3	<p>We recognise that many people are not happy with the passenger experience while using the existing terminal.</p> <p>Nevertheless, it is a functioning terminal located in the centre of the airport. The timescales involved in replacing the existing terminal would not enable continuity of airline operation, and this would also cause increased disruption.</p> <p>As part of the Proposed Development Terminal 1 will be expanded.</p>	No
10.2.8	Support for the proposed new fuel pipeline to deliver fuel if it can be constructed to ensure the protection and safety of the environment and local community.	99	Noted.	No
10.2.9	Concerns regarding the safety and security risks associated with the proposed fuel pipeline. Request further information on the safety measures to be implemented to avoid risk of terrorism, leakages, fire/explosion hazards, and nuisance to the local community (noise, smell).	102	Please see response to ref 10.1.8.	No

Ref	Comment	No CC	Response	Change
10.2.10	The proposed new fuel pipeline should progress regardless of the expansion.	16	Noted.	No
10.2.11	Concerns that any increase in fuel storage will increase the risk of fire and explosion. Suggestions include reducing the existing storage capacity on the site and relocating the storage/fuel-farm site away from the airport site.	9	Please see response to ref 10.1.21.	No
10.2.12	Oppose the construction of the new fuel pipeline and/or fuel storage within the Green Belt due to the adverse impacts including on the Green Belt and rural areas, especially during construction.	11	Please see response to ref 10.1.9 and 10.1.14.	No
10.2.13	Oppose proposal to deliver fuel by a new fuel pipeline and proposed fuel storage.	43	Please see response to ref 10.1.8 and 10.1.9.	No
10.2.14	Oppose expansion therefore any plans for a new fuel pipeline and fuel storage is not necessary.	2	Please see response to ref 10.1.8 and 10.1.9.	No
10.2.15	Objects to the Proposed Development and therefore opposes the details of the masterplan.	72	Noted.	No
10.2.16	Objects to the details of the proposed masterplan, specifically the size, scale and location of the expansion. Some respondents were specifically concerned that there is insufficient space to	46	Please see response to ref 10.1.10.	No

Ref	Comment	No CC	Response	Change
	accommodate the proposed expansion and increased number of flights and passengers.			
10.2.17	Permanently linking the airport to a piped supply of aviation fuel seems counter to requirements to move away from fossil fuels and meet UK targets on net zero carbon. Suggestions to explore more sustainable alternatives to development that support the use of fossil fuels to support the air travel industry such as electrification.	86	Please see response to ref 10.1.11.	No
10.2.18	Objects to the proposed plans to redevelop the existing terminal facilities. The Proposed Development will result in an overcrowded airport facility that will put pressure on the local area. Respondents suggest repurposing the airport including renewable energy production (solar power farm, wind farm), rewilding/green space.	69	Please see the responses to ref 10.1.5 and 10.1.10.	Yes
10.2.19	Do not consider building a second runway.	3	Please see response to ref 10.1.13.	No
10.2.20	Separate access towards both ends of the runway should be provided from the fire training ground.	1	Please see response to ref 10.1.31.	Yes
10.2.21	The existing fire station should remain where it is.	1	The fire station will remain in its current location in the Proposed Development.	No

Ref	Comment	No CC	Response	Change
10.2.22	Further information is needed to understand the interim location of fire services during the construction period.	1	The existing provision at Terminal 1 will remain live during the construction of Terminal 2.	No
10.2.23	Further information is needed to understand accident and safety procedures relating to fire services.	1	Procedures will be developed to align with legislation, guidelines and local practice at the time of construction, and only after full engagement with the relevant authorities.	No
10.2.24	Support plans to deliver fuel via a new pipeline however suggests retaining deliveries by tankers as well as exploring alternative methods of transport including rail, DART.	5	Noted.	No
10.2.25	Concerns regarding accessibility for disabled people.	3	Please see response to ref 10.1.29.	No
10.2.26	Suggests airlines should be allocated to a specific terminal rather than being split to help with passenger accessibility.	1	It is acknowledged that it is more efficient for an airline to operate in a single terminal. Please also see response to ref 10.1.6.	No
10.2.27	Opposes the proposed plans to develop Terminal 2 and associated facilities/amenities such as Luton DART, forecourt and coach station.	46	Noted.	No
10.2.28	Currently there is no plan for any maintenance facilities around the expanded area and only one road crossing from the current airport to the new stands which could provide problems during busy times for maintenance providers to attend aircraft. If another	1	A dedicated crossing point will be added for ease of vehicle movements between the two terminals. The Engine Run-Up Bay is considered as buffer stands in terms of overnight parking and so is not intended for	Yes

Ref	Comment	No CC	Response	Change
	<p>road crossing could be created this would give more options to get between the two terminals and cause fewer long running technical delays. There was also an interim solution for providing more stands to reach 21mppa of using the current engine run-up bay along with creating a new area. The run-up bay will likely be used to park aircraft overnight, which is exactly when maintenance is done which will then require the bay for engine runs before the first wave departures. Given its remote location it is more practical to park the aircraft closer to the maintenance bases on the airport and tow the aircraft for a morning run than park them in the bay and work there. In this situation there would likely be operational effects to both the airport and the airlines as aircraft would have to be moved around to enable a run to be carried out in time for departure. If this can be avoided it will likely benefit everyone.</p>		<p>regular use but to provide operational flexibility.</p> <p>An area to the east of the proposed terminal has been identified for airport operations and maintenance facilities.</p>	
10.2.29	<p>The existing terminal is currently the worst terminal visited by me worldwide. Overcrowding, congestion, the need to rush from one point to another due to poor departure planning, inefficient security and inadequately trained staff are common. The design and layout of the terminal makes it feel like a rabbit warren of passages, corridors and a distinct shortage of space. It is clear that the terminal redevelopment was carried out by people without foresight and a developmental approach to planning and space management. Passenger delays, especially time spent in terminals and traversing the airport are excessive</p>	1	<p>Please see responses to ref 10.1.6 and 10.2.7.</p>	No

Ref	Comment	No CC	Response	Change
	<p>due to this congestion. Inefficiencies in baggage handling (from airside to landside) and poor access points result in a poor arrivals experience. The services arrivals side could also be greatly improved. The layout of the airport precincts do not facilitate effective through flow of passengers complicated by single entrance/exit road network and overpriced inefficient parking. Your proposals for the existing terminal merely continues this theme...they reflect a lack of foresight, an absence of developmental and space management. Quite frankly, the only improvement to your proposals would be demolish the existing terminal and start again.</p>			
10.2.30	<p>The airport is already trying to put the infrastructure in place for 32 million passengers without approved planning agreed.</p>	1	<p>No infrastructure associated with the Proposed Development will be delivered in advance of all necessary consents being in place. There is an existing planning permission for the operator, LLOAL, to deliver Project Curium, delivery of which is currently underway.</p>	No
10.2.31	<p>Suggestions for the design of Terminal 2: integration with existing airport facilities, should consider the long-term strategy for the airport beyond the DCO application, sustainable design, high quality design, high quality airport services, iconic design features (e.g., timber roof), public amenities, improved retail/hospitality space, accessibility, triple glazing,</p>	16	<p>Noted. Suggestions for the detailed design are welcomed and will be considered at the detailed design stage.</p>	No

Ref	Comment	No CC	Response	Change
	sufficient fire exits, inclusion of travellators, explore options to locate new facilities underground.			
10.2.32	Inclusion of a de-icing bay, calibration bay, and engine ground running bay is essential to any airport.	1	Noted.	No
10.2.33	Concerns that the visualisations of the Proposed Development are unrealistic, and the terminal as built will be lower quality.	1	Please see response to ref 10.1.17.	No
10.2.34	The terminal has not yet been completed so it is hard to assess the impact.	1	<p>A Reference Design has been developed to inform the scheme layouts and for assessment. The reference design is based on forecasts and informed by international design guidance appropriate for the type of operation envisaged.</p> <p>The PEIR sets out the preliminary environmental assessment of the Proposed Development. This will be further developed into an ES which will be submitted as part of the proposed application for development consent.</p>	No
10.2.35	Has the airfield been laid out in such a way to minimise aircraft taxiing? Or has it been laid out with the time and logistics of making aircraft as the key focus.	1	The proposed airfield layout as shown in the WDR and associated drawings has been set out to minimise the delays to aircraft on the ground and hence reduce taxiing distances, such as through direct taxiway links at the ends of the runway. In	Yes

Ref	Comment	No CC	Response	Change
			<p>delivering the additional airfield infrastructure required to support increased capacity, a number of requirements have been considered. These include:</p> <ul style="list-style-type: none"> a) maintaining and where possible, improving the existing operations of the airfield; b) developing a scheme that is operationally efficient, safe and secure; c) developing a scheme that is resilient and adaptable to future changes; d) sizing the scheme appropriate for 32 mppa; and e) constructing and releasing stands progressively in line with need. <p>The Proposed Development addresses these requirements by improving the taxiway connectivity to the runway to allow aircraft to enter and exit the runway more efficiently, taxiing with less need to stop en-route, therefore reducing fuel burn. The location of the additional apron is close to the existing runway, further minimising taxiing times of aircraft.</p>	

Ref	Comment	No CC	Response	Change
10.2.36	<p>No consideration has been given to other sites within the current footprint which would have delivered an increase in terminal space. On the North side of the main apron, there is an extensive hangar line with direct access to parking stands which currently require coaching of passengers for boarding. All of these hangars apart from the TUI maintenance operations support no daily maintenance operations, as all are now used for executive aircraft hangarage, and one is vacant. This hangar line could be replaced with a two or even three storey building to provide the floor space which the current plan produces, and stay within the current visual landscape, as the current structures are of similar height. The structure could be either purely airside lounges, or split with a landside concourse facility as the site sits on Percival Way, the central spine road of the current site. All deliverable on site, with no increase in road network, no effect on local residential road networks, and no loss of local green space amenity or disruption of the landfill site.</p>	1	<p>Please see response to ref 10.1.6 and 10.1.10.</p>	No
10.2.37	<p>If relocating fire training - where is the best place for active units?</p>	1	<p>The FTG will be relocated to the south side of the runway in Phase 2. This will include all associated buildings which are in the vicinity of the existing FTG. The fire station will remain in its current location.</p> <p>The detailed design of the new fire training rig would be undertaken in consultation with airport rescue and fire fighting service</p>	No

Ref	Comment	No CC	Response	Change
			and the regulator to ensure all end user requirements are captured.	
10.2.38	It does not need to be separated into a T1 and T2	1	Options to extend the existing terminal have been explored and assessed. Due to the site constraints, in particular the taxiway network, and the additional terminal space and functions required to meet the demand, it is not possible to develop an efficient solution. Options to build a single new terminal and close the existing were also assessed but did not score well in terms of cost. Details of the options considered can be found in the sift reports. The most recent sift report is appended to the WDR , and previous sift reports can be found on the Luton Rising website.	No
10.2.39	Perhaps consider terminal 2 becoming an arrivals or departures only terminal thereby all supporting facilities in the nearby precinct support that activity.	1	This proposal would not align with the operational modal of airlines.	No
10.2.40	Will the existing site be rationalised to create a better development and further development for the airport.	1	The existing terminal will be expanded in terms of the building, car parks and aprons. The proposals seek to make best use of the existing facilities.	No
10.2.41	General support for airfield proposals.	2	Noted.	No

Ref	Comment	No CC	Response	Change
10.2.42	Suggest the existing runway should be moved or reorientated.	8	Please see response to ref 10.1.19.	No
10.2.43	Support or suggest a second runway or extension of the existing runway.	16	Please see response to ref 10.1.20.	No

A11 Wigmore Valley Park

Table A11.1: Regard had to statutory consultation responses on Wigmore Valley Park - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
11.1.1	Concerns that there may be low levels of usage of the proposed Wigmore Valley Park.			3	<p>We recognise that Wigmore Valley Park is important to the public.</p> <p>We are committed to providing open space for the public to enjoy that is more attractive and usable to a wider range of people than the current offer. We have worked hard to ensure that what we offer is not only of a very high quality but is also larger in size - the Proposed Development includes a 10% larger land area for Wigmore Valley Park.</p> <p>The replacement open space remains in relatively close proximity to the existing park and residential edge of Wigmore. The new park is no closer to the airfield or air traffic than the existing park.</p> <p>Although the replacement open space will be located further to the east, the main entrance into Wigmore Valley Park from Eaton Green Road will be retained and overall accessibility and</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>connectivity within the replacement open space will be improved, through the upgrading of footpaths and bridleways. These will be suitable for a range of users, including both walkers and cyclists, and appropriate signage and facilities will be included to help support various user groups.</p> <p>We have updated our design in response to feedback received to retain as much of the existing Park as possible and remodeled the new area so that it is much better connected to the existing area of open space.</p> <p>User counts and quality surveys were completed at Wigmore Valley Park. These are reported in the health and community assessment (see Chapter 13 Health and Community of the PEIR). User questionnaires have also been undertaken to understand more about the types of users and activities undertaken at the existing park.</p>	
11.1.2	Concerns with the habitat replacement proposed at Wigmore Park. Specific			6	The Consultation Brochure provides details of the proposed park. The replacement park will	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>concerns included objections to the replacement park, as the existing park is established with mature trees and ecosystems, which will take decades to reach the same level, as well as concerns that saplings will be planted, which have less benefit to the environment than mature trees which currently help reduce air pollution. Additionally, concerns included that the site lies on an existing landfill site, concerns that there will be knock-on effects for the natural ecosystems present currently, general concerns that landscape proposals are insufficient, concerns that the park won't be circular, or that there is a lack of clarity in proposals, and that proposals are just redesignating existing public space rather than delivering additional space.</p>				<p>incorporate several of the enhanced facilities proposed in this area as part of New Century Park application (application ref. 17/02300/EIA).</p> <p>The majority of the current Wigmore Valley Park County Wildlife Site (CWS) will be lost as a result of the Proposed Development. We have changed our design to retain as much of the existing park as possible and designed the replacement area so that it offers greater opportunity to support biodiversity, including orchids. Once established, this area will also mitigate for the loss of habitats within the current CWS currently used for foraging, dispersal, and shelter by a range of wildlife species.</p> <p>Proposed amendments to the design include a reduced platform and earthworks, including excavation of the landfill and associated impacts. These are set out in the Works Description Report (WDR) and the Construction Method Statement and Programme Report in</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Appendix 4.1 of Volume 3 of the PEIR.</p> <p>The design has sought to avoid valued tree cover where possible but would result in the loss of a number of mature trees. Due to the existing ground conditions, it is not possible to translocate affected trees or plant mature trees without causing greater environmental impacts.</p> <p>The proposed park will provide an area of space that is at least as good in usefulness, attractiveness, quality, accessibility and at least 10% larger than the current provision.</p> <p>The Proposed Development makes available for public access land that is currently in use as productive farmland. The Replacement Open Space is at least 10% greater in size than that existing and defined in Figure 2.2 in Volume 4 of the PEIR.</p>	
11.1.3	Concerns with the management and maintenance of the proposed Wigmore Park, with concerns			1	It is our intention that the new park be placed into the control of a new Community Trust which would include as Trustees, local	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>that the Airport doesn't have the expertise to manage the park, which might lead to financial neglect and insufficient management and protection. Concerns also queried the logistics of funding and management with the Park being split across multiple authorities, as well as a lack of clarity in consultation material regarding the habitat / vegetation management period, management strategies, and ongoing management to support the proposed landscape.</p>				<p>community representation and other key stakeholders. We have committed funds within our (Luton Rising) future budgets to fund the maintenance of the park into the future.</p> <p>Further detail on the future management of Wigmore Valley Park will be included in the application for development consent.</p>	
11.1.4	<p>Concerns with the size and location of the proposed Wigmore Park, with specific concerns with the location, distance from local people, and that the replaced park is too small, as well as the close proximity to the end of the runway, being located within Hertfordshire borders, and therefore being less accessible to the local</p>			8	<p>Please see responses to refs 11.1.1 and 11.1.2.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	community without using a car.					
11.1.5	Concerns with the loss of Wigmore Valley Park. Specific concerns included that the established wildlife and trees cannot be replaced, and that the new park will not be effective in absorbing pollution for generations, which is inappropriate given the current climate crisis, as well as opposition to the expansion and therefore opposition to the loss of the park, that the decision is unpopular with local residents, and concerns that the new park will be built on in the future.			13	<p>Please see responses to refs 11.1.2 and 11.1.3.</p> <p>Proposed planting will take several years to fully establish. The Proposed Development will, however, phase the removal of existing vegetation and deliver the vast majority of proposed landscape mitigation at the start of construction, in order to allow it several years to establish before most increases in aircraft movements occur from construction of the new terminal.</p> <p>The replacement of open space proposed by this application is subject to strict planning tests and is only proposed in this instance having exhausted other options. Further information can be found in the sift report, the most recent of which is appended to the WDR, and previous sift reports can be found on the Luton Rising website. Whilst it is not impossible that the new park may be built on in the</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					future any such application would be subject to similar planning tests.	
11.1.6	Suggestions that the existing Wigmore Valley Park should remain and not be developed, and instead should be improved and expanded.			5	<p>The Proposed Development has been carefully selected following a three stage Sift process which did consider options for Wigmore Valley Park. A scheme that sought to avoid Wigmore Valley Park in its entirety was developed and subsequently appraised at Sift 3 alongside the existing Sift 2 options. This option was however discounted as it proposed development in the Green Belt and outside of the Luton Local Plan LLP6 Strategic Allocation boundary and was judged to performed poorly against other criterion notably on the basis of operations noise impacts land ownership and landscape and visual impact considerations. The most recent sift report is appended to the WDR, and previous sift reports can be found on the Luton Rising website.</p> <p>As part of the Proposed Development the replacement open space would incorporate several of the enhanced facilities proposed in this area as part of</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>New Century Park application (i.e. the improved skate park and play facilities and the refurbished Wigmore Pavilion). Overall, the loss of part of the existing park will be fully mitigated by:</p> <ul style="list-style-type: none"> a. the enhancement of existing facilities, such as the upgrading of existing footpaths and new signage; b. the provision of a larger area of publicly accessible open space; and c. the continuation of accessibility to the park through the existing main entrance and within the replacement open space through the upgrading of existing rights of way and new surfaced paths which further improve public accessibility. 	
11.1.7	Kings Walden Parish Council would expect to be included in any development plans, and that the extension to Wigmore Park falls within the designated Kings Walden Neighbourhood Plan area and would prefer not to see any movement of Wigmore Park	Kings Walden Parish Council		1	<p>As part of the landscape proposals for the Proposed Development, an area of Wigmore Valley Park will be lost and replacement open space of a greater area will be provided to the east of the existing park.</p> <p>This additional round of statutory consultation provides Kings</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	but, if movement is required, the parish council must be involved in all plans.				Waldon Parish Council a further opportunity to comment on our proposals and we welcome your feedback. We will also continue to liaise with local communities and stakeholders in future.	
11.1.8	The proposed extension to Wigmore Park falls wholly within Kings Walden Parish and the North Herts District of Hertfordshire.	Kings Walden Parish Council		1	Noted.	No
11.1.9	Suggestions for the facilities that should be included in the new park, including coffee shop, footpaths, cycleways, and children's play area.			2	The open space proposals take into consideration feedback from the public and relevant statutory consultees. We are committed to providing open space for the public to enjoy that is more attractive and usable to a wider range of people than the current offer. We have worked hard to ensure that what we offer is not only of a very high quality but is also larger in size - the Proposed Development includes a 10% larger land area for Wigmore Valley Park. We have changed our design to retain as much of the existing Park as possible and remodeled the new area so that it is much better	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>connected to the existing area of open space.</p> <p>The replacement park will incorporate several of the enhanced facilities proposed in this area as part of New Century Park application (application ref. 17/02300/EIA), including an improved skate park and play facilities, an improved Wigmore Pavilion (with coffee shop) and better surfaced footpaths. The replacement open space proposals, as shown within the Consultation Brochure, retain these enhanced facilities and we will extend these sorts of facilities under the proposed application for development consent and consider all feedback received as we finalise our proposals.</p>	
11.1.10	<p>The proposal to create a long thin 'replacement' for Wigmore Park appears contrived. There is no evidence that existing users of the park would be happy with such a restrained shape, nor that the habitat in such narrow confines would be sustainable.</p>	Kings Walden Parish Council		1	<p>The open space proposals have evolved in response to feedback from the public and relevant statutory bodies.</p> <p>The amended proposals, as shown in the Consultation Brochure, are less linear in arrangement and focus on establishing natural habitats delivering areas of</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					meadow grassland, native shrub planting, broadleaf woodland, and mixed species hedgerows with hedgerow trees.	
11.1.11	The erasure of Wigmore Valley Park would involve loss of a varied mosaic of habitats including orchid-rich grassland which is a County Wildlife Site. The replacement park is already greenfield land with a distinctive character which is candidate-AONB land, proposed by the Chilterns Conservation Board to Natural England in 2013 for inclusion within the Chilterns AONB through boundary review. The plans identify land near Winch Hill for 'landscape restoration' which implies that it is in poor condition, but it is rural countryside.	Chilterns Conservation Board		1	<p>The majority of the current Wigmore Valley Park CWS will be lost as a result of the Proposed Development. We have changed our design to retain as much of the existing Park as possible, and designed the replacement area so that it offers greater opportunity to support biodiversity, including orchids.</p> <p>Effects on the aesthetic and perceptual qualities of the Chilterns AONB are considered in Chapter 14 Landscape and Visual of the PEIR and will be further described in the ES. As part of the Government's Airspace Modernisation programme, which is separate to the Proposed Development, the desirability of avoiding overflying the AONB will be considered, in line with the guidance set out in the CAA's CAP1616.</p> <p>In the open space east of Winch Hill Lane, the plans for landscape</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					restoration comprise a further area of wildflower grassland that would be grazed by livestock to control more aggressive plant species and maintain it as a species rich environment.	
11.1.12	North Hertfordshire District Council would also wish LLAL to be clear on the purpose and benefits of the park rather than just stating it is a relocation project to enable the airport and Century Park to expand and would expect the assessment of reasonable alternatives to at least test a scenario of the development without the expansion of the park into North Hertfordshire in order to justify its relocation. They would also expect to see specific analysis as to how the scheme in terms of its development/design/mitigation will minimise the impact on Green Belt aims.		North Hertfordshire District Council		<p>In respect of consideration of alternatives please see response to ref 11.1.6.</p> <p>The benefits of replacing the open space are inherently linked to the wider airport expansion and delivery of employment at New Century Park. We have committed to deliver an area of replacement open space that is at least as good in terms of in terms of size, usefulness, attractiveness, quality, and accessibility, as well as being 10% larger than existing provision.</p> <p>Please see response to ref 11.1.6 regarding the Sift process, and minimisation of impacts on the Green Belt.</p>	No
11.1.13	The current evidence base for the consultation is deficient, and a comprehensive		North Hertfordshire		The calculation and an associated explanatory report along with all measures for the establishment	No

Ref	Comment	PC	LA	No PILs	Response	Change
	monitoring, mitigation and compensation strategy is necessary, which is of key importance to North Hertfordshire as well as the purpose and management of the relocated park.		District Council		and long term management of habitats will be detailed within the detailed Landscape and Biodiversity Management Plan (LBMP) which will be submitted as part of the ES. A Draft LBMP can be found at Appendix 8.2 of Volume 3 of the PEIR. Please see response to ref 11.1.3 for information on the future management of the park.	
11.1.14	NHDC wish to be very clear that the park should have no detrimental impact upon their residents through loss of agricultural land. Nor should the park have any impact at any time on the Council budget, for example through on-going maintenance and operating costs, and congestion on our rural roads resulting from visitors. Therefore, we expect that LLAL, or any subsidiary will be fully responsible for all the costs now, and in the future with regard all aspects relating to the park.		North Hertfordshire District Council		The agricultural impact assessment included within Chapter 6 Agricultural Land Quality and Farm Holdings of the PEIR concludes that the Proposed Development would not significantly impact on any agricultural farm holdings. In terms of impact on LBC budget please see response to ref 11.1.3.	No

Ref	Comment	PC	LA	No PILs	Response	Change
11.1.15	Further clarity on the future management of Wigmore Park is necessary.		Host Authorities		Please see response to ref 11.1.3.	No

Table A11.2: Regard had to statutory consultation responses on Wigmore Valley Park - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
11.2.1	Concerns with the proposed recreation area within Wigmore Park. Specific concerns included that the play area designs are unattractive, that the inclusion of airplanes designed into the play area are insulting, and that the skatepark won't be used, as well as objections to any damage to the existing landscape.	4	<p>The replacement park will incorporate several of the enhanced facilities proposed in this area as part of New Century Park application (application ref. 17/02300/EIA), including a play area and skate park. The public were consulted on the design of the play area as part of the New Century Park planning application.</p> <p>The open space proposals can be found within the Consultation Brochure and have been informed by the EIA process and propose several measures to try and mitigate significant environmental effects.</p>	Yes
11.2.2	Concerns with the level of usage that the proposed Wigmore Park would see. Specific concerns included that plans are unattractive due to the levels of noise and air pollution that will face park-users, as well as concerns with the current park being unpopular, and not being clear on who future users will be. Also concerns that in the future, the park will be built over if insufficient people use it.	26	<p>Please see response to ref 11.1.1.</p> <p>The replacement open space takes into consideration the accessibility of the existing community that uses it and future proposed communities to the east of Luton. The replacement of open space proposed by this application is subject to strict planning tests and is only proposed in this instance having exhausted other options (please see response to ref 11.1.6 regarding the Sift process). Whilst it is not infeasible that the new park may be built on in the future any</p>	Yes

Ref	Comment	No CC	Response	Change
			such application would be subject to similar planning tests.	
11.2.3	Concerns with the facilities proposed within Wigmore Park, including how accessible it will be, whether there will be a replacement of football pitches and changing facilities, whether there will be any additional facilities, and whether the park will be delivered to a high quality.	5	<p>Please see response to ref 11.1.9 for details of the facilities to be included in the proposed park.</p> <p>Wigmore Valley Park does not contain any football pitches that are in use currently. The land within the Park that was formerly used for football would be affected by the New Century Park planning application which LBC has resolved to grant (reference 17/02300/EIA). This includes a financial contribution to support the delivery of further football pitches within the Borough.</p>	Yes
11.2.4	Concerns with the habitat replacement proposed at Wigmore Park. Specific concerns included objections to the replacement park, as the existing park is established with mature trees and ecosystems, which will take decades to reach the same level, as well as concerns that saplings will be planted, which have less benefit to the environment than mature trees which currently help reduce air pollution. Additionally, concerns included that the site lies on an existing landfill site, concerns that there will be knock-on effects for the natural ecosystems present currently, general concerns that landscape proposals are insufficient, concerns that the park won't be circular, or that there is a lack of clarity in proposals, and that	140	Please see response to ref 11.1.2.	Yes

Ref	Comment	No CC	Response	Change
	proposals are just redesignating existing public space rather than delivering additional space.			
11.2.5	Concerns with the management and maintenance of the proposed Wigmore Park, with concerns that the Airport doesn't have the expertise to manage the park, which might lead to financial neglect and insufficient management and protection. Concerns also queried the logistics of funding and management with the Park being split across multiple authorities, as well as a lack of clarity in consultation material regarding the habitat / vegetation management period, management strategies, and ongoing management to support the proposed landscape.	8	Please see response to ref 11.1.3.	No
11.2.6	Concerns with the size and location of the proposed Wigmore Park, with specific concerns with the location, distance from local people, and that the replaced park is too small, as well as the close proximity to the end of the runway, being located within Hertfordshire borders, and therefore being less accessible to the local community without using a car.	62	Please see response to ref 11.1.1.	Yes
11.2.7	Concerns with the loss of Wigmore Valley Park. Specific concerns included that the established wildlife and trees cannot be replaced, and that the new park will not be effective in absorbing pollution for generations, which is inappropriate given the current climate crisis, as well as opposition to the	200	Please see responses to refs 11.1.2 and 11.1.3.	Yes

Ref	Comment	No CC	Response	Change
	expansion and therefore opposition to the loss of the park, that the decision is unpopular with local residents, and concerns that the new park will be built on in the future.			
11.2.8	Suggest investing in a sustainable project, such as an Eden Project, to bring tourism into Luton and jobs, rather than the relocated park.	1	We have a responsibility to replace open space affected by the Proposed Development with a facility that is at least as good in terms of size, usefulness, attractiveness, quality, and accessibility as may be lost. We are committed to meet this responsibility and are proposing to provide an area of open space that is at least 10% larger than the current provision.	No
11.2.9	Suggestions that there must be sufficient and ongoing engagement with local stakeholders in designing the park, including engagement with children and young people.	10	We agree that the local community should be involved in the development of Wigmore Valley Park. This additional round of statutory consultation provides a further opportunity to comment on our proposals and we welcome your feedback. We will also continue to liaise with local communities and stakeholders in future.	Yes
11.2.10	Suggestions that the maintenance and management of the new Wigmore Park should be managed, funded, and maintained economically through the long term, which should be taken on by experts via a Trust.	7	Please see response to ref 11.1.3.	No

Ref	Comment	No CC	Response	Change
11.2.11	Suggestions that the existing Wigmore Valley Park should remain and not be developed, and instead should be improved and expanded.	83	Please see response to ref 11.1.6.	Yes
11.2.12	Suggestions for the facilities that should be included in the new park. Respondents suggested the following: sports provision, such as football pitches, a viewing platform to watch the aircraft, a slightly smaller children's play area, community hall, sufficient disabled access, toilets, free parking, mountain bike trails/BMX tracks/pump tracks and facilities to be used for Parkour and bouldering, a wetland area and nature trail to be used by local schools, exercise equipment, a café, the protection of some of the area as open grassland, good active travel provision, a skate park, sailing lake, a swimming pool, sufficient parking, changing facilities, a learning centre for schools, and an airport themed play area.	43	Please see response to ref 11.1.9.	Yes

A12 Impacts on Local Communities

Table A12.1: Regard had to statutory consultation responses on Impacts on local communities - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
12.1.1	The ready local availability of an international airport is valued by both the business community and the residents of Stevenage.		Stevenage Borough Council	1	Noted.	No
12.1.2	Enhances a tremendous community asset that provides wider benefits to society.			1	Noted.	No
12.1.3	Concerns that the proposal will have an adverse impact on the health and wellbeing of residents, specifically: those living within the flight path and children growing up in the area, local communities (Hertfordshire, Bedfordshire, Harpenden, Keeble, Whitwell, Breech Wood Green, Luton, Hitchin, Stevenage, Wheatamstead Tring, Caddington, Slip End, Marykate, St Albans, Batford, Katherine Warrington School. Health and well-being concerns include; disrupted sleep/lack of sleep, respiratory			37	<p>The Health Impact Assessment in Chapter 13 Health and Community of the PEIR assesses the potential effect of the Proposed Development on the physical and mental health and wellbeing of local residents.</p> <p>This identifies that there will be positive benefits to the health and wellbeing of local communities through the provision of jobs during construction and operation. However, it also identifies that there could potentially be</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>illness/conditions (such as lung disease, asthma, bronchitis), Chronic Obstructive Pulmonary Disease, heart disease/conditions, increased stress, mental health, Alzheimer's, type II diabetes, tinnitus, cancer.</p>				<p>negative impacts on mental health and wellbeing as a result of uncertainty and concern around the planning, construction and operation of the Proposed Development. Public consultation and engagement will provide information which may help to reduce uncertainty and stress; however, it is likely that some people's mental wellbeing within the affected communities will continue to be adversely impacted.</p> <p>The assessment also identifies that there could potentially be negative effects on health for some people in certain locations due to changes to the environmental conditions, particularly noise, as a result of increased aircraft movements. The Proposed Development will incorporate measures to reduce noise effects as described in the noise section of this report, and in more detail in Chapter 16 Noise and Vibration of the PEIR.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					Given the findings of this assessment, we do not foresee any change in demand for health services.	
12.1.4	Concern that the proposals will significantly decrease property values in the area. Specifically for properties within the flight path and areas such as Luton, Hertfordshire, Bedfordshire, Harpenden, Keeble, Whitwell, Breech Wood Green, Luton, Hitchin, Stevenage, Marykate, St Albans. Further information is required to understand the impacts of the Proposed Development on property values.			18	<p>There is no evidence that property prices are necessarily impacted by airport expansion as the greater connectivity provided by an airport can also attract new buyers to the market. Specific noise mitigation measures are detailed in Chapter 16 Noise and Vibration of the PEIR. Separate to our proposals, noise improvements are likely to occur as a result of Civil Aviation Authority's Airspace Modernisation Strategy which sets out the initiatives that the UK industry will deliver to achieve the government's policies of quicker, cleaner, quieter journeys. This may allow for aircraft to climb more quickly due to the lifting of constraints imposed on aircraft from neighbouring airports.</p> <p>A range of statutory compensation measures exist</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>where land is acquired under compulsory acquisition and also where residential property values are impacted due to use of the new airport facilities. The entitlement to claim arises at different times during the project. Such compensation will be paid in accordance with the so called Compensation Code, which is the statutory framework that governs compensation for projects of this nature. Where a right to compensation arises the property owner is able to take professional advice and they will be able to negotiate a settlement with our instructed surveyors. Such discussions will always remain confidential between us and the affected property owner. Further information is contained in Draft Compensation Policies and Measures.</p>	
12.1.5	Concerns that the proposed mitigation and funding provided under the Future LuToN Impact Reduction Scheme is not			1	The Future LuToN Impact Reduction Scheme (FIRST) has been renamed Community First. It is not	No

Ref	Comment	PC	LA	No PILs	Response	Change
	adequate to reduce adverse noise, air quality, landscape, road traffic and health effects on the Three Counties.				intended to mitigate impacts – that is the role of mitigation identified through the ES, which will be secured through the DCO. The purpose of Community First is to make funds available to community groups and Town and Parish Councils to address local needs in areas of high deprivation or for decarbonisation projects.	
12.1.6	The proposals for new open space do not meet the needs of local residents and does not account for the loss of open space required to enable the expansion.			1	We are committed to providing No open space for the public to enjoy that is attractive and usable to a wider range of people than the current offer. We have worked hard to ensure that what we offer is not only of a very high quality but is also larger in size - the Proposed Development includes a 10% larger land area for Wigmore Valley Park. We have changed our design to retain as much of the existing park as possible, and remodelled the new area so that it is much better	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>connected to the existing area of open space.</p> <p>We are happy to commit to commencing our proposals for the improvements to Wigmore Valley Park before any work is undertaken in the current park. This is the first item on our list for delivery at the earliest opportunity, with work on the new park commencing early (and in advance of DCO consent where practical and permissible)</p> <p>Further information regarding the proposed open space provision is included in the Consultation Brochure.</p>	
12.1.7	Compensation does not take account of the loss/degradation of natural habitats, health and wellbeing of local communities, community facilities.			3	<p>Potential impacts of the Proposed Development are identified and assessed in the relevant chapters of the PEIR, and appropriate mitigation is proposed.</p> <p>The compensation proposals are intended to compensate local residents and businesses directly affected by the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Proposed Development and details are set out in the Draft Compensation Policies and Measures consultation document.	
12.1.8	Suggests further community engagement to receive feedback from residents and organisations/institutions (e.g., local primary schools) about methods to mitigate the adverse effects of construction.			3	<p>Further community engagement is being undertaken as part of this Statutory Consultation.</p> <p>Potential impacts of the Proposed Development for both construction and operation are identified and assessed in the relevant chapters of the PEIR, and appropriate mitigation is proposed.</p> <p>Construction will be undertaken in accordance with a CoCP. A Draft CoCP can be found in Appendix 4.2 of Volume 3 of the PEIR. Section 5 of the Draft CoCP covers community relations and stakeholder engagement.</p>	Yes
12.1.9	Concerns that the proposed expansion will interfere with			1	The Proposed Development will not interfere with television signals.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	public access to a television signal.					
12.1.10	Concerns that the proposed expansion will drive housing development at a rate which will drastically change the character and amenity of the area, increase traffic congestion. Areas such as Cockernhoe, Harpenden, Luton, Bedfordshire, Hertfordshire, Buckinghamshire.			6	<p>It is our intention that most of the new jobs created by the Proposed Development will go to local people. Rather than requiring more housing this is aimed at reversing the current daily net migration of people working away from Luton. We want more local people working locally - leading to better environmental outcomes, better quality of life, better social impacts and ultimately better health through this effect.</p> <p>The Draft ETS sets out proposals to create an environment in which the local community can benefit from the employment opportunities created by the Proposed Development, during both construction and operation. The Draft ETS will be further developed after the consultation and the proposals are being developed in</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>consultation with local stakeholders.</p> <p>We are also proposing Community First which will make funds available to community groups and Town and Parish Councils to address local needs in areas of high deprivation or for decarbonisation projects.</p>	
12.1.11	General concerns regarding adverse impacts on the local community including, noise pollution, air pollution, light pollution, traffic.	Civil Aviation Authority	Central Bedfordshire Council	83	Potential impacts of the Proposed Development are identified and assessed in the relevant chapters of the PEIR, in particular Chapter 7 Air Quality, 16 Noise and Vibration, and 18 Traffic and Transportation and appropriate mitigation is proposed.	No
12.1.12	Concerns regarding the waste expected to be generated from the construction and operation of the airport. Further information is required to understand how waste will be managed including the incinerator, Tidy Tip.			3	The Proposed Development has been designed, as far as possible, to avoid effects related to waste and resources through option identification, appraisal, selection and refinement.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Mitigation measures have been integrated (embedded) into the design for the purpose of minimising effects related to waste and resources. These general measures focus on designing out waste and implementing the waste hierarchy.</p> <p>Provision for internal and external waste storage to allow waste segregation during operation has been included in the design.</p> <p>For construction, good practice mitigation in the form of specific guidance on managing waste in accordance with the relevant regulations are outlined in the Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR and Draft Outline Site Waste Management Plan (OSWMP) in Appendix 19.1 of Volume 3 of the PEIR. The Draft OSWMP sets waste recovery and recycled content targets for construction. The lead contractor will be required to produce a Site Waste</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Management Plan (SWMP) based on the OSWMP before the commencement of works.</p> <p>The likely impact of proposed, non-waste related development on existing waste management facilities has been considered. The Proposed Development study boundary includes a safeguarded waste site, the LBC Household Waste and Recycling Centre also known as the Tidy Tip. The Proposed Development will not have any impact on the Tidy Tip, it will not be used to manage Proposed Development construction or operational waste.</p>	
12.1.13	Concerns that the expected population increase resulting from the employment opportunities created by the Proposed Development will further exacerbate the housing shortage in the area.			1	Please see response to ref12.1.10.	No
12.1.14	Concerns that any new employment opportunities will			1	Employment opportunities created by the Proposed	No

Ref	Comment	PC	LA	No PILs	Response	Change
	benefit the overseas workforce. The expected population increase will further exacerbate pressures on the housing market, local amenities, social infrastructure, economy and may contribute to increased crime.				Development will be open to all , although our Draft ETS sets out how we will encourage local people to take up these opportunities. Please see response to ref 12.1.10 in terms of the impact on the housing market and other infrastructure.	
12.1.15	Land use and development intentions LGC has long standing intentions to develop parts of its landholdings for significant residential and employment purposes and has promoted such through the Luton and southern Central Bedfordshire Core Strategy (2010-11); the Central Bedfordshire Development Strategy (2011-14), and now through the Central Bedfordshire Local Plan (CBLP 2018). The two land parcels with development potential are: - About 18 ha of land adjacent to Slip End being promoted for residential development for about 350 houses. - About 44 ha of land east of the M1 at J10/10a			1	Noted. Surrounding development sites of relevance to the EIA are considered in the relevant assessments as required. Further information is set out in Chapter 21 In-Combination and Cumulative Effects Assessment of the PEIR, and the specific sites included in this are identified in Appendix 21 of Volume 3 of the PEIR.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>being promoted for about 94,000 sqm of strategic distribution and logistics uses.</p> <p>The Inspector for the CBLP EiP has advised the Council that it needs to undertake a significant amount of additional work to supplement its evidence base to underpin or inform revisions to the spatial strategy with regard to both housing and employment sites. The result is that both sites remain options that may need to be considered by the Council in order to achieve a sound and sustainable scale and distribution of development. Both sites therefore represent genuine and realistic development opportunities that should be taken into account in any proposals to expand the airport and increase the number of passengers from 18 mppa to 32 mppa.</p>					
12.1.16	The Study also identified the need for additional hotel supply to service an expanded airport and a site has been identified on-airport. There may be pressures			1	Please see response to ref 12.1.10.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	placed on the local employment and housing supply, when construction workers and airport workers move into the area and seek to live locally, and as an expanded airport requires more workers once operational. This may affect the availability of housing for those Estate workers living locally, as well as the availability of a local workforce to run the Estate. These indirect effects again should be fully assessed in the Environmental Statement.					
12.1.17	The most telling comment is at the end of the airfield section, which states: 'where possible, the strategy will be to construct most of the works outside the current airfield to minimise impacts on operations.' This is tantamount to admitting that communities to the east of the airport, such as Breachwood Green, will suffer most of the disruption, whilst actually receiving none of the gains. This shows that the airport has little or	Kings Walden Parish Council		1	The Proposed Development has been carefully selected following a three stage sift process. The most recent sift report is appended to the Works Description Report (WDR) and previous sift reports can be found on the Luton Rising website. These provide further information regarding why the chosen option is considered the most appropriate, including the consideration of potential	No

Ref	Comment	PC	LA	No PILs	Response	Change
	no consideration for neighbouring communities.				<p>impact to neighbouring communities.</p> <p>The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR sets out how construction impacts will mitigate any adverse construction effects on neighbouring communities.</p>	
12.1.18	Suggests ongoing communication with the local community during all phases of the development.			1	<p>This additional round of Statutory Consultation allows further opportunity for the local community to engage on the Proposed Development.</p> <p>Engagement with the local community will continue in the construction phase. Section 5 of the Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR covers community relations and stakeholder engagement.</p>	Yes
12.1.19	The Proposed Development will drive increased housing demand.	Kings Walden Parish Council		1	Please see response to ref 12.1.10.	No
12.1.20	Luton Borough Council must accept the limitations of owning an airport in such a highly populated area.	Kings Walden Parish Council		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
12.1.21	The underlying assumption behind the proposals is to cause as little disturbance as possible to existing airport operations to the detriment of neighbours.	Kings Walden Parish Council		1	Please see response to ref 12.1.17.	No
12.1.22	<p>Historically disposed waste may still pose a risk to the environment and remain a controlled waste and must be handled, transported, treated, recovered or disposed in line with an Environmental Permit. This waste is subject to waste management legislation, which includes:</p> <ul style="list-style-type: none"> - Duty of Care Regulations 1991 - Hazardous Waste (England and Wales) Regulations 2005 - Environmental Permitting (England and Wales) Regulations 2010 - The Waste (England and Wales) Regulations 2011 <p>If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period the developer</p>	Environment Agency			Excavated material from the former Eaton Green Landfill will be managed via an environmental permit granted and regulated by the Environment Agency. Other excavated materials will be managed via the Contaminated Land: Applications in Real Environments (CL:AIRE) Definition of Waste: Code of Practice (DoWCoP) process and the Lead Contactor will be required to undertake works in accordance with a Materials Management Plan agreed with the independent body, CL:AIRE.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>will need to register with us as a hazardous waste producer. Refer to the Hazardous Waste pages on GOV.UK for more information.</p> <p>Definition of Waste: Code of practice</p> <p>Where DoWCoP is followed in full we have no objections to materials re-use, in accordance with our position statement. Materials not used in accordance with the DoWCoP process in full may be deemed waste and will require a relevant permit for deposit. Based on the information we hold relating to the site, and the requirement to hold an Environmental Permit for other parts of these works, it would not be possible to comply with DoWCoP in full, therefore this scheme should not be implemented for material arising or being deposited on Eaton Green Landfill.</p> <p>If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>12-month period the developer will need to register with us as a hazardous waste producer. Refer to the Hazardous Waste pages on GOV.UK for more information. Based on the information we hold relating to the site, and the requirement to hold an Environmental Permit for other parts of these works, it would not be possible to comply with DoWCoP in full, therefore this scheme should not be implemented for material arising or being deposited on Eaton Green Landfill.</p>					
12.1.23	<p>In view of the prospective timescales for the submission of the NSIP application in the second half of 2020, it is likely that the new Buckinghamshire Council would want to take a formal position on whether to support LLAL's plans. We also note that government support for Luton Expansion may become clearer in the coming year with consultation on and adoption of a new national Aviation Strategy. Looking ahead to April 2020;</p>		<p>Buckinghamshire County Council and Aylesbury Vale District Council</p>		<p>Noted.</p>	<p>No</p>

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>when the Council s combine to form one new Council for Buckinghamshire, we have sought through a joint response to provide a single aligned view from the two councils. Given that Buckinghamshire is at its closest some 12 kilometres from Luton Airport, certain elements of the consultation are less relevant to us. Our response therefore focuses on aircraft noise, economic development, carbon, transport and community aspects of the proposed NSIP. Notwithstanding this we do want to highlight the importance of considering the cumulative effect of the expansion of airport capacity in the South East.</p> <p>Aircraft Noise</p>					
12.1.24	<p>LLAL need to engage in assessing the housing and infrastructure implications of the development through the local plan making functions.</p>		Host Authorities		<p>Please see response to ref 12.1.10.</p> <p>We have regularly engaged with relevant local authorities in respect of the Proposed Development and will continue to do so.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
12.1.25	Under the Police and Crime Act 2009 the Airport is required to pay for the policing required to mitigate issues identified through the multi-agency threat and risk analysis, which for Luton Airport currently is a dedicated armed and unarmed policing presence, reviewed in line with the terms of the Police Service Agreement. The size of this unit and its associated equipment costs will be determined through the normal Police Service Agreement process and due to nearly 50% increase in footfall and new terminal are expected to need to grow significantly. However, as mentioned, in the main this PSA will only pay for the direct costs of the officers and their associated equipment.	Bedfordshire Police and Crime Commissioner			Noted.	No
12.1.26	There are significant wider issues, linked to the crime types above, that would need to be catered for under such a large expansion, centering around the infrastructure needed and the indirect impact on Force resources over and above the	Bedfordshire Police and Crime Commissioner			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>aforementioned dedicated police unit. The influx of employees and associated population growth will be less easy to specifically define in terms of policing demand. Whilst development is generally a positive opportunity, such increases inevitably drive demand for general non specialist policing services over and above those that are met from the specific Police Service Agreement and this would need to be taken into account given the proposed scale of the expansion.</p>					
12.1.27	<p>The level of public order and anti-social type criminality at the airport has grown in significant numbers over the past few years as the footfall has increased from approximately 15M to 18M passengers. As a result the number of incidents either involving investigation and/or cell space have also increased significantly which has put the cell space within Bedfordshire, both at Luton and Bedford under considerable pressure. The near</p>	Bedfordshire Police and Crime Commissioner			<p>The Proposed Development includes appropriate facilities for the police. For more information, please see the WDR. We will work with the Bedfordshire Police and Crime Commissioner to develop the detailed design for this and the request for additional custody space is noted.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>doubling of passenger numbers, and associated facilities at the airport i.e. licensed premises, increased retail etc. will undoubtedly see the pressure on both the investigative resources within the Force and Custody space increase disproportionately resulting in the additional costs being incurred through the use of another Force's Custody provision (resulting in longer travelling times for officers thus increasing their abstraction away from front line duties) or priority crimes outside of the Airport demand not being able to be policed adequately. The provision to increase custody space as a result of this expansion will therefore be a necessity and the planning would need to be opposed if this was not forthcoming.</p>					
12.1.28	It goes without saying that any increase in the dedicated team at the Airport will need to be considered alongside the provision of appropriately sized	Bedfordshire Police and Crime Commissioner			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>accommodation and facilities, including appropriate facilities for dogs such as kennelling and exercising as the number of security dogs are also likely to need to increase (as part of the PSA negotiations). In addition for the appropriate level of serious and organised and Counter Terrorism Policing to be conducted in an airport of the proposed size, both Schedule 7 and STRAP (high level physical & security access) facilities would need to be increased and the Airport would have a statutory responsibility to provide the appropriately sized accommodation. Over and above the estate issues the Force would undoubtedly have to consider increasing those indirect activities that co-inside with an increase in demand at the Airport such as the Force Control Room, Investigative capabilities, recruitment, training etc. for which Bedfordshire Police would be expecting additional funding to provide. As with the infrastructure without the necessary funding Bedfordshire</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	Police would need to oppose the expansion as set out in the proposals. The alternative would be to reduce the service the Force provides to the whole of Bedfordshire, to supplement the Airport which is one that the Police and Crime Commissioner and Chief Constable are not prepared to consider.					
12.1.29	Finally, Bedfordshire Police would be expected to be engaged with all proposed transport links and road networks to ensure that safety is achieved, for both the general public and the officers and staff of Bedfordshire Police, at all times. This would include full involvement in the design of the new proposed DART function. Bedfordshire Police are happy to be engaged with the expansion proposals for the Airport but, as mentioned above, without sufficient additional resource/funding to support such a large expansion and the inevitable demand increases on the Police Force we would need	Bedfordshire Police and Crime Commissioner			Noted. Bedfordshire Police will continue to be engaged as a Statutory Consultee.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	to oppose the proposals being put forward.					
12.1.30	The wider health and quality of life impacts from the increased number of noise events and their frequency/pattern do not appear to have been fully considered in the consultation documentation, with a heavy reliance of noise contour monitoring. This should be addressed before the Acceptance stage in the DCO process.		St Albans District Council		Please see response to ref 12.1.3.	No
12.1.31	[Flight paths over CBC] is an issue for CBC residents with increasing implications in terms of sleep deprivation, health and wellbeing, as identified and expanded upon by the CBC Public Health Team.		Central Bedfordshire Council		Please see response to ref. 12.1.3. The process of airspace modernisation is being undertaken separately to our Proposed Development. Further information can be found on the CAA website.	No
12.1.32	PHE exists to protect and improve the nation's health and wellbeing and reduce health inequalities; these two organisational aims are reflected in the way we review and respond to NSIP applications.	Public Health England			Noted. Please see response to ref 12.1.3.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from, for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.</p>					
12.1.33	<p>Evidence suggests that health effects can still occur below limit values for air pollutants under EU regulation.</p>	Public Health England			<p>Chapter 7 Air Quality of the PEIR assesses all potential impacts to human and ecological health in respect of air quality as a result of the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Proposed Development. Where required, mitigation is proposed to reduce emissions to air.</p> <p>Chapter 7 Air Quality notes that the EU directives national legislation in England remains in force and sets the requirements that the Secretary of State for the Environment has for air quality, which is ensuring compliance with the air quality limit values.</p> <p>The proposed mitigation measures set out in Chapter 7 Air Quality will provide mitigation in accordance with all relevant standards.</p>	
12.1.34	The PEIR does not include an assessment of the health impacts of odour. We agree with the acknowledgement in the PEIR that this should be considered in the ES.	Public Health England			An odour assessment was undertaken to consider the risk of odour from aircraft emissions and works at the historic landfill, this can be found in Chapter 7 Air Quality of the PEIR. With good practice measures set out within the Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR and the Draft Air	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Quality Plan in Appendix 7.2 of Volume 3 of the PEIR, no likely significant effects were identified.	
12.1.35	We have assessed the submitted documentation with respect to noise and have provided comments in Appendix 1. Human Health and Wellbeing We have assessed the submitted documentation with respect to human health and well-being. This section of PHE's response, identifies the wider determinants of health and wellbeing we expect the Environmental Statement (ES) to address, to demonstrate whether they are likely to give rise to significant effects. PHE has focused its approach on the determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are: Access Traffic and Transport Socioeconomic · Land Use	Public Health England			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
12.1.36	Combined effects of the development on local communities needs to be assessed in a separate Health Impact Assessment. This should include the effects on vulnerable groups which need to be identified		Host Authorities		A Health Impact Assessment has been undertaken and can be found in Chapter 13 Health and Community of the PEIR.	No
12.1.37	The proposals would place significant additional pressure on housing demand in the wider area and this matter needs to be considered as part of the DCO process.		WSP for Host Authorities Central Bedfordshire Council		Please see response to ref 12.1.10	No
12.1.38	Whilst the commitment to be a better neighbour is welcomed, Hertfordshire communities do not consider London Luton Airport to be a good, considerate, neighbour. The County Council has every sympathy with that view.		Hertfordshire County Council		Noted.	No
12.1.39	We ask LLAL to note that in Dacorum Borough, current flightpaths from the airport, have a significant impact upon the villages of Markyate and Flamstead in terms of aircraft		Dacorum Borough Council		It is expected that the modernisation of airspace across the South East of England will allow aircraft to climb more quickly on departure from the airport but	No

Ref	Comment	PC	LA	No PILs	Response	Change
	noise. Eastern Hemel Hempstead and Tring are also significantly affected by noise				<p>this is a separate process from the application for development consent.</p> <p>The Proposed Development assesses the environmental impacts associated with the current airspace and flight paths, along with current aircraft performance. Adopting this approach will represent the worst case for an environmental assessment.</p> <p>Furthermore, it is intended that the ES to be submitted with the application for development consent will include sensitivity analysis showing the potential effect of airspace changes under consideration to the extent that these are available prior to submission of the application for development consent.</p>	
12.1.40	We are mindful of what the impacts of the emerging expansion proposals could be for Dacorum Borough.		Dacorum Borough Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
12.1.41	From a policing perspective an airport expansion, of this magnitude, will bring some significant policing challenges that Bedfordshire Police will want to be assured can be minimised, mainly through provision for extra resources and infrastructure, in consultation with ourselves. The increase from 18M passengers to 32M passengers will result in a potential increase in the following crime categories for the Force: • Counter Terrorism; • Serious and Organised Crime; • Public Order and Anti-Social Behaviour; • Property Crime including Theft and Robbery; • Traffic related incidents; and • Protests	Bedfordshire Police and Crime Commissioner			Noted. Please see response to ref 12.1.27. Bedfordshire Police will continue to be engaged as a Statutory Consultee.	No
12.1.42	Additionally, measures to secure increased housing demand for future employees migrating to the area in the administrative boundary of Luton should be set out and discussed.		WSP for Host Authorities Central Bedfordshire Council		Please see response to ref 12.1.10.	No
12.1.43	Full details of the construction and methodologies will not be known for some time so a	Highways England			The application for development consent will include a Construction	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Construction Management Plan which facilitates the ongoing involvement of Highways England in the process of construction traffic management will be required. Documents setting out the intended approach, ways of working and engagement; including a Construction Traffic Management Plan and Construction Logistics Plan should however be provided at an earlier stage.				<p>Method Statement and Programme Report and a Construction Transport Management Plan which together provide a comprehensive approach to the management of construction traffic, drafts of these can be found in Appendix 4.1 and 4.2 of Volume 3 of the PEIR respectively.</p> <p>We will continue to liaise with the relevant Highways Authorities.</p>	
12.1.44	The proposed consultation period will span 14 years from 2020 to 2034. During this time, Luton Hoo will be exposed to increased traffic, night-time construction lighting, dust, and pressures on the local housing market from construction workers which has the potential to impact staff working at the Estate.			1	<p>The PEIR provides preliminary assessments of a wide range environmental effects, including air quality, noise, surface access as well as economic benefits. The findings of the PEIR will be updated in an ES prior to the submission of the application for development consent. It will then be for the Planning Inspectorate to consider the balance between the costs and benefits of the Proposed Development based on the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>evidence submitted with the application.</p> <p>Potential impacts upon Luton Hoo Grade II* Registered Park and Garden are considered in Chapter 10 Cultural Heritage of the PEIR.</p> <p>Appropriate mitigation measures for buildings qualifying for compensation will be determined on a case-by-case basis.</p>	

Table A12.2: Regard had to statutory consultation responses on Impacts on local communities - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
12.2.1	Supports the Proposed Development and the benefits to the community including: reducing poverty/homelessness, improve the character and amenity of the local area, job creation for local people, economic benefits, reduced unemployment, improvements to crime rates, improves travel costs, improves the quality of air travel.	89	Noted.	No
12.2.2	Concerns that the proposal will have an adverse impact on the health and wellbeing of residents, specifically: those living within the flight path and children growing up in the area, local communities (Hertfordshire, Bedfordshire, Harpenden, Keeble, Whitwell, Breech Wood Green, Luton, Hitchin, Stevenage, Wheatamstead Tring, Caddington, Slip End, Marykate, St Albans, Batford, Katherine Warrington School. Health and well-being concerns include; disrupted sleep/lack of sleep, respiratory illness/conditions (such as lung disease, asthma, bronchitis), Chronic Obstructive Pulmonary Disease, heart disease/conditions, increased stress, mental health, Alzheimer's, type II diabetes, tinnitus, cancer.	449	Please see response to ref 12.1.3.	No
12.2.3	Concern that the proposals will significantly decrease property values in the area. Specifically for properties within the flight path and areas such as Luton, Hertfordshire, Bedfordshire, Harpenden, Keeble, Whitwell, Breech Wood Green, Luton, Hitchin, Stevenage, Marykate, St Albans. Further information is required to	52	Please see response to ref 12.1.4.	No

Ref	Comment	No CC	Response	Change
	understand the impacts of the Proposed Development on property values.			
12.2.4	Concerns that the proposed mitigation and funding provided under the Future LuToN Impact Reduction Scheme is not adequate to reduce adverse noise, air quality, landscape, road traffic and health effects on the Three Counties.	2	Please see response to ref 12.1.5.	No
12.2.5	The proposals for new open space do not meet the needs of local residents and does not account for the loss of open space required to enable the expansion.	2	Please see response to ref 12.1.6.	No
12.2.6	Compensation does not take account of the loss/degradation of natural habitats, health and wellbeing of local communities, community facilities.	37	Please see response to ref 12.1.7.	No
12.2.7	Suggests further community engagement to receive feedback from residents and organisations/institutions (e.g. local primary schools) about methods to mitigate the adverse effects of construction. Suggestions include 12-week notice period for any works/road closures commencing, providing further detail on construction mitigation methods/milestones, a local forum for residents to help manage the project, viewing areas for people to monitor construction progress, no construction during the evening, a dedicated helpline which operates 24 hours/365 days.	33	Please see response to ref 12.1.8.	Yes

Ref	Comment	No CC	Response	Change
12.2.8	A refuse incineration is being proposed for the Lower Luton Road. With a north wind the smoke from the incinerator will be blown directly into Harpenden. The north wind is a regular feature of Britain's weather pattern. We do not want an incinerator near our town.	1	The refuse incineration mentioned in the comment is not a part of our Proposed Development. Comments on that project should be directed to the applicant and local planning authority.	No
12.2.9	The main project consultant inferred that any expansion would have: 1) New technologies but agreed that there were no current ways of recycling or disposing of them. He stated that the project would take 10 years to complete by which time science would have progressed to allow disposal/recycling to occur.	1	Construction and operational waste will be managed considering the accepted best practice available at the time of waste production. A Draft OSWMP is contained in Appendix 19.1 of Volume 3 of the PEIR. The Draft OSWMP sets waste recovery and recycled content targets for construction. The lead contractor will be required to produce a SWMP based on the OSWMP before the commencement of works.	No
12.2.10	Concern that developing on a landfill site has potential impacts on health and safety, with regards to excavation, treatment, transport and disposal of the hazardous waste.	2	Building over landfill is common practice and there are well established best practice measures for working over such an environment which we will follow. We have made changes to earthworks design which significantly reduce the volume of landfill required to be excavated and therefore associated impacts. In addition, a Preliminary Risk Assessment of Land Contamination (Appendix 17.1 of Volume 3 of the PEIR) has been	No

Ref	Comment	No CC	Response	Change
			<p>undertaken which assesses the risks from piling and provides an evaluation of the most appropriate technique to be adopted to ensure that any contamination present is not mobilised. These measures will ensure that no new pathways are created and that no contaminants are inadvertently mobilised to the groundwater as part of the development works. Works will be carried out in accordance with all applicable regulatory requirements.</p> <p>Please see also response to ref 12.1.22 in respect of treatment of materials.</p>	
12.2.11	Concerns that the existing healthcare system is not equipped to deal with the expected rise in healthcare risks of local communities as a result of added pollution from the proposed expansion.	2	Please see response ref 12.1.3.	No
12.2.12	Concerns that the proposed expansion will interfere with public access to a television signal.	8	Please see response to ref 12.1.9.	No
12.2.13	Concerns that the proposed expansion will drive housing development at a rate which will drastically change the character and amenity of the area, increase traffic congestion. Areas such as Cockernhoe, Harpenden, Luton, Bedfordshire, Hertfordshire, Buckinghamshire	35	Please see response to ref 12.1.10.	No

Ref	Comment	No CC	Response	Change
12.2.14	General concerns regarding adverse impacts on the local community including, noise pollution, air pollution, light pollution, traffic.	1022	Please see response to ref 12.1.11.	No
12.2.15	Concerns regarding the waste expected to be generated from the construction and operation of the airport. Further information is required to understand how waste will be managed including the incinerator, Tidy Tip.	13	Please see response to ref 12.1.12.	No
12.2.16	Suggests that any potential sub-contractors managing waste disposal be required to meet high standards for waste disposal/management.	1	Please see response to ref 12.2.9. The lead contractor will be responsible for compliance with the SWMP regardless of whether works are sub-contracted or not.	No
12.2.17	Concerns that the expected population increase resulting from the employment opportunities created by the Proposed Development will further exacerbate the housing shortage in the area.	18	Please see response to ref 12.1.10.	No
12.2.18	Concerns that any new employment opportunities will benefit the overseas workforce. The expected population increase will further exacerbate pressures on the housing market, local amenities, social infrastructure, economy and may contribute to increased crime.	8	Please see response to ref 12.1.10 and 12.1.14.	No
12.2.19	The BHF said PM2.5 can have a "seriously detrimental effect to heart health", increasing the risk of heart attack and stroke and making existing health problems worse. It says that around 11,000 coronary heart disease and	1	Please see response to ref 12.1.3. A GCG framework which will ensure that the airport operates within particular "limits" is proposed. One of these limits relates to	No

Ref	Comment	No CC	Response	Change
	<p>stroke deaths each year in the UK are caused by particulate matter air pollution. Jacob West, executive director of healthcare innovation at the BHF, said: ""Air pollution is a major public health emergency and over many years it has not been treated with the seriousness it deserves. ""Unless we take radical measures now to curb air pollution, in the future we will look back on this period of inaction with shame. "As these figures show, the effect of air pollution on our heart and circulatory system is profound, and we have no choice over the air we breathe in the places we live. "Legislation was passed over a decade ago to protect people from passive smoke, and similarly decisive must be taken to protect people from air pollution. "The last government accepted that it is possible to implement tougher WHO air pollution limits, and the next government must now do so protect the health of the nation." Earlier this year the head of the NHS has declared an air pollution "emergency" after a major study today shows it causes hundreds of heart attacks and strokes every year. The UK study found reveal days of high air pollution trigger an extra 124 cardiac arrests, 231 stroke admissions and 193 hospitalisations for asthma across nine major UK cities each year. The research by Kings College London, which is due to be published next month was the first of its kind to analyse the impact of air pollution on health across different UK regions in this way. Dr Mark Miller, a British Heart Foundation-funded researcher specialising in air pollution, said: It is now recognised that air pollution affects almost all organs of the body and has a staggering detrimental effect on our</p>		<p>air quality. The relevant "limit" will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals. However, one of our GCG proposals is that where a "limit" is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the "limit". An independent body is proposed to monitor and enforce such "limits".</p>	

Ref	Comment	No CC	Response	Change
	health. Ultimately, there is no safe level of air pollution, but adopting stricter limits will be crucial to ensure that action is taken to effectively reduce air pollution. The potential health benefits of realising these targets are enormous, allowing everyone to live healthier lives for longer.			
12.2.20	Suggests any construction waste be reduced where practicable including; processing/recycling waste on site, utilising other LLAL owned sites for processing/recycling waste, define routes for waste haulage to avoid villages, supports innovation to reduce waste, increase recycling and improve the environment.	7	In relation to waste associated with the Proposed Development, please see response to ref 12.1.12. In relation to construction traffic please see response to ref 12.1.43.	No
12.2.21	Also in paragraph 7.4.9, LLAL trumpet, 'Overseas leisure travel [has] important quality of life benefits, which would not be reflected in such an analysis. The availability of leisure travel is a vital factor in making an area an attractive place to live and work, which ultimately will impact on GDP and employment. However, estimating this effect would be highly complex.' Yet the balancing factors that make an area an unattractive place to live and are a more tangible drain on GDP, such as stress-related illnesses caused by noise, air pollution, surface access issues, loss of Wigmore Valley Park etc. are ignored.	1	<p>Further information on the economic benefits of the Proposed Development can be found in the Draft Need Case.</p> <p>The potential impacts of the Proposed Development have been carefully considered in the PEIR, specifically in Chapter 7 Air Quality, Chapter 8 Biodiversity, Chapter 16 Noise & Vibration, Chapter 18 Traffic and Transportation, and Chapter 21 In-Combination and Cumulative Effects Assessment.</p> <p>The Health Impact Assessment addresses the potential health impacts on the public in</p>	No

Ref	Comment	No CC	Response	Change
			<p>Chapter 13 Health and Community of the PEIR.</p>	
12.2.22	<p>To give you some clarity here: • LLA initially responded to my noise complaints saying that everything was fine and within legal limits (IT WAS NOT) • I asked LLA what remedial action could be taken to help positively change the negative health effects the noise is having (THEY REPLIED WITH NO IDEAS) • LLA asked to meet me in a coffee shop. I replied saying i would be delighted to, but before i did i would like to be provided with what options of remedial action they were suggesting. This was so i could consider this before meeting (LLA REPLIED THAT NO REMEDIAL ACTIONS WERE BEING OFFERED BUT IT WAS JUST TO MEET AND TALK. I DECLINED) • I provided LLA with idea that would help positively change the negative health effects the noise is having on me (LLA REPLIED SAYING THEY WOULD NOT BE RPELYING TO ANY MORE OF MY COMPLAINTS) I escalated the issue to ██████████ COPY AND PASTED THE ANSWERS I HAVE READ A THOUSAND TIMES. ██████ OFFERED NO REMEDIAL ACTION) You will see from the above that I have gone out of my way to give LLA every opportunity to offer a single piece of remedial action that will have immediate effect on the noise. LLA have provided nothing other than copy and paste again and again of their 5 Year Plan (If I get sent this one more time it will likely push me over the edge)</p>	1	<p>LLAOL, as the current airport operator, has responsibility for existing noise levels. This is a matter which should therefore be progressed with them.</p> <p>Expansion of the airport should not mean that local communities suffer detrimental noise effects. As part of the Proposed Development, we are looking to introduce new measures to control noise, for example through the Noise Envelope and GCG.</p>	No

Ref	Comment	No CC	Response	Change
12.2.23	There is also a strong correlation between the increase in mass air travel and respiratory illness and death. There is a very large offsetting cost to the NHS.	1	Chapter 7 Air Quality of the PEIR concludes that air quality impacts for all receptors during construction and operation are negligible. As the Proposed Development is not assessed as adding to pollution it is concluded that there would be no knock-on effect on the existing healthcare system.	No
12.2.24	In addition to this we farm next to the runway at [REDACTED]. We have been there almost 6 years but, in this time, have seen a massive difference in the noise, light & air pollution, negatively. We have had numerous wildlife & habitat inspections instigated by LLA and have taken time out of our working day to allow these representatives (normally Birmingham University Students) access to the farm. Sadly, in this time we have lost all the barn owls that were on the farm as these have been taken by aircraft engines! Now when planes taxi and turn at the end of the runway their lights shine across the farmyards like search lights! The smell of burning rubber is now a constant and the noise that used to be a background noise that you could bear is now overpowering. If the airport was to expand it would defiantly make us question the location of our business as it seems unfair not only to impact this onto ourselves but our animals too. We pride ourselves on producing quality local meats that have minimal food miles and farmed using non-intensive methods, yet the animals will have to endure the additional noise, light & air pollution created by LLA	1	Potential impacts of the Proposed Development are identified and assessed in the relevant chapters of the PEIR, in particular Chapters 6 Agricultural Land Quality and Farm Holdings, 8 Biodiversity, 7 Air Quality which includes odour, 16 Noise and Vibration , and appropriate mitigation is proposed.	No

Ref	Comment	No CC	Response	Change
	which could stress the animals thus totally working against what we as a farming business are trying to do.			
12.2.25	Suggests ongoing communication with the local community during all phases of the development.	7	<p>This additional round of Statutory Consultation allows further opportunity for the local community to engage on the Proposed Development.</p> <p>Engagement with the local community will continue in the construction phase. Section 5 of the Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR covers community relations and stakeholder engagement.</p>	Yes
12.2.26	Suggestion to reduce council rates for the local community.	1	<p>Council taxes are set by the Government and local authorities. They are not a matter for consideration as part of the Proposed Development.</p>	No
12.2.27	Suggests that safe and secure accommodation be provided for airport staff, specifically prohibiting drug use.	1	<p>The Proposed Development would include accommodation provided within specific buildings to meet the operational need. The future operator would be responsible for managing such accommodation however as a minimum all national legislation regarding drug use would apply.</p>	No
12.2.28	Suggestion that contractors provide funding for community initiatives during construction including a viewing platform.	2	<p>This suggestion will be considered at the detailed design stage.</p>	No

Ref	Comment	No CC	Response	Change
12.2.29	General support for the proposed waste management proposals.	2	Noted.	No
12.2.30	Recognises that the Proposed Development will increase property prices in the area.	2	Noted	No
12.2.31	Our conversation has involved something of the diversity of the town its ages, gender, ethnicity, occupation, education, and the areas we live in. We have members who work at the airport or in associated businesses; live variously in Wigmore, under the flightpath, including the final approach, or in remoter areas of Luton; drive the roads; have medical conditions impacted by the pollution; walk in Wigmore Park; and have deep concern for local and global impacts of increased air travel and global warming. Yet we also recognise that as a church we and our members benefit directly from the economic benefits, and work closely with charities that benefit from LLAL funding.	1	Noted.	No
12.2.32	We write as the Parish Church Council of St Marys, the Parish Church of Luton following an hour s discussion of the proposed airport development plans at our recent meeting. As a church that has been at the heart of the Luton community through its history we join with Luton Borough Council and the people of the town in our commitment to both the welfare and prosperity of the town. It has become obvious to us in talking with many people that the fulfilment of that commitment in regard to	1	Noted.	No

Ref	Comment	No CC	Response	Change
	expansion of the airport is no easy matter, and our submission cannot be summed up in terms of an easy expression of favour or not at the plans. We are both enthusiastic at the potential for growth, yet deeply concerned at the damages such expansion will involve and not fully convinced by the proposed mitigation plans. It is therefore clear to us that there is no easy answer, and we have rather concluded that we should seek to express the range of opinions we share. We do so in the prayerful hope that the decisions you have to take will be done wisely and in the light of negative impact a decision either way will have.			
12.2.33	No direct suggestions, but one overall proposal is that no one involved with the airport, in any capacity, should be allowed to earn more than five times the income of the lowest paid employees. This would provide money for maximum job creation, as well as, for example, reducing house prices in the local area, for the benefit of everyone.	1	This is not a matter to be considered as part of the application for development consent.	No
12.2.34	Hope we can get city status	1	This is not of relevance to the Proposed Development.	No
12.2.35	Luton is a very diverse town that deserves to be recognised as a town that's welcoming and town of opportunities as it's very close to London and is one of the most favourable town to live within.	1	Noted.	No
12.2.36	This was minuted at a recent meeting of our Town Planning & Environmental Management Committee: The	1	Noted.	No

Ref	Comment	No CC	Response	Change
	<p>Committee received details of the proposed further expansion of London Luton Airport. This is the second public consultation following the initial consultation on proposed long-term sustainable growth of the airport in summer 2018. The airport is targeting expansion to 32 million passengers per annum from its current cap of 18 million, using the existing single runway. This second consultation includes key strategies to minimise and mitigate impacts on the environment. Cllr Clarke commented that with the expansion, the distance travelled for long haul flights would be less for travellers who would normally use Heathrow or Gatwick. The proposals would also create a lot of jobs from which Milton Keynes could benefit. The Chairman said that if the proposals do happen it may displace business jet travel to Cranfield airport potentially resulting in more flights over Newport Pagnell.</p>			

A13 Passenger Experience

Table A13.2: Regard had to statutory consultation responses on Passenger experience - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
13.1.1	General concerns with the current passenger experience at Terminal 1, with responses including that the experience is not enjoyable, noisy, chaotic, confusing, and messy, with a lack of seating or uncomfortable seating which leads to Airport users sitting in the corridors. Responses also included that the departure lounge is overcrowded, that there are continuous building works, issues with there not being any travelators, issues for those with limited mobility, and that the Airport is unable to cope with the numbers of passengers currently, and that the Airport is already too big and therefore should not be expanded.			9	<p>We recognise that many people are not happy with the passenger experience while using the existing terminal. Improvement works were underway before the 2019 consultation which exacerbated the poor experience. These improvement works have improved the experience at Terminal 1 in recent years. The Proposed Development includes an extension to Terminal 1.</p> <p>A second terminal building will help reduce pressure on the existing Terminal 1. The design and layout of the expanded airport is such that it allows growth without increasing pressure on existing facilities.</p> <p>The design of Terminal 2 will be to modern standards, addressing many of the issues highlighted in Terminal 1 including seating areas, legibility, and accessibility. It will provide an improved passenger experience.</p> <p>There will be an opportunity for further engagement on the detailed design of the airport at the detailed design stage.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Suggestions for operation of the airport are also welcome and will be for the future operator to consider.	
13.1.2	Concerns with the physical accessibility aspect of passenger experience of boarding aircraft.			1	<p>The proposed design of the new terminal safeguards the option of including passenger airbridges between departure gate and aircraft door. It should be noted however that the airlines using the airport tend to favour the use of steps rather than airbridges as it allows speedier boarding through both doors. The proportion of contact gates will increase as a result of the Proposed Development, which will allow for boarding without the use of steps.</p> <p>The Proposed Development will be designed in full compliance with the Disability Discrimination Act 1995 and related legislation.</p> <p>Additionally, the airport is required to provide assistance to Persons of Restricted Mobility at any stage of the passenger journey from arrival at the airport to the aircraft seat and the airport will continue to comply with all such obligations.</p>	No
13.1.3	Suggest that there is a need to improve the design and layout of the existing facilities in order to improve the passenger experience for Airport users. Specific suggestions			3	<p>Please see response to ref 13.1.1.</p> <p>Given the type of airlines and destinations that are anticipated to operate to/from the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	included being able to walk between terminals and direct route to boarding gates avoiding shops.				<p>airport it is likely that very few passengers would need to transit between the terminals. However, the Luton DART would enable such transfers.</p> <p>The layout of airport terminals must consider multiple design considerations that make it very difficult to provide multiple routes for passenger convenience. Furthermore, commercial areas are part of the level of service offered to the passengers and intentional surveys show that when passengers find closed shops or a lack of food and beverage outlets, this generates complaints.</p>	
13.1.4	The following suggestions were made to improve terminal facilities: clearing passengers from immigration efficiently, positive attitudes of staff and allowing open access to the terminal (including for non-travellers).			1	Suggestions for operation of the airport are noted and will be for the future operator to consider.	No
13.1.5	Suggest the physical accessibility of boarding should be improved, including by using air bridges and reducing the distance to gates and aircraft.			1	Please see response to ref 13.1.2.	No
13.1.6	Suggest physical accessibility within the airport should be improved, including the need for travelators, escalators, lifts,			3	Please see response to ref 13.1.2. Detailed design suggestions, such as the use of	No

Ref	Comment	PC	LA	No PILs	Response	Change
	improved access throughout for those with limited mobility, and improved signage and wayfinding.				travellers are welcomed and will be considered at the detailed design stage.	
13.1.7	easyJet believes that customer experience should be at the heart of proposed development. Given the low need for a second terminal in the short term we would urge LLAL and LLAOL to focus on customer experience improvements within the existing terminal infrastructure. These will not require significant CAPEX spend and should be focussed on the automation of core processes (such as boarding) as well as improvements in customer experience in passenger dwell areas such as the international departure lounge.			1	The Proposed Development includes an extension to the existing terminal as part of works to increase its capacity to 21.5 mppa. Suggestions for operation of the airport are welcomed and are for the operator to consider.	No
13.1.8	It is vital that London Luton airport combines the improvement in connectivity which will be offered by the DART with improved customer experience to reach its full potential.			1	Noted.	No
13.1.9	easyJet believes that improving customer experience should be a strategic priority for LLA. When the time does come for airport capacity growth, the customer should be placed at the heart of this development.			1	Please see response to ref 13.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
13.1.10	The automation of core processes (such as boarding) should be a focus.			1	<p>Many passengers prefer to use self-service kiosks. The airlines determine how they wish to see their passengers checked in and the new terminal will provide for a mix of conventional check-in desks and self-service kiosks.</p> <p>It is anticipated that the aviation sector will continue to transition towards touch-free, automated, self-managed passenger journey in the future; the use of facial recognition and biometrics is part of strategy for modern airports. This is a consideration for the detailed design stage.</p>	No
13.1.11	It is important that London Luton Airport Limited closely scrutinise the full airport experience for opportunities to incentivise travel by sustainable modes. Such options may include, but are not limited to, express queueing, access to lounges, giveaways and cross subsidy or discounted Public Transport tickets.		Milton Keynes Council		<p>We are committed to delivering the Proposed Development in a sustainable way.</p> <p>The Proposed Development includes many measures to encourage sustainable transport, for example reductions in car parking spaces to reflect our target for 45% of trips to be by sustainable modes. We are also assessing revised potential forecourt and car parking charging regime. Further information can be found in the SAETS.</p> <p>Suggestions for detailed measures such as these are welcomed and will be considered at the detailed design stage.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
13.1.12	Milton Keynes council recognises the important role of LLAL in providing both air passenger transport capacity to Milton Keynes, as its closest major international airport as well as employment opportunities to the wider catchment region, including Milton Keynes.		Milton Keynes Council		Noted.	No
13.1.13	Suggestion that improvements are needed in the customer experience within passenger dwell areas, such as the international departure lounge.			1	Please see response to ref 13.1.1.	No

Table A13.2: Regard had to statutory consultation responses on Passenger experience - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
13.2.1	Concerns with the current passenger experience of checking-in at Terminal 1, with specific concerns including that the check-in area is overcrowded, poorly organised, slow, has insufficient staff, queues and that check-in and security should be separated from the entrance of the airport and have an improved flow to security. Respondents were also concerned with the long walk from check-in to boarding gates.	11	Please see responses to refs 13.1.1 and 13.1.3.	No
13.2.2	Concerns with the current passenger experience of using the shops in Terminal 1, with specific concerns including that the shops take up too much room, meaning there is not enough space for passengers to sit, the external facades of shops are dated, and passengers feel that income from shop purchases is being prioritised over them as an Airport user.	19	The amount of retail has been configured to meet the requirements of passengers. The revenue from retail helps ensure the airport can offer competitive fees for airlines, thus keeping air fares lower. The internal finishes of the buildings and the external facades of shops are matters for the detailed design stage. Please also see response to ref 13.1.1.	No
13.2.3	General concerns with the current passenger experience at Terminal 1, with responses including that the experience is not enjoyable, noisy, chaotic, confusing, and messy, with a lack of seating or uncomfortable seating which leads to Airport users sitting in the corridors.	124	Please see response to ref 13.1.1. In order to maximise the current Terminal 1 capacity, we are proposing expansions of the current building. The design/selection of seating is a matter that will be considered at detailed design stage.	No

Ref	Comment	No CC	Response	Change
	Responses also included that the departure lounge is overcrowded, that there are continuous building works, issues with there not being any travelators, issues for those with limited mobility, and that the Airport is unable to cope with the numbers of passengers currently, and that the Airport is already too big and therefore should not be expanded.		Please see response to ref 13.1.2.	
13.2.4	Concerns with the future passenger experience after the expansion of the airport, with particular concerns including it not being clear about how the expansion will benefit the passenger, concerns about the impact on passengers in the case of an airport shut-down due to security or weather issues, concerns that increased numbers of flights will lead to increased numbers of delays in take-offs and landing, concerns that the expansion will lead to too much being cramped into a small space, decreasing the passenger experience further.	9	<p>Concerns regarding the level of service provided by the existing passenger terminal are noted, particularly during recent expansion works. This is one of the reasons why it is proposed to develop a second terminal to accommodate the majority of the expected growth, with only minimal further alterations to the existing terminal to increase its capacity to 21.5 mppa.</p> <p>Expansion of Terminal 1 boarding areas will be undertaken in areas adjacent to the existing terminal, with minimal operational interface. From a passenger experience perspective, Terminal 2 works will be undertaken completely 'offline' with little to no operational interface.</p> <p>Additional taxiways are proposed to ensure that flight delays are not increased above acceptable levels. This has been tested by simulation modelling.</p> <p>Airports do, on occasion, have closures due to a variety of natural and man-made events. The airport has well established procedures for managing the consequences of such events. In the very unlikely event that the airport</p>	No

Ref	Comment	No CC	Response	Change
			needs to shut down the appropriate management regime will be in place in the same way as already exists for the exiting terminal.	
13.2.5	Concerns with the physical accessibility aspect of passenger experience of boarding aircraft, with specific concerns with the length of walk from checking-in to boarding without a travelator, especially for the elderly and those with limited mobility, as well as the use of stairs to board aircraft rather than boarding bridges.	7	Please see response to ref 13.1.2.	No
13.2.6	Concerns with the physical accessibility within the airport, with specific issues including there not being sufficient room to move between shops and lounge seats to access departure gates, the terminals being overcrowded, and the walking distances being too far for those with limited mobility (the elderly, children, and disabled people), and that the mobility assistance services appears underfunded	11	Please see responses to refs 13.1.1 and 13.1.2.	No
13.2.7	Concerns about the level of passenger experience for both disabled passengers and those who don't speak English as their first language.	1	Please see response to ref 13.1.2. Provision of information in alternative languages is noted and will be a consideration for the detailed design stage.	No

Ref	Comment	No CC	Response	Change
13.2.8	Concerns that the airport is becoming less accessible, which is negatively impacting passengers	1	Please see response to ref 13.1.2.	No
13.2.9	Suggest that there is a need to improve the design and layout of the existing facilities in order to improve the passenger experience for airport users. Specific suggestions included improvements to waiting areas, signage and wayfinding, a general need for modernisation and access for those with limited mobility, as well as the provision of a direct walkway from terminals to gates, and covering any exposed walkways, reducing the number of stairs and to move the drop-off zone closer to terminals.	31	Please see response to ref 13.1.1. Suggestions for the detailed design of the airport are noted and will be considered at the detailed design stage.	No
13.2.10	Suggest the seating areas at both terminals and gates should be improved, as it is currently felt that there is not enough seating areas, and what is provided is uncomfortable.	28	Please see response to ref 13.1.1. Suggestions for the detailed design of the airport are noted and will be considered at the detailed design stage.	No
13.2.11	The following suggestions were made to improve terminal facilities: charging points, Wi-Fi, additional toilets, storage facility for unclaimed items, on-site medical assistance, water fountains, viewing area for watching aircraft, travelators, greater variety of retail and restaurant choices, the provision of airbridges,	24	Suggestions for the detailed design of the airport are noted and will be considered at the detailed design stage.	No

Ref	Comment	No CC	Response	Change
	hotels near the airport and airside transit facilities for passengers with connecting flights.			
13.2.12	The following suggestions were made for improving customer experience: improvements to terminal spaces and facilities, the modernisation of computer systems, employment and training focused on customer service, increased natural light, attractive public areas, improvements to efficiency, improve ease of access, and have specific airlines within each terminal.	37	In relation to improving ease of access, please see response to ref 13.1.2. Similarly, suggestions for operation of the airport, such as staff training, are also noted and will be for the future operator to consider.	No
13.2.13	Suggest the physical accessibility of boarding should be improved, including by using air bridges and reducing the distance to gates and aircraft.	10	Please see response to ref 13.1.2.	No
13.2.14	Suggest physical accessibility within the airport should be improved, including the need for travelators, escalators, lifts, improved access throughout for those with limited mobility, and improved signage and wayfinding.	16	Please see response to ref 13.1.2. Detailed design suggestions, such as the use of travelators are noted and will be considered at the detailed design stage.	No
13.2.15	Suggest there should be additional facilities supporting those with special needs, or those who do not speak English as a first language.	1	Please see response to ref 13.1.2. Provision of information in alternative languages, and other avenues for assistance for those with special needs, will be a consideration for the detailed design stage.	No

Ref	Comment	No CC	Response	Change
13.2.16	Comments in support of proposals, as the expansion will enable additional flights to a greater number of destinations	50	Noted.	No
13.2.17	General comments of support for the expansion, which will benefit passenger experience	50	Noted.	No

A14 Surface Access

Table A14.3: Regard had to statutory consultation responses on Surface access - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.1	Concerns about the coach station including that it is unnecessary, or that it has been poorly planned in terms of design, location, size or number of bays, as well as issues with it being uncovered.			1	<p>As part of the Proposed Development the airport is planning an increase in public transport usage from the current 38% to 45% as a minimum. This is considered an achievable target, but it will require improvements in public transport.</p> <p>Encouraging passengers to access the airport by coach is an important part of this and as such a new coach station is proposed. The detailed design for the coach station will be developed at the appropriate time and we are currently consulting with a potential operator. We are also in discussions with coach operators about increasing the coverage and frequency of services to the airport.</p> <p>Information on coach layouts has been provided as part of the drawing pack and appendix to Getting to and from the Airport –</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					Our Emerging Transport Strategy (SAETS).	
14.1.2	Concerns with the existing bus services, including: speed, storage space, limited coverage and timings.			3	Discussions have taken place with public transport operators and will continue as part of the Proposed Development to ensure that sufficient emphasis is placed on public transport access to both terminals. Discussions with bus providers aim to increase the coverage and frequency of services to airport.	No
14.1.3	General concerns around the distance to the terminals from car parks.			1	Where necessary buses will be provided to connect the car parks with the terminal buildings. Further information can be found in the SAETS .	No
14.1.4	Concerns that delivering additional car parking spaces will encourage the use of private cars, adversely impacting local communities through pollution, congestion, GHG emissions and adverse impacts on the local highways network.			1	The number of parking and drop-off spaces has been determined to meet the future demand alongside achievement of the mode share targets. Despite measures to increase the proportion of journeys to the airport by public transport there will be additional journeys made by car due to the growth in passengers as	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>a result of the Proposed Development. The SAETS aims to mitigate the impact of these airport journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods.</p> <p>Some of the car parks proposed are to replace existing car parks which are removed as a result of the Proposed Development.</p>	
14.1.5	The number of proposed parking/drop-off spaces is insufficient.			5	Please see response to ref 14.1.4.	No
14.1.6	Consider existing cost of parking too high and have concerns that future cost of parking/drop-off points will also be too high.			16	Drop off/parking charges will be/are set by the operator, however we are seeking powers to introduce additional charges for road users accessing the airport in order to encourage sustainable modes of transport. Further information can be found in the SAETS . In the application for development consent, we will develop proposals into a clear framework to govern the	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					setting and varying of charges. This will make clear how decisions would be made and set out the process to be followed before new charges could be imposed or existing charges varied.	
14.1.7	The cost of parking means that airport users are parking in inappropriate areas including residential streets and Luton Train Station, which are free/cheaper.			9	We will seek to enter discussions with local authorities with regard to the potential for parking management schemes in their local residential areas. It should be noted however, that it is the responsibility of neighbouring authorities to put in place any parking restrictions as appropriate. As part of our ongoing engagement with Luton Borough Council (LBC), should issues arise with parking at Luton Train Station, they will be identified, and a response agreed.	Yes
14.1.8	Airport staff should not have to pay for car parking.			1	We are seeking to encourage sustainable travel for all, and measures relating to staff will be brought forward in due course. Further information about the approach to staff travel can be found in the draft Travel Plan section of the SAETS . At this stage	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					of the scheme, it is not possible to rule out staff charging because this would need to be developed and implemented by the operator in the future.	
14.1.9	Concerns with the current configuration of drop-off points, which was cited as confusing, overcrowded, too far from the terminals (especially for those with limited mobility), uncovered from weather, and not providing enough time to collect / drop-off, particularly with delays caused by traffic which can lead to fines.			7	Please see response to ref 14.1.6. The current drop-off arrangements are temporary in nature, whilst Luton DART and the new multi-storey car park (MSCP) are constructed. Following completion of Luton DART the drop off will be located on the ground floor of the new MSCP, with improved connectivity to the existing terminal. The current drop off arrangements will be improved as part of the Proposed Development, and further detail can be found in the SAETS .	No
14.1.10	Concerns about the impacts of the relocation of the long-term car park, including the adverse visual impacts, pollution, loss of land (with particular concerns around the loss of Wigmore Park), and distance to terminals.			4	The impacts of the Proposed Development including the relocation of the long-term car park and loss of Wigmore Valley Park have been assessed in the relevant chapters of the PEIR, including Chapter 14 Landscape and Visual and Chapter 7 Air Quality .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.11	General concerns around the cost of delivering the proposed DART.			2	Although our Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the operation and construction of the scheme is outside of this application for development consent.	No
14.1.12	Private car or taxi is the preferred mode of transport for many in accessing the airport, particularly for those travelling with luggage.			1	Noted. Details of the anticipated modes of transport are set out in the SAETS .	No
14.1.13	Concerns that the proposed expansion, and improvements to the highways network and associated infrastructure (including additional parking spaces) will encourage the use of private car travel, with queries as to why these improvements are necessary with the public transport targets.			8	As part of the Proposed Development, we are aiming to increase the percentage of journeys to the airport by public transport. The Luton DART will be open when the Proposed Developed is delivered, providing a direct link to Luton Airport Parkway Station. A new coach station is proposed as part of the Proposed Development, we also propose to expand the coach facilities at the existing terminal. We are in discussion with bus providers to increase the coverage and frequency of services to airport.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>Despite measures to increase the proportion of journeys to the airport by public transport, there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development. The proposed strategy aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods. The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken, and can be found within the SAETS, to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>A Green Controlled Growth (GCG) framework which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface access - specifically, mode share. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.</p>	
14.1.14	<p>Concerns with the current highway network and infrastructure not being sufficient to cope with current demand, which is likely to be worsened by the proposed airport expansion, even with the</p>			10	Please see response to ref 14.1.13.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	proposed measures to create additional capacity.					
14.1.15	Concerns that the expansion will cause negative impacts on the condition of roads.			4	Please see response to ref 14.1.13. Highways maintenance is the responsibility of the relevant highway authority. We will continue to liaise with the relevant highways authorities in respect of the Proposed Development.	No
14.1.16	Issues currently with airport users, staff and taxis, parking on residential streets, or at Luton Parkway Station, causing issues with residents being able to park, blocking drives and pavements. This is likely to become a bigger problem with the expansion, as there are no mitigation methods proposed to combat this.			24	Please see response to ref 14.1.7.	No
14.1.17	The proposed expansion will lead to an increase in traffic and congestion, which is already felt to be an issue in the following areas: Hertfordshire; Hitchin; Luton; Tea Green; Putteridge; Vauxhall; Leighton Buzzard;			73	Please see response to ref 14.1.13. The modelling work has identified the locations where highway mitigations are required in response to the Proposed Development. The proposed highway mitigation	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	Apron; Wigmore; Stopsley; Aylesbury Vale; Chilterns; Dacorum; Berkhamsted; Tring; Buckinghamshire; Whitwell; Slip End; Stockingstone Hill; Royston; Markyate; Breachwood Green; Darley Hall; Brent Cross; Refbourne, as well as the following specific roads: M1; A1; M25, A505 (Hitchin Road), A602 (Stevenage Road); B653 (Lower Luton Road); A5; A41; B4506; Stockingstone Road; Gipsy Lane; Ashcroft Road; Wigmore Lane; Eaton Green Road; Century Park Access Road; Cutenhoe Road; Main Street; Marshalswick lane; Leagrave High Street.				designs, including type of mitigation and land required, are shown in the Appendix to the SAETS .	
14.1.18	Concerns around the impact that construction/preparatory works will have on the highways network and supporting infrastructure, through traffic and congestion, with specific concerns around the routes which will be taken, the number of construction vehicles used, impacts on rush			14	The CoCP will contain a suite of mitigation and management measures to ensure that the impacts of construction, including traffic, are avoided where possible and otherwise minimised. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	hour traffic flow, and the safety of roads.				A Draft CoCP is available in Appendix 4.2 of Volume 3 of the PEIR, and it includes within it a Draft Construction Traffic Management Plan .	
14.1.19	Concerns around the impact of expansion on the highway network and associated infrastructure, and how this will impact the local community through increased traffic and congestion.			17	Please see response to ref 14.1.13.	No
14.1.20	Concerns that the expansion will lead to increased traffic and congestion for people accessing the airport.			10	Please see response to ref 14.1.13.	No
14.1.21	Concern about continued impact of highways works on local communities as there have already been a number of major highways works (e.g. M1 J10).			1	Please see response to ref 14.1.18. The Health Impact Assessment in Chapter 13 Health and Community of the PEIR considers the potential impact of construction of the Proposed Development including highway works on local communities. It is not possible to predict other highway works which may be underway at the time of construction of highway mitigations	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					associated with the Proposed Development. To mitigate this, we have prepared an Outline Construction Traffic Management Plan which sets out measures that would be undertaken by the contractor to minimise the impact of construction traffic, this is available in Appendix 4.2 of Volume 3 of the PEIR. We will also prepare a construction-specific community engagement plan for the construction of the Proposed Development, which will be made available prior to the start of construction.	
14.1.22	Concerns around the cost of the proposed public and sustainable transport modes for the user, with many suggesting that they would only be encouraged to use these modes if the cost was comparable to that of using and parking a private car or taking a taxi.			5	Noted. We are not responsible for setting public transport fares but will continue to liaise with operators to encourage fares to be set at a level which supports our public transport ambitions.	No
14.1.23	The proposed improvements to public and sustainable transport			41	As part of the Proposed Development, we have set	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>would not encourage their use in accessing the airport, due to lack of accessibility, convenience of car, living walking distance to the airport, and cost of public transport.</p>				<p>ambitious public transport mode share targets and are aiming to increase the share of public transport trips made by passengers from 38% currently to 45%. The Proposed Development includes measures to encourage public transport use, including a new Luton DART station at Terminal 2 and a new coach station.</p> <p>We have carried out public transport investigations which included assessing rail capacities and identifying which additional trips could access the airport by public transport. This was then applied to our modelling work to ensure a robust approach.</p> <p>Rail improvements already in place plus contactless payment (recently introduced) have already contributed to a significant increase in the public transport modal share from 32% (in 2016) to 38% (in 2019). Luton DART and Crossrail should make a significant additional contribution. As background traffic levels increase on the wider network, road congestion will also encourage greater use of rail over</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>time. If the airport is given permission to grow beyond 19 mppa it is likely to become even more of a coach hub as operators take the opportunities to extend and consolidate their networks. We are also in discussion with bus providers to increase the coverage and frequency of services to airport.</p> <p>The Proposed Development will be designed in full compliance with the Disability Discrimination Act and related legislation.</p> <p>Additionally, airports are legally required to provide assistance to Persons of Restricted Mobility at any stage of the passenger journey from arrival at the airport to the aircraft seat, and the airport will continue to comply with all such obligations.</p> <p>We therefore believe that the 45% target achievable. Further information can be found in the SAETS.</p> <p>Please see response to ref 14.1.22 in respect of public transport fares.</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.24	Concerns that the objective of increasing the number of passengers travelling to and from the airport using public transport to at least 45% is unrealistic, unnecessary and unenforceable.			12	<p>Please see response to ref 14.1.23.</p> <p>Further information on how the target of 45% mode shift has been reached can be found within the SAETS.</p> <p>A GCG framework which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface access - specifically, mode share. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.</p>	No
14.1.25	Objection to the airport expansion and therefore			1	Noted.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	proposals to increase the use of public transport in accessing the airport are unnecessary.					
14.1.26	The airport currently has poor public transport services and links, with the following issues cited: busy, unreliable, slow services which cannot be accessed from a wider enough area (particularly in accessing the airport from the East or West), limited hours of operation, and not user friendly for those with limited mobility issues.			9	Please see response to ref 14.1.23.	No
14.1.27	Concerns that the current targets of increasing the number of passengers travelling to and from the airport using public transport to at least 45% are too high, and therefore unrealistic and unachievable.			9	Please see response to refs 14.1.23 and 14.1.24.	No
14.1.28	Concerns that the current targets of increasing the number of passengers travelling to and from the airport using public transport to at least			2	As part of the Proposed Development the airport is planning an increase in public transport usage from the current 38% to 45% as a minimum. This is	Yes

Ref.	Comment	PC	LA	No PILs	Response	Change
	45% are too low and not ambitious enough to contribute towards overall sustainability, or that these targets will not offset the negative impacts of the expansion or of flying.				considered as an achievable target, but it will require improvements in public transport, through entering into discussions with public transport operators. Further information on how the target of 45% have been reached can be found within the SAETS .	
14.1.29	The current highways network is already at capacity, and therefore the airport expansion will exacerbate these issues.			1	Please see response to ref 14.1.13.	No
14.1.30	Safety concerns regarding the proposed road and junction improvements, as a result of increased traffic and congestion leading to speeding, leading to road accidents.			5	The highway design of the Proposed Development has been developed to the standards set within the Design Manual for Roads and Bridges. Road Safety Audits would be carried out to inform further design development. Further information can be found in the SAETS .	No
14.1.31	Surface access proposals include highways interventions which have been previously rejected by PINS, or that do not			1	It is not clear which proposals this response is referring to, nevertheless we have been engaging with relevant local highway authorities in developing our proposals, including to ensure	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	conform with local planning policy.				they comply with local planning policy and will continue to do so.	
14.1.32	General objections to the road and junction improvement proposals, including that proposals are either too extensive, or not extensive enough, and will cause disruption for local people, destruction of the local environment, and will have limited potential for upgrades in the future.			2	<p>Please see response to ref 14.1.13. The impacts of the Proposed Development have been assessed in the PEIR, including impacts on the local community in Chapter 13 Health and Community, on biodiversity in Chapter 8 Biodiversity and on landscape in Chapter 14 Landscape and Visual.</p> <p>The comment regarding future upgrades is noted, the proposed highway works have been designed to accommodate the future demand forecasts and as such any subsequent future upgrades are not envisaged at this time.</p>	No
14.1.33	Concerns around the cost of travelling to Luton via rail, which is currently, and likely to in the future, act as a deterrent in accessing the airport by rail.			1	Please see response to ref 14.1.22.	No
14.1.34	Surface access proposals are ineffective/insufficient.			2	Please see response to ref 14.1.13.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					Surface access proposals have been developed using recognised models informing the design process. Further information can be found in the SAETS , which also details how the surface access proposals have been influenced by previous rounds of consultation.	
14.1.35	Objection to the airport expansion, therefore all surface access proposals are unnecessary.			3	Noted.	No
14.1.36	A car park should be constructed nearer the middle of the proposed new park. This would encourage more people to use it and reduce the distance to the terminal.			1	Please see response to ref 14.1.3. Further information can be found within the SAETS .	No
14.1.37	Suggestions to limit the car parking spaces within the proposals, which will in turn encourage the use of public transport in accessing the airport.			2	Noted. As referenced in the response ref 14.1.4 the number of parking spaces is linked to the future demand forecasts and the increase in public transport usage.	No
14.1.38	Suggestions to make car parking more expensive, to			1	We are seeking powers to introduce additional charges for road users	Yes

Ref.	Comment	PC	LA	No PILs	Response	Change
	discourage accessing the airport via private cars, and instead encouraging the use of sustainable transport.				accessing the airport in order to encourage sustainable modes of transport. Further information can be found in the SAETS . In the application for development consent, we will develop proposals into a clear framework to govern the setting and varying of charges. This will make clear how decisions would be made and set out the process to be followed before new charges could be imposed or existing charges varied.	
14.1.39	Suggestions to either reduce the price of drop-offs and car parking, or make it free, with particular suggestion to allow electric vehicles free parking, and discounts for local residents. Some respondents felt that this would reduce the number of airport users parking on residential roads.			5	Please see the response to ref 14.1.6 regarding parking and drop-off charges. Further information on the proposed approach to parking can be found in the SAETS . Please see response to ref 14.1.7, which provides a response on parking on residential roads.	No
14.1.40	Suggestions to improve the facilities and accessibility of drop-off point including link with the DART and more user-friendly.			5	Please see response to ref 14.1.9.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.41	Suggestions that there should be additional fast charging electric vehicle charging points at the airport, and around Luton, with some respondents suggesting these to be free, while others suggest the motorists should pay for their use.			1	Provision for electric vehicles, including the potential for charging points, will be considered as part of detailed design.	Yes
14.1.42	Suggest a Park and Ride scheme for airport users.			2	<p>Currently there are no proposals to provide park and ride schemes as they are deemed not necessary for the public transport strategy for the Proposed Development.</p> <p>Our surface access strategy mitigates the impact of the Proposed Development without the need for a park and ride scheme. If a promoter(s) were to come forward with sites to be used for a park and ride scheme we would engage with them as appropriate, although such a scheme is not necessary as part of the Proposed Development.</p>	No
14.1.43	Suggestions that the DART should be a free service to encourage airport users to use sustainable transport methods.			3	Our Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the operation and construction of the	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	Some respondents felt that Oyster cards should be able to be used for the DART.				<p>scheme is outside of this application for development consent.</p> <p>It is likely that a charge will be applied to passengers of the Luton DART, however this pricing structure has not yet been finalised and setting such charges is not part of the Proposed Development.</p> <p>You can only use contactless to pay as you go at Luton Airport Parkway Station (not Oyster). If you don't use contactless, you need to buy a paper ticket. Journeys to/from Luton Airport Parkway Station are not included in fee caps.</p>	
14.1.44	Suggestions that there is a need to improve the access to the airport via the highways network, with particular roads including the M1, A1081, A1, Wigmore Lane roundabout, a better link to the north which doesn't rely on the M1, A6 or A1, access from J10 of M1 and A505, as well as access from the M4 with a tunnel under the runway. There were also suggestions that access should be improved from Hitchin,			3	<p>Please see response to ref 14.1.13.</p> <p>The modelling work has identified the locations where highway mitigations are required in response to the Proposed Development. The proposed highway mitigation designs, including type of mitigation and land required, are shown in the Appendix to the SAETS.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	Harpenden, east/west links, and a reduced use of Wigmore Lane, Ashcroft Road and Vauxhall Way.					
14.1.45	Suggestions to reduce traffic and congestion on the highways network, with particular concerns regarding roads in Harpenden, the A1(M), M1, A505, A602, Darley Road, A6, Wigmore Lane and Ashcroft Lane. Suggestions to prevent additional traffic included the Hitchin Bypass, dualling access roads, and through ensuring there are mitigation measures at Wigmore Place roundabout to deter traffic from Breachwood Green.			6	Please see response to ref 14.1.13.	No
14.1.46	Suggestions on how to reduce traffic and congestion on the highways network from construction vehicles including minimise road closures, not blocking roads, limit movement to daytime, ban construction vehicles from villages and ensuring that construction			4	Please see response to ref 14.1.18.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	vehicles abide by lorry ban areas.					
14.1.47	Suggestions for how to improve safety along the highways networks including: limit movement to daytime, ensure mud is removed and undertake impact assessments of highways works.			2	We are working with the relevant authorities regarding design solutions for the highways improvement and all designs will be subject to the relevant safety audits. Please see response to ref 14.1.18 in respect of construction noting that wheel washing will be a requirement.	No
14.1.48	There is a need to prevent airport users from parking on residential streets, and the airport should pay for introducing restrictions and permits.			3	Please see response to ref 14.1.7. The cost of introducing such measures is not a matter which has been discussed with local highway authorities.	No
14.1.49	Suggestions that the mode shift targets should be achieved regardless of whether the airport expansion progresses.			7	This is a matter for consideration by the current airport operator, LLAOL.	No
14.1.50	Suggestions that accessing the airport by public transport should be encouraged, for both airport users and staff through various measures including			8	For pricing, please see response to ref 14.1.22. We are committed to delivering the Proposed Development in a	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	discounts when using public transport, reduced or no car parks, advertising of public transport when buying flight tickets, effective marketing, and enforcement of targets. Other suggestions included ensuring public transport runs in the early morning and late at night and banning heavily polluting vehicles from the airport similar to a low emission zone.				sustainable way. Suggestions for detailed measures such as these are welcomed and will be considered at the appropriate time. The SAETS includes a draft Travel Plan with more information about the measures proposed.	
14.1.51	Suggestions that the airport should only support, or incentivise carbon neutral methods of accessing the airport, through electric / hybrid / hydrogen buses, taxis, autonomous ride hailing vehicles, and private cars, with associated infrastructure provided by the airport.			3	Please see response to ref 14.1.23. The type of buses used by local operators is outside of our control however we will enter into discussions with local bus operators to encourage the use of sustainable buses. Trends show that electric buses are likely to become much more commonplace within the next decade. Please see response to ref 14.1.6 for access via cars.	No
14.1.52	Mode share targets should be more ambitious.	Chilterns Conservation Board		9	Please see response to ref 14.1.28.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.53	Suggestions that proposals for specific roads and areas need improving, including the A1, A1081, Lower Luton Road, Wigmore Lane, A505, Stopsley Roundabout, west of Luton, A1(M), Vauxhall road, access from Stevenage, M1 northbound, A6, Darley Road, Eaton Green Road, Crawley Green, Stockingstone Road, Gypsy Lane, Dunstable Road, Kimpton Road, London Road, B653, A5183, M25 and Hertfordshire			6	Please see response to ref 14.1.13.	No
14.1.54	Suggestions that road and junction proposals should not include any additional traffic lights, with concerns around traffic flow, delays, congestion, noise, and air quality.			4	Chapter 18 Traffic and Transportation of the PEIR provides a transport assessment covering both the construction and operational phases of the Proposed Development, where required mitigation is proposed. Where required, traffic signals are included in the Proposed Development and have been assessed as relevant in the PEIR. Safety audits will also take place in due course for all of the highway mitigation proposals.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.55	<p>Suggestions that there is a need to improve the services, links and capacity of the various rail services serving the airport, with an increase in capacity through additional services from Milton Keynes, Oxford, Watford Junction, St Albans, Cambridge, Bedford, Stevenage, Harpenden, Radlett, Elmstree & Borehamwood, Dunstable, London (St Pancras, Euston), Aylesbury, Stanstead Airport, Wheathampstead, Welwyn Garden City, Hertford, Nottingham, with direct links from Luton Parkway, so that there is no need for the DART / shuttles etc. with suggestions from some respondents that this link should be underground. Suggestions for improvements in capacity of the Thameslink services, as well as 24/7 services, and a dedicated rail link so that airport users don't impact commuters. Suggestions for improved</p>			3	<p>Please see response to ref 14.1.23. Peaks in air passenger rail demand do not coincide with commuter peaks. Analysis shows that in 2043, if services remain as at present, the additional rail demand from additional air passengers will take a maximum of 6% of the available capacity (seated and standing) in the peak periods (07:00-10:00 and 16:00-19:00). This is summarised in our SAETS.</p> <p>Although our Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the operation and construction of the scheme is outside of this application for development consent.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	facilities included lifts and parking at Luton Parkway.					
14.1.56	Suggestions that there is a need for surface access improvements despite/regardless of the expansion.			3	Noted. This is outside the scope of the Proposed Development.	No
14.1.57	Suggestions to improve active travel infrastructure, including cycle facilities.			2	<p>Pedestrian and cycle connectivity to the airport from local residential areas has been a key consideration in terms of meeting the public transport mode share targets, and details of this can be found within the SAETS. Such linkages will be provided along the new Airport Access Road and onto the roads in the immediate vicinity of both terminals. In addition, all Public Rights of Way within our land holdings would be improved, either through surfacing, new signage, or improved connectivity.</p> <p>The provision of segregated cycle and pedestrian routes along rural lanes would impact on third party land which falls outside of our control.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.58	Supporting comments regarding the mode share targets, as it was felt that public transport improvements will encourage the use of these in accessing the airport. Some respondents noted that this would only be the case, depending on cost of public transport, how busy services will be, through the delivery of early morning or late-night services, faster direct routes from towns and villages and not needing to use a combination of modes.			14	Noted.	No
14.1.59	Comments of support for the mode share targets of 45%, however, some respondents felt that this should be achieved without the airport expansion.			5	Noted.	No
14.1.60	Comments of support regarding the proposed coach station.			2	Noted.	No
14.1.61	General comments of support of the design and location of			2	Noted.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	proposed road and junction improvements.					
14.1.62	Support of the improved rail services and links proposals.			2	Noted.	No
14.1.63	General comments of support for the surface access proposals (including the parking proposals), which will improve traffic and congestion, and encourage the use of Luton over other airports in the region, benefiting the local economy.			4	Noted.	No
14.1.64	Comments in support of the DART proposals, including it being a more sustainable method of accessing the airport, that it will encourage public transport in accessing the airport, which will reduce traffic and congestion, and that it should have been delivered in recent years and should be promoted effectively to maximise benefits.	Kings Walden Parish Council Chilterns Conservation Board		15	Noted. Although our Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the operation and construction of the scheme is outside of this application for development consent.	No
14.1.65	Suggestions that in order to encourage accessing the			1	Please see response to ref 14.1.22.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	airport through public transport, and specifically through public buses, that free or subsidised services should be offered.					
14.1.66	Various suggestions that in order to achieve the mode share targets, the bus and coach station facilities and services need to be improved.			4	Please see response to ref 14.1.13.	No
14.1.67	Concerns around the proposed DART service, which respondents felt to be inadequate in meeting mode share targets, for reasons including, the DART won't be attractive for those who do not live on the rail line connecting with Luton Parkway, the DART should run in a continuous loop, concerns that the DART will not meet the demands of 2 terminals, demand for the DART should be met by buses, airport users will prefer cars over using the DART, and therefore traffic and congestion will continue, DART may be unsustainable in the near			6	<p>Although our Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the operation and construction of the scheme is outside of this application for development consent.</p> <p>The Luton DART will only run from the station to the two terminals. We have assessed bus and coach connectivity as part of the wider public transport measures. Please refer to the SAETS for more information.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	future, DART should link with town centre, concerns that the DART is unnecessary.					
14.1.68	Concerns around surface access proposals, which were seen to be unnecessary, inadequate, insufficient. Objections included the accuracy of modelling work, phasing of interventions, impacts on local communities, electric car proposals, parking schemes, the inclusion of the Vauxhall Road Trailer Park in proposals, the planned roundabout at the top of New Airport Way, constant roadworks, use of Luton Parkway Station as a bus hub, and that the proposals do not cover a wide enough area, or correspond with existing proposed surface access schemes. There were also concerns with how far the Counties and Highways Agencies support the proposals. Many respondents suggested that the expansion			8	<p>Most relevant authorities have agreed the modelling data and usage, with the strategic model being widely used by these authorities. The VISSIM model was specifically built for this project. Mode share targets established will be adhered to as part of an ongoing monitoring program. Please refer to the SAETS for more information.</p> <p>Please see response to ref 14.1.41 in respect of electric vehicles and 14.1.32 in respect of impacts on communities.</p> <p>A new coach station is proposed as part of the Proposed Development. The use of Luton Parkway Station as bus hub is not proposed as part of this application for development consent.</p> <p>The relevant counties and highways authorities have been engaged throughout the development of proposals and engagement will continue. Responses they provided</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	will exacerbate any surface access issues currently faced.				<p>to the 2019 consultation are included in this 2019 Consultation Feedback Report.</p> <p>We carried out modelling work using models agreed with relevant local authorities. The models came out in support of mitigation proposals that we are consulting on. In our view these proposals are adequate and mitigate the impact of additional trips related to airport expansion on the highway network. The trailer park included is seen as part of our proposals for staff parking. Overall, our parking numbers reflect the modal share targets we have set. The Percival Way junction improvements have been identified as being needed through our modelling results.</p>	
14.1.69	Suggestions that new roads are required at various locations.			3	Please see response to ref 14.1.13	No
14.1.70	Suggestions that the road and junction proposals are necessary despite the expansion.			3	Please see response to ref 14.1.13.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.71	Suggestions that there needs to be restrictions against airport users using certain routes.			1	As part of the ongoing review process, we intend to produce monitoring programs, assess any impacts, and then intervene accordingly if any issues persist as appropriate.	No
14.1.72	Suggestions to limit the car parking spaces within the proposals, which will in turn encourage the use of public transport in accessing the airport.			1	Noted.	No
14.1.73	Concerns around Luton Parkway being used as an airport car park as it is cheaper than the airport car parks and then taking the DART to the airport, which is reducing the number of spaces available for those with Season Tickets for Luton Parkway.	Kings Walden Parish Council		1	Please see response to ref 14.1.7.	Yes
14.1.74	Concerns that there are insufficient car parking spaces for airport employees.	Kings Walden Parish Council		1	Detail on staff parking modelling can be found within the SAETS . Calculations for staff parking are based on projected numbers of staff and are influenced by the public transport mode share targets. The	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					proposed numbers of spaces are also based on shift patterns so as to avoid a surplus of spaces. In the event of a car park being used for multiple purposes, clearly defined areas will be provided between staff and passenger areas, and buses will collect staff.	
14.1.75	Concerns that as a result of the insufficient car parking capacity at the airport, there is a risk of 'fly-parking' and private firms setting up unauthorised satellite car parks in the AONB.	Chilterns Conservation Board		1	The analysis carried out and the car parking requirements that have been established are based on our future modal share targets and as such we have enough spaces to meet that demand at the public transport levels targeted. This is in-line with our sustainable approach to transport. We cannot comment on illegal car parks off site as that is a matter for the relevant local authority to address.	No
14.1.76	Concerns around the number of available car parking spaces designated for TUI staff.			1	Please see response to ref 14.1.74. Any spaces affected will be replaced as per existing levels, further information about parking proposals can be found in the SAETS .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.77	Concerns that the increase in car parking provision proposed will not encourage the modal shift to sustainable transport.		Milton Keynes Council	1	Please see response to ref 14.1.13.	No
14.1.78	The mode shift targets will still represent a growth in numbers of cars driving to Luton Airport, which require these additional parking spaces proposed.	Chilterns Conservation Board		1	Please see response to ref 14.1.13.	No
14.1.79	Concerns that there has not been any robust evidence provided that the local road network will be able to adequately serve the additional traffic generated through the expansion.			1	Please see response to ref 14.1.13. Most relevant authorities have agreed the modelling data and usage, with the strategic model being widely used by these authorities. The VISSIM model was specifically built for this project. Please refer to the SAETS for more information.	No
14.1.80	Concerns that the Luton Hoo Elite Hotels Estates will experience increased traffic (through roads including the A505, and other local and trunk roads), which will adversely impact the staff and guests accessing the Estate, both			1	The majority of the traffic is based on forecasts of passengers accessing the airport via the M1 Junction 10. Please refer to the SAETS for more information. A Draft Construction Traffic Management Plan is included in the Draft CoCP in Appendix 4.2 of	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	when fully functioning, and during construction. The phasing of highways interventions is crucial here in minimising impacts.				Volume 3 of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	
14.1.81	Concerns around the cost of public transport, with concerns that driving, and parking is a more affordable option.	Chilterns Conservation Board		1	Please see response to ref 14.1.22.	No
14.1.82	Concerns that if the mode shift targets are not met, then there will be adverse impacts on the local highways network.			1	As part of the Proposed Development the airport is planning an increase in public transport usage from the current 38% to 45% as a minimum. This is considered an achievable target, but it will require improvements in public transport. Further detail can be found in the SAETS .	No
14.1.83	Concerns regarding potential restrictions placed on the use of car parking, which will be an issue for staff and guests at Luton Hoo Elite Hotels Estates.			1	This location is outside the scope of the application for development consent and so restrictions on use of its car parking are not a matter for the Proposed Development.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.84	Highways forecasting underestimates the volume of traffic which will access the airport from the east, through Hitchin, Breachwood Green, Kimpton, Whitwell, Codicote, Welwyn and Wheathampstead. Improvements are required now, not through the proposed phased approach. These works should include a Hitchin bypass, linking the airport via a motorway standard A505, to a widened A1M, and without, the expansion should not continue. The roads around the airport are already at capacity, and there seems to be nothing planned to alleviate the everyday traffic jams to and from Junction 10 of the M1. You should include a review of the Eaton Green Rd/Darley Road roundabout and rural roads being used to park and as rat-runs for commuters. This needs a cross-county party looking at this now and addressing to find solutions.	Kings Walden Parish Council		1	<p>Please see response to ref 14.1.13.</p> <p>The surface access strategy aims to mitigate the impact of these airport journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods.</p> <p>We have been working with all relevant highways authorities across all relevant counties to develop our proposals.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.85	<p>The airport expansion is predicted to have an impact on the road network including Junction 10 of the M1. Some potential improvement measures for Junction 10 are outlined in the Surface Access Strategy report, although not in detail. The Strategy goes on to state that discussions about mitigation measures are ongoing with Highways England, the relevant local authorities and public transport operators and that LLAL will continue to work towards an agreement on the form of transport network solutions that will address the impacts. As a general principle, any improvements to the highway network should take account of background traffic growth (so as to future-proof any improvements) and any development proposals that remain live opportunities in the CBLP EiP and that rely on access to the same highway network. In the case of LGC s</p>			1	<p>The highways modelling undertaken No to inform the Proposed Development considers background traffic growth, further information can be found in the SAETS.</p> <p>The long and short lists of cumulative schemes assessed within Chapter 21 In-combination and Cumulative Effects of the PEIR. The list of cumulative schemes has been consulted on with host authorities through the Planning Officers Coordination Group.</p> <p>Modelling takes into account any relevant nearby development proposals which are either committed or under construction.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	landholding, this would include its proposals at J10/10a on the M1 south west of Luton. The PEIR states at para 6.11.1 that the cumulative assessment should take account of not just commitments, but reasonably foreseeable developments. This approach is normal practice with for EIAs. In this regard, LGC s site at J10a M1 should be taken into account.					
14.1.86	The proposed airport expansion includes a major new road comparable to the CPAR scheme proposed some years ago. The road dissects a number of TUI Group buildings and car parks. Whilst the principle of the airport expansion proposals are supported by TUI Group, without proper and full consideration and mitigation, the proposed expansion will severely compromise TUI Group operations.			1	Noted.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.87	Concerns that accessing the airport via rail is only practical from the north/south, however, there is a significant number of airport users accessing from the east, through Hertfordshire and Buckinghamshire. Current Thameslink services are already overcrowded at peak times, and have insufficient luggage provision.	Kings Walden Parish Council		1	Please see response to ref 14.1.55.	No
14.1.88	Concerns around how TUI w stoill be impacted by the proposed expansion, with concerns that there has not been sufficient mitigation measures explored.			1	Please see response to ref 14.1.76 in respect of staff parking and ref 14.1.13 for mitigation measures.	No
14.1.89	Walking or cycling is not practical with luggage or for a family travelling with young children.	Kings Walden Parish Council		1	Active travel proposals are relevant to both passengers and staff; however, it is envisioned that the majority of those accessing the airport by walking or cycling will be employees.	No
14.1.90	The provision of parking would be more space efficient as a	Chilterns Conservation		1	Some multi story car parking is being proposed as part of a wide range of parking provision. Details of parking within the Proposed	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	multi-story car park, located nearby the new terminal.	Board			Development are set out in the SAETS .	
14.1.91	The plan as it stands puts significant pressure on the site to take all the car parking. It would seem to make more sense to seek alternative further afield sites that could take off-site parking, for both customers and staff, that could then have airport users brought to the site via mass transit.			1	Please see response to ref 14.1.42.	No
14.1.92	Assessment and action is needed on use of roads in the Chilterns AONB for accessing the airport. We do not seek junction improvements to ease congestion, we seek measures to reduce use of the AONB for through-traffic, for example using the B489 to Dunstable and A6 to Bedford.	Chilterns Conservation Board		1	The SAETS sets out the monitoring and mitigation measures proposed, as well as the transport impact on the Chilterns AONB.	No
14.1.93	Construction traffic will need to be carefully managed in order to avoid negative impacts on the Local and Strategic Road network.	Highways England		1	Please see response to ref 14.1.18.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.94	<p>Having reliable and efficient road connectivity to the airport is of critical importance, both during the work planned for Century Park and after expansion is complete. It is essential that all road works taking place are designed to minimise disruption to time critical freight operations and to ensure that continued access to the cargo shed is maintained. Specific concerns include; a significant amount of Express freight movements take place overnight, so road closures overnight would have a disproportionate impact on our operations, and therefore a detailed traffic mitigation plan is urgently required, explaining how congestion is to be managed during the works and the impact on journey times; Early communication of intended road works, impact on journey time and access, is critical to enable planning.</p>			1	<p>Please see response to ref 14.1.18. Luton Rising is the developer of both New Century Park and the Proposed Development, giving us greater scope to influence construction to minimise disruption on existing and future airport operations.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.95	The mode shift target will help to mitigate some of the other impacts of growth by reducing the number of vehicle movements to site and on the local road networks.			1	Noted.	No
14.1.96	Unless the construction of a Hitchin bypass, linking the airport via a motorway standard A505, to a widened A1M, no expansion should be permitted.	Kings Walden Parish Council		1	The SAETS sets out the transport modelling undertaken and has not identified this as being necessary to mitigate for the impact of the Proposed Development.	No
14.1.97	Suggestions that highways improvements are required now, not as a phased approach.	Kings Walden Parish Council		1	Please see response to ref 14.1.84. We are committed to ongoing monitoring of highway network performance and interventions being made as appropriate.	No
14.1.98	Suggestions that an uninterrupted roadway to major trunk roads, using flyovers and avoiding junctions is preferable to roundabouts.	Kings Walden Parish Council		1	Our analysis and level of mitigation shown within the SAETS indicate that such measures are not required.	No
14.1.99	Concerns that we might only know whether surface access proposals will be successful once complete.			1	The best available tools have been used to predict what mitigation is required. We will also monitor vigorously the network performance to ensure measures are adequate	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>and appropriate in terms of magnitude and time of implementation. Further details of this can be found within the SAETS.</p> <p>A GCG framework which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface access. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.</p>	
14.1.100	Concerns with the current configuration of car parks, including difficulties with finding cars after using the airport, traffic flow, no cover from			4	Further information about car parking can be found in the SAETS . Comments in respect of the detailed design of these are noted and will	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	adverse weather, continued re-design of car parks leading to confusion, and the unattractive design currently. Concerns that these issues will be exacerbated with expansion.				be considered at the detailed design stage.	
14.1.101	Object to the expansion of Luton Airport, therefore any developments to car parking facilities are unnecessary.			3	Noted.	No
14.1.102	Concerns that it is unclear how the targets of increasing the number of passengers travelling to and from the airport using public transport to at least 45% have been derived, or that this forecasting is inaccurate or unreliable. Some respondents noted that travelling via car will continue to be the favoured method of accessing Luton as sustainable access proposals are insufficient.			19	Please see response to ref 14.1.23.	No
14.1.103	Concerns that the road and junction improvement proposals are inadequate and insufficient, and are likely to be ineffective,			20	Please see response to ref 14.1.13.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	with some particular concerns that there are already issues which will be exacerbated by the expansion					
14.1.104	The existing rail network, serving Luton Airport currently were seen to be poor.			4	Please see response to ref 14.1.55.	No
14.1.105	Concerns around the impact the proposed expansion will have on the capacity of rail services, which are already seen to be overcrowded. Particular services of concern were the Thameslink, East Midlands Railway, and general services at rush hours, as well as services from Harpenden, London (St Pancras or Kings Cross), St Albans, Welwyn Garden City, Stevenage, Radlett, Elstree & Borehamwood and Bedford			22	Please see response to ref 14.1.55.	No
14.1.106	Concerns around the cost of using a taxi to access the airport.			1	Noted. We are not responsible for setting taxi fares.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.107	Suggestions that in order to achieve the mode share targets, the cost of public transport needs to be free, reduced or subsidised by the airport.			1	Please see response to ref 14.1.22.	No
14.1.108	Suggestions that existing roads should be improved in quality.			1	The Proposed Development includes highways improvements which have been identified as necessary to mitigate impacts of the expansion.	No
14.1.109	Suggestions that there should not be any highways improvements, or that roads should not be widened.			1	Please see response to ref 14.1.13.	No
14.1.110	Improve the road and junction proposals through the delivery of a number of Bypasses, including around all towns and villages around Luton, a bypass around Hitchin, or a bypass around Harpenden.			3	Please see response to ref 14.1.13. The level of mitigation proposed and shown within the SAETS indicates what is required based on the modelling. This has not identified the need for any new bypasses.	No
14.1.111	Even with your target of 45% of passengers arriving by public	Kings Walden Parish Council		1	A GCG framework which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	transport an additional 5.2m journeys would result.				access - specifically, mode share. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals . However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such "limits".	
14.1.112	The infrastructure does not cope with the existing passenger numbers (it is fragile, and damage is accumulating). Neither the current nor proposed infrastructure could cope.	Kings Walden Parish Council		1	Please see responses to refs 14.1.13, 14.1.23 and 14.1.55.	No
14.1.113	Rogue parking in neighbouring villages by airport users.	Kings Walden Parish Council		1	Please see response to ref 14.1.7.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.114	Car parking charges must be low enough to stop passengers arriving in three cars, parking two in surrounding villages and just taking one to the airport. No information is provided to demonstrate convincingly that such rogue parking will be avoided. In fact, the application specifically indicates the parking will be restricted and this is therefore likely to increase the problem, which again goes to demonstrate the difficulties of surface transport and negative impact on other communities. Passengers will drive to the Luton Airport Parkway to drop off and collect passengers blocking the existing parking for season ticket holders and commuters to London	Kings Walden Parish Council		1	Please see responses to ref 14.1.6 and 14.1.7.	No
14.1.115	The roads in North Hertfordshire, south Central Beds and east Buckinghamshire are not designed for, and could not	Kings Walden Parish Council		1	Please see response to ref 14.1.13. The majority of traffic is M1 Junction 10 motorway bound based on the forecasted predictions of passengers that will use the airport.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	cope with, the levels of traffic anticipated. The roads around the airport are already jammed at peak times and there seems to be nothing planned to alleviate the everyday traffic jams to and from Junction 10 of the M1.				Please refer to SAETS for more information. The modelling used to inform the Proposed Development considers commuter traffic peaks, more information can be found in the SAETS .	
14.1.116	Concerns with the increase in commuting traffic, which will have a negative impact on the surrounding areas.	Kings Walden Parish Council		1	The modelling used to inform the Proposed Development considers commuter traffic peaks, more information can be found in the SAETS .	No
14.1.117	Travelling to the airport from the east, the only way to get there, with luggage, would be to travel by car or taxi. The DART, forecourt and coach station will do nothing to help those travelling from the east.	Kings Walden Parish Council		1	Please see response to refs 14.1.2 and 14.1.13. The SAETS includes details on how access improvements are proposed from the east.	No
14.1.118	The target of 45% public transport access is not adequately evidenced as being realistically achievable.	Kings Walden Parish Council		1	Please see response to ref 14.1.23.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.119	Whilst LTN's ambition to increase access by public transport is admirable, there just isn't the capacity on commuter trains and it is questionable that the DART alone would be able to cope with your goal of at least 45% of journeys. There is insufficient information in the consultation regarding the DART's capacity.	Kings Walden Parish Council		1	Please see response to ref 14.1.23. The SAETS includes detail on the capacity of the Luton DART.	No
14.1.120	Direct bus services to the airport from major nearby towns like Aylesbury could be part of the solution too. Passenger's journeys to airports are typically long, so the airport has a far longer reach than the local area alone.	Chilterns Conservation Board		1	We are already in discussions with operators to increase the coverage and frequency of services to the airport, including buses and coaches. The Proposed Development would be delivered over a long time period and more bus and coach proposals will therefore be developed by operators at the appropriate time. As this is a long term scheme, we are unable to provide specific route details and to model them at this time. However, as the scheme progresses and the airport gains passengers, we will be able to use monitoring information and work with operators to consider new	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					routes. Access routes and more services could be introduced as appropriate in consultation with operators and local authorities.	
14.1.121	Plusbus in Luton will not help those arriving from further afield.	Kings Walden Parish Council		1	Noted, Plusbus tickets will only benefit people travelling on services on which they are eligible. Please see response to ref 14.1.22 in respect of public transport fares.	No
14.1.122	The Luton DART is likely to help modal shift, but only if fares are set at affordable levels that make public transport more affordable than driving and parking near the airport.	Chilterns Conservation Board		1	Noted. Please see response to ref 14.1.43.	No
14.1.123	Concerns that there are insufficient proposals for bus and coach service improvements for airport users and staff accessing the airport from areas which do not serve Luton directly by rail (including Hertfordshire, Stevenage, Hitchin, Welwyn Garden City, Hatfield, Hemel Hempstead, and Watford).		Hertfordshire County Council		Accessibility issues at stations served by the rail routes remain outside of our control, however we will continue to work closely with public transport operators including buses and coaches.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.124	Concerns that through the restriction of car parking spaces at the airport, this risks airport users parking on residential streets, and therefore appropriate mitigation measures are required.		Essex County Council		Please see response to ref 14.1.7.	No
14.1.125	Concerns that if the mode shift targets are not met, then there will be an increased demand for long-term parking provision, which due to Luton boroughs' land constraints, may have to be met within neighbouring authorities.		Central Bedfordshire Council		Please see response to refs 14.1.7 and 14.1.75.	No
14.1.126	Concerns around the construction impacts in North Hertfordshire District Council, such as noise, vibration, and construction traffic.		North Hertfordshire District Council		Chapter 16 Noise and Vibration of the PEIR provides an assessment of construction and operational noise, along with mitigation measures. Please see response to ref 14.1.18 in respect of construction traffic.	No
14.1.127	Concerns that there must be sufficient assessments on airport traffic using roads through the Chilterns AONB,	Chilterns Conservation Board		1	Please see response to ref 14.1.92.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	and the rural lanes to the east of Luton which is candidate AONB land.					
14.1.128	Concerns that the expansion will lead to increased traffic within Slip End Parish.	Slip End Parish Council			The SAETS sets out the monitoring and mitigation measures proposed, as well as the transport impacts in Slip End. Please see response to ref 14.1.13.	No
14.1.129	The Aviation National Policy Statement states that without effective mitigation, expansion is likely to increase congestion on existing routes.	Natural England			Noted. Effective mitigation is proposed. Further information can be found in the SAETS .	No
14.1.130	Concerns that the expansion will lead to increased traffic within Central Bedfordshire Borough, with particular concerns for the local highways networks and the M1. Concerns that the local communities will experience negative impacts as a result of the proposed expansion.		Central Bedfordshire Council		The SAETS sets out the monitoring and mitigation measures proposed, as well as the transport impact on Central Bedfordshire. Please see response to ref 14.1.13.	No
14.1.131	Concerns around the impact of the proposed expansion on the Hertfordshire road network,		Hertfordshire County Council		Please see response to ref 14.1.13.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	including the A505, A1081, B653, A602, M1 and A1(M) junctions, and the A602 as well as rural roads around Breachwood Green.					
14.1.132	Concerns that the proposals do not identify the off-site parking locations present, and therefore forecasting is not accurate in identifying the amount of private car traffic generated by the airport. Therefore, mode shift targets are not ambitious enough.		Milton Keynes Council		Please see response to ref 14.1.44 and 14.1.28.	No
14.1.133	Concerns around the amount of traffic which the proposed expansion will generate on the Milton Keynes highways network.		Milton Keynes Council		Please see response to ref 14.1.13.	No
14.1.134	Concerns about the consistency of information provided in consultation events regarding the percentage of mode shift targets.	Highways England			The mode share target is to increase the percentage of journeys to/from the airport by public transport from 38% to 45%. Details of this are set out in the SAETS .	No
14.1.135	Concerns that achieving the modal share requires the	Highways England			Most relevant authorities have agreed the modelling data and	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	delivery of a number of measures as set out in the framework travel plan; and that the effect of some of these on mode share has been forecast based on assumption. The achievement of the target modal share will also require the successful production and appropriately phased delivery of the Airport Surface Access Strategy and the management thereof through the Travel Plan, which have yet to be provided for review.				usage, with the strategic model being widely used by these authorities. The VISSIM model was specifically built for this project. Mode share targets established will be adhered to as part of an ongoing monitoring program. As part of the consultation the updated SAETS is provided.	
14.1.136	Concerns around the evidence behind achieving mode shift targets, with these being seen as unrealistic and overoptimistic, and that if these targets are not achieved, then there will be adverse impacts on the highways networks as a result.		St Albans District Council		Please see response to ref 14.1.23.	Yes
14.1.137	The effect on mode shift to rail travel from Milton Keynes is likely to be limited, given the current uncertainty of the East-		Milton Keynes Council		Please see response to ref 14.1.55. Further information about the mode share targets can be found in the SAETS .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>West Rail (EWR) route and proposed service patterns. The present line has missing links with the lack of both a Bletchley Chord which would enable direct services between Central Milton Keynes and Bedford, as well as a south-west facing chord between EWR and the Midland Mainline towards Luton Airport Parkway Station. The existing service requires changes at Bletchley (if travelling from Central Milton Keynes or Wolverton), Bedford and Luton Airport Parkway stations making it an inconvenient and time-consuming option. The absence of a direct and fast connection makes travelling by this route from Milton Keynes unattractive and does not improve on the existing service frequency offered by the rail links and interchange via London Euston-St Pancras.</p>					
14.1.138	Milton Keynes Council considers that there is too much faith placed in the market to		Milton Keynes Council		We are promoting a sustainable transport approach and are working with operators to ensure we achieve	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	respond appropriately, based solely on increased air passenger numbers and improved facilities. There are concerns regarding statements that the expansion will lead to Luton being a public transport hub, which was felt to be optimistic, given that the new services would perhaps operate at a loss initially and require investment in promotion and marketing, as well as other enabling policies by local authorities and the airport in terms of demand management, promotions, bus priority provision and possible subsidy.				that. The hub is mentioned as once passenger levels exceed 25 mppa they become more attractive as a hub where it is possible to interchange, rather than a stop.	
14.1.139	Concerns regarding the bus/coach mode share levels, which were felt to be insufficient, compared to rail. This was felt to be inadequate, as there are no direct links to the airport from Milton Keynes.		Milton Keynes Council		Please see response to ref 14.1.23. Accessibility issues at stations served by the rail routes remain outside our control, however we will continue to work closely with public transport operators including buses and coaches.	No
14.1.140	Discussions on the Transport Assessment work are ongoing and as such there remains the	Highways England			We are working and will continue to work with National Highways, and this has not yet reached a	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>potential that some refinement of the schemes so far identified may occur. In terms the Strategic Road network, the M1 south of Junction 10 has been identified as a critical link; and we note that in the design year of 2039, with no airport expansion, some form of online capacity improvement would be helpful in accommodating forecast background growth in the peak periods. For modelling purposes only, it has been agreed that it would be sensible to assume that the online section of the M1 between junctions 9 and 10 operates with an improved capacity that includes hard shoulder running. It is considered that hard shoulder running is the most likely scheme to improve online capacity should any scheme be considered by Highways England in the future. The package of highway improvements identified to date assumes that the capacity of the M1 between J9 and J10 will be improved, although not as</p>				<p>conclusion. To ensure that the appropriate volume of traffic is assessed we have included the M1 hard shoulder south of Junction 10 in the modelling at the 32 mppa assessment scenario. Further detail on the modelling can be found in the SAETS. More work will be carried out and included in the application for development consent.</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>part of the airport expansion proposals. The graphic on page 75 of the Guide to Statutory Consultation, shows the forecast increase in traffic movements as a result of the increase to 32mppa and assumes that all lane running will be in place by that time. At present, there is no commitment by DfT to deliver such a scheme and it cannot therefore be guaranteed that this will be forthcoming. To address this point, LLAL, through their consultant ARUP, have undertaken to assess the network with a scenario that does not assume a potential online solution. Arup note that this is likely to result in a different set of potential mitigation schemes. Further information on this is awaited. It is clear that the M1 provides the key highway linkage to the airport from the airports largest market area and will therefore be critical in terms of providing the connectivity, referred to in our response to Q5a, that is</p>					

Ref.	Comment	PC	LA	No PILs	Response	Change
	necessary to unlock the potential of the airport together with the associated economic benefit.					
14.1.141	The proposal has the potential to significantly increase the number of passengers using the nearby Luton Airport Parkway and Luton railway stations. As such Network Rail would requires an assessment of the current and predicted passenger usage at the above stations. This should identify and improvements or mitigations required to facilitate any increase required due to the proposed expansion. These will need to be funded by the Promoter to ensure the safe and efficient running of the railway station.	Network Rail			Please see response to ref 14.1.23. We have been engaging with Network Rail since the 2019 consultation and will continue to do so.	No
14.1.142	In terms of rail, the impact on passengers travelling from St Albans and Harpenden, particularly commuters in the peak, is not reflected in the Surface Access Strategy. There		Hertfordshire County Council		Please see response to ref 14.1.55.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	is mention that there will be insufficient seats for passengers getting on at Luton Parkway, but it fails to acknowledge that this means less or no seats from stations south					
14.1.143	The Surface Access Strategy produced for the consultation acknowledges that the current route frequency and missing Bedford interchange makes the route unattractive and advises that EWR was not included as part of the surface access mode share analysis.		Milton Keynes Council		Noted.	No
14.1.144	Surface access impacts in Hertfordshire, and the proposed mitigations are not sufficiently evidenced.		Hertfordshire County Council		Chapter 18 Traffic and Transportation of the PEIR provides an assessment of the traffic and transport construction and operational impacts of the Proposed Development and identifies relevant mitigation measures. This has been prepared in accordance with the SAETS , which provides detail on mitigation plans.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.145	Concerns that the expansion proposals do not sufficiently evidence surface access mitigation measures.	England's Economic Heartland			Please see response to ref 14.1.144.	No
14.1.146	Suggestions that Luton Airport should be encouraging the delivery of new green bus operators and routes, as well as increased frequency and efficiency of existing services to make them more attractive to passengers and employees, using bus priority measures. Suggestions to consider incentives for passengers and employees who use sustainable modes to encourage behaviour change. Monitoring should be considered early to ensure targets are met and mitigation is properly enforced in the longer term.		Stevenage Borough Council		Please see response to ref 14.1.51 for promoting green buses, 14.1.50 in respect of incentives and 14.1.120 for service.	No
14.1.147	Suggestions to identify which bus and coach links LLAL will be prioritising for improvement.		Milton Keynes Council		Please see response to ref 14.1.120.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.148	Figure 3 shows that bus/coach share has plateaued since 2011, suggesting that more effort is needed to further increase mode share by this method of travel. Recent bus/coach improvements in Milton Keynes include the enhanced Coachway facility at Junction 14 of the M1 and implementation of smart ticketing. Alongside these developments, the council is also committed to exploring new technologies and the potential for more demand-responsive services which offer a more flexible and customer friendly service. Milton Keynes own aspirations for a mass transit network to service its growth in the next 30 years advances the case further for enhanced bus/coach connectivity to the airport.		Milton Keynes Council		Please see response to ref 14.1.120.	No
14.1.149	Milton Keynes Council requests that accessibility mapping work be undertaken, alongside more analysis of bus services,		Milton Keynes Council		It is not appropriate at this stage to carry out accessibility mapping due to the long time period over which the Proposed Development will be	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	journey times, reliability, frequency, fare prices and hours of operation to provide some direction on which bus routes should be prioritised for improvement based on their potential to deliver modal shift and enhance accessibility of the airport.				delivered. Further work on accessibility mapping will be carried out when required as a result of changes in demand.	
14.1.150	The provision of car parking at, and for LTN, as well as its type and pricing will play an important role in the airport achieving its modal share targets. The careful balance of supply, promotion, and pricing of the differing opportunities to access LTN should form a key part of the Airport Surface Access Strategy and Travel Plan documents.	Highways England			Please see response to ref 14.1.4. Further information can be found within the SAETS .	No
14.1.151	Suggestions to consider what impact private parking providers would have on surface access proposals and parking provision.		Host Authorities		Please see response to ref 14.1.75. The SAETS provides further detail on parking provision.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.152	Linked to the work to identify opportunities to increase rail share, the promoter should consider whether an increase in the capacity of DART is required to support the proposal and if so, set out how that increase will be realised.	England's Economic Heartland			Please see response to ref 14.1.141. The SAETS includes detail on the capacity of the Luton DART.	No
14.1.153	We note that connectivity benefits are mentioned in terms of more visitors to the area and the expenditure injection. We will be seeking a joint approach to enable visitors accessing the area, as well as airport employees and passengers from within Buckinghamshire, to access the airport using sustainable modes. We suggest that the proposed FIRST fund be used to invest in and improve accessibility to the airport within the three counties. This would also assist in addressing the surface access carbon impacts of the expanded airport in accordance with the Airports NPS.		Buckinghamshire County Council and Aylesbury Vale District Council		<p>Noted.</p> <p>In our last consultation we set out how we wanted to share the benefits of airport growth with neighbouring communities and proposed a new fund which we called FIRST. The aim of this was to make funds available to our neighbours to use for projects related to either, Community, Environment, or Access.</p> <p>We still propose to establish a similar fund, but having reflected on it we feel it could be put to more direct beneficial use, in line with our social and environmental ethos, by targeting areas of high deprivation in the region and by helping to finance local decarbonisation projects. As well as fitting better</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
					<p>with our own values, we also believe this approach is better aligned with the national levelling up and decarbonisation agendas promoted by the government. To better reflect this revised approach we have renamed the fund 'Community First'.</p> <p>In order to maximise independence and transparency we propose that the fund should be independently administered. We believe the best way to do this would be to make it available to community groups and Town and Parish Councils through our existing independently administered Community Funding Programme.</p> <p>We propose that Community First will provide £1 in funding for every additional passenger above the passenger cap current at the time that our DCO is consented. The available total Community First fund has the potential to raise up to £13m per year.</p> <p>The fund will be available to communities in Central Bedfordshire, North Hertfordshire, St Albans, Dacorum, Stevenage,</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
					Welwyn, Hatfield, eastern parts of the former Aylesbury Vale district and parts of East Hertfordshire.	
14.1.154	<p>Suggestions to clarify how the use of private cars will be discouraged, rather than just encouraging the use of public transport.</p> <p>Sustainable modes of transport should be at the forefront of development decisions, to reduce additional vehicular traffic as much as possible, and not just a later stage consideration to mitigate adverse impacts.</p>		Stevenage Borough Council		<p>Please see response to ref 14.1.6. Measures to encourage sustainable travel are set out in the SAETS. They include, for example, consideration of a revised forecourt and car parking charging regime and reductions in car parking spaces.</p>	No
14.1.155	<p>In terms of mitigation, consideration should be given to exploring sustainable transport solutions such as an extension to the Busway services on or off road that could extend round the new perimeter road and beyond to connect with the A505, a point that has been highlighted by CBC Strategic Highways.</p>		Central Bedfordshire Council		<p>We have proposed measures to encourage sustainable transport that are within our control. We have already, and will continue, engaging with operators and authorities.</p> <p>Please find additional information in the SAETS and Chapter 18 Traffic and Transportation of the PEIR.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.156	Surface access proposals should be underpinned by the investment in measures that improve local connectivity between the airport and the immediate surrounding area, which should be supported by proposals that actively engage airport employees (both existing and future) and encourage them to use active travel modes.	England's Economic Heartland			Further information on our proposed approach can be found in the SAETS . This includes a draft Travel Plan setting out measures to encourage active travel modes.	No
14.1.157	Any proposal to increase on-site car parking should only be considered once the opportunities to improve local connectivity and public transport infrastructure and services have been fully exploited.	England's Economic Heartland			We agree. Please see response to ref 14.1.4.	No
14.1.158	Whilst the provision of public transport infrastructure and services largely rests in the hands of third parties, the promoter should actively work with those third parties to develop proposals that ensure that the share of public	England's Economic Heartland			Please see response to ref 4.1.23.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	transport is increased so as to achieve the targeted modal split. In particular the promoter should identify the levels of service/capacity required to support the proposal. It should then work with the infrastructure and service providers to develop the business case for the required level of investment to be delivered through the appropriate delivery mechanisms.					
14.1.159	Use incentives to encourage modal shift for employees and air passengers travelling from Milton Keynes, through non-car modes such as buses. Trial early morning and late night services and identify the demand from that. Public transport will have to improve markedly to outstrip the increased demand for car access to the airport in the future.		Milton Keynes Council		Please see response to ref 14.1.50. Further information about how sustainable modes of transport will be encouraged can be found in the SAETS .	No
14.1.160	As the passenger growth will be realised in phases, the council		Milton Keynes Council		A GCG framework which will ensure that the airport operates within	Yes

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>would like to see the higher cap to be permitted in stages, subject to the surface access mode share performance. Doing so would give much greater confidence that the mode share targets will be met and that LLAL will engage seriously with bus operators to deliver improved PT connectivity.</p>				<p>particular “limits” is proposed. One of these limits relates to surface access. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.</p>	
14.1.161	<p>The red line boundary around M1 J10 and the A1081 Airport Way appears tightly drawn around the extents of the improvement scheme identified in the early transport assessment work and as presented at Statutory Consultation. Discussions on the Transport Assessment work are ongoing and the possibility that some refinement of the</p>	Highways England			Noted.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	schemes so far identified cannot be ruled out. Consideration should be given to allowing an element of flexibility of design so that any improvement scheme which is found to be necessary in order to protect Highway Safety or to facilitate efficient movement of people and goods to and from the airport, is not precluded as a result of the red line boundary identified.					
14.1.162	There is a new Highways Agency Water Risk Assessment Tool (HEWRAT) assessment tool as of June 2019. This should be used for trunk/motorway roads. The CIRIA SUDs Manual Simple Index Approach (SIA) should be used for non-trunk/motorway road catchments.	Environment Agency			Noted. This will be considered at the appropriate detailed design stage.	No
14.1.163	The Design Manual for Roads and Bridges (DMRB) is currently being updated. All updates are due to be finished by the end of 2019. Document	Environment Agency			The highway design of the Proposed Development has been developed to the standards set within the most recent the Design Manual for Roads and Bridges.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	'HD 45/09' has now been updated and is now 'LA 113 - Road drainage and the water environment'. It is still found in the DMRB in Volume 11, Section 3, Part 10. Please make sure the most up-to-date documentation is referred to.					
14.1.164	It is considered essential that the local highway networks around the airport, including those from within the St Albans District should be subject to robust ongoing monitoring throughout any approved expansion of the airport and that a clear system is put in place to enable communities to access mitigation funding or works to resolve any unforeseen impacts on these roads. That process is not set out in sufficient detail at this stage, and this must be addressed prior to the Acceptance stage of the DCO process.		St Albans District Council		As part of our ongoing review process, we intend to produce monitoring programs, assess any impacts, and then intervene accordingly if any issues persist as appropriate. Further information about the approach to monitoring can be found in the SAETS .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.165	<p>Specific areas of opportunity that we consider need further exploration include: Midland Main Line - discussions linked with the recently let East Midlands Railway franchise identified the importance of Luton Airport Parkway as a gateway to the airport: the significance of rail will increase further as a result of the proposed expansion. This is likely to require a reassessment of the way capacity on the Midland Main Line is allocated. The promoter should therefore look to identify what changes might be required to the frequency of services calling at Luton Airport Parkway and the destinations served, in order to increase further the rail share. In this context the promoter should assume that East West Rail will be operational, and in particular consider the additional travel opportunities that effective interchange between Midland Main Line</p>	England's Economic Heartland			Please see response to ref 14.1.55.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	services and East West Rail would offer.					
14.1.166	EWR will have some beneficial impact on public transport accessibility for LTN particularly for air passengers without access to a car. Given that the report acknowledges there is at least some benefit to the airport rail access links via EWR, it seems a missed opportunity not to investigate further what LLAL could do to engage with the East West Rail Company, England's Economic Heartland (our sub-national transport body), and the Department for Transport in order to lobby for improvements to the proposed route that would directly link Milton Keynes and other destinations on the West Coast Mainline to the airport.		Milton Keynes Council		East West Rail (EWR) is an important proposal in the context of the economic region in which the airport is located. It will provide an additional option for people to access the airport, although it is not anticipated to have a significant impact. We are willing to engage with EWR however it is noted that an application for EWR is currently being prepared and the scheme is not yet consented.	No
14.1.167	We provided comments on the Scoping Opinion in May 2019, noting concerns with regard to the proposed methodology for assessing significance,	Highways England			We have followed established modelling procedures and the modelling process has informed the mitigation proposed. Information is set out in the SAETS .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>primarily due to its age. We provided a number of projects which have utilised differing methodologies which enabled them to make a more considered assessment of the likely significance of environmental effects of those projects. We note that in the PIER, our suggestion is dismissed as the projects we have listed are either: - London based - Where environmental effects will be felt during construction rather than operation as is the case at LTN. Whilst we note that the examples given do differ from the expansion at LTN, we would make the following comments: - Whilst it is fair comment that the sensitivity to some topics may be greater in a congested London context, this simply means that it will be possible to scope out impacts on the basis of high-level analysis. It does not justify ignoring topics entirely. - The scale of a project or the phase at which environmental effects</p>				<p>We also continue to work with operators and authorities in relation to public transport and as the airport grows, we will be in a position to provide more detailed assessments and mitigation. Please see response to ref 14.1.7.</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>are felt should have no bearing on the assessment undertaken; and we have experience of where using equivalent frameworks on projects across the spectrum has worked satisfactorily. - Use of the IEMA guidance as published is likely to completely ignore impacts on public transport (except bus drivers), parking and to a substantial extent walking and cycling. It may well be simple to identify that there are no impacts in these areas in which case assessment would not add significant workload but would increase the robustness of the assessment. We note that the guidance states 'If potential impacts are small or non-existent the Statement should say so rather than ignore them'. It then goes on to say, 'Other impacts should be added if relevant.' This is what our comments relate to and as such we do not consider that this would be unreasonable. - We note that driver delay will be considered once traffic</p>					

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>modelling has been validated, but the use of IEMA guidance, which has a threshold of a 30% change in traffic levels (before significance is declared) is not likely to apply well to Luton, where there is little spare network capacity. Overall, the approach needs to demonstrate that all travel impacts are properly considered or appropriately scoped out. It also needs to demonstrate that the detailed criteria reflect the impact of changes. This applies particularly for driver/vehicle occupant delay in relation to traffic levels and consequent delays.</p>					
14.1.168	<p>Discussions on the Transport Assessment work are ongoing and the possibility that some refinement of the schemes so far identified cannot be ruled out. Highways England will continue to work with LLAL and their consultants ARUP to determine the benefits/disbenefits of the</p>	Highways England			Noted.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	airport expansion and the final package of highway measures.					
14.1.169	As can be seen for the joint response by the host authorities the current evidence base for the consultation is deficient in some areas and clearly further engagement and monitoring is required in areas such surface access (the impacts on the network for all modes, and the potential mitigations required, are currently not satisfactorily evidenced).		North Hertfordshire District Council		Please see response to ref 14.1.144. Most relevant authorities have agreed the modelling data and usage, with the strategic model being widely used by these authorities. The VISSIM model was specifically built for this project. Please refer to the SAETS , and Chapter 18 Traffic and Transportation of the PEIR for more information. This round of statutory consultation provides a further opportunity for engagement.	No
14.1.170	The Council is particularly concerned at the lack of modelling regarding the potential impact of traffic on the rural roads through rat-running to the east of the airport within North Hertfordshire and the suggested road improvements in Hitchin along the A505 and A602. These suggested improvements are likely to increase and bring the traffic		North Hertfordshire District Council		Please see response to ref 14.1.144.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>closer to residential properties and possibly lead to the decline in air quality standards. The works proposed are along one of the routes the traffic to the airport is likely to take and are in two Local Air Quality Management Areas and could impact on health of the local community and the location of our air quality monitoring station. The Council is equally concerned regarding the traffic impacts along the A505 corridor as it passes through Letchworth linking the airport further eastwards and northwards towards Central Bedfordshire and South Cambridgeshire and would expect to see the A505 corridor included in the modelling.</p>					
14.1.171	<p>The scheme includes a number of proposed road junction improvements. Close to the airport is the A1081/B653/Gypsy Lane/Lower Harpenden Road. This junction lies just to the east of the Luton Drive into the Luton Hoo estate.</p>	Historic England			<p>Please see response to ref 14.1.140 with regards to the ongoing engagement with National Highways.</p> <p>All mitigation measures to highways are shown in drawings in the SAETS Appendix. These form our</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	It would be helpful to understand what changes might be proposed here. There are also highways works proposed within Hitchin close to a number of grade II listed buildings and several grade II* including Western House, LB201. Again, it would be helpful to understand the work proposed.				proposals to date and will be re-evaluated based on consultation feedback.	
14.1.172	Although the Borough is not a Highways Authority, we expect that the output from the CBLTM-LTN model to be shared with HCC in order to review any possible delays to traffic and junctions in Stevenage.		Stevenage Borough Council		We are working closely with Hertfordshire County Council (Herts CC) and have shared modelling information.	No
14.1.173	As an authority in close proximity to the airport, the Transport Assessment (TA), Surface Access Strategy (SAS) and Travel Plan (TP) are of particular interest to the Council. It is recognised LLA still has a lot of modelling work before these documents are completed and available for		Stevenage Borough Council		Please see response to ref 14.1.144.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	consultation at the DCO stage. On that basis we will expect to see a thorough assessment of the likely surface access impacts and how these will be minimised and mitigated in due course.					
14.1.174	There is also reference to a bus/coach strategy and of working in close cooperation with the neighbouring local authorities, bus/coach service providers and airlines to promote the introduction of better services. The Council would welcome inclusion in this group and looks forward to inputting.		Stevenage Borough Council		Noted. We have been engaging with and will continue to engage with all relevant authorities on this matter in due course. Please refer to the SAETS for additional information on bus and coach strategies.	No
14.1.175	In some areas the consultation is premature as work still needs to be done. The PIER lacks transparency across a number of topics including for example, noise, air quality, surface access, phasing, health, mitigation, and the draft DC Order. To achieve adequate consultation much more		Host Authorities		Engagement with stakeholders has continued to discuss feedback received from the 2019 statutory consultation. This additional round of statutory consultation will also allow stakeholders to review and comment on any further information provided within the PEIR .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>information is required as is a step change in technical engagement. Need a project plan to provide this information and ensure the right engagement takes place. This will avoid technical debate during the examination. Further detail on necessary areas of work are set out.</p>					
14.1.176	<p>In view of minimum road improvement intervention justification is needed for 45% public transport use assumption, which LA's feel is a best case not worst case. All the various modelling scenarios need to have a sensitivity test run with public transport uptake set at its current level in order to ensure the assessment of the worst-case scenario. Sufficient time will be needed for the Highways Authorities to consider. This will have implications for noise, air quality and health.</p>		Host Authorities		<p>Please see response to ref 14.1.23. Work carried out to date has been shared with the key highway authorities, Herts CC, LBC, and Central Bedfordshire Council (CBC).</p> <p>Sensitivity testing will be carried out as appropriate with the relevant local authorities. The case we have consulted on is a robust case and is considered appropriate to assess for mitigation purposes. Please refer to the SAETS for additional information.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.177	<p>The above Traffic and Transport issues are not exclusive, and consideration must be given to the comprehensive points provided by CBC Strategic Highways (see Appendix A). The shortcomings in the information raise significant concerns regarding the robustness of the assessment and mitigation measures identified. CBC expects further assessment on the Traffic and Transport matters identified and ongoing input from relevant consultees to inform the baseline data and appropriate mitigation measures. Input from CBC should be provided on the progression of a Travel Plan, Construction Traffic Management Plan and Construction Workers Travel Plan.</p>		Central Bedfordshire Council		<p>Please see response to ref 14.1.144.</p> <p>All relevant background information has been shared with CBC. We will continue and build on this dialogue.</p> <p>The SAETS provides further detail on how engagement has influenced proposals.</p>	No
14.1.178	<p>Walking and cycling should be prioritised as the most sustainable modes of travel, particularly to employees.</p>		Stevenage Borough Council		<p>Please see response to ref 14.1.57.</p> <p>Please find additional information within the SAETS.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.179	Chiltern District Council is supportive of the mode share targets.		Chiltern District Council		Noted.	No
14.1.180	From the technical work so far undertaken, Highways England are broadly satisfied that a passenger mode share of 45% is readily achievable. For the purpose of making a reasonable assumption on the forecast Public Transport mode share from which to determine the impact of non-Public Transport trips, 45% is therefore agreed.	Highways England			Noted.	No
14.1.181	Any improvements to the public transport network south from London Luton would be encouraged, especially where this would improve connectivity between Harrow and Luton Airport. Harrow Council would be supportive of any initiatives that reduces the use of private motor vehicles to access the airport and increases the modal share of sustainable transport		Harrow London Borough Council		<p>Please see response to ref 14.1.23.</p> <p>As we gain momentum as part of the DCO we will assess all possible public transport improvements including any potential links to Harrow. We will need to address potential patronage and employee levels and then appropriate measures will be discussed in due course.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	modes (i.e., public transport, walking, cycling).					
14.1.182	Hertfordshire Fire and Rescue fully support any improvements in the road network in the surrounding area.	Hertfordshire Fire and Rescue			Noted.	No
14.1.183	Public Health England support the proposal to increase the proportion of journeys made to the airport by public transport, cycling and walking	Public Health England			Noted.	No
14.1.184	Dacorum Borough Council welcome LLAL's intention is to encourage further use of public transport and the investment it is making in the new Luton DART light rail service to help increase passenger journeys by public transport in future.		Dacorum Borough Council		Noted.	No
14.1.185	England's Economic Heartland welcome the proposal to establish a new coach station and bus station.	England's Economic Heartland			Noted.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.186	England's Economic Heartland particularly welcome the investment being made in the DART, representing as it does a step change in terms of connectivity between Luton Airport Parkway station and the airport.	England's Economic Heartland			Noted.	No
14.1.187	The council notes the existing Airport Surface Access Strategy (ASAS) ¹ rail share KPI aims to increase modal share from 16% to 24% by 2022. The opening of the DART in 2021 and improvements to rail services through the new Thameslink timetable and service improvements associated with the new East Midlands franchise are required to achieve these targets. If the rail and bus mode share KPI's are achieved, the public transport modal split for passengers will reach 40% in 2022.		Milton Keynes Council		Noted.	No
14.1.188	Although the PEIR states that the EIA is based on maximum horizontal and vertical extents		WSP for Host Authorities		Please see response to ref 14.1.24 and 14.1.13. The 45% mode share target is a minimum target.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>(i.e., worst case scenario), it is not always clear that this is applied in topic chapters. The assessment of traffic impacts appears to be based on a best-case mode share by public transport of 45% by 2029. However, it is not certain that this level of mode share is achievable from the measures being implemented.</p>					
14.1.189	<p>In addition to our requests to work with you on aircraft noise, economic development, and transport benefits we would welcome confirmation that the proposed FIRST fund will follow the principles set out in the Airports NPS. We want to ensure that the fund is proportionate to the size of the environmental impact, expansion causes in Buckinghamshire and that it would be distributed proportionate to that impact across the affected communities. We would, for example, want to build into the fund calculation and allocation</p>		<p>Buckinghamshire County Council and Aylesbury Vale District Council</p>		<p>Community First is not intended to mitigate impacts – that is the role of mitigation identified and secured through the ES, to be submitted with the application for development consent. The purpose of Community First is to make funds available to community groups and Town and Parish Councils to address local needs in areas of high deprivation or for decarbonisation projects.</p>	<p>No</p>

Ref.	Comment	PC	LA	No PILs	Response	Change
	mechanism a monitor, mitigate and compensate approach which in the event impacts worsened in real terms or by comparison to other areas increased funding available to public bodies, business, or individuals in Buckinghamshire to address or compensate for those increased impacts.					
14.1.190	The rail passenger forecasts should be presented at individual train loading level to identify capacity availability and constraints and to provide a full understanding of the loading expectations by time of day. The underlying assumptions in the uncertainty log for the forecast models should be further verified with the highway authorities in terms of developments and schemes in light of current and emerging programmes (e.g., A505 Strategy).		WSP for Host Authorities		Regarding rail, sufficient information has been provided to justify the modal share targets and background information has been provided to all the key highway authorities. Details are set out in the SAETS . The A505 strategy is being produced by Herts CC and is not available yet. We have been working closely with all the key stakeholder highway authorities and to date they have not come forward with any sensitivity tests required.	No
14.1.191	The Strategy currently focuses heavily on passenger access to		WSP for Host Authorities		The modelling work has taken into account passengers and employees	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>the airport and there is the need to more comprehensively cover employees, visitors, and goods, and particularly how these have been factored into the modelling. Based on the current assumptions the proposed highway mitigation works comprise minor schemes contained within the existing highway boundary. However, given the uncertainties identified as part of the review, it is recommended that further definition, detail, and assessments be undertaken to give confidence that the proposals are adequate, achievable, and deliverable. Should these changes be considered as materially different to those that formed part of the consultation, LLAL may be required to undertake further statutory consultation. It is recommended that the Strategy is completed, reviewed, and agreed by the relevant authorities, prior to the</p>				<p>and consequently so does the mitigation propose. The mitigation proposed is appropriate to mitigate the impacts of the Proposed Development. Goods traffic is also included and is not expected to increase significantly. Further information can be found within Chapter 18 Traffic and Transportation of the PEIR and the SAETS.</p> <p>Please also see response to ref 14.1.144.</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
	submission of the DCO application					
14.1.192	The mode share by public transport (45%) represents a best-case scenario in terms of traffic impact. It is recommended that LLAL undertakes additional sensitivity scenarios are identified to understand the full extent of potential mitigations required;		WSP for Host Authorities		Please see response to ref 14.1.176 and 14.1.193, further information is provided in the SAETS .	No
14.1.193	The Surface Access Strategy provides a good basis for summarising the transport Access arrangements for all types of airport user and is valuable in providing a full understanding of the contribution of each mode of travel and how this will be achieved. The documents provide a good basis for developing the strategy further over the coming months prior to the DCO application, with scope, in particular, to develop the areas identified in this response.		WSP for Host Authorities		Noted.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.194	<p>WSP note that the pricing structure for the forecourt area will need to be reviewed as part of the Travel Plan to ensure it remains effective over time. No information is provided on how the ten bus bays has been arrived at and whether this is sufficient based on peak bus service levels during the day. WSP comment that the number, layout and location of the coach service facility is not provided, and it is assumed that onward terminal access will be on foot, but this is not confirmed.</p>		WSP for Host Authorities		<p>The relationship between road user charges and forecourt and parking charges can be found in the SAETS.</p>	No
14.1.195	<p>WSP note that para 3.7.4 of the Existing Airport SAS (2019-22) does not tie up with the information in table 3.4. It is noted that without having sight of further detail on how passenger forecast are built up it is not possible to provide further comment and additional supporting information should be reviewed further. No detail is provided on the number of</p>		WSP for Host Authorities		<p>Information that converted passenger numbers to trips on the network have been supplied to all the highway authorities. Further information on passenger forecasting can be found within the SAETS.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	coach bays and that greater clarity is needed to avoid confusion on the number of bus bays at the new terminal and the number of coach bays associated with the new coach facility. It is noted that further information on the assumptions made with regard to the coach and bus strategy contributions is required					
14.1.196	WSP indicate that reference is made to public transport routes being expanded commercially providing connections by rail but there is no specification for the coach services that will be required.		WSP for Host Authorities		Chapter 18 Traffic and Transportation of the PEIR provides an assessment of the traffic and transport impacts from construction and operation of the Proposed Development and identifies relevant mitigation measures. The SAETS provides additional information.	No
14.1.197	WSP note the 45% public transport target and that the car parking requirement is calculated on that basis. They note that restricting car parking numbers to encourage public transport usage will depend on whether the provision meets the demand requirements and		WSP for Host Authorities		Please see response to ref 14.1.144. Please refer to the SAETS for additional information.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	ability of the public transport system to provide a high quality, reliable and efficient system. They note that there is nothing further provided to substantiate the car parking calculations. Also, insufficient information is provided on how the car park phasing is aligned to the expected demand growth.					
14.1.198	WSP comment that there is no reference to car parks which operate privately outside of the red-line boundary. They recommend that for completeness these could be recognised and the role that they currently play in providing access opportunities to the airport and how this could be managed with the expansion to ensure it does not adversely affect the mode share forecasts.		WSP for Host Authorities		Please see response to ref 14.1.75.	No
14.1.199	WSP note that it is unclear from the document whether there will be a cost associated with using		WSP for Host Authorities		Please see responses to refs 14.1.22 and 14.1.43.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	the DART and what the cost would be. It is noted that this could have an impact on the attractiveness and use for airport access. Noted that a CPAR drawing is provided but no further information on traffic flows and modelling analysis to provide a review of whether the proposals mitigate the airport expansion impacts at this location.					
14.1.200	WSP understand that car parking at the mid stay location will be increased to make use of the DART accessed via Airport Way. They note that there is no information provided about the localised impacts of this additional traffic accessing the car parks for staff and passengers in an area that is already congested.		WSP for Host Authorities		The SAETS provides additional information on the impact of additional traffic, including localised traffic accessing the airport as well as journeys to the airport across the wider transport network.	No
14.1.201	WSP indicate that it is not made clear how the significant mode shift would be achieved and what the drivers are. Refer to para 2.3.3 of the Existing		WSP for Host Authorities		Please see response to refs 14.1.23 and 14.1.24. Please find additional information within the SAETS .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>Airport SAS which suggests limited provision of car parking will be one of drivers for mode switch and ask the question if London Luton does not manage the demand for parking will there be a proliferation of privately operated car parks and shuttles or concierge services which in the worst case could result in cars being locally street parked.</p> <p>Discussion in the SAS about how or whether the rail network can cope with 10% mode switch to rail is limited and high level.</p>					
14.1.202	<p>WSP was unable to find a copy of the train loading analysis and would like to review the document. They note that it would be helpful to understand the current, and expected loadings at train level, exactly which groups of services, and at which times of day they are expected to become most crowded, which will let them better understand what tools the operators are likely to be</p>		WSP for Host Authorities		<p>Please see response to ref 14.1.190.</p> <p>We provided additional information on public transport to the host authorities which we understand was not passed onto WSP; this information would address the comments raised by WSP.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>able to employ to manage or potentially re-distribute demand. The SAS mentions an assumed 3% year on year growth on the rail network. WSP indicate that the precedence of this number is unclear, and it seems lower than for other predictions for the network. WSP indicate that the ability of the rail network to cope with additional demand will be significantly influenced by the time of day when demand is generated and also the direction it is going, but this information is not given.</p>					
14.1.203	<p>The SAS does not discuss the degree of airport growth which the recently awarded East Midlands franchise were steered towards including in their franchise bid - it would be desirable to understand how any change to the anticipated airport growth will impact Abellio's forecast levels of crowding. The impact on passengers travelling from St Albans and Harpenden,</p>		WSP for Host Authorities		Please see responses to refs 14.1.190 and 14.1.202.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>particularly commuters in the peak, is not reflected in the SAS - WSP point out that the DfT only tolerates standing for 20 minutes or less. Noted that Class 700 'official standing capacity' was used for analysing GTR loading. However, standing capacity might be lower when considering a significant level of airport demand since passengers will have luggage.</p>					
14.1.204	<p>WSP indicate that SAS is not sufficiently clear that EMR intercity services will no longer stop at Bedford, Luton or Luton Parkway and the reference to 24 Thameslink services through the core is misleading. Also indicate that the stopping services are unlikely to be attractive to airport passengers so the impact will be felt on the fast/semi fast services which will adversely affect passengers travelling from Harpenden and St Albans.</p>		WSP for Host Authorities		Please see responses to refs 14.1.190 and 14.1.202.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.205	<p>WSP state that it is not clear whether the tables 5.7 to 5.9 within the SAS show the reduced forecasts or whether it shows the full growth assumptions from TEMPro and that the Council's need to check whether these are appropriate for their forecast local plan growth over the timescale. They note that these forecasts will have a direct impact on the level of background traffic included in the models. With respect to tables 5.10-5.13, WSP ask how the impacts across the districts including North Hertfordshire reported when the detailed model area does not include the whole of the district and therefore the results outside the detailed modelled area will be less realistic. WSP note that there is recognition of the anticipated traffic growth within the report, but the mitigation does not seem to go far enough.</p>		WSP for Host Authorities		Please see response to ref 14.1.144.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.206	WSP note that Figure 5.19 suggests very little local traffic to the airport but ask how this compares with census 2011 journey to work data and the CAA data/trip distribution patterns of existing airport trips. WSP indicate that it is unclear how the cost of car parking has been used within the transport models to represent car park choice and sensitivity to changes in cost. WSP provide commentary on each of the drawings included in the surface access drawings package at appendix A of the WSP report, which will need to be checked.		WSP for Host Authorities		Please see response to ref 14.1.144.	No
14.1.207	WSP comment that it would be helpful to identify 'new' initiatives associated with the airport expansion separately. They refer to a section on the current consented access arrangements for each mode followed by a section on the expanded airport approach. WSP note that there is a heavy		WSP for Host Authorities		Please refer to the SAETS for detail on employee and goods movement.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	focus on air passengers, however employee and goods movement is not sufficiently covered and would be expected to have a significant part to play in overall access strategy.					
14.1.208	<p>WSP note that cycle parking for employees is proposed in the basement but there is no further information provided on access routes to and through the airport roads for cyclists which will need to be addressed. Notes that 2.4.4 states that T2 short stay MSCP would have capacity for around 2,500 cars but in figure 2.2 the increase in short stay over the expansion period is 1,900 meaning further explanation should be provided to tie this together in terms of what assumptions are being applied in the modelling work. Noted that travel from nearby hotels may occur on foot and this should be discussed in the strategy to ensure safe provision if this is likely to be a reality. Note that connectivity</p>		WSP for Host Authorities		<p>Please see response to refs 14.1.57 and 14.1.89.</p> <p>Please find additional information within the SAETS.</p>	No

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	with external walking and cycling routes is ongoing.					
14.1.209	WSP note that the labelling on Figure 2.3 of the SAS could better reflect the terminology used in the text to identify the car parks being discussed. It is noted that mid-stay and long-stay car parks will use shuttle bus and they ask whether employees have a shuttle link. Also note that the DART is not shown. Forecourt layout section only covers T2, however, to provide a comprehensive approach for the whole airport, the SAS should cover both terminals.		WSP for Host Authorities		Noted, updated figures and information about the approach are included in the SAETS .	No
14.1.210	WSP note that in the 2039 forecast year without airport traffic, the M1 J10 requires additional mitigation to accommodate demand, whilst no scheme for this is designed or programmed measures have been included in the models. It is noted that this scheme would need to be recognised and		WSP for Host Authorities		Detail on the modelling assumptions have been set out within Chapter 18 Traffic and Transportation of the PEIR and the SAETS .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	funding sought to accommodate background traffic growth without airport development, or it could be seen as a limiting factor for the airport development.					
14.1.211	The SAS does not make clear how the future modal share has been determined. Also, the report does not make clear which markets, flows and domestic origin/destinations are anticipated to grow most and thus whether some or any of the mode shift is explained by factors linked to this. WSP indicate that it would be useful to have more insight to the numbers to better understand the mode switch. Reference to rollout of Oyster to Luton Airport is incorrect as it will be contactless pay as you go.		WSP for Host Authorities		Please see response to ref 14.1.144.	No
14.1.212	WSP assume that there is a development and highway/transport uncertainty log associated with the traffic modelling work. This should be		WSP for Host Authorities		Noted. Please see response to ref 14.1.176.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>reviewed and agreed by the authorities prior to the DCO application being made to ensure the traffic modelling reflects the 'worst case' rather than the 'best case' scenario for traffic and transport. Measures contained in the existing airport Surface Access Strategy should be included in the background and the new SAS should cover both terminals. Reference to transport policy would better fit in an introductory or background section in the SAS.</p>					
14.1.213	<p>WSP indicate that it is unclear what evidence base has been used to derive the forecast modal share assumptions in Table 3.4 and also indicate that it is unclear what mode share reactions occur in the future central Bedfordshire and Luton Transport Model for Luton Airport and how this compares with the targets. It is noted that the SAS does not state whether any sensitivity tests have been undertaken to determine the impacts of not meeting the</p>		WSP for Host Authorities		<p>Please see response to ref 14.1.144.</p> <p>Please find additional information within Chapter 18 Traffic and Transportation of the PEIR and the SAETS.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	public mode share proportions in the table and the impacts this has on the highway network.					
14.1.214	WSP note that para 3.7.4 does not tie up with the information in table 3.4. It is noted that without having sight of further detail on how passenger forecast are built up it is not possible to provide further comment and additional supporting information should be reviewed further. No detail is provided on the number of coach bays and that greater clarity is needed to avoid confusion on the number of bus bays at the new terminal and the number of coach bays associated with the new coach facility. It is noted that further information on the assumptions made with regard to the coach and bus strategy contributions is required. Also, WSP indicate that it is not clear how the additional vehicle movements associated with public transport enhancements have been taken account of in the modelling work as the routes		WSP for Host Authorities		Please see response to ref 14.1.144. Further discussion has been held with the Host authorities in respect of these detailed comments.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	and expected service levels have not been defined.					
14.1.215	<p>With reference to para 4.23 of the SAS, WSP ask if CBLTM-LTN variable demand model is designed to estimate the effect of changes in transport infrastructure and travel cost upon patterns of non-airport demand, what is being used to assess the changes in airport demand? WSP ask if the highway assignment model/public transport model has a fixed assumption around public transport mode share. They also state that 45% by PT for air passengers and the way employee trips and goods movements are dealt with in the models is not explicitly stated. With respect to the CBL TM-LTN Base model, WSP indicate that very little information is provided on the model building and validation/calibration exercise, so it is not possible for them to comment on whether the model is suitable for forecasting purposes, but they</p>		WSP for Host Authorities		Please see response to ref 14.1.144. Further discussion has been held with the Host authorities in respect of these detailed comments.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	assume this assessment has been undertaken and that the authorities are content that the validation/calibration exercise was sufficient.					
14.1.216	With respect to the VISSIM model, WSP assume that matrix estimation was undertaken, although this is not stated in the SAS. WSP indicate that no information is provided on how the extent of the VISSIM area was decided or the calibration or validation of the model, so they can make no further comment in terms of the assumptions and suitability of the model for forecasting. The VISSIM model had background traffic growth applied at 0.25% for non-motorway traffic and 0.5% for through traffic on the M1 the derivation and assumptions used to generate these is not provided.		WSP for Host Authorities		Please see response to ref 14.1.144. Further discussion has been held with the Host authorities in respect of these detailed comments.	No
14.1.217	WSP note that no information is provided on the strategic model forecasting and how the modal		WSP for Host Authorities		Please see response to ref 14.1.144. Further discussion has been held with the Host authorities	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>share has been developed across the public transport model and whether the 45% mode share was achievable with the suggested measures for rail and public transport. Further information is required to gain a better understanding of the assumptions made in the strategic model. WSP note the VISSIM outputs for assessing model performance and suggest that the local authorities should be active in identifying specific junctions which are of concern and outside the scope of the detailed modelling in VISSIM that has been undertaken. WSP indicate that it is not clear how the different components of the new demand have been built into the demand matrices for the models. WSP note that two land-use scenarios are tested and that reported in the results are the WebTAG models and that the document states the results of both scenarios in terms of the highway network were similar. WSP advise that</p>				<p>in respect of these detailed comments.</p>	

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>there is insufficient information provided to confirm this assertion and that further information on what the difference in the assumptions is between the scenarios would be helpful. WSP note that the process of identifying developments for inclusion seem reasonable but it is not possible to check the application of this in the models without further detail which will be contained in the Forecasting report. They refer to the table in the PIER which provides details of the developments and schemes that have been included in the modelling, a number of which are identified as not meeting EIA guidelines for inclusion individually. However, they note that it is not fully understood whether collectively those developments that have been excluded could have an impact on traffic flows within the model areas.</p>					

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.218	It is noted that paragraph 6.5.3 of the SAS states that inclusion of the enhanced M1 capacity is fundamental to many parts of the PIER. WSP note that reference is made in para 6.4.4 of the SAS to further work on the development of a scenario model which does not assume this enhancement with discussions ongoing with Highways England. WSP welcome this since if this key access route and junction has capacity issues, then there will likely be greater traffic impacts elsewhere in the network with knock-on impacts on the PIER conclusions.		WSP for Host Authorities		We are currently undertaking further work with National Highways and will share findings when this is complete.	No
14.1.219	The SAS does not make clear how the future modal share has been determined. Also, the report does not make clear which markets, flows and domestic origin/destinations are anticipated to grow most and thus whether some or any of the mode shift is explained by factors linked to this. WSP		WSP for Host Authorities		Please see response to ref 14.1.144. It is understood that Herts CC and other authorities have not asked to audit the models to date and are happy to investigate inputs and findings.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>indicate that it would be useful to have more insight to the numbers to better understand the mode switch. Reference to rollout of Oyster to Luton Airport is incorrect as it will be contactless pay as you go. WSP would be keen to be involved in the process of reviewing the models and associated documentation if required to confirm good practice has been adopted and to verify that the assumptions and resulting conclusions are reasonable.</p>					
14.1.220	<p>The VISSIM model had background traffic growth applied at 0.25% for non-motorway traffic and 0.5% for through traffic on the M1 the derivation and assumptions used to generate these is not provided. WSP note that generated road traffic is taken from the York Aviation Forecasts and predicted changes on modal shift, but no further detail is provided about the assumptions that have been</p>		WSP for Host Authorities		Please see response to ref 14.1.144 and 14.1.176.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>made and how they have been applied to the model. WSP note that the assumption within the VISSIM is that 45% modal share by Public Transport is achievable, which they say is a 'best case' traffic generation scenario. WSP recommend that a 'worst case' scenario is tested to identify the mitigation requirements. Also, there is no mention of the airport goods traffic being included in the modelling.</p>					
14.1.221	<p>WSP note the Travel Plan is aimed at passengers, employees, and visitors and as such there should be clear sections relating to targets, actions, and monitoring for each of these user groups. It is also noted that during the construction period there will be a construction worker travel plan and a construction traffic management plan which should be referenced in the framework travel plan (FTP) as they will run alongside it.</p>		WSP for Host Authorities		Noted. Please see response to ref 14.1.144.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.222	WSP note that 'quickest, easiest and most sustainable mode possible' is a stated objective but consider it will be difficult to achieve all of these for all potential journeys.		WSP for Host Authorities		Background work carried out to date demonstrates that the targets are achievable. Further information can be found in the SAETS .	No
14.1.223	It also identified the need for bus and coach service improvements to bring passengers and staff to the airport from areas not linked directly to Luton by rail (for example east-west in Hertfordshire, from Stevenage, Hitchin, Welwyn Garden City, Hatfield, Hemel Hempstead, and Watford). Such improvements would be important mitigation and at present remain under-developed.		Hertfordshire County Council		Please see response to ref 14.1.120.	No
14.1.224	The SAS does not make an assessment of priority bus services with detailed modelling work, with only table 3.4 referring to a Bus/coach strategy. The LLAL Preliminary Environmental Impact Report		Milton Keynes Council		Regarding existing bus services please see response to ref 14.1.2. Please see response to ref 14.1.120 in respect of future bus services.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>(PEIR) expands on this indicating that a bus/coach strategy will be produced which is aimed at increasing the frequency of service, introducing new routes, integrated ticketing, ticket purchasing facilities and better vehicles (p.25). Milton Keynes Council considers that this statement does not go far enough and needs to identify current service deficiencies and at what times of day these occur in order to provide a framework for engagement with Local Authorities (LAs) and service operators.</p>					
14.1.225	<p>The bus services provide important east-west links to locations such as Milton Keynes which can be accessed either directly or by changing services at Luton Station Interchange. However, the existing coach services have limited capacity, restricted operating times and can be unreliable due to issues on the M1. The SAS notes that there</p>		Milton Keynes Council		<p>Regarding existing bus services please see response to ref 14.1.2. Please see response to ref 14.1.120 in respect of future bus services.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	are 168 buses/coaches per day per direction from the airport that serve destinations other than London. The main coach operators that serve the Milton Keynes to London Luton Airport route are Stagecoach and National Express. Stagecoach is affordable and direct, but services are infrequent and have limited operating times and capacity. Limited capacity makes it difficult for passengers to swap services if they arrive later than planned due to plane and security delays, or to get a seat on services which cannot be prebooked.					
14.1.226	There is already a degree of long-term parking provided within Central Bedfordshire, most notably the Airparks on Grove Road, Slip End.		Central Bedfordshire Council		Noted.	No
14.1.227	ECC notes that at least 45% of journeys to and from the airport are intended to be made by public transport and other sustainable travel modes. It is		Essex County Council		Please see response to ref 14.1.7. Further information on the mitigation strategies proposed can be found within Chapter 18 Traffic	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>also acknowledged that restricting car parking is being utilised to encourage passengers and staff to use public transport. It is also noted that the proposal includes information on the car parks including phasing and numbers for long, mid, and short stay. It is important to note that consideration should be given to the impact of restricted car parking on local streets and to determine whether restricted parking or other forms of mitigation may be required. The proposal also includes information on the extension to the Luton DART. ECC recommends that consideration is given to the relationship between the emerging proposals and reviews to the Airport Surface Access Strategy and Travel Planning.</p>				<p>and Transportation of the PEIR and the SAETS.</p>	
14.1.228	<p>The proposed East-West Expressway (EWE) and the smart motorway improvements to the M1, coupled with the highway improvements that are</p>		Milton Keynes Council		Please see response to ref 14.1.13.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	proposed as part of this DCO application, are likely to further enhance the attractiveness of car travel to London Luton Airport from Milton Keynes, North Buckinghamshire, and the surrounding area. In order to mitigate this attractiveness, the current public transport offer will have to improve markedly to outstrip increased demand for car access to the airport in the future.					
14.1.229	The car parking proposals should be addressed comprehensively to recognise the provision by private operators, which may undermine the strategy for a relative reduction in parking provision per mppa, and which could further have localised impacts within those communities where this off-site parking provision occurs		WSP for Host Authorities		Please see response to refs 14.1.4 and 14.1.75.	No
14.1.230	In the last two years the parish has experienced rapid growth in the practice of fly parking by	Slip End Parish Council			Please see response to ref 14.1.7. Further information on the mitigation strategies proposed can	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	airport customers, and in some cases, by employees. The attraction lies in its proximity to the airport, and, of course, it is free. Your proposed parking strategy does nothing to alleviate this problem. We are in discussions with Airparks Ltd to restrict use of the Airparks courtesy bus service to Airparks customers and parish residents, but this is unlikely to completely solve the issue, and it is likely that we will have to introduce, regretfully, parking restrictions in the parish at some point.				be found within Chapter 18 Traffic and Transportation of the PEIR and the SAETS .	
14.1.231	There is also concern that inappropriate parking on residential roads in Central Bedfordshire would become increasingly prevalent, and consideration should be given to measures that could be put in place, enforcing against this.		Central Bedfordshire Council		Please see response to ref 14.1.7. Further information on the mitigation strategies proposed can be found within Chapter 18 Traffic and Transportation of the PEIR and the SAETS .	No
14.1.232	Concern that with the growth in passenger numbers envisaged, and despite that investment, there will still be a significant		Dacorum Borough Council		Please see response to ref 14.1.13. The SAETS sets out the monitoring and mitigation measures	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	increase in traffic on roads in the locality, including those within Dacorum Borough				proposed, as well as the transport impact within Dacorum Borough.	
14.1.233	Concerns in respect of the impact of further airport growth on traffic generation along the stretch of the M1 south of junction 10/10a and request that both the Transport and Environmental Impact Assessment closely consider both the traffic and air quality implications of airport growth in that locality.		Dacorum Borough Council		Please see response to ref 14.1.13. An air quality assessment of the Proposed Development has been undertaken and can be found in Chapter 7 Air Quality of the PEIR.	No
14.1.234	NHDC is concerned at the lack of modelling regarding the potential impact of traffic on the rural roads through rat-running to the east of the airport within North Hertfordshire and the suggested road improvements in Hitchin along the A505 and A602. These suggested improvements are likely to increase and bring the traffic closer to residential properties and possibly lead to the decline in air quality standards. The		North Hertfordshire District Council		Please see response to ref 14.1.144. Most relevant authorities have agreed the modelling data and usage, with the strategic model being widely used by these authorities. The VISSIM model was specifically built for this project.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	works proposed are along one of the routes the traffic to the airport is likely to take and are in two Local Air Quality Management Areas and could impact on health of the local community and the location of our air quality monitoring station.					
14.1.235	The Council is equally concerned regarding the traffic impacts along the A505 corridor as it passes through Letchworth linking the airport further eastwards and northwards towards Central Bedfordshire and South Cambridgeshire and would expect to see the A505 corridor included in the modelling.		North Hertfordshire District Council		Please see response to ref 14.1.144. Most relevant authorities have agreed the modelling data and usage, with the strategic model being widely used by these authorities. The VISSIM model was specifically built for this project, and further detail can be found within the SAETS .	No
14.1.236	WSP note that the SAS states that access arrangements for T1 remain largely unchanged which implies that all of the uplifted modal share		WSP for Host Authorities		Please see response to ref 14.1.11, and for more information refer to the SAETS .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	expectations are based around T2 provision.					
14.1.237	WSP note that some ambitious targets for mode share for passengers and employees are provided in the SAS and at the moment the Action Plan does not provide sufficient to substantiate the reasonable achievement of these targets.		WSP for Host Authorities		Further information on the measures proposed to encourage sustainable transport are set out in the SAETS .	No
14.1.238	The Council also notes that the TA and SAS will be based on a projected 45% use of public transport for trips by air passengers and 40% by staff. The Council doesn't believe there is sufficient evidence at this stage to demonstrate how these targets will be met.		Stevenage Borough Council		Please see response to ref 14.1.23.	No
14.1.239	The lack of clarification on how this mode shift will be achieved and the specific measures that will be undertaken by LLAL makes it difficult to have confidence in the mode share targets reported in Figure 1.		Milton Keynes Council		Please see response to ref 14.1.23.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.240	WSP refer to the commitment of LLAL to 'improved air quality and reducing carbon emissions' which is addressed in the SAS 'through encouraging greater use of public transport and ensuring that the car and taxi trips that remain are made more efficient and use cleaner vehicles'. WSP indicate that this appears purely aspirational as there is no target or other information to support efficiency or use of cleaner vehicles.		WSP for Host Authorities		The SAETS provides detail on accessing the airport through the use of cleaner vehicles. Please see response to ref 14.1.23 in respect of our mode share targets and 14.1.51 in respect of green buses. Please also see 14.1.41 in respect of electric vehicle charging and 14.1.6 for drop-off and parking charges.	No
14.1.241	Whilst the proposal seeks to provide infrastructure to support sustainable transport modes to and from the airport, it is considered that the anticipated 45% sustainable transport mode shift for passengers and a 40% mode share for employees, may not be fulfilled as these assumptions are likely to be extremely challenging. Achieving this percentage modal shift is dependent on numerous external factors, namely public transport		Central Bedfordshire Council		Please see response to ref 14.1.176. For additional information on how the 45% target was reached, please refer to the SAETS .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>operators who provide the services to meet demand. It is considered that the PEIR fails to model the 'worst' case scenario. It is considered that the 45% and 40% modal shifts are unsubstantiated and there are serious concerns that other scenarios have not been assessed. This is a significant shortcoming of the PEIR as a failure to achieve these targets would significantly affect the local road network with increased volumes of vehicular traffic.</p>					
14.1.242	<p>The assessment of traffic impacts appears to be based on a best-case mode share by public transport of 45% by 2029. However, it is not certain that this level of mode share is achievable from the measures being implemented. This assumption is key to determining the wider traffic impacts.</p>		WSP for Host Authorities		Please see response to ref 14.1.176 and 14.1.241.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.243	Increased employee traffic impacts are not well represented in the PEIR. A worst-case traffic scenario has not been assessed in the PEIR. The issues / limitations of the traffic modelling will affect the prediction and assessment of operational noise and air quality effects.		WSP for Host Authorities		Potential traffic impacts from both passengers and employees are considered in Chapter 18 Traffic and Transportation of the PEIR.	No
14.1.244	There is also concern that increased passenger numbers at Luton Airport Parkway station would put pressure on the already busy Midland Main Line that is served by Thameslink and East Midlands franchises, which could be at cost to other stations, resulting in adverse impacts for residents of CBC who rely on these services.		Central Bedfordshire Council		Please see response to ref 4.1.55. Information regarding existing rail services can be found within the SAETS .	No
14.1.245	WSP comment that the overall structure of the document is not logical and does not generally read well. It would help if each mode is dealt with separately with the modelling data provided either as an appendix		WSP for Host Authorities		Comments have been taken on board in the updated SAETS available as part of this consultation.	Yes

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>or at the front-end of the document (as this provides context for the forecasts across many of the modes) to provide context on the assumptions being made. Differentiation between users and their respective access opportunities should be clearer throughout the document and embedded within the structure to ensure all users are comprehensively understood and addressed within the strategy for each mode of travel that is available to them.</p>					
14.1.246	<p>WSP advise that there could be further information provided on the interactions between the modes of travel. It is noted that the car parks are considered separately in terms of their location without providing necessary information about the expected traffic movements to and around them and that the transfers between modes are not sufficiently detailed in the document to provide assurance that the expected</p>		WSP for Host Authorities		<p>Please see response to ref 14.1.144, and refer to the SAETS for information on how the different modes of transport interact with each other.</p>	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	passenger numbers can be accommodated at the peak times for the different modes.					
14.1.247	WSP advise that the FTP (Framework Travel Plan) should be broadened to encompass the whole airport (not just limited to the expansion) providing comprehensive information about the whole site situation. Also, a flow diagram would be helpful to show the governance of the travel plan. A travel plan monitoring and review programme needs to be included to provide interim as well as final targets and monitoring activities and methods that will take place throughout the airport development and ongoing from completion. A review programme should be included, and timescales clearly identified. WSP note that the targets are only aimed at employees, whilst earlier text indicates that it was for passengers, employees, and		WSP for Host Authorities		Please see response to ref 14.1.144.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	visitors. This should be better defined, and targets, measures and action plans developed for each target group. WSP note that reference is made to the previous ASAS (Airport Surface Access Strategies) and indicate that all information should be brought together in a single FTP with no cross referencing to previous documents for ease of use for implementation.					
14.1.248	There is currently a lack of clarity and as a result, areas of uncertainty over the substance and credibility of key aspects of the surface access proposals. This arises from shortcomings in the evidence and assumptions on which the transport proposals are based, and a lack of detail in some of the descriptions of proposed transport arrangements.		WSP for Host Authorities		Noted. Please see response to ref 14.1.144.	No
14.1.249	Our communities have been clear at the recent consultation events that they would want the airport to fund a frequent direct		Buckinghamshire County Council and Aylesbury		Please see response to ref 14.1.120. We will work with relevant authorities/operators to consider additional services as appropriate.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	<p>bus service from Aylesbury through Wing to serve the local villages. We have secured new bus and coach services from Heathrow in advance of Heathrow submitting its own NSIP application. Our expectation is that LLAL would work with us to put in place these new bus and coach links in the next year to improve access to the airport for passengers and employees. This new service could underpin the Councils prospective support for the surface access proposals in the NSIP application when submitted by LLAL in 2020. We would advocate that LLAL sets an objective of delivering no net increase in private car traffic to the airport as each phase of expansion is released and that this then drives investment and improved connectivity between bus, coach, and rail links within the three counties.</p>		<p>Vale District Council</p>			

Ref.	Comment	PC	LA	No PILs	Response	Change
14.1.250	The proposal to establish a new coach station and a new bus station is welcomed. However, there is a need for the promoter to work with service providers to identify the options available for broadening the range of destinations served by buses and coaches.	England's Economic Heartland			Please see response to ref 14.1.120.	No
14.1.251	It is noted that the current proposal would result in a 48% increase in car parking spaces provided at the airport. The promoter should actively look to realise the potential of the above opportunities [public transport methods] before seeking to make the case for any increase in on-site parking. Where a case for increased car parking can be made, every effort should be taken by the promoter to keep it to the absolutely minimum.	England's Economic Heartland			Please see response to ref 14.1.4.	No
14.1.252	The current public transport offer will have to improve markedly to outstrip increased		Milton Keynes Council		Please see response to ref 14.1.23 and 14.1.144.	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	demand for car access to the airport in the future.					
14.1.253	Eventually 32 mppa would make the airport considerably more attractive as a public transport hub. There would be much improved facilities for coach operators and a major incentive for all public transport operators to offer improved and expanded services. This is very optimistic, given that the new services would perhaps operate at a loss initially and require investment in promotion and marketing, as well as other enabling policies by local authorities and the airport in terms of demand management, promotions, bus priority provision and possible subsidy.		Milton Keynes Council		Please see response to ref 14.1.138.	No
14.1.254	Harrow Council would be supportive of any initiatives that reduces the use of private motor vehicles to access the airport and increases the modal share of sustainable transport		Harrow London Borough Council		Noted. Further information can be found within the SAETS .	No

Ref.	Comment	PC	LA	No PILs	Response	Change
	modes (i.e., public transport, walking, cycling).					
14.1.255	Highways England supports any proposals that would reduce the number of HGV movements on the SRN or through junctions that interact with it. Quantification of the overall effect of this proposal would help in considering the benefit likely be gained	Highways England			Noted.	No.

Table A14.4: Regard had to statutory consultation responses on Surface access - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
14.2.1	Concerns about the coach station including that it is unnecessary, or that it has been poorly planned in terms of design, location, size, or number of bays, as well as issues with it being uncovered.	12	Please see response to ref 14.1.1.	No
14.2.2	Concerns with the existing bus services, including reliability, frequency of delays, length/cost/timings/queues/number of services, lack of space for luggage, ability to link with rail services, and the lack of services serving surrounding including Dunstable, Luton, the Hertfordshire villages, Leighton Buzzard, Welwyn Garden City, Harpenden, Sandridge, Wheathampstead and St Albans.	34	Please see response to ref 14.1.2.	No
14.2.3	General concerns around the distance to the terminals from both medium- and long-term car parks and drop-off points, particularly for those with limited mobility. Question why the DART would not connect airport users with the car parks.	25	Please see response to ref 14.1.3. Further information can be found within the SAETS .	No
14.2.4	Concerns that delivering additional car parking spaces will encourage the use of private cars, adversely impacting local communities through pollution, congestion, GHG emissions and adverse impacts on the local highways network.	36	Please see response to ref 14.1.4.	No

Ref	Comment	No CC	Response	Change
14.2.5	The number of proposed parking/drop-off spaces is insufficient.	48	Please see response to ref 14.1.4. The modelling behind the number of parking spaces proposed can be found within the SAETS .	No
14.2.6	Inadequate number of parking spaces for airport staff, and concerns with both the distance and method for how staff will travel to their work post from car parks.	12	Please see response to ref 14.1.74. Our scheme drawing layouts show parking locations and connectivity between these locations will be provided most probably via a bus service.	No
14.2.7	Consider existing cost of parking too high and have concerns that future cost of parking/drop-off points will also be too high.	147	Please see response to ref 14.1.6.	No
14.2.8	The cost of parking means that airport users are parking in inappropriate areas including residential streets and Luton Train Station, which are free/cheaper.	18	Please see response to ref 14.1.7.	No
14.2.9	Airport staff should not have to pay for car parking.	2	Please see response to ref 14.1.8.	No
14.2.10	There is an existing lack of available car parking spaces at Luton Parkway Station.	2	Please see response to ref 14.1.7.	No
14.2.11	Concerns that the forecasting undertaken to identify parking need is not accurate, leading to insufficient parking spaces.	3	The SAETS provides additional information on the forecasting identifying parking need.	No

Ref	Comment	No CC	Response	Change
14.2.12	Concerns with the current configuration of drop-off points, which was cited as confusing, overcrowded, too far from the terminals (especially for those with limited mobility), uncovered from weather, and not providing enough time to collect / drop-off, particularly with delays caused by traffic which can lead to fines.	76	Please see response to ref 14.1.9.	No
14.2.13	Concerns that the target of 45% accessing Luton via public transport will not be met, and therefore there will be insufficient number of parking spaces.	8	Please see response to ref 14.1.23.	No
14.2.14	Concerns about the impacts of the relocation of the long-term car park, including the adverse visual impacts, pollution, loss of land (with particular concerns around the loss of Wigmore Park), and distance to terminals.	13	Please see response to ref 14.1.10.	No
14.2.15	Suggest that fewer car parking spaces should be delivered to encourage the use of public and active travel in accessing the airport.	4	Please see response to ref 14.1.4.	No
14.2.16	General concerns around the cost of the proposed DART alongside questioning its justification, with particular concerns around the DART only being necessary due to the expansion, that the DART won't significantly reduce access by car, that the funding would be better spent elsewhere (e.g., tackling poverty, or improvements to local bus	24	Please see response to ref 14.1.11.	No

Ref	Comment	No CC	Response	Change
	services), and concerns that the DART is being funded by the taxpayer rather than Luton Airport.			
14.2.17	The expansion will impact traffic flow, particularly at rush hours, which are already felt to be at capacity, with particular concerns regarding areas within the airport (i.e., the drop off zone), as well as the M1, A1081, Gypsy Lane, Eaton Green Road, and roads around Harpenden and Hitchin, which may lead to feasibility issues for the proposed development if not addressed sufficiently.	12	Please see response to ref 14.1.13.	No
14.2.18	Highways works should be carried out in such a way which impacts traffic flow the least - e.g., at non-peak times.	3	Please see response to ref 14.1.18.	No
14.2.19	Mitigation proposals are insufficient in ensuring traffic flow around the airport is not made worse, and do not consider the wider area and global environment, with particular concerns with the forecasting suggesting that traffic flow during construction and operation are not likely to change.	23	Please see response to ref 14.1.13.	No
14.2.20	Private car or taxi is the preferred mode of transport for many in accessing the airport, particularly for those travelling with luggage.	4	Please see response to ref 14.1.12.	No
14.2.21	Concerns that the proposed expansion, and improvements to the highways network and	109	Please see response to ref 14.1.13.	No

Ref	Comment	No CC	Response	Change
	associated infrastructure (including additional parking spaces) will encourage the use of private car travel, with queries as to why these improvements are necessary with the public transport targets.			
14.2.22	Concerns with the current highway network and infrastructure not being sufficient to cope with current demand, which is likely to be worsened by the proposed airport expansion, even with the proposed measures to create additional capacity.	100	Please see response to ref 14.1.13.	No
14.2.23	Concerns that the expansion will cause negative impacts on the condition of roads, which haven't been addressed sufficiently in consultation documents.	31	Please see response to ref 14.1.15.	No
14.2.24	Issues currently with airport users, staff and taxis, parking on residential streets, or at Luton Parkway Station, causing issues with residents being able to park, blocking drives and pavements. This is likely to become a bigger problem with the expansion, as there are no mitigation methods proposed to combat this.	84	Please see response to ref 14.1.7.	Yes
14.2.25	The proposed expansion will lead to an increase in traffic and congestion, which is already felt to be an issue in the following areas: Hertfordshire; Hitchin; Luton; Tea Green; Putteridge; Vauxhall; Leighton Buzzard; Apron; Wigmore; Stopsley; Aylesbury	977	Please see response to ref 14.1.13.	No

Ref	Comment	No CC	Response	Change
	Vale; Chilterns; Dacorum; Berkhamsted; Tring; Buckinghamshire; Whitwell; Slip End; Stockingstone Hill; Royston; Markyate; Breachwood Green; Darley Hall; Brent Cross; Radbourne, as well as the following specific roads: M1; A1; M25, A505 (Hitchin Road), A602 (Stevenage Road); B653 (Lower Luton Road); A5; A41; B4506; Stockingstone Road; Gipsy Lane; Ashcroft Road; Wigmore Lane; Eaton Green Road; Century Park Access Road; Cutenhoe Road; Main Street; Marshalswick lane; Leagrave High Street.			
14.2.26	Concerns around the impact that construction / preparatory works will have on the highways network and supporting infrastructure, through traffic and congestion, with specific concerns around the routes which will be taken, the number of construction vehicles used, impacts on rush hour traffic flow, and the safety of roads.	111	Please see response to ref 14.1.18.	No
14.2.27	Concerns around the impact of expansion on the highway network and associated infrastructure, and how this will impact the local community through increased traffic and congestion.	249	Please see response to ref 14.1.13.	No
14.2.28	Concerns that the expansion will lead to increased traffic and congestion for people accessing the airport.	95	Please see response to ref 14.1.13.	No

Ref	Comment	No CC	Response	Change
14.2.29	Concerns around the funding source of the proposed highways interventions, with opposition to these being funded via the taxpayer rather than by the airport.	3	Funding for the Proposed Development is not expected to be provided by a single party but by multiple parties who are interested in different aspects of the proposal. We do not intend there to be any direct contribution from LBC or any impact upon local Council Taxpayers, as there are numerous models available for the funding, financing and procurement of the works which are likely to be spread over a period of up to 20 years. Further details on the financial aspects of the Proposed Development will be set out in the Funding Statement, which will be submitted with the application for development consent.	No
14.2.30	Concern about continued impact of highways works on local communities as there have already been a number of major highways works (e.g., M1 J10).	1	Please see response to ref 14.1.18.	No
14.2.31	Accessing the airport via public transport is not realistic or practical for many people with limited mobility, or those who do not live directly on a route served by public transport.	13	Please see response to ref 4.1.23. The Proposed Development will be designed in full compliance with the Disability Discrimination Act and related legislation. Additionally, airports are legally required to provide assistance to Persons of Restricted Mobility at any stage of the passenger journey from arrival at the airport to the aircraft seat and the airport will continue to comply with all such obligations.	No

Ref	Comment	No CC	Response	Change
14.2.32	Concerns around the cost of funding the public transport measures proposed, including concerns that LLAL is not funding/subsidising the measures, and that public funding is instead required, as well as concerns that the amount of funding allocated will not be sufficient enough to provide attractive, practical, and user-friendly services.	9	We will fund agreed improvements necessary to mitigate any public transport improvements included in, or required as a result of, the Proposed Development. Please also see response to ref 14.2.29.	No
14.2.33	Concerns around the cost of the proposed public and sustainable transport modes for the user, with many suggesting that they would only be encouraged to use these modes if the cost was comparable to that of using and parking a private car or taking a taxi.	62	Noted. Please see response to ref 14.1.22.	No
14.2.34	The proposed improvements to public and sustainable transport would not encourage their use in accessing the airport, due to lack of accessibility, convenience of car, living walking distance to the airport, cost of public transport, preferring other airports and opposition of flying due to environmental reasons.	578	Please see response to ref 14.1.23.	No
14.2.35	Concerns that the objective of increasing the number of passengers travelling to and from the airport using public transport to at least 45% is unrealistic, unnecessary, and unenforceable.	136	Please see response to ref 14.1.24.	No

Ref	Comment	No CC	Response	Change
14.2.36	Objection to the airport expansion and therefore proposals to increase the use of public transport in accessing the airport are unnecessary.	7	Noted.	No
14.2.37	The airport currently has poor public transport services and links, with the following issues cited: busy, unreliable, slow services which cannot be accessed from a wider enough area (particularly in accessing the airport from the East or West), limited hours of operation, and not user friendly for those with limited mobility issues.	195	Please see response to ref 14.1.23.	No
14.2.38	Concerns that the current targets of increasing the number of passengers travelling to and from the airport using public transport to at least 45% are too high, and therefore unrealistic and unachievable.	78	Please see response to ref 14.1.24.	No
14.2.39	Concerns that the current targets of increasing the number of passengers travelling to and from the airport using public transport to at least 45% are too low and not ambitious enough to contribute towards overall sustainability, or that these targets will not offset the negative impacts of the expansion or of flying.	86	Please see response to ref 14.1.23.	No
14.2.40	Question why there is a need for the various highways network improvements if passengers will be encouraged to access the airport by public and active transport.	4	Please see response to ref 14.1.13.	No

Ref	Comment	No CC	Response	Change
14.2.41	The current highways network is already at capacity, and therefore the airport expansion will exacerbate these issues. Some respondents felt that this was reason enough to object to the Proposed Development.	23	Please see response to ref 14.1.13.	No
14.2.42	Consider the road and junction proposals would be unnecessary if there was no airport expansion.	19	Noted.	No
14.2.43	There were safety concerns regarding the proposed road and junction improvements, as a result of increased traffic and congestion leading to speeding, leading to road accidents. It was also noted that aviation fuel can leave a film on the roads, making the surface slippery after rain.	24	Please see response to ref 14.1.30. Jettisoning of fuel is an infrequent event which takes place over water or at high altitude, allowing dispersion. Effects are not considered to be significant and have been scoped out of the assessment within the PEIR.	No
14.2.44	Concern that some works are already under construction (e.g., the A1081), which Luton Borough Council had not consulted the local community on.	2	The works to the A1081 are not part of our Proposed Development. Concerns should be addressed by LBC as the local highways authority.	No
14.2.45	Surface access proposals include highways interventions which have been previously rejected by PINS, or that do not conform with local planning policy.	1	Please see response to ref 14.1.31.	No
14.2.46	Concerns that the local community has felt the negative impacts of various highways improvement schemes throughout recent years and will now be	2	Please see response to ref 14.1.18. Mitigation, including during construction, where required, is included within the PEIR . The Draft	No

Ref	Comment	No CC	Response	Change
	impacted by the highways works associated with the expansion.		CoCP in Appendix 4.2 of Volume 3 of the PEIR contains a suite of mitigation and management measures to ensure that impacts of construction are avoided where possible and otherwise mitigated. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	
14.2.47	The cost of highways improvements would be better spent elsewhere.	1	Highway's improvements are necessary in mitigating any impact as a result of the Proposed Development. Further justification can be found within the SAETS .	No
14.2.48	Concerns that the highways improvements are being prioritised at the expense of the environment.	4	Please see response to ref 14.1.24 and 14.1.144.	No
14.2.49	General objections to the road and junction improvement proposals, including that proposals are either too extensive, or not extensive enough, and will cause disruption for local people, destruction of the local environment, and will have limited potential for upgrades in the future.	14	Please see response to ref 14.1.13.	No
14.2.50	Concerns around the cost of travelling to Luton via rail, which is currently, and likely to in the future, act as a deterrent in accessing the airport by rail.	10	Please see response to ref 14.1.22.	No
14.2.51	Concerns that the train station is unnecessary and that existing and proposed rail services are too poor,	4	Please see response to ref 14.1.55.	No

Ref	Comment	No CC	Response	Change
	and therefore it will not be possible to encourage increased use of rail.			
14.2.52	There should be one single train station in Luton.	1	This is not a matter of relevance to the Proposed Development.	No
14.2.53	Support for nationalisation of the railways.	1	This is not a matter of relevance to the Proposed Development.	No
14.2.54	There is currently an over-reliance on a single rail service, and there should be multiple links serving Luton, to reduce the risk of delays and cancellations to services.	1	Please see response to ref 14.1.55. Further detail can be found within Chapter 18 Traffic and Transportation of the PEIR.	No
14.2.55	Concerns around the information provided within the consultation documents, and whether forecasting/modelling was based upon the most up-to-date information. There was also a lack of clarity around the impact of freight on the passenger rail services, as well as concerns that there are no legal commitments in delivering mode share targets.	8	Please see response to ref 14.1.23 and 14.1.24. Further information can be found within the SAETS and Chapter 18 Traffic and Transportation of the PEIR.	No
14.2.56	Surface access proposals are ineffective/insufficient, with concerns around the mode shift targets not being sufficient, as well as an insufficient amount of parking spaces being planned for.	44	Please see response to ref 14.1.13 and 14.1.24 in respect of the proposals and mode shift target, and 14.1.4 with regard to the number of parking spaces.	No

Ref	Comment	No CC	Response	Change
14.2.57	Objection to the airport expansion, therefore all surface access proposals are unnecessary.	52	Noted.	No
14.2.58	Concerns around the impacts of taxis on the local environment.	1	Modelling, as contained in the SAETS , does not show taxis as being a major form of accessing the airport. The impacts on the local environment have been considered in the relevant chapters of the PEIR, for example Chapter 7 Air Quality .	No
14.2.59	Question how realistic accessing the airport via active transport will be, in terms of distance, preference, safety, cycle parking, and ability to do so with luggage, particularly for airport staff.	14	Whilst walking and cycling are proposed in the form of upgraded connections to local residential areas, it is also recognised that these modes of transport are unlikely to be utilised by large numbers of passengers due to the wide catchment area and limitations, for example regarding baggage. However, the promotion of walking and cycling will be a key aspect of the airport employee travel plan, and public transport is also a key part of our strategy. Further information can be found in the SAETS . Please also see response to ref 14.1.89.	No
14.2.60	Concerns that active travel proposals are inadequate and require further consideration.	1	Please see response to ref 14.2.59..	No
14.2.61	Suggest accessibility of the coach and bus drop-off zones should be improved.	1	As part of the new terminal, new facilities will be provided, and extra capacity is to be provided at T1. Further detail can be found within Chapter	No

Ref	Comment	No CC	Response	Change
			18 Traffic and Transportation of the PEIR and the SAETS . Please see response to ref 14.1.9.	
14.2.62	Suggest active promotion of public transport to encourage use.	1	Noted. Further detail can be found within the SAETS .	No
14.2.63	Concerns about how the car hire facilities will be accessed, whether by the DART or other forms of public transport.	3	It is likely that the car hire facilities will be accessed by bus, further information can be found in the SAETS .	No
14.2.64	Suggestions to limit the car parking spaces within the proposals, which will in turn encourage the use of public transport in accessing the airport. Some respondents suggested that this would save money being spent on parking, which could instead be invested into sustainable transport.	53	Please see response to ref 14.1.4.	No
14.2.65	Suggestions to make car parking more expensive, to discourage accessing the airport via private cars, and instead encouraging the use of sustainable transport.	5	Please see response to ref 14.1.6.	Yes
14.2.66	Suggestions to either reduce the price of drop-offs and car parking, or make it free, with particular suggestion to allow electric vehicles free parking, and discounts for local residents. Some respondents	162	Please see response to refs 14.1.38 and 14.1.39.	Yes

Ref	Comment	No CC	Response	Change
	felt that this would reduce the number of airport users parking on residential roads.			
14.2.67	Suggestions that the parking facilities are clear, well-lit, and user-friendly, ensuring ease of finding cars after using the airport, with the drop-off and pick-up located in the same place. These will ensure continuous traffic flow into and out of the airport.	9	Noted. Further detail can be found within Chapter 18 of the PEIR and the SAETS .	No
14.2.68	Suggestions to improve the facilities and accessibility of drop-off point including link with the DART, be larger, more user-friendly (particularly for those with limited mobility, as well as through having flight information, or having a travelator taking passengers to the terminal), being located closer to terminals, or being located off-site with shuttle services taking passengers to terminals. Some respondents also suggested that pick-up points should be separated from drop-off points, while others felt separate drop-off points for both terminals would be beneficial.	47	Please see response to ref 14.1.9.	No
14.2.69	Suggestions that there should be additional fast charging electric vehicle charging points at the airport, and around Luton, with some respondents suggesting these to be free, while others suggest the motorists should pay for their use.	25	Please see response to ref 14.1.41. The provision of charging points outside of the Application Site is outside our control.	No
14.2.70	Suggest a Park and Ride scheme for airport users.	23	Please see response to ref 14.1.42.	No

Ref	Comment	No CC	Response	Change
14.2.71	Suggestions that the car parking proposals would not be necessary if the airport did not expand.	3	Noted.	No
14.2.72	Suggestions that the DART should be a free service to encourage airport users to use sustainable transport methods. Some respondents felt that Oyster cards should be able to be used for the DART.	11	Please see response to ref 14.1.43.	No
14.2.73	Suggestions that the DART should be a transport hub, linking cars, hire cars, staff parking, or an underground service. Suggestions regarding extending the service to car parks, Luton town centre, Luton bus station, a park and ride service, and conflicting views around whether the DART should link with just terminal 1 or both terminal 1 and the proposed terminal 2.	19	Although our Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the operation and construction of the scheme is outside of this application for development consent. Further information can be found in the SAETS .	No
14.2.74	Suggestions that there is a need to improve the access to the airport via the highways network, with particular roads including the M1, A1081, A1, Wigmore Lane roundabout, a better link to the north which doesn't rely on the M1, A6 or A1, access from J10 of M1 and A505, as well as access from the M4 with a tunnel under the runway. There were also suggestions that access should be improved from Hitchin, Harpenden, east/west links, and a reduced use of Wigmore Lane, Ashcroft Road and Vauxhall Way.	47	Please see response to refs 14.1.13 and 14.1.44.	No

Ref	Comment	No CC	Response	Change
14.2.75	Suggestions to reduce traffic and congestion on the highways network, with particular concerns regarding roads in Harpenden, the A1(M), M1, A505, A602, Darley Road, A6, Wigmore Lane and Ashcroft Lane. Suggestions to prevent additional traffic included the Hitchin Bypass, dualling access roads, and through ensuring there are mitigation measures at Wigmore Place roundabout to deter traffic from Breachwood Green.	70	Please see response to ref 14.1.13.	No
14.2.76	Suggestions on how to reduce traffic and congestion on the highways network from construction vehicles include preventing construction vehicles from using Lower Eaton Road, M1, any country or residential roads, B440, any road in Harpenden or the B653. Construction vehicles should only be allowed access via motorways, the A505 or A1081, and suggestions that construction vehicles should only travel during the daytime, but not in rush hours, or only between 10pm-7am. Some respondents also suggested that there should be at least 1 day a week without construction vehicles, and that road closures should be minimised, and when works are not ongoing, that traffic should flow without restrictions, with works being aligned with other highways works to reduce impact on communities and ensuring that construction vehicles abide by lorry ban areas.	51	Please see response to ref 14.1.18.	No
14.2.77	Suggestions for how to improve safety along the highway's networks including: road modifications to	5	Please see response to ref 14.1.47.	No

Ref	Comment	No CC	Response	Change
	take into account the health and safety of residents, ensure any mud from construction vehicles is quickly removed from roads, and to widen J10 of the M1 to reduce accidents, but not into the hard shoulder which is necessary for breakdowns.			
14.2.78	There is a need to prevent airport users from parking on residential streets, and the airport should pay for introducing restrictions and permits. Some respondents also suggested the implementation of a grant funded by the airport to allow residents to add driveways to their properties.	17	Please see response to ref 14.1.7.	No
14.2.79	Suggestions that the mode shift targets should be achieved regardless of whether the airport expansion progresses.	94	Please see response to ref 14.1.49.	No
14.2.80	Suggestions that accessing the airport by public transport should be encouraged, for both airport users and staff through various measures including discounts when using public transport, reduced or no car parks, advertising of public transport when buying flight tickets, effective marketing, and enforcement of targets. Other suggestions included ensuring public transport runs in the early morning and late at night and banning heavily polluting vehicles from the airport similar to a low emission zone.	117	Please see response to ref 14.1.50. Suggestions for operational matters and detailed design which are within our control are welcomed and will be considered at the detailed design stage. Some matters are outside of our control and will be for the operators to consider.	No

Ref	Comment	No CC	Response	Change
14.2.81	Suggestions to achieve mode share targets through improvements in public transport services, such as the provision of additional luggage facilities, easily accessible, up-to-date service information, the provision of transport between the two terminals, shuttles between bus stations / train stations and the airport, the use of Oyster cards on services and an improved Thameslink service.	33	Please see response to ref 14.1.23. Suggestions for operational matters and detailed design which are within our control are welcomed and will be considered at the detailed design stage. Some matters are outside of our control and will be for the operators to consider.	Yes
14.2.82	Suggestions to achieve mode share targets through improvements in public transport links, with specific improvements to links to the airport from: the North and Midlands (Manchester, Leeds, Sheffield, Derby, Leicester, Nottingham), London (Kings Cross, Moorgate), and surrounding areas (Stevenage, Kensworth, Hitchin, Letchworth, East Hertfordshire, Hertford, Watton, Leighton Buzzard, Luton Parkway, Milton Keynes, Bedfordshire, Welwyn Garden City, St Albans, Aylesbury, Tring, Aldbury, Harpenden, Stopsley, Dunstable, Barton Le Clay, Whitwell, Houghton Regis, Hatfield, Royston, Little Gaddesden, and Oxford).	122	Please see response to ref 14.1.55.	No
14.2.83	Suggestions that the airport should only support, or incentivise carbon neutral methods of accessing the airport, through electric / hybrid / hydrogen buses, taxis, autonomous ride hailing vehicles, and private cars, with associated infrastructure provided by the airport.	40	Please see response to ref 14.1.243.	No

Ref	Comment	No CC	Response	Change
14.2.84	Mode share targets should be more ambitious.	95	Please see response to ref 14.1.28, for further information on how the 45% target was reached, please refer to the SAETS .	No
14.2.85	Suggestions that the mode share targets should be binding objectives, with the airport expansion halted if these targets are not met.	1	A GCG framework which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface access - specifically, mode share. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals . However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such "limits".	Yes
14.2.86	Add traffic lights within the road and junction proposals, which should be added to the Crawley Green / Vauxhall Way junction or swap the lollypop lady to a traffic lights by the ASDA on Wigmore Lane.	2	Please see response to ref 14.1.54.	No
14.2.87	Proposed road and junction improvements need to improve the capacity of routes, with particular roads	20	Please see response to ref 14.1.13.	No

Ref	Comment	No CC	Response	Change
	including the M1, A5, M25, roads around nearby villages and airport access roads.			
14.2.88	Suggestions that proposals for specific roads and areas need improving, including the A1, A1081, Lower Luton Road, Wigmore Lane, A505, Stopsley Roundabout, west of Luton, A1(M), Vauxhall road, access from Stevenage, M1 northbound, A6, Darley Road, Eaton Green Road, Crawley Green, Stockingstone Road, Gypsy Lane, Dunstable Road, Kimpton Road, London Road, B653, A5183, M25 and Hertfordshire	88	Please see response to ref 14.1.13.	No
14.2.89	Suggestions that road and junction proposals should not include any additional traffic lights, with concerns around traffic flow, delays, congestion, noise, and air quality.	15	Please see response to ref 14.1.54.	No
14.2.90	Suggestions that the cost of rail improvements should instead be used on improving highways	1	The SAETS sets out our proposed strategy, the strategy requires improvements to public transport as well as highways to mitigate impacts of the Proposed Development.	No
14.2.91	Suggestions that there is a need to improve the services, links and capacity of the various rail services serving Luton Airport, with an increase in capacity through additional services from Milton Keynes, Oxford, Watford Junction, St Albans, Cambridge, Bedford, Stevenage, Harpenden, Radlett, Elmstree & Borehamwood, Dunstable,	87	Please see response to ref 14.1.55.	No

Ref	Comment	No CC	Response	Change
	London (St Pancras, Euston), Aylesbury, Stanstead Airport, Wheathampstead, Welwyn Garden City, Hertford, Nottingham, with direct links from Luton Parkway, so that there is no need for the DART / shuttles etc. with suggestions from some respondents that this link should be underground. Suggestions for improvements in capacity of the Thameslink services, as well as 24/7 services, and a dedicated rail link so that airport users don't impact commuters. Suggestions for improved facilities included lifts and parking at Luton Parkway.			
14.2.92	Suggestions that Oyster cards should be able to be used in accessing Luton Airport and Luton Parkway Station on traditional rail and DART services, as well as improvements to the user-friendliness of purchasing rail tickets.	2	Please see response to ref 14.1.43.	No
14.2.93	Suggestions around construction traffic management, including considerations into the provision of secondary access being provided to limit impacts on BAE, ASDA, suppliers, and customers, as well as consideration given to the potential for loads falling onto the highways network used by construction vehicles.	1	Please see response to ref 14.1.18.	No
14.2.94	Suggestions that forecasting and modelling for the purpose of surface access proposals take into account where potential airport users will be travelling from, and should consider the wider area,	4	Please see response to ref 14.1.144. Please also refer to the SAETS for further information.	No

Ref	Comment	No CC	Response	Change
	while overestimating the impact on surface access numbers, to ensure mitigation measures are sufficient			
14.2.95	Suggestions that there is a need for surface access improvements despite/regardless of the expansion.	41	Noted, this is outside the scope of the Proposed Development.	No
14.2.96	Suggestions that there should not be a monopolisation of taxi companies, and that local taxi companies should be promoted, with no drop-off charges to allow for cheaper taxi services for users. Some suggestions to encourage electric taxis, and to deliver additional drop-off areas, including at the DART or by shuttle service.	21	Provision for electric vehicles, including those which could be used by taxis, will be considered as part of detailed design. For information on the proposed drop off areas please refer to the SAETS . The monopolisation of taxi companies and promotion of local taxi companies is outside of the scope of this application for development consent.	No
14.2.97	Suggestions to improve active travel infrastructure, including covered walkways, pedestrian and cycle access from nearby hotels and Luton town centre, as well as Stopsley, Wigmore, Ramridge, Breachwood Green and both Luton Parkway and Luton station. Suggestions also included ensuring active travel users' safety, and for the DART to be replaced with a cycle route linking Luton Parkway Station.	22	Please see response to ref 14.1.57. In respect of safety please see response to ref 14.1.30.	No
14.2.98	Supporting comments regarding the mode share targets, as it was felt that public transport	385	Noted.	No

Ref	Comment	No CC	Response	Change
	improvements will encourage the use of these in accessing the airport. Some respondents noted that this would only be the case, depending on cost of public transport, how busy services will be, through the delivery of early morning or late-night services, faster direct routes from towns and villages and not needing to use a combination of modes.			
14.2.99	Comments of support for the mode share targets of 45%, however, some respondents felt that this should be achieved without the airport expansion progressing	216	Noted.	No
14.2.100	Comments in support of the improved public transport links which have been proposed, however, some respondents felt that these proposals should be delivered now, rather than in a phased approach	74	Noted.	No
14.2.101	Comments of support regarding the proposed bus services.	14	Noted.	No
14.2.102	Comments of support regarding the proposed coach station.	14	Noted.	No
14.2.103	Comments of support regarding proposed car parking facilities.	20	Noted.	No
14.2.104	Comments that the current car parking facilities are sufficient currently.	4	Noted.	No

Ref	Comment	No CC	Response	Change
14.2.105	Comments in support of the drop-off/pick-up proposals.	2	Noted.	No
14.2.106	General comments of support of the design and location of proposed road and junction improvements.	44	Noted.	No
14.2.107	Support of the improved rail services and links proposals, with comments including noting the necessity of rail improvements, support for plans to link with Luton Parkway, and support for the rail improvements freeing capacity on the local roads, while encouraging airport users not to drive	23	Noted.	No
14.2.108	General comments of support for the surface access proposals (including the parking proposals), which will improve traffic and congestion, and encourage the use of Luton over other airports in the region, benefiting the local economy	80	Noted.	No
14.2.109	Support for the proposals for taxis, with respondents suggesting that this is a favoured method of accessing the airport, due to ease, minimal cost, and convenience	7	Noted.	No
14.2.110	Comments in support of the DART proposals, including it being a more sustainable method of accessing the airport, that it will encourage public transport in accessing the airport, which will reduce	183	Noted. Although our Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the operation and construction of	No

Ref	Comment	No CC	Response	Change
	traffic and congestion, and that it should have been delivered in recent years and should be promoted effectively to maximise benefits.		the scheme is outside of this application for development consent.	
14.2.111	Suggestions that in order to encourage accessing the airport through public transport, and specifically through public buses, that free or subsidised services should be offered.	12	Please see response to ref 14.1.22.	No
14.2.112	Various suggestions that in order to achieve the mode share targets, the bus and coach station facilities and services need to be improved. The areas where services were felt to be insufficient included Buckinghamshire, North Hertfordshire, South Bedfordshire, Luton, from the East/West, Dunstable, Caddington, Harpenden, Aylesbury, Pitstone, Leighton Buzzard, Wheathampstead, Welwyn Hatfield and Potters Bar. Respondents also identified the need for a free shuttle, sufficient services for staff through incentives, early morning and late evening services, an extension of existing services, improvement in reliability of services and bus lanes to prioritise buses. Additionally, the bus stations were suggested to have comfortable seating in waiting areas, be under cover, have no curbs for ease with luggage, and to have sufficient trolleys once dropped off at Luton Airport.	66	Please see response to ref 14.1.1, 14.1.13, and 14.1.50	No
14.2.113	Concerns around the proposed DART service, which respondents felt to be inadequate in meeting	88	Please see response to ref 14.1.67.	No

Ref	Comment	No CC	Response	Change
	mode share targets, for reasons including, the DART won't be attractive for those who do not live on the rail line connecting with Luton Parkway, the DART should run in a continuous loop, concerns that the DART will not meet the demands of 2 terminals, demand for the DART should be met by buses, airport users will prefer cars over using the DART, and therefore traffic and congestion will continue, DART may be unsustainable in the near future, DART should link with town centre, concerns that the DART is unnecessary			
14.2.114	Concerns that the DART proposals are insufficient or ineffective, with concerns including that the DART will not benefit the community, is causing disruption already, the DART contributes to CO2 emissions, it won't provide sufficient capacity, and is leading to confusion as to why it has been included as a benefit to expansion as it is already being constructed	24	Please see response to ref 14.1.67.	No
14.2.115	Concerns around surface access proposals, which were seen to be unnecessary, inadequate, insufficient. Objections included the accuracy of modelling work, phasing of interventions, impacts on local communities, electric car proposals, parking schemes, the inclusion of the Vauxhall Road Trailer Park in proposals, the planned roundabout at the top of New Airport Way, constant roadworks, use of Luton Parkway Station as a bus hub, and that the	113	Please see response to ref 14.1.13 and 14.1.68.	No

Ref	Comment	No CC	Response	Change
	proposals do not cover a wide enough area, or correspond with existing proposed surface access schemes. There were also concerns with how far the Counties and Highways Agencies support the proposals. Many respondents suggested that the expansion will exacerbate any surface access issues currently faced.			
14.2.116	Suggestions that new roads are required at various locations, including south of the airport to the A6 and to Lilly Bottom, from the A1 to Luton, from the M1 and A505 to airport carpark, access routes from the east, additional roads linking the east to west, from Knebworth to A505 or M1, airport to Wheathampstead, from A1081 to the airport, North Hertfordshire, and suggestions for an entire new road network	39	Please see response to ref 14.1.13.	No
14.2.117	Suggestions that the road and junction proposals are necessary despite the expansion, with some respondents suggesting that the delivery phasing for interventions is too late, and improvements are necessary now, including at Gypsy lane, A6/A505 link, M1, southern relief link around Hitchin, Leagrave High Road, Wigmore Lane, Stopsley Tea Green, Handcross Road, the three Hitchin roundabouts	26	Noted, this is outside the scope of the Proposed Development.	No
14.2.118	Suggestions that there needs to be restrictions against airport users using routes such as Darley	24	Please see response to ref 14.1.13 and 14.1.71.	No

Ref	Comment	No CC	Response	Change
	Road, Residents Way, and Wigmore Place as well as restrictions against trucks, construction vehicles and HGVs using Eaton Green Road, Darley Road, routes leading to Harpenden and Breachwood Green, or restrictions based on the time of day for such vehicles. Suggestions also included restricting access for some routes to just residents, traffic calming measures through Caddington Chaul End Road, and for Satnavs to avoid using B653 to access the airport. Through additional signage, and greater enforcement, rat-running will be prevented			
14.2.119	Concerns that coaches are an expensive and unsustainable method of transport, which will contribute to the current traffic and congestion issues, with confusion around why the coach station would be necessary with the provision of the DART.	6	Coach travel is a key aspect of the modal share and public transport offer. It will not be possible for all passengers to arrive via rail and the Luton DART. Please find additional information within the SAETS .	No
14.2.120	Concerns that the expansion will cause additional traffic and congestion on the local highways networks, which will impact the efficiency of buses and coaches	2	Please see response to ref 14.1.13.	No
14.2.121	Concerns that proposals do not plan for increased coach capacity	2	Please see response to ref 14.1.1.	No
14.2.122	Suggestion to remove bus lanes.	1	We are not responsible for the provision of bus lanes; this is a matter for the relevant highway authority.	No

Ref	Comment	No CC	Response	Change
14.2.123	Suggestions that in order to achieve the mode share targets, the cost of public transport needs to be free, reduced or subsidised by the airport.	16	Please see response to ref 14.1.22.	No
14.2.124	Suggestions to use alternative locations for the car parking facilities, including through off-site parking, which should be easily accessible / nearby to the M1, with either a free shuttle (with some respondents suggesting that there should be separate shuttles from the drop-off and for parking) or the DART to transfer users to the terminals which would reduce congestion, or by having parking as close to the terminal as possible, to shorten the walk to terminals. Other suggestions included not having any additional parking for Terminal 2, while others objected to Wigmore Park being used for parking.	23	Please see response to ref 14.1.3.	No
14.2.125	Suggestions to increase the size of the land used for both short and long-term car parking, through multistoried / underground parking, additional spaces at Luton Parkway, additional spaces for disabled persons, and increased sizes of spaces. Some respondents felt that this would prevent people from parking on residential streets.	57	Please see response to ref 14.1.4. There is sufficient land on-site designed for car parking without the need to revert to delivering additional parking at Luton Airport Parkway Station.	No
14.2.126	Suggestions to improve the facilities and accessibility of drop-off point, which respondents felt should be linked with the DART, be larger, more user-friendly (particularly for those with limited	3	The Proposed Development will be designed in full compliance with the Disability Discrimination Act and related legislation.	No

Ref	Comment	No CC	Response	Change
	mobility, as well as through having flight information, or having a travelator taking passengers to the terminal), being located closer to terminals, or being located off-site with shuttle services taking passengers to terminals. Some respondents also suggested that pick-up points should be separated from drop-off points, while others felt separate drop-off points for both terminals would be beneficial.		Additionally, airports are legally required to provide assistance to Persons of Restricted Mobility at any stage of the passenger journey from arrival at the airport to the aircraft seat and the airport will continue to comply with all such obligations. For more information about proposed drop off arrangements please see response to ref 14.1.9 and the SAETS .	
14.2.127	Concerns around whether there will be a drop-off area at Luton Parkway	1	Luton Airport Parkway Station is outside the area subject to the application for development consent. However, we have engaged with LBC as the local highways authority since the 2019 consultation and will continue to do so.	No
14.2.128	Suggestions to limit the car parking spaces within the proposals, which will in turn encourage the use of public transport in accessing the airport. Some respondents suggested that this would save money being spent on parking, which could instead be invested into sustainable transport, while others suggested that the car parks could be repurposed once private vehicles become less commonplace.	7	Please see response to ref 14.1.4.	No
14.2.129	Concerns that the delivery of the DART is necessary prior to expansion.	1	The Luton DART will be operational before commencement of the Proposed Development. Although our Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the operation	No

Ref	Comment	No CC	Response	Change
			and construction of the scheme is outside of this application for development consent.	
14.2.130	Concerns around the impact the proposed expansion will have on the capacity of rail services, which are already seen to be overcrowded. Particular services of concern were the Thameslink, East Midlands Railway, and general services at rush hours, as well as services from Harpenden, London (St Pancras), St Albans, Radlett, Elstree & Borehamwood, and Bedford	420	Please see response to ref 14.1.55.	No
14.2.131	Concerns that the negative impacts of expansion will outweigh any positives from the mode share targets	1	The impact of the Proposed Development is assessed in the PEIR . The application for development consent will be submitted to the Planning Inspectorate who will examine the application before making a recommendation to the Secretary of State. Please see response to ref 14.1.144.	No
14.2.132	The airport should use parking charges as a method of investing funds into sustainable transport methods.	1	Noted.	No
14.2.133	Suggestions that improvements to car parking proposals could include a dedicated traffic officer, the delivery of an 'American style cell lot', valet parking and computerised ticketing system to identify those over-staying.	5	Noted. This are operational matters which will be considered at the detailed design stage.	No

Ref	Comment	No CC	Response	Change
14.2.134	Suggestions to encourage the use of long-term car parks	1	These are included in the Proposed Development.	No
14.2.135	Concerns that as a result of the limited car parking spaces, airport users will reach the airport and won't know beforehand that there are no spaces. In this case, users should be warned.	1	This is an operational matter that we will deal with via appropriate signage. Regarding mid and long stay most of the bookings are pre-booked and this is therefore not an issue.	No
14.2.136	Concerns with the building materials being used for the car parks, which should not be built using materials which will reflect noise or be tall in height.	1	Noted. The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR requires the contractor to use appropriate materials. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	No
14.2.137	Suggestions for the provision of pick-up alternatives to traditional taxis.	1	Pick up areas will be open to other vehicles as well as traditional taxis, for example Uber.	No
14.2.138	General comments of support of the DART proposals, with respondents suggesting it should have been delivered in recent years, and suggesting that it must be promoted effectively to maximise benefits	1	Noted.	No
14.2.139	Concerns around the lack of train driver/ticket inspector within the DART proposals	1	Please see response to ref 14.1.43.	No
14.2.140	Concerns around the accessibility of Century Park through the DART	1	As part of the Proposed Development a new Luton DART station will be provided at T2 which	No

Ref	Comment	No CC	Response	Change
			will be within a reasonable walkable distance of Century Park.	
14.2.141	Clarity required on the proposed flow increase on the A1081 that forms the direct connection between the airport and M1.	1	Noted. This will be included in the Transport Assessment submitted with the application for development consent. Further information is contained in the SAETS .	No
14.2.142	Concerns that we might only know whether surface access proposals will be successful once complete.	1	Please see response to ref 14.1.99.	No
14.2.143	Concerns that improvements to the highways network in Stopsley/Putteridge will hinder the community feel of the area, which residents would like to keep 'exclusive'.	1	Any improvements have been well thought out and deemed as necessary based on modelling work undertaken. More liaison will take place with the relevant highway authorities prior to finalising any proposals.	No
14.2.144	Concern about the level of clarity of the information provided within consultation documents regarding highways improvements.	1	The SAETS sets out the surface access proposals in detail.	No
14.2.145	Concerns with the current configuration of car parks, including difficulties with finding cars after using the airport, traffic flow, no cover from adverse weather, continued re-design of car parks leading to confusion, and the unattractive design currently. Concerns that these issues will be exacerbated with expansion.	48	Please see response to ref 14.1.100.	No

Ref	Comment	No CC	Response	Change
14.2.146	Object to the expansion of Luton Airport, therefore any developments to car parking facilities are unnecessary.	54	Noted.	No
14.2.147	Concerns that it is unclear how the targets of increasing the number of passengers travelling to and from the airport using public transport to at least 45% have been derived, or that this forecasting is inaccurate or unreliable. Some respondents noted that travelling via car will continue to be the favoured method of accessing Luton as sustainable access proposals are insufficient	206	Please see response to ref 14.1.23.	No
14.2.148	Concerns that the road and junction improvement proposals are inadequate and insufficient, and are likely to be ineffective, with some particular concerns that there are already issues which will be exacerbated by the expansion	217	Please see response to ref 14.1.13.	No
14.2.149	The existing rail network, serving Luton Airport currently were seen to be poor, with specific issues including: poor rail links (particularly east / west links with the airport), unreliability of the services, as well as delays and cancellations (with some respondents citing extreme hot weather causing disruption), services being overcrowded, particularly with users carrying luggage, the lack of facilities at the train station (no specialty lifts / disabled access), lack of services in the early morning or late at night, poor /	145	Please see response to ref 14.1.55.	No

Ref	Comment	No CC	Response	Change
	insufficient luggage racks, and difficulty accessing the airport from the station. Many of these issues were felt likely to be exacerbated with the expansion.			
14.2.150	Concerns around the cost of using a taxi to access the airport, with particular concerns around the airport only allowing one taxi service to operate at the airport, which was creating a monopoly and driving up prices. Some respondents felt the cost of taxis are discouraging the use of Luton Airport.	17	Please see response to ref 14.1.106. Access to the airport by black cabs is being improved and as part of the Proposed Development, provision has been made for taxi accessibility, for example at Terminal 2. Operationally Luton Rising will encourage all black cabs to have equal access.	No
14.2.151	Concerns around the impact of the airport expansion on existing cyclists and cycle routes.	3	Please see response to ref 14.1.57.	No
14.2.152	Suggestions regarding direct access into the airport, with some respondents suggesting that access should only remain at the current entrance, to avoid congestion spilling out, while others suggested additional access points, including at Breachwood Green, Percival Way, and to both the east and west of the airport. There were also comments regarding improving the user-friendliness of access points, which should be well-lit and less confusing.	15	Surface access proposals have been informed by the modelling work to date. Detailed design suggestions will be considered at the detailed design stage.	No
14.2.153	Suggestions that existing roads should be improved in quality	6	Noted, this is outside the scope of the Proposed Development.	No

Ref	Comment	No CC	Response	Change
14.2.154	Suggestions that there should not be any highways improvements, or that roads should not be widened	3	Please see response to ref 14.1.13.	No
14.2.155	Improve the road and junction proposals through the delivery of a number of Bypasses, including around all towns and villages around Luton, a bypass around Hitchin, or a bypass around Harpenden.	19	Please see response to ref 14.1.110.	No

A15 Land and Compensation

Table 0.5: Regard had to statutory consultation responses on Land and compensation - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
15.1.1	Concerns that the compensation schemes are ineffective and insufficient. Respondents noted that reducing the noise of a plane is impossible, and therefore any form of mitigation would be ineffective against current and future noise levels.			25	<p>The proposed compensation and Noise Insulation Schemes which we consulted on in 2019 already represented a significant improvement on the current offer at Luton and were more generous than any other UK airport. Since then, other airports have moved on and we have also further improved our offer such that it stands to be best in class in terms of UK airport noise compensation schemes.</p> <p>The current noise insulation policy at the airport sets eligibility for properties within the 63 dB LAeq,16h or 55 dB LAeq,8h noise contours. The proposed policy changes set out in 'Aviation 2050: The future of UK aviation. A Consultation' require that noise insulation policy threshold extend from 63dB LAeq,16h to 60dB LAeq,16h. In developing the proposed Noise Insulation Schemes, we have reviewed the existing scheme in light of government policy</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>requirements and feedback received during the 2019 statutory consultation and extended the noise insulation policy to four tiers covering:</p> <ul style="list-style-type: none"> • Scheme 1 - properties within the 63 dB LAeq,16h contour; • Scheme 2 – properties within the 60 dB LAeq,16h; • Scheme 3 – properties within the 57 dB LAeq,16h contour; and • Scheme 4 – properties within the 54 dB LAeq,16h contour. <p>The proposed Noise Insulation Schemes have been designed to significantly improve on the current noise insulation scheme, not only by increasing the number of properties which may be eligible under the new schemes, but also by substantially improving the level of contribution. They represent a significant improvement on the current offer at Luton.</p> <p>Further information is available in the Draft Compensation Policies and Measures consultation document.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
15.1.2	Concerns around the area covered by the CPO proposals. Including that they are excessive and unclear.			2	<p>The Proposed Development has been designed to minimise land required which is not within our existing ownership, however a certain amount of additional land will be required to deliver the Proposed Development.</p> <p>With our shareholder, LBC, we own or control the majority of land needed for the proposed expansion. The boundary of the Proposed Development has been designed to incorporate all the land necessary to implement the Proposed Development and no more. We will submit a Statement of Reasons as part of the application for development consent explaining why it will be necessary for the DCO to contain powers to enable us to acquire compulsorily land and rights over land, and to take possession of land temporarily, to enable the construction and delivery of the Proposed Development. The Draft Land Assembly Plans set out the land required for the Proposed Development.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
15.1.3	General objections to the use of CPO to support the Airport expansion, with concerns that it is inappropriate or undemocratic.			13	<p>The Proposed Development has been designed to minimise the acquisition of land; however, a certain amount of additional land (outside of our existing ownership) will be required to deliver the Proposed Development. It is usual for major infrastructure projects such as ours to include relevant compulsory acquisition powers (which have to be proportional and justified). It should be noted that the compulsory acquisition powers sought in our case are relatively limited.</p> <p>Our intention is always to acquire land/rights by agreement and compulsory acquisition powers will only be used as a last resort, where agreement cannot be reached.</p>	No
15.1.4	Concerns with the FIRST proposals, which was considered to be inadequate, ineffective, and insufficient in mitigating the impacts of expansion felt by the local communities and environment.			25	<p>In our last consultation we set out how we wanted to share the benefits of airport growth with neighbouring communities and proposed a new fund which we called FIRST. The aim of this was to make funds available to our neighbours to use for projects related to either,</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Community, Environment, or Access.</p> <p>We still propose to establish a similar fund, but having reflected on it we feel it could be put to more direct beneficial use, in line with our social and environmental ethos, by targeting areas of high deprivation in the region and by helping to finance local decarbonisation projects. As well as fitting better with our own values, we also believe this approach is better aligned with the national levelling up and decarbonisation agendas promoted by the government. To better reflect this revised approach we have renamed the fund ‘Community First’.</p> <p>In order to maximise independence and transparency we propose that the fund should be independently administered. We believe the best way to do this would be to make it available to community groups and Town and Parish Councils through our existing independently administered Community Funding Programme.</p> <p>We propose that Community First will provide £1 in funding for every</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>additional passenger above the passenger cap current at the time that our DCO is consented. The available total Community First fund has the potential to raise up to £13m per year.</p> <p>The fund will be available to communities in Central Bedfordshire, North Hertfordshire, St Albans, Dacorum, Stevenage, Welwyn, Hatfield, eastern parts of the former Aylesbury Vale district and parts of East Hertfordshire.</p> <p>Community First is not intended to mitigate impacts – that is the role of mitigation identified and secured through the Environmental Statement (ES) that will be submitted with the proposed application for development consent.</p>	
15.1.5	Objection to the expansion proposed at Luton Airport, and therefore, any FIRST scheme compensation is unnecessary.			2	Noted.	No
15.1.6	General concerns with the FIRST compensation scheme, including it is not guaranteed it will work, may			3	Please see response to ref 15.1.4.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	not be delivered, and concern over how it will be funded.					
15.1.7	Concerns around the area covered by the land and discretionary compensation scheme, with particular concerns with the lack of clarity in the consultation documents regarding the area covered by the scheme.			5	<p>Please see response to ref 15.1.1 with regards to noise contours.</p> <p>The Compensation Code is a collective term used to describe the legislation and case law which regulates the procedures for compensation following compulsory purchase. All compensation claims will be assessed in accordance with the Code, and details of the Code can be found within the Draft Compensation Policies and Measures consultation document.</p> <p>In addition to statutory compensation, discretionary schemes are proposed, details of which can be found in the Draft Compensation Policies and Measures. Eligibility for these schemes is based on affected persons falling within specified noise contours.</p> <p>The Draft Compensation Policies and Measures now also includes indicative illustrative noise contour maps allowing members of the</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					public to indicatively see if they would be eligible for the voluntary, hardship or noise insulation schemes.	
15.1.8	Concerns that the land and discretionary compensation scheme will be ineffective, insufficient, and inadequate. Responses included that the level of compensation is likely to be inadequate and not to market rate levels and not cover enough people.			4	Please see response to ref 15.1.7.	No
15.1.9	General comments of support for the noise insulation compensation schemes.			5	Noted.	No
15.1.10	General comments of support for the FIRST scheme.	Kings Walden Parish Council		4	Noted.	No
15.1.11	General comments of support for the land and discretionary compensation scheme.			3	Noted.	No
15.1.12	Suggestions regarding the three noise insulation schemes, included covering air conditioning and should be expanded to cover replacing			2	Please see response to ref 15.1.1. All eligible properties making an application under the Noise	No

Ref	Comment	PC	LA	No PILs	Response	Change
	older double glazing which does not provide adequate noise insulation (minimum 6.3mm laminated double glazed units).				Insulation Schemes will be visited by an assessor appointed to agree with the owner what works can/should be undertaken. Air conditioning is outside of the scope of the Noise Compensation Scheme.	
15.1.13	Those already affected by the existing noise impacts of the airport should receive compensation.			2	LLAOL is responsible for managing the airport's existing noise insulation scheme. Further details can be found on the Luton Airport website. We are not consulting on the existing compensation but are seeking views on future compensation proposals which are more generous than the existing.	No
15.1.14	Support for purchase of their property.			1	Noted.	No
15.1.15	Suggest an independent assessment of the compensation schemes including to evaluate eligibility, the area covered by the schemes and land and home valuations.			1	The compensation policies and measures have been developed fully in line with the requirements of the Compensation Code and in some cases, we offer voluntary policies which go beyond those statutory standards.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Our proposed compensation policy will be assessed as part of the DCO application, and therefore an independent audit is not required. We have produced our compensation policies following a review of policies at other airports as well as consultee responses. The Compensation Code means that those eligible can apply for an advisor/consultant to act on their behalf. Further information on our compensation policies, including eligibility requirements, is contained in the Draft Compensation Policies and Measures.</p>	
15.1.16	<p>Suggestions that the compensation schemes should cover other impacts including having to change school and workplace as a result of moving, compensating for previous expansion, emotional impacts, and council tax rebates.</p>			5	<p>The compensation entitlement incorporates both statutory requirements and our discretionary schemes which have been devised to support those most impacted. The statutory entitlements do not generally include compensation for changing school or workplace, or emotional impacts. We envisage that the most likely impact to our neighbours will be noise related hence our discretionary measures focus on mitigating this.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Our proposals exceed those set out within the Compensation Code, as described in the Draft Compensation Policies and Measures .	
15.1.17	Suggestions that all compensation schemes should cover a wider area including everyone who is affected.			5	Please see responses to refs 15.1.1, 15.1.7 and 15.1.21. It may be possible for property owners to claim compensation under Part 1 of the Land Compensation Act 1973. This provides compensation for the diminution in residential property value where this is caused by the physical factors from use of the new airport facilities. Such a claim is not strictly defined by the noise contours, or distance from the airport facilities, but must be substantiated by the property owner or their appointed agent.	No
15.1.18	Suggestions that the amount of compensation being provided through the FIRST scheme should be increased and should include existing passenger levels.			2	Community First represents a unique approach to sharing the benefits of airport growth with the surrounding area. By its nature it is linked to growth and should not include current passengers. The available total Community First fund	No

Ref	Comment	PC	LA	No PILs	Response	Change
					has the potential to raise up to £13m per year to help make the national levelling up and decarbonisation agendas meaningful at a local level.	
15.1.19	London Luton Airport Operations Limited are seeking advance negotiations prior to the compulsory purchase and temporary access to LLAOL's land in order to implement the DCO proposals.			1	Noted. Discussions with LLAOL are underway and will continue throughout the preparation and examination of the proposed application for development consent.	No
15.1.20	AT Oliver Holdings resist and object to any Compulsory Purchase of their land interests.			1	Our intention is always to acquire land/rights by agreement and compulsory acquisition powers will only be used as a last resort, where agreement cannot be reached.	No
15.1.21	Noise impact is very subjective. The criteria set are virtually impossible to prove. It is unclear as to what exactly is meant by the '69dB contour'. Is this an average, frequent or occasional peak? Constant noise at 60dB has a much greater impact than occasional noise at 69dB.	Kings Walden Parish Council		1	<p>The main criteria for eligibility for the discretionary compensation schemes, including the Noise Insulation Schemes, is that a property will need to be within the requisite noise contours at the time of the opening of the scheme.</p> <p>The thresholds for the schemes are: 69dB (LAeq,16h) for the voluntary scheme, 66dB (LAeq,16h) for the hardship scheme; and 63dB</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>(LAeq,16h), 60dB (LAeq,16h), 57dB (LAeq,16h) or 54dB (LAeq,16h) for noise insulation. This is a more generous offer than other airports.</p> <p>Eligibility details can be found in the Draft Compensation Policies and Measures. Noise contour forecasts would be published annually so people know if they are eligible. Our proposed approach meets relevant Government guidance and is in line with other airports.</p> <p>Indicative noise contour plans showing the areas are available in the Draft Compensation Policies and Measures.</p> <p>It may be possible to claim compensation under Part 1 of the Land Compensation Act 1973. This provides compensation for the diminution in residential property value where this is caused by the physical factors from use of the new airport facilities. Such a claim is not defined by the noise contours but must be substantiated by the property.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					Please see Chapter 16 Noise and Vibration of the PEIR for further information on noise levels.	
15.1.22	The zones for noise insulation are limited.	Kings Walden Parish Council		1	Please see response to ref 15.1.21.	Yes
15.1.23	£1 per passenger is insufficient to mitigate the impact of expansion in North Hertfordshire. Any amount should be index linked. The allocation should be based on a percentage of gross profits. North Herts District council must have a say in how the money is spent. Kings Walden parish council should be party to how this money is spent. Initiatives funded by the scheme should have direct benefits on the residents of Kings Walden. For example, funding residents parking schemes to prevent Luton customers and workers using villages as car parks. The proposals to share are entirely based on growth and don't address the current imbalance between Luton and surrounding areas. No funding is mentioned to deal with the impact of	Kings Walden Parish Council		1	<p>The £1 per passenger contribution provided by Community First is not intended as a mitigation measure. Actions required to mitigate negative impacts of expansion are set out and committed through the Environmental Statement. The intention of Community First is to offer help to nearby community groups and Parish and Town Councils, including those in North Hertfordshire, for them to address local needs in areas of high deprivation or for decarbonisation projects. This is aligned with our values and a further illustration of our commitment to improving lives and being a better neighbour.</p> <p>The application is to grow the airport and to mitigate any negative impacts of that growth whilst ensuring that the whole region is able to enjoy the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the recent expansion to 18 million passengers per annum.				<p>significant economic and other benefits which would flow from expansion. As such, all of our proposals linked to the Proposed Development are forward looking from the current position. The Community First fund is offered as a result of our plans for growth beyond the existing passenger cap. It is right that this application should address the negative impacts related to the proposals within the current application.</p> <p>Community First will contribute additional funds to our existing, and already substantial community funding programme.</p>	
15.1.24	<p>Noise insulation schemes for buildings do nothing to reduce outdoor noise in tranquil landscapes valuable for recreation and wildlife. People visiting are more likely to be outdoors in an AONB. Fifty aircraft movements an hour is one every 72 seconds.</p>	Chilterns Conservation Board		1	<p>Our noise modelling shows that as the airport grows over time, noise levels will reduce as aircraft become quieter. As part of the Proposed Development, we are developing a Noise Envelope. The Noise Envelope will contain control measures to ensure that the Proposed Development cannot go ahead unless certain noise targets are met. For further information about our proposed noise mitigation</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					please see Chapter 16 Noise and Vibration of the PEIR.	
15.1.25	Following the mitigation hierarchy (avoid, reduce, compensate), funding should be directed for residual harm to the Chilterns AONB. This could fund environmental and community initiatives, including Chalkscapes, and be similar to the '3.75m AONB enhancement fund set up by Network Rail and run by the Chilterns Conservation Board to address the impacts of Great Western Rail electrification.	Chilterns Conservation Board		1	Please see response to ref 15.1.4.	No
15.1.26	Luton Hoo state suggest significant changes to the current Noise Insulation Scheme, that would allow property owners free choice as to what would provide the best noise reduction for their individual properties rather than forcing a single supply contractor onto property owners.			1	Changes to the Noise Insulation Scheme are proposed and are covered in the Draft Compensation Policies and Measures . At this time a decision has not been made as to which contractor or group of approved contractors may be used to undertake the works.	No
15.1.27	Based on the available consultation documents, the case in support of			1	The case in support of compulsory acquisition will be made as part of	No

Ref	Comment	PC	LA	No PILs	Response	Change
	compulsory acquisition has not been made, bearing in mind the alternative options referred to in this representation.				the application for development consent, in the Statement of Reasons.	
15.1.28	<p>The Airport expansion proposals include the provision of a Fire Training Ground (FTG) on land just north of █████ landholding. The █████ land is in agricultural use, being part of █████. █████ is concerned that the Fire Training at the FTG could be a source of noise, visual disturbance and fumes that could adversely affect the operation of the agricultural holding. █████ seek assurances that such adverse effects would not occur, or that an appropriate buffer / screening could be provided on LLALs land. If any such buffer would be required on █████ land, then such would need to be acquired LLAL on commercial terms. █████ therefore request that LLAL provide evidence to demonstrate whether any adverse effects could occur and how any mitigation if required is to be achieved. In this context, it is noted that the LLAL acknowledges that</p>			1	<p>The impact of the Proposed Development, including the FTG has been assessed in the PEIR, this includes consideration of noise in Chapter 16 Noise and Vibration and visual impacts in Chapter 14 Landscape and Visual.</p> <p>Proposed landscape mitigation measures include the introduction of hedgerow and hedgerow tree planting within █████ land holdings for visual screening purposes to mitigate significant effects on users of Public Rights of Way (PRoW) to the south of the airport. The agricultural assessment determines there not to be a significant effect on this farm holding. Accordingly, no mitigation is proposed.</p> <p>We will seek to engage with all affected landowners to agree an approach to acquisition and /or future management as necessary.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	where the DCO interferes with an interest in a property, a Section 10 Claim (under the Compulsory Purchase Act 1965) may apply.				<p>Compensation for any compulsory acquisition of land or rights in land would be paid according to the Compensation Code. The Compensation Code is a collective term used to describe the legislation and case law which regulates the procedures for compensation following compulsory purchase.</p> <p>Specialist valuers will be appointed by each party to negotiate compensation. The valuation will be based on the unaffected open market value (what would have been the value of the property without the airport expansion).</p> <p>Further information on the approach to acquisition can be found in the Draft Compensation Policies and Measures.</p>	
15.1.29	General comments of support for the three noise insulation compensation schemes.			5	Noted.	No
15.1.30	Suggestions that the compensation schemes should be above market rate, generous, transparent, and fair,			6	Compensation for any compulsory acquisition of land or rights in land would be paid according to the Compensation Code. The Compensation Code is a collective	No

Ref	Comment	PC	LA	No PILs	Response	Change
	with CPOs including relocation, disruption, legal and moving costs.				<p>term used to describe the legislation and case law which regulates the procedures for compensation following compulsory purchase.</p> <p>Specialist valuers will be appointed by each party to negotiate compensation. The valuation will be based on the unaffected open market value (what would have been the value of the property without the airport expansion). In addition, we would also reimburse reasonable costs associated with acquiring and moving into a new property, which could include payment of the stamp duty land tax for a replacement property of equivalent value, statutory home loss payment of 10% of the open market value (with a cap of £64,000, reflecting the statutory provision), reasonable conveyancing and agent's fees, and other disturbance elements such as removal costs. Such costs would be assessed in accordance with the Compensation Code, meaning participants in the scheme would receive payment as if their property had been compulsorily acquired.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					Our proposed Noise Insulation Schemes go above and beyond statutory requirements. Further information on our voluntary compensation schemes can be found in the Draft Compensation Policies and Measures .	
15.1.31	Concerns that the three noise insulation compensation proposals are inadequate due to the level of compensation, and issues with the glazing offered, which was felt to be ineffective in mitigating noise impacts, not compatible with older or listed homes, or irrelevant when windows are open in summer, while still causing noise issues when outside of the home.			25	Please see response to ref 15.1.1. All eligible properties making an application under the Noise Insulation Schemes will be visited by an assessor appointed to agree with the owner what works can/should be undertaken. If listed building consent is required, the owner will need to obtain this in the same way they would for any other changes to the property before the works could be undertaken. Further information is available in the Draft Compensation Policies and Measures .	Yes
15.1.32	Concerns with the area covered by the three noise insulation compensation proposals, including			6	Please see response to ref 15.1.21.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	for those who fall just outside the boundary.					
15.1.33	Concerns that the CPO proposals are inadequate. Responses included objections to the compulsory acquisition powers, which will negatively impact both the environment and community, as well as the levels of compensation being insufficient, and queries as to whether this will be at the market rate.			5	Please see response to ref 15.1.2 and 15.1.3.	No
15.1.34	Suggestions that there must be an easy and transparent application process to compensation.			4	We are developing the procedure for No applying for compensation and agree that the proposal should be easy and transparent.	No
15.1.35	Suggestion that the compensation provided through the FIRST scheme should be proportionate to the impact of the expansion faced by the local communities and environment.			1	Please see response to ref 15.1.4.	No
15.1.36	Suggestions that there must be further stakeholder engagement, to ensure clarity of level, eligibility, and			7	Noted. Stakeholder engagement will continue as the application for development consent is developed and this statutory consultation	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	application for compensation schemes.				provides another opportunity for consultation.	
15.1.37	Noise is not the only reason that local residents may require compensation or voluntary purchase. The scheme should also consider the impact of pollution, light, vibration, and traffic.	Kings Walden Parish Council		1	Please see response to ref 15.1.7 for the response on noise. As per the Draft Compensation Policies and Measures , the physical factors taken into account when making a claim for compensation pursuant to Part 1 of the Land Compensation Act 1973, include noise, vibration, smell, fumes, smoke, artificial lighting and discharge on to the property of any solid or liquid substance.	No
15.1.38	Concerns that the three noise insulation schemes are not considered mitigation.	Kings Walden Parish Council		1	Through the EIA process, we have identified mitigation proposals in response of noise, as set out in Chapter 16 Noise and Vibration of the PEIR . The Noise Compensation Schemes are the provision of compensation in addition to mitigation measures.	No
15.1.39	Noise insulation is not noise mitigation, since clearly it only makes the difference when people are inside a home with the windows closed ' and therefore does not	Kings Walden Parish Council		1	Please see response to ref 15.1.38.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	deliver any beneficial effect when the windows are open during summer nights, or when people are outside in the gardens or seeking to enjoy tranquillity in the rural surroundings of this area.					
15.1.40	Noise insulation cannot readily be applied to listed properties.	Kings Walden Parish Council		1	Please see response to ref 15.1.31.	No
15.1.41	In the FIRST compensation scheme the Council would wish to see more detail on other compensation elements that could be included, such as dynamic landscaping payments to be agreed later with surrounding landowners, and air quality mitigation (which can include financial payments for monitoring, planting and even traffic restrictions for major projects). NHDC would want to be signatories to any S106 and have oversight over control of how the money is spent in our District. We would welcome further discussion with LLAL on this point.		North Hertfordshire District Council		Noted. Please see response to ref 15.1.4.	No

Ref	Comment	PC	LA	No PILs	Response	Change
15.1.42	Residents and Councillors are accustomed to developers mitigating the impact development has on the area through Section 106 and Community Infrastructure Levy (CIL). As the borough of Stevenage is going to be impacted by the LLA expansion, it seems reasonable that Stevenage communities receive mitigation or improvements through the development. The Council would like to open discussions with LLA on potential improvements and funding that will benefit the residents of Stevenage. One example may be funding towards improved public transport schemes across Stevenage with a focus on reducing carbon emissions.		Stevenage Borough Council		<p>Noted. Modelling has been undertaken to inform our proposed mitigation and information is set out in Getting to and from the Airport – Our Emerging Transport Strategy. This includes a commitment to on-going monitoring of surface access impacts. Should this identified that additional mitigation is required this would be discussed at the appropriate time.</p> <p>The approach to S106 and CIL is still under consideration and we will liaise with the relevant parties at the relevant time if required.</p>	No
15.1.43	Need meaningful engagement over the operation of the FIRST Scheme. Comments provided on how the scheme could be applied Effects on specific community groups need to be assessed as part of a comprehensive Health Impact Assessment.		Host Authorities		<p>Please see response to ref 15.1.4 in respect of Community First.</p> <p>A Health Impact Assessment has been undertaken and can be found in Chapter 13 Health and Community of the PEIR.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
15.1.44	The proposed noise insulation scheme is broadly comparable to recently adopted schemes at other airports in terms of daytime noise impacts. However, if night-time noise qualification levels remain as currently, the scheme would fall far short of current UK good practice.		WSP for Host Authorities		The 2019 PEIR night-time noise contours for eligibility for the noise insulation schemes sit wholly within the daytime contours, therefore anyone qualifying under the daytime contours would automatically qualify under the nighttime contours, the opposite is not the case. This is the reason they were not referenced in the compensation proposals presented at the 2019 consultation.	No
15.1.45	Slip End Parish Council note that your FIRST scheme intends to offer compensation to communities on a passenger number basis up to a figure of c 10-15k. This is unlikely to meet the costs of traffic enforcement, and we suggest that LLAL funds this separately and directly.	Slip End Parish Council			<p>We propose that Community First will provide £1 in funding for every additional passenger above the passenger cap current at the time that our DCO is consented. The available total Community First fund has the potential to raise up to £13m per year.</p> <p>The fund will be available to communities in Central Bedfordshire, North Hertfordshire, St Albans, Dacorum, Stevenage, Welwyn, Hatfield, eastern parts of the former Aylesbury Vale district and parts of East Hertfordshire.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
15.1.46	<p>Affinity is a statutory undertaker for the purposes of section 127 of the Planning Act 2008. It is clear from consultation that LLAL will need to use its compulsory acquisition powers in relation property interests held by Affinity. Whilst section 127 is not engaged until a DCO application has been made, Affinity wishes to put on record that if the concerns summarised in this response have not been fully resolved by the time the application is submitted, it will be making a serious detriment representation and case pursuant to section 127. Affinity has had limited engagement with LLAL to date. Affinity seeks further, more detailed engagement with LLAL in order to find appropriate solutions to prevent adverse impacts on Affinity's ability to meet the conditions of its statutory appointment and to minimise the impacts on its business throughout the entire development process. Affinity also seeks the reimbursement of its costs in engaging with LLAL and the DCO as that work and resource is required solely because of the LLAL</p>	Affinity Water			<p>Noted. The DCO application will include Protective Provisions for the benefit of water and sewerage undertakers. We have been engaging with Affinity water since the 2019 consultation and will continue to engage with them as we progress with the DCO application.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	proposals and is not a core function of Affinity's core business.					
15.1.47	<p>As set out in the Compensation Proposals document, LALL have put forward a series of mitigation measures to benefit residents affected by the expansion proposals. The intended Future Luton Impact Reduction Scheme (FIRST) project would provide funding to compensate for some of the impacts felt by local communities. However, the document is vague and lacks detail to ascertain how the FIRST project would be of benefit and therefore what weight can be given to it. Evidence is required to understand how the proposed total figure has been arrived at; whether there will be any apportionment exercise across different local authorities; the means for securing funds by local authorities; means of safeguarding the funding in perpetuity through the DCO process; management procedures and review mechanisms. The FIRST project would provide funding for three key themes: Environment, Access, and</p>		Central Bedfordshire Council		<p>We propose that Community First will provide £1 in funding for every additional passenger above the passenger cap current at the time that our DCO is consented. The Community First fund has the potential to raise up to £13m per year in total (being the difference between the 32 mppa passenger cap sought through the DCO and the recent planning authority resolution to increase the current cap to 19 mppa).</p> <p>Impacts requiring mitigation will be identified and secured through the ES submitted with the application for development consent, in this respect Community First is not intended as a required mitigation measure, its purpose is to make funds available to community groups and Town and Parish Councils to address local needs in areas of high deprivation or for decarbonisation projects.</p> <p>Further information can be found in the Draft Compensation Policies</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Community but these are too vague to understand whether they are adequate to mitigate the impacts on CBC residents.				and Measures consultation document.	
15.1.48	In addition, there is concern that the amount of compensation would be insufficient to offset loss of property value for CBC residents.		Central Bedfordshire Council		Please see response to ref 15.1.30.	No
15.1.49	Additional justification and explanation are required on all these matters to fully understand how the FIRST funding would benefit residents. Therefore, clarification is required on the types of projects that the funding could support, the management process and long-term implementation of the programme. Engagement should be undertaken with the authorities listed on page 10 of the Compensation Proposals document prior to further progression of the scheme		Central Bedfordshire Council		Please see response to 15.1.4.	No
15.1.50	Network Rail require engagement with LLAL with regards to the proposed temporary possession, and /or acquisition of rights which	Network Rail			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	would take place alongside and over the railway.					
15.1.51	Further detail is needed on the extent of insulation to be provided		WSP for Host Authorities		Information is available in the Draft Compensation Policies and Measures .	No
15.1.52	As set out in the LLAL Compensation Proposals document, a compensation scheme has also been put forward, but it is considered that the level of information available is too limited and fails to consider night-time noise, falling short of current good practice at other airport as identified in the WSP Review.		Central Bedfordshire Council		Information is available in the Draft Compensation Policies and Measures .	No
15.1.53	The PEIR (Main Report) notes at paragraph 9.8.26 that the expansion plans for the Airport would result in the noise receptor at Slip End (AR12) experiencing predicted noise levels that would exceed the Significant Observed Adverse Effect Level (SOAEL) in 2039 (nighttime only). Consequently, the proposed dwellings at Slip End may require additional noise mitigation than would be the case if the Airport were			1	Please see response to ref 15.1.21. There isn't anything in our proposals that exclude properties yet to be built from our discretionary noise insulation schemes. It would, of course, be necessary for the property to be in place and fulfil the relevant qualifying criteria at the time to be eligible for the scheme. It may also be possible for property owners to claim compensation under Part 1 of Land Compensation	No

Ref	Comment	PC	LA	No PILs	Response	Change
	to remain at its current operational level. Whilst LLAL propose to provide compensation to existing homeowners, it is considered that this should be extended to likely future homeowners within the Slip End site. Applying the principle of equivalence, such compensation should equate to the additional cost of providing any further mitigation or the diminution in value of those properties.				Act 1973 for impact on value, this is on the basis that the property is constructed and occupied in advance our works being completed.	
15.1.54	This [compensation proposals] document represents a positive step on the journey towards developing a set of compensation measures and a community fund that will be required to mitigate residual impacts of the proposed Development. however, the current proposals lack detail and it is recommended that LLAL undertake immediate and meaningful engagement with the host and other eligible authorities on its contents.		WSP for Host Authorities		We have been engaging regularly with the relevant local authorities. Updated information is available in the Draft Compensation Policies and Measures , which is in line with the level of information available at other airports.	No
15.1.55	Meaningful engagement with the host and other eligible authorities in relation to the FIRST Fund in order		WSP for Host Authorities		Please see response to 15.1.4.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	to provide clarity on the extent of funding proposed, how the eligible authorities have been determined, how the funding formula has been devised, whether it will be proportionate and how the fund is proposed to be administered, managed and monitored. As noted within the PEIR review, these discussions should also extend to consideration of how the Fund might be used to address any unforeseen Local Impacts that may arise in the future given the duration of the proposals					
15.1.56	Our clients object to the inclusion of the land hatched in red on the attached plan being included within the DCO. The land shown hatched red is identified in the new North Herts District Councils Local Plan to be removed from the Green Belt and allocated for housing to assist in meeting Luton's housing need. The proposed DCO will directly impact upon the deliverability of providing housing efficiently on this site. The national planning policy approach is that once land is removed from the Green Belt for a purpose, the land			1	Discussions with all affected landowners are underway and will continue. Minor development is proposed in the Green Belt and the Planning Statement submitted with the application for development consent will set out the very special circumstances justifying this development and its potential impact.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>should be used efficiently for that purpose; the reason being to reduce pressure for further releases of the Green Belt. The airport expansion proposals directly impact upon the ability to use the land efficiently and will prevent the optimum level of housing being provided. It will hinder and fetter the development of the site and will be prejudicial to the delivery of much need housing. Our clients object to the inclusion of the land hatched green on the attached plan being included within the DCO. Our clients farm the land. The proposals will impact upon the agricultural operations and increase costs whilst reducing the productivity of the agricultural unit. It is unclear from the plans provided whether this includes our clients land hatched blue on the attached plan. Notwithstanding this our clients object to the proposals as they affect the northern boundary of their ownership. Our clients are in the process of re -developing this part of the site which will involve a new building abutting the northern boundary. Any landscaping or hedge planting should be a</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>minimum of 6 metres from our clients boundary so root protection zones do impact on the ability of our clients to construct the new building. When considering the substantial environmental damage created by the expansion of the airport, the small amount of environmental gain proposed on our clients landholding interests is negligible, but the impact upon them and their ability to develop and use their land is very substantial. There is not an overriding need or case for the inclusion of our clients land in the DCO and it should be removed.</p>					
15.1.57	<p>█ acts on behalf of █ and █ who together have land interests shown in the areas hatched red, green and blue on the attached plan. These areas are included within the Development Control Order (DCO). Our clients have not been contacted by LLA Ltd and there has been no effort to engage with our clients even though they are stakeholders.</p>			1	Discussions with all affected landowners are underway and will continue.	No
15.1.58	<p>An Asset Protection Agreement is required to be signed before</p>				Noted. Currently the Proposed Development does not include any	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>proceeding with any design or construction work alongside, above or below Network Rail s Infrastructure. Prior to any development/construction or alterations to the site, further site-specific safety requirements, engineering technical approval and detailed conditions will need to be sought from Network Rail's Asset Protection team. Network Rail have standard protective provisions which will need to be included in the DCO as a minimum.</p>				<p>bridge links across the Midland Mainline and therefore we do not believe that there is a requirement for either an asset protection agreement or protective measures. If final works require such structures we will contact and liaise with Network Rail accordingly. We will continue to engage with Network Rail and keep this position under review.</p>	
15.1.59	<p>It is not clear from the Scheme Development and Construction Report (Appendix C) what form of tenure is proposed to be acquired or when the process of acquisition by agreement may commence. The mitigation proposals include a requirement for ongoing habitat / vegetation management, but the management period is not specified, or if it would be in-perpetuity. Neither is there a reference to any intention to seek to acquire any rights in [REDACTED] land by agreement; this being a precursor to any compulsory acquisition process.</p>			1	Please see response to ref 15.1.28.	No

Ref	Comment	PC	LA	No PILs	Response	Change
15.1.60	London Luton Airport should be aware that they may be responsible for charges/costs associated to Network Rail's pre-application engagement in relation to the proposed DCO.				Noted.	No
15.1.61	In respect of existing Cadent infrastructure, Cadent will require appropriate protection, assurance or relocation of retained apparatus including compliance with relevant standards for works which may be proposed within close proximity of its apparatus. Cadent has identified the following apparatus within the vicinity of the proposed works: High pressure (above 2 bar) gas pipelines and associated above ground and below ground equipment Low or Medium pressure (below 2 bar) gas pipelines and associated above and below ground equipment (as a result it is highly likely that there are also gas services and associated apparatus in the vicinity, these are not shown on plans but their presence should be anticipated and investigated further)	Cadent Gas			Noted. The DCO application will include Protective Provisions. We will engage with Cadent Gas as we progress with the DCO application.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Above Ground Installations Note: No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission. Diversions and Protection of Apparatus: In order to assess the impact to Cadents apparatus and network, as a minimum we need to conduct a high level impact assessment and feasibility study of our below 7 bar and above 7 bar network associated with the London Luton Airport Expansion Scheme. This work can take upwards of 12 months to undertake depending on the complexity of the scheme and therefore a meeting with the Promoter to discuss the scope and requirements is recommended at the earliest opportunity. Cadent will provide (not limited to): - Drawings showing asset locations and a high level view whether the asset would be a Divert, Protect or Abandon - An impact assessment based on information provided by the Promoter (including Shapefiles and Design information as requested/agreed) - Asset information of impacted assets,</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>including size, material and any high level outage windows - An indication of the cost of the project (desktop exercise only) and where applicable any major foreseen difficulties Land & Consents Requirements Where diversions of apparatus are required to facilitate the scheme, Cadent will require the Promoter to obtain all necessary land, planning permissions and other consents to enable the diversion works to be carried out. Details of these consents should be agreed in writing with Cadent before any applications are made to ensure that they are sufficient to deliver works within the proposed timescales. Cadent would ordinarily require a minimum of Conceptual Design study to have been carried out to establish appropriate diversion routes, land and consents requirements ahead of any application being made. The Promoter will be responsible for obtaining at their cost and granting to Cadent the necessary land rights, on Cadents standard terms, to allow the construction, maintenance, protection and access of the diverted apparatus. As such</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>adequate land rights must be granted to Cadent (e.g. following the exercise of compulsory powers to acquire such rights included within the DCO) to enable works to proceed, to Cadent's satisfaction. Cadent's approval to the land rights powers included in the DCO prior to submission is strongly recommended to avoid later substantive objection to the DCO. Land rights will be required to be obtained prior to construction and commissioning of any diverted apparatus, to avoid any delays to the project's timescales. A diversion agreement may be required addressing responsibility for works, timescales, expenses and indemnity. Protection/Protective Provisions: Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection for retained apparatus and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. Operations within Cadent's existing easement strips are not permitted</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	without approval and any proposals for work in the vicinity for Cadent's existing apparatus will require approval by Plant Protection under the Protective Provisions. Early discussions are advised.					
15.1.62	There is a general lack of clarity in the documentation, such that it is not clear how many other Affinity assets (apart from those specifically referenced below) will be affected by the proposals and how the required new infrastructure will interact with the diversion of the existing. The consultation documents issued contain insufficient detail for Affinity to be able to properly scope the potential impact on its infrastructure and the works necessary to address that.	Affinity Water		1	Noted. The DCO application will include Protective Provisions. We have been engaging with Affinity water since the 2019 consultation, and will continue to engage with them as we progress with the DCO application.	No
15.1.63	The Airport expansion plans include a proposal for temporary possession, and/or acquisition of rights (only) relating to about 1km of hedgerow on land owned by [REDACTED] south of the Airport. The hedgerow is part of a network of about 7km located off-airport proposed for habitat creation/restoration and new planting of hedgerow trees. The			1	Please see response to 15.1.28	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>hedgerow is shown on the Draft Land Plans (Sheet 6 of 10) from the Draft Land Assembly Plans attached at Appendix 2. From the plan, it appears that the hedgerow is required to provide mitigation in relation to (1) providing habitat creation to secure net biodiversity gain.</p> <p>█████ acquired the land south of the Airport as a long term investment based on its potential to accommodate essential transport infrastructure and/or airport-related development. Any habitat creation in this area could prejudice those long term investment aims. The compulsory acquisition of an interest in the land that accommodates the hedgerow can only be acceptable if it passes the test that there must be a compelling case in the public interest. Further, an acquiring authority should be sure that the purposes for which the compulsory purchase order is made justifies interfering with the human rights of those with an interest in the land affected. These are strict tests and place the onus on LLAL to justify the acquisition of any of █████ land for</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	any landscape/biodiversity mitigation purpose.					
15.1.64	Limited mitigation options. Glazing treatment options are limited given the listed status of the existing buildings. The mansion has already been internally insulated, within the constraints of the listed building, meaning little more can be done to reduce internal noise from aircraft traffic. Arguably this could all mean a reduction in guests and potentially threaten the longer-term viability of the hotel with the associated consequences to the local economy. Elite Hotels therefore welcomes having a discussion with LLAL on other potential mitigations to address harmful noise impacts arising.			1	We believe the benefits of the Proposed Development outweigh the potential impacts. We will continue to work with all landowners potentially affected by the Proposed Development.	No

Table 0.6: Regard had to statutory consultation responses on Land and compensation - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
15.2.1	Concerns that the noise insulation compensation proposals are ineffective and insufficient. Respondents noted that reducing the noise of a plane is impossible, and therefore any form of mitigation would be ineffective against current and future noise levels.	172	Please see response to ref 15.1.1.	No
15.2.2	Objection to the expansion of Luton Airport, with respondents suggesting that the only way to reduce the impact of noise would be to abandon expansion proposals.	19	Noted.	No
15.2.3	Concerns for those living in private rental properties. Some respondents questioned whether there will be requirements for landlords to apply for the compensation schemes.	3	The Noise Insulation Compensation schemes would be made available to all eligible residential properties, however, the scheme improvements would require landlord (freeholder) permission.	No
15.2.4	Suggest that the funds for the compensation proposals would be better spent retrofitting all Luton homes.	1	The noise insulation measures are designed to benefit those most impacted by the Proposed Development. Funds are not being provided to retrofit all homes. Instead the mitigation being offered is based upon what is reasonable and appropriate.	No

Ref	Comment	No CC	Response	Change
15.2.5	Concerns that the compensation schemes are seen to act as a bribe to local residents in order to gain support/secure consent.	3	In accordance with the Compensation Code, various parties may have statutory claims for compensation as a result of the Proposed Development. We have gone beyond the statutory minimum, and sought to set out a policy which exceeds industry standards. These compensation policies will help mitigate the impacts of the Proposed Development on eligible local residents, and are available to all eligible residents, regardless of support for the Proposed Development.	No
15.2.6	Communities that are effected by noise should receive benefits in the form of compensation to community facilities/services and schools.	2	In accordance with the Compensation Code, various parties may have statutory claims for compensation as a result of the Proposed Development. In addition, we propose a range of discretionary compensation measures that are designed to help mitigate against specific impacts the airport expansion may have, such as noise, for example through a Noise Insulation Scheme. This scheme applies to public buildings, such as schools. Further details of these can be found in the Draft Compensation Policies and Measures .	No
15.2.7	Concerns around the area covered by the CPO proposals. Respondents were unclear on which properties were included and what alternatives had been considered. Some objected to the CPO proposals, citing that they would cause resentment, that the extend of land and rights Luton was seeking was unacceptable and excessive.	4	Please see response to ref 15.1.2.	No

Ref	Comment	No CC	Response	Change
15.2.8	Objection to the expansion of Luton Airport, and therefore any CPO compensation scheme is unnecessary.	13	Noted.	No
15.2.9	General objections to the use of CPO to support the Airport expansion, with concerns that it is inappropriate or undemocratic.	197	Please see response to ref 15.1.3.	No
15.2.10	Concerns with the FIRST proposals, which was considered to be inadequate, ineffective and insufficient in mitigating the impacts of expansion felt by the local communities and environment.	297	Please see response to ref 15.1.4.	No
15.2.11	Objection to the expansion proposed at Luton Airport, and therefore, any FIRST scheme compensation is unnecessary.	52	Noted.	No
15.2.12	Concerns that there was a lack of clarity within consultation documents regarding the FIRST scheme, how it will be allocated, and who will be overseeing the spending of the fund. Some respondents also questioned whether inflation would be taken into account.	25	Please see response to 15.1.4.	No
15.2.13	General concerns with the FIRST compensation scheme. Responses	32	Please see response to ref 15.1.4.	No

Ref	Comment	No CC	Response	Change
	included concerns that the scheme would be unsuccessful, objection to impact reduction rather than prevention, concerns with the area covered by the FIRST scheme, and concerns that any benefits from the FIRST scheme will not outweigh the negative impacts of the existing, and proposed expanded airport.			
15.2.14	Concerns around the area covered by the land and discretionary compensation scheme, with particular concerns with the lack of clarity in the consultation documents regarding the area covered by the scheme.	26	Please see response to ref 15.1.7.	No
15.2.15	Concerns that the land and discretionary compensation scheme will be ineffective, insufficient and inadequate. Responses included that the level of compensation is likely to be inadequate and not to market rate levels and not cover enough people, while financial compensation doesn't outweigh negative impacts to the environment, lives of residents, quality of life, infrastructure, air quality and noise levels, and that the scheme is likely to cause physical and emotional stress for those involved.	47	Please see response to ref 15.1.7.	No

Ref	Comment	No CC	Response	Change
15.2.16	General comments of support for the noise insulation compensation schemes.	112	Noted.	No
15.2.17	General comments of support for the CPO scheme.	27	Noted.	No
15.2.18	General comments of support for the FIRST scheme.	46	Noted.	No
15.2.19	General comments of support for the land and discretionary compensation scheme.	18	Noted.	No
15.2.20	General comments of support for the three noise insulation compensation, and land & discretionary compensation schemes, which were acknowledged to be legal requirements.	5	Noted.	No
15.2.21	Suggestions regarding the three noise insulation schemes, included the installation of triple glazing, acoustic glass, insulated external walls and ceilings, air conditioning for summer, the reinstatement of glazing which is no longer sufficient, provision of glazing which reduces the noise of both additional aircraft and traffic, and for the scheme to apply to a wider area, such as 10 miles from the Airport, with those living	26	Please see response to ref 15.1.1.	No

Ref	Comment	No CC	Response	Change
	further afield being able to apply for the scheme.			
15.2.22	Those already affected by the existing noise impacts of the Airport should receive compensation.	22	Please see response to ref 15.1.13.	No
15.2.23	The CPO compensation scheme should cover a wider area.	12	Please see response to ref 15.1.2.	No
15.2.24	Suggest an independent assessment of the compensation schemes including to evaluate eligibility, the area covered by the schemes and land and home valuations.	8	Please see response to ref 15.1.15.	No
15.2.25	Compensation schemes should be paid before the start of construction.	6	<p>The intention is that the Noise Insulation Schemes will be progressively rolled-out should the application for development consent be granted. It will be rolled-out to homes forecasted to be within the relevant noise contours for the schemes as a result of growth in air traffic movements from the Proposed Development.</p> <p>Compensation for compulsory acquisition is paid from the date at which land and property is acquired. This will take place during the lifecycle of the project.</p> <p>As detailed in our Draft Compensation Policies and Measures, our Voluntary and Hardship property acquisition schemes will be open to application once the application for development consent has been submitted. In accordance with statute, compensation under Part 1 of the Land</p>	No

Ref	Comment	No CC	Response	Change
			<p>Compensation Act is available from one year after the scheme is open to fare paying passengers. The provisions help to ensure that the impacts of the scheme are understood in the market when compensation is assessed and paid.</p>	
15.2.26	<p>Suggestions that the compensation schemes should only cover those who live within close proximity of the Airport, rather than a wide area, with suggestions that some bought their properties at a low price, and therefore compensation should be capped.</p>	3	<p>The statutory compensation payments will be in accordance with the Compensation Code. The discretionary schemes are based on properties falling within a defined noise contour.</p>	No
15.2.27	<p>Suggestions that the compensation schemes should cover other impacts from the airport, such as noise, light and air pollution, flights during the night, loss of property value, council tax rebates, local community financial aid, air conditioning for those being compensated through glazing, as well as additional electricity costs to fund this air conditioning, traffic compensation and private security, private healthcare and compensation to fund schools and hospitals.</p>	38	<p>Details of our compensation schemes, including those which seek to address noise impacts are detailed in Draft Compensation Policies and Measures. The noise insulation policy for example would mitigate against noise at day and night. The Community First scheme (which is not intended to be mitigation but instead enhances the benefits of the airport for the local community) involves local community funding.</p> <p>Those who suffer a reduction in property value as a result of physical factors arising from the scheme, including light, noise or smell, may be able to bring a statutory claim under Part 1 of the Land Compensation Act 1973. It is not within our remit to grant council tax rebates.</p>	No

Ref	Comment	No CC	Response	Change
			We consider the compensation policies offered as part of the Proposed Development to be better than industry standards.	
15.2.28	Suggestions that all compensation schemes should cover a wider area. Suggestions included eligibility for those living within a 15 mile, 20 mile or 16km radius from the Airport, for those south beyond the M1, and into towns and villages such as Kensworth, Knebworth, Breechwood Green, Stopsley, Hitchin, Bedfordshire, Harpenden, St Albans, Stevenage, Whitwell, St Pauls Walden, Farly Hill Estate, Buckinghamshire, Royston, Dagnall, Kimpton, and Caddington. Suggestions also included for greater emphasis to be placed on the frequency of flights overhead, and for anyone effected by Luton to be compensated.	93	<p>Our Draft Compensation Policies and Measures provides for possible property acquisition, where homes are significantly affected, or a range of mitigation measures depending on the anticipated noise impact at a location. This is indicated by noise contour plans.</p> <p>It may be possible for property owners to claim compensation under Part 1 of the Land Compensation Act 1973. This provides compensation for the diminution in residential property value where this is caused by the physical factors from use of the new airport facilities. Such a claim is not strictly defined by the noise contours, or distance from the airport facilities, but must be substantiated by the property owner or their appointed agent.</p>	No
15.2.29	Suggestions for all land occupied by Luton Airport and its associated industries to be used for both social or private housing, to reduce the housing need in Luton.	4	The Proposed Development is to expand the airport and alternative uses such as housing have not been considered.	No
15.2.30	Suggestions that instead of a CPO, landowners should retain possession of	1	Where land is required permanently for the Proposed Development, our proposals would not progress if landowners remained in possession. We will seek to enter	No

Ref	Comment	No CC	Response	Change
	their properties, and Luton should pay rent for them.		into agreements for land interests and avoid exercising compulsory acquisition powers wherever possible.	
15.2.31	Suggestions that UK examples of successful compensation schemes should be provided.	1	Draft Compensation Policies and Measures sets the approach for the Proposed Development. Similar proposals at other airports have been considered in the preparation of these but it is not appropriate to record proposals for other airports in this document.	No
15.2.32	Suggestions that any funding secured via a CPO should be put into a land trust to protect the local community from any impacts of climate change.	1	Funds will be used to acquire eligible properties.	No
15.2.33	Suggestions that any properties not needed afterwards should be offered for resale back to the original owners at a discount.	1	We will only acquire land that is necessary for the Proposed Development. If it becomes apparent that land acquired compulsorily is no longer required, it will offered back to the original owners in accordance with the Crichel Down rules. All those properties acquired permanently will be, in many cases, demolished and incorporated into the expanded airport and its infrastructure. Any land needed temporarily will be compensated for and not acquired permanently.	No
15.2.34	Suggestions to keep the impact of the airport on various local communities under review to ensure no one misses out on the compensation scheme.	2	Once the area covered has been determined, all those eligible will be contacted via Land Interest Questionnaires.	No

Ref	Comment	No CC	Response	Change
15.2.35	Suggestions to compensate local residents through cheap or free flights.	1	This is outside of our remit as airport owner. Airlines will be responsible for setting future flight prices.	No
15.2.36	Suggestions that if compensation works are not felt to be delivered to a high enough standard, they should be replaced at no cost to the landowner.	1	Any accommodation compensation works will be agreed, in so far as practical, with the landowner prior to the works being carried out. Impacted parties will have a right to claim statutory compensation in accordance with the Compensation Code, should losses be suffered.	No
15.2.37	Suggestions that level and eligibility of compensation schemes should be assessed on a case-by-case basis.	2	The Compensation Code will be followed to ensure a fair compensation. Additional discretionary proposals are set out, together with eligibility criteria, in Draft Compensation Policies and Measures .	No
15.2.38	Suggestion that the FIRST compensation scheme should cover a wider area	5	The Community First fund will be available to communities in Central Bedfordshire, North Hertfordshire, St Albans, Dacorum, Stevenage, Welwyn, Hatfield, eastern parts of the former Aylesbury Vale district and parts of East Hertfordshire.	No
15.2.39	Suggestions that the amount of compensation being provided through the FIRST scheme should be increased, and should include existing passenger levels.	8	Community First represents a unique approach to sharing the benefits of airport growth with the surrounding area. By its nature it is linked to growth and should not include current passengers. The available total Community First fund has the potential to raise up to £13m per year to help make the national levelling up and decarbonisation agendas meaningful at a local level.	No

Ref	Comment	No CC	Response	Change
15.2.40	Suggestions to include cost-benefit analysis [of FIRST] to demonstrate the tangible benefits of funding schemes.	1	The benefits of schemes such as Community First are being developed.	No
15.2.41	Concern with what will happen to the available funds if they are declined by the residents.	1	We can only pay compensation where a claim is made and accepted by us (or determined by a tribunal in accordance with the Compensation Code). Appropriate provision will be made within budgets to fund the compensation scheme. As with other budget provisions, if the funds are unused they will be re-allocated.	No
15.2.42	General comments of support for the three noise insulation compensation schemes	100	Noted.	No
15.2.43	Suggestions that the compensation schemes should be above market rate, generous, transparent and fair, with CPOs including relocation, disruption, legal and moving costs.	59	Please see response to ref 15.1.30.	No
15.2.44	Concerns that the 3 noise insulation compensation proposals are inadequate due to the level of compensation, and issues with the glazing offered, which was felt to be ineffective in mitigating noise impacts, not compatible with older or listed homes, or irrelevant when windows are open in summer, while still causing noise issues when outside of the home.	226	Please see response to ref 15.1.31.	No

Ref	Comment	No CC	Response	Change
15.2.45	Concerns around the lack of information available regarding the compensation schemes, as well as an insufficient level of clarity within consultation documents, leading to confusion.	6	Updated information is available in the Draft Compensation Policies and Measures .	No
15.2.46	Concerns with the area covered by the 3 noise insulation compensation proposals. Respondents were specifically concerned when they didn't live within the area covered, but are impacted by noise, which included Breechwood Green, St Albans, Harpenden, Edlesborough, Dagnall, Hatton, Hastoe, Knebworth, Studham, Whitwell, Royston, Tring, Chilterns, Markyate, Welwyn, Kensworth and Stevenage.	144	Please see response to ref 15.1.21.	No
15.2.47	Concerns that the CPO proposals are inadequate. Responses included objections to the compulsory acquisition powers, which will negatively impact both the environment and community, as well as the levels of compensation being insufficient, and queries as to whether this will be at the market rate.	36	Please see response to ref 15.1.30. For those not having a property acquired but are impacted it may be possible to claim compensation under the Compensation Code, for example Part 1 of the Land Compensation Act 1973. This provides compensation for the diminution in residential property value where this is caused by the physical factors from use of the new airport facilities. Such a claim is not defined by the noise contours but must be substantiated by the property.	No

Ref	Comment	No CC	Response	Change
15.2.48	Suggestions that there must be an easy and transparent application process to compensation.	20	We are developing the procedure for applying for compensation and agree that the proposal should be easy and transparent.	No
15.2.49	Suggestion that the compensation provided through the FIRST scheme should be proportionate to the impact of the expansion faced by the local communities and environment.	8	Please see response to ref 15.1.4.	No
15.2.50	Suggestions that there must be further stakeholder engagement, to ensure clarity of level, eligibility and application for compensation schemes.	15	Please see response to ref 15.1.36.	Yes
15.2.51	Suggestions that the compensation schemes require an independent assessment to evaluate eligibility, the area covered by the schemes and land and home valuations.	1	Please see response to ref 15.1.15.	No
15.2.52	The plan shows the boundaries of the off site hedgerow restoration around various fields to the north east of the main site. Will the ownership of the hedgerows remain with the existing landowners or has the airport some rights over that land? This should be explained.	1	Ensuring hedges are grown and maintained in certain areas is part of the proposed mitigation for the Proposed Development. There are options as to how this can be achieved; either rights can be established over the land to maintain these hedgerows or an agreement can be put in place so that landowners maintain these hedgerows. We will seek to agree the approach with relevant landowners and enter into agreements wherever practicable. In order to	No

Ref	Comment	No CC	Response	Change
			<p>ensure that we are able to successfully implement the Proposed Development, rights may be sought to ensure compliance. We will be seeking compulsory acquisition powers over all land necessary as part of the Proposed Development, but only if an agreement cannot be met in advance.</p>	
15.2.53	<p>Local residents should be compensated for negative impacts during the construction period, for example, a 10% rebate on Council Tax.</p>		<p>Council taxes are set by the Government and local authority. They are not a matter for consideration as part of the Proposed Development. Local residents affected by the construction of the Proposed Development may be eligible for compensation in accordance with the Compensation Code or as part of our discretionary schemes which go above and beyond the Compensation Code, as set out in the Draft Compensation Policies and Measures. Local residents can also benefit through the Community First fund which is provided to community groups and Town and Parish Councils, further information is set out in the Draft Compensation Policies and Measures.</p> <p>Additionally, the airport is central to the local economy and is an important connectivity asset for the broader region it serves including the Oxford-Cambridge Arc, as well as supporting regeneration and levelling up in Luton and neighbouring areas where levels of deprivation are below average. In order to maintain its connectivity and significance across the economic region, the airport must address its capacity constraints.</p> <p>Without additional capacity the airport will not be able to accommodate any further growth in demand in the future</p>	

Ref	Comment	No CC	Response	Change
			<p>and this would limit its ability to support wider economic growth across the sub-region.</p> <p>The number of direct airport-related jobs is expected to increase by 4,500 by the time the airport is handling 32 mppa.</p> <p>When indirect and induced jobs are considered, the total number of new jobs would be 4,800 in Luton, 6,600 in the three counties, and a total of 12,100 across the UK. The contribution of the airport’s operation to the UK economy would also increase by over £1.6 billion by the time the airport is handling 32 mppa. Of this increase, £1 billion in total would be realised within the three counties region.</p>	

A16 Construction and Phasing

Table 0.7: Regard had to statutory consultation responses on Construction and phasing - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
16.1.1	Concern that the proposed earthworks are of poor quality and/or are not realistically achievable. Some respondents express concern about the vast scale of the work.			4	<p>Proposed amendments to the design include a reduced platform and earthworks, including excavation of the landfill and associated impacts. These are set out in the Works Description Report and the Construction Method Statement and Programme Report in Appendix 4.1 of Volume 3 of the PEIR.</p> <p>The earthworks scheme aims to make the best use of the available landholdings, immediately adjacent to the existing airport, to provide materials (soils) to support the proposed infrastructure. This was identified in feedback from a previous consultation as preferable, as this would prevent large numbers of lorry vehicle movements on the roads. The earthworks will be subject to the relevant British and Eurocode standards, to ensure quality implementation.</p> <p>Construction Demolition and Excavation Waste (CDEW) will be managed in line with the Waste Hierarchy, prioritising waste minimisation and reuse of materials onsite over offsite management/processing. Chapter 19 Waste and Resources of the PEIR sets out waste minimisation activities. A permitted</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					construction waste management facility will be on site to screen and sort waste and prioritise the reuse of materials. Any off-site movement of material will be in line with the Waste Hierarchy. An Outline Site Waste Management Plan will also be submitted alongside the ES and a draft is available in Appendix 19.1 of Volume 3 of the PEIR.	
16.1.2	Respondents deemed the proposed earthworks unnecessary as the wider development plans should not go ahead.	Kings Walden Parish Council		3	Noted.	No
16.1.3	Respondents expressed general objection towards the proposed earthworks.			2	Please see response to ref 16.1.1.	No
16.1.4	Concern that the proposed phasing of the construction works will not be delivered as planned and/or is of insufficient quality.			1	<p>We have incorporated flexibility into our design to allow incremental growth which responds to passenger demand, for example we have adjusted our second terminal to be modular. On a project of this scale and duration the construction plan needs to provide the flexibility to respond to changing demand.</p> <p>The passenger forecasts have been updated and used to inform the assessments for all relevant topics in the PEIR. The phased</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					delivery of capacity is described and considered in the PEIR.	
16.1.5	Concern regarding the pace, duration and/or cost of the proposed phasing.			3	<p>Please see response to ref 16.1.4.</p> <p>The overall delivery period is 16 years running from 2025 to the end of 2040. The majority of work will take place between 2033 and 2040.</p> <p>Mitigation, including during construction, where required, is included within the PEIR. The Draft CoCP, in Appendix 4.2 of Volume 3 of the PEIR, contains a suite of mitigation and management measures to ensure that the environmental impacts of construction, including earthworks and landscaping, are avoided where possible and otherwise minimised. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.</p> <p>Further guidance on specific areas such as the management of earthworks and ground water control will be considered based on industry best practice guidance documents, as established in each environment topic section of the CoCP. The CoCP will also outline the approach for broader environmental commitments, community relations, working hours, good housekeeping, security and other measures.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Currently, the estimated cost for the Proposed Development represents a significant reduction in the scheme costs since 2019. Funding is not expected to be provided by a single party but by multiple parties who are interested in different aspects of the proposal. We do not intend there to be any direct contribution from LBC or any impact upon local Council Taxpayers, as there are numerous models available for the funding, financing and procurement of the works which are likely to be spread over a period of up to 20 years. Given the attractiveness of the proposition and the range of delivery models available, we have every confidence that the Proposed Development is deliverable. Further details on the financial aspects of the Proposed Development will be set out in the Funding Statement, which will be submitted with the application for development consent.	
16.1.6	Concern regarding the uncertain future of the overall development, rendering phasing details irrelevant.			2	Noted.	No
16.1.7	Concern that the duration of the construction works will be too long. Specific concerns included; continued duration			7	Please see responses to refs 16.1.4 and 16.1.5.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	of existing works, unclear timelines, prolonged traffic congestion and the impact on local residents/visitors.					
16.1.8	Concern about the impact of construction works on current airport operations.			1	We understand the need to keep the current airport operational during construction. The construction of Terminal 2 will take place separately from the existing terminal, and we will liaise with current the airport operator, LLAOL, to ensure disruption is minimised.	No
16.1.9	Concern that the proposed construction management plans are unnecessary as the Proposed Development itself should not go ahead.			5	Noted.	No
16.1.10	Concern about the hours of construction and the potential impacts upon neighbours.			3	<p>Construction noise will be mitigated through the implementation of Best Practicable Mean, as defined by Section 72 of the Control of Pollution Act 1974, with construction working limited to specified times.</p> <p>Core construction working hours will be from 08:00 to 18:00 on weekdays (excluding bank holidays) and from 08:00 to 13:00 on Saturdays. These are standard hours for large construction projects which aim to minimise impacts on people who live nearby, although</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					we acknowledge that it is not possible to meet the needs of all our neighbours in this respect. The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR contains a suite of mitigation and management measures to ensure that the environmental impacts of construction, including earthworks and landscaping, are avoided where possible and otherwise minimised. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	
16.1.11	Concern that the proposed preparatory works are unnecessary as the Proposed Development itself should not go ahead.			1	Noted.	No
16.1.12	Concern that planning permission for the proposed preparatory works should not be obtained prior to permission for the Proposed Development itself.			1	It is not our intention to seek planning permission for any preparatory works ahead of the application for development consent.	No
16.1.13	Suggest that the proposed transport mitigation measures be implemented prior to the			1	A significant number of highway improvements are proposed in a phased approach. Highway mitigations will be	No

Ref	Comment	PC	LA	No PILs	Response	Change
	main construction works commencing.				<p>delivered as they are required to mitigate for the impact of the Proposed Development.</p> <p>A Green Controlled Growth (GCG) framework which will ensure that the airport operates within particular “limits” is proposed. Limits will be set in respect of air quality, noise, surface access and carbon emissions. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.</p>	
16.1.14	Suggest that Wigmore Valley Park be delivered prior to the main construction works commencing.			1	We are happy to commit to delivering our proposals for the improvements to Wigmore Valley Park before any work is undertaken in the current park. This is the first item on our list for delivery at the earliest opportunity, with work on the new park commencing early (and in advance of DCO consent where practical and permissible).	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
16.1.15	Suggest phasing is too ambitious and need an additional 6 weeks inbuilt.			1	Please see response to ref 16.1.4.	No
16.1.16	Suggest that the applicant complete construction works at a specific time including not at night, outside of peak travelling hours, and not at weekends or bank holidays.			5	Please see response to ref 16.1.10.	No
16.1.17	Suggest that construction is managed by experts.			1	The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR outlines the environment management and mitigation requirements to be implemented by us and the contractors. We will appoint a suitably qualified team to manage and deliver construction of the works.	Yes
16.1.18	Suggest that the applicant implement surface vehicle cleaning measures to minimise the mess on surrounding roads.			1	Please see response to ref 16.1.5.	No
16.1.19	Support towards the earthwork proposals.			1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
16.1.20	Support the use of earth from surrounding areas for the earthwork proposals.			1	Noted.	No
16.1.21	Support the proposed preparatory works in general.			1	Noted.	No
16.1.22	LLAL's proposals should provide LLAOL with the power and flexibility it needs to operate the airport during the concession period.			1	Please see response to ref 16.1.8.	No
16.1.23	Concern that the proposals to manage the construction works are of poor quality and/or do not enable the applicant to act as a 'good neighbour'.			6	Please see responses to refs 16.1.4 and 16.1.5.	No
16.1.24	Oppose preparatory works.			5	Please see response to ref 16.1.12.	No
16.1.25	Support towards the phasing and timeline of the construction works.			1	Noted.	No
16.1.26	LLAOL also shares LLAL's vision as set out in the document: "London Luton			1	Please see response to ref 16.1.8.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Airport Vision for Sustainable Growth 2020-2050". As you are aware, the London Luton Airport site has been leased to London Luton Airport Operations Limited ('LLAOL') under a concession agreement which runs until 2031. Under that agreement, LLAOL has sole responsibility for the operation and management of the airport during the concession period. It is, of course, also essential that such longer-term expansion plans do not come at the expense of the immediate operation of the airport and the plans we have in the short and medium-term to expand capacity within the limits of the existing airport.</p>					
16.1.27	<p>Concern that the earthworks may pose a health and safety risk.</p>			2	<p>All works are covered by the Health and Safety at Work Act 1974. Construction works are also covered by the Construction (Design and Management) Regulations 2015 that set out what people involved with construction need to do to protect themselves and others from harm, or anyone that the works affect.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					The Health and Safety Executive provides best practice and guidance for construction operations. Before commencing the work, the lead contractor will undertake a risk assessment and produce a method statement detailing how they will undertake the earthworks. All construction activities will be physically segregated from the general public by means of fences, hoardings and barriers.	
16.1.28	Concern that the duration of the construction works will be too long.	Kings Walden Parish Council		1	Please see response to ref 16.1.5.	No
16.1.29	The size and scale of the proposal is confirmed by the length of time that will be needed to complete the works. Condemning local neighbours to 14 years of construction noise, pollution and traffic.	Kings Walden Parish Council		1	Please see response to ref 16.1.5.	No
16.1.30	The measures proposed include future creation of site management and works policies but we see no evidence that such policies	Kings Walden Parish Council		1	Please see response to ref 16.1.5.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	exist or would be effective or would be put into effect.					
16.1.31	No construction plan could mitigate against the disruption to the right to peaceful existence earned by local residents. During project Curium there were substantial problems with overnight piling disturbing residents.	Kings Walden Parish Council		1	Please see response to ref 16.1.10.	No
16.1.32	Concern about the hours of construction and the potential impacts upon neighbours. Respondents expressed concern regarding works occurring at night, at the weekend and for too long.	Kings Walden Parish Council		1	Please see response to ref 16.1.10.	No
16.1.33	Concern that planning permission for the proposed preparatory works should not be obtained prior to permission for the Proposed Development itself.	Kings Walden Parish Council Chilterns Conservation Board		2	Please see response to ref 16.1.12.	No

Ref	Comment	PC	LA	No PILs	Response	Change
16.1.34	Growth should be phased to stay within environmental limits. Performance against targets on carbon and surface access should be closely monitored, and noise and air quality should stay within the approved envelope. Growth should be released only when headroom exists within the limits.	Chilterns Conservation Board		1	A GCG framework which will ensure that the airport operates within particular “limits” is proposed. Limits will be set in respect of air quality, noise, surface access and carbon emissions. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals . However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional capacity until such time that it can be demonstrated that any growth would not cause a breach of the “limit”. An independent body is proposed to monitor and enforce such “limits”.	No
16.1.35	Respondent will recommend to the Secretary of State that, if approved, each phase of the development is contingent upon an up to date assessment that shows that the projected number of next generation aircraft and fleet mix are coming forward as predicted. The applicant’s modelling and forecasting should therefore be carefully considered and updated		St Albans District Council		Please see response to ref 16.1.4.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	before the Acceptance stage of the DCO process.					
16.1.36	The anticipated trajectory for passenger numbers for the 2012 application (LBC 12/01400/FUL) was 18mppa up to 2028, but due to unprecedented levels of growth these levels could be breached in 2020, eight years earlier than the original forecast. Due to this it would be necessary, as part of the DCO process, to secure a phasing plan for increasing passenger numbers to ensure growth is steady and to enable timely implementation of noise mitigation measures.		Central Bedfordshire Council		Please see response to ref 16.1.4.	No
16.1.37	Suggest that the applicant consider certain measures in relation to proposals to manage construction. In relation to mitigation it states that [heritage asset protection] is covered in the Historic Environment	Historic England			The proposed design has taken into consideration the cultural heritage assets in the surrounding area in order to minimise any harm to their significance. This is discussed in more detail in Chapter 10 Cultural Heritage of the PEIR.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Management Plan, appendix 18-4. However, at present this only covers archaeological mitigation and it should be expanded.				A Draft Cultural Heritage Management Plan can be found in Appendix 10.6 in Volume 3 of the PEIR.	
16.1.38	In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management. Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled and how to make best use of the different soils on site. Further guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction	Natural England			Chapter 6 Agricultural Land Quality and Farm Holdings of the PEIR includes an assessment of the operational impacts of the Proposed Development on agricultural land quality, soil resources and farm holdings.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Sites (including accompanying Toolbox Talks) and we recommend that this is followed.					
16.1.39	Welcome the inclusion of specific mitigations and monitoring that will be required during the construction phase relating to Soils and Geology and the Water Environment, as detailed in Chapter 16 and 19 respectively, of the Draft Code of Construction Practice (CoCP). Appreciate that the CoCP is a draft document at this time, however the requirements described in Chapter 16 and 19 are in line with our expectation for a large scale remediation project such as the re-engineering of the Eaton Green Landfill.	Environment Agency			Noted.	No
16.1.40	Respondent will seek assurance, in any event, that any agreed mitigation measures are adequately		St Albans District Council		Please see response to ref 16.1.34 in respect of our GCG approach, which will be secured through the DCO.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	controlled by legal agreement and/or planning condition and that robust review and monitoring triggers are put in place to ensure those mitigation measures are implemented successfully. Each phase of the proposed expansion should only be permitted to continue if that review process shows that the assumptions made by the airport in relation to noise, pollution or highway matters have been effectively realised as predicted, and that any agreed mitigation measures have been implemented.				<p>The CoCP will contain a suite of mitigation and management measures to ensure that the environmental impacts of construction, including earthworks and landscaping, are avoided where possible and otherwise minimised. The CoCP is secured by a requirement to the DCO (like a planning permission condition) and it will be a legal requirement for the contractor to comply with the CoCP under the DCO. A Draft CoCP is provided in Appendix 4.2 of Volume 3 of the PEIR.</p> <p>Relevant chapters in the PEIR set out the monitoring proposed for that topic.</p>	
16.1.41	The Scheme Development & Construction Report provides a useful description of the key features of the Proposed Development, its constituent parts and seeks to set out the proposed delivery. Given the extent of the expansion proposals, the potential interdependences and durations of certain works, and given that the proposals		WSP for Host Authorities		<p>Chapter 4 Proposed Development of the PEIR presents an updated description of the development, including proposed phasing, in line with the requirements of the EIA Regulations. Additional information on the construction methodology has also been provided within the Construction Method Statement and Programme Report in Appendix 4.1 of Volume 3 of the PEIR.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>are yet to be finalised, it is understandable that LLAL wishes to retain a degree of flexibility in relation to the construction methodology and phasing. However, as noted within the PEIR review there is a requirement for clearer explanations regarding this phasing, in order to ensure that the EIA uses the appropriate assessment years. Similarly, the phasing of the mitigation in certain areas such as the replacement Wigmore Valley Park remain somewhat unclear.</p>					
16.1.42	<p>The [consultation] Guide also explains how major earthworks would be required at the airport with large numbers of vehicle movements to import up to 4 million cubic metres of material. To mitigate these impacts extensive new planting is proposed. The summary of the landscape and visual impact in the</p>	Historic England			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Guide notes that the land to the south and east of the airport is predominantly rural with several features valued for their amenity, heritage or ecological value. It continues that the proposals would substantially alter the landform east of the airport and introduce a built form which would be prominent in views from several locations, including potential light spill, page 135. Mitigation measures include using appropriate form, finishes and materials for buildings which are in scale to the existing airport buildings, siting car parks on lower ground and additional hedgerows to reinstate historic field patterns and directional lighting, page 136.</p>					
16.1.43	<p>Measures to use construction materials with a lower carbon footprint and design new buildings that are energy efficient are supported.</p>		Milton Keynes Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
16.1.44	Due to the extent and long duration period consideration should be given to construction phases rather than zones with recommended year on year plans to show works and potential interactions.		Host Authorities		Please see response to ref 16.1.4.	No
16.1.45	The heritage assets at Luton Hoo are included in the operational effects but not construction and again we suggest further consideration is given to this.	Historic England			Potential impacts upon Luton Hoo Grade II* Registered Park and Garden during both construction and operation are considered in Chapter 10 Cultural Heritage of the PEIR.	No
16.1.46	This is a very large-scale earthworks proposal which impacts on public parkland and undeveloped countryside which is candidate-AONB land. It is not clear why the airport expansion involves the removal of high quality attractive greenfield landscape to east of the airport, in preference re-developing and extracting spoil from beneath the run-down brownfield employment	Chilterns Conservation Board		1	The Proposed Development has been carefully selected following a three stage sift process which did consider options for Wigmore Valley Park. A scheme that sought to avoid Wigmore Valley Park in its entirety was developed and subsequently appraised at Sift 3 alongside the existing Sift 2 options. This option was however discounted as it proposed development in the Green Belt and outside of the Luton Local Plan LLP6 Strategic Allocation boundary. It was also judged to perform poorly against other criterion - notably on the basis of operational noise impacts, land ownership, and landscape and visual impact	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>land north of the airport (Percival Way area etc). Other alternatives to extraction and land-lowering to the east of the airport, could be saving extracted material from construction of the DART and reusing it for the platform? These should be explored as reasonable alternatives under Schedule 4 of the EIA Regulations.</p>				<p>considerations. The most recent sift report is appended to the Works Description Report (WDR), and previous sift reports can be found on the Luton Rising website.</p> <p>As part of the Proposed Development the replacement open space would incorporate several of the enhanced facilities proposed in this area as part of the New Century Park application (i.e. the improved skate park and play facilities and the refurbished Wigmore Pavilion). Overall, the loss of part of the existing park will be fully mitigated by:</p> <ul style="list-style-type: none"> a. the enhancement of existing facilities, such as the upgrading of existing footpaths and new signage; b. the provision of a larger area of publicly accessible open space; and c. the continuation of accessibility to the park through the existing main entrance and within the replacement open space, through the upgrading of existing rights of way and new surfaced paths which further improve public accessibility. <p>An assessment of reasonable alternatives has been undertaken in accordance with EIA</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					regulations and this can be found in Chapter 3 Alternatives of the PEIR. Please also see response to ref 16.1.1.	

Table 0.8: Regard had to statutory consultation responses on Construction and phasing - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
16.2.1	Concern that the proposed earthworks and/or landscaping, will cause a negative environmental impact. Specific concerns included; disturbance to old landfill under Wigmore Valley Park releasing harmful materials, excessive carbon emissions, general disturbance to locals including noise, impact on local ecology/habitats, pollution, risk of future subsidence, impact on crop production and impact on water courses. Some respondents expressed a desire for the earthworks to be carried out under conditions that minimise any negative environmental impacts.	30	Please see response to ref 16.1.1. The CoCP will contain a suite of mitigation and management measures to ensure that the environmental impacts of construction, including earthworks and landscaping, are avoided where possible and otherwise minimised. It will be a legal requirement for the contractor to comply with the CoCP under the DCO. Further guidance on specific areas such as the management of earthworks and ground water control will be considered from industry best practice guidance documents, as established in each environment topic section of the CoCP. A Draft CoCP is available in Appendix 4.2 of Volume 3 of the PEIR.	No
16.2.2	Concern that the proposed earthworks are of poor quality and/or are not realistically achievable. Some respondents express concern about the vast scale and practicalities of the work, including concerns about the volume of trucks required to move the displaced materials, including associated costs.	25	Please see response to ref 16.1.1.	No

Ref	Comment	No CC	Response	Change
16.2.3	Respondents deemed the proposed earthworks unnecessary as the wider development plans should not go ahead.	55	Noted.	No
16.2.4	Respondents expressed general objection towards the proposed earthworks. Some respondents; questioned whether materials from HS2 works would be used for infilling purposes, or expressed concern at the volume of trucks required to move displaced materials.	14	<p>Please see response to ref 16.1.1.</p> <p>The HS2 construction programme does not align with the timescales for the Proposed Development. HS2 Phase 1 will be nearing completion when the bulk of the earthwork materials for the Proposed Development is required.</p> <p>Earthwork phasing has been developed to ensure the maximum volume of material is retained and reused on site.</p> <p>The vehicle movements associated with construction have been considered in the relevant chapters of the PEIR, in particular Chapter 18 Traffic and Transportation.</p>	No
16.2.5	Concern that the proposed phasing of the construction works will not be delivered as planned and/or is of insufficient quality. Specific concerns included; impaired experience for travellers/visitors, overcrowding, duration of works, and discrepancy between phasing and greenhouse gas emission calculations.	11	<p>Please see response to ref 16.1.4.</p> <p>Construction will be carried out in a way that minimises disruption to the operation of the existing airport.</p> <p>The GHG emissions calculations reflect the proposed phasing, more information can be found in Chapter 12 Greenhouse Gases of the PEIR.</p>	No

Ref	Comment	No CC	Response	Change
16.2.6	Respondents deemed the proposed phasing unnecessary as the wider development plans should not go ahead.	14	Noted.	No
16.2.7	Concern regarding the pace, duration and/or cost of the proposed phasing. Specific concerns included; too many works phased in quick succession, timings/costs changing due to project delays, works phased too slowly, duration of disturbance to local residents, lack of detail of phasing plans, revenue interests of Luton Borough Council and risk of overspending.	24	Please see responses to refs 16.1.4 and 16.1.5.	No
16.2.8	Concern regarding the uncertain future of the overall development, rendering phasing details irrelevant. Specific concerns included; impact of a change of government, economic impacts of delays and the pressure of the upfront investment overshadowing project risks.	9	Noted.	No
16.2.9	Concern that the duration of the construction works will be too long. Specific concerns included; continued duration of existing works, unclear timelines, prolonged traffic congestion and the impact on local residents/visitors.	26	Please see responses to refs 16.1.4 and 16.1.7.	No

Ref	Comment	No CC	Response	Change
16.2.10	Concern about the impact of construction works on current airport operations. Specific concerns included; continuing safe operations in close proximity to works, security of airport/site, completing works whilst maintaining optimal service levels, and the impact on car parking.	5	Please see response to ref 16.1.8.	No
16.2.11	Concern that the proposed construction management plans are unnecessary as the Proposed Development itself should not go ahead. Some respondents consider the airport to have already reached maximum capacity, that the applicant is the only one who wants the development and that the only way to remove any potential harm to residents is to not proceed.	75	Noted.	No
16.2.12	Concern about the hours of construction and the potential impacts upon neighbours. Respondents expressed concern regarding works occurring at night, at the weekend and for too long. Some respondents are concerned following negative impacts of previous works on site for Curium and/or DART.	5	Please see response to ref 16.1.10. Mitigation, including during construction, where required is included within the PEIR. The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR sets out measure specific to construction.	No
16.2.13	Concern that the proposed preparatory works will have negative environmental impacts. Respondents express concern regarding the	6	Please see response to ref 16.1.12. In respect of the construction of the Proposed Development, the CoCP will contain a suite of mitigation	No

Ref	Comment	No CC	Response	Change
	impact on Wigmore Valley Park and heritage assets at Luton Hoo.		<p>and management measures to ensure that the environmental impacts of construction, including earthworks and landscaping, are avoided where possible and otherwise minimised. It will be a legal requirement for the contractor to comply with the CoCP under the DCO. A Draft CoCP is available in Appendix 4.2 of Volume 3 of the PEIR.</p> <p>Potential impacts upon Luton Hoo Grade II* Registered Park and Garden are considered in Chapter 10 Cultural Heritage of the PEIR. Please see response to ref 16.1.14 with regard to Wigmore Valley Park.</p>	
16.2.14	Concern that the proposed preparatory works are unnecessary as the Proposed Development itself should not go ahead.	64	Noted.	No
16.2.15	Concern that planning permission for the proposed preparatory works should not be obtained prior to permission for the Proposed Development itself. Some respondents are concerned that spending public funds on this before full permission is guaranteed is inappropriate and pre-emptive.	47	Please see response to ref 16.1.12.	No
16.2.16	Concern that the proposed preparatory works should not begin until after the consultation period has ended for the Proposed Development.	2	<p>Please see response to ref 16.1.12.</p> <p>No works are proposed before the required consents have been secured.</p>	No

Ref	Comment	No CC	Response	Change
16.2.17	<p>Suggestions for measures in relation to the proposed earthworks. Respondents suggest the following; use an electric powered conveyor belt system to move displaced material, use the displaced material to create noise reducing earth berms, publish the ground investigation results, retain displaced material at the east end of the runway to allow for future lengthening, allow free tipping of the displaced material, source the earth material needed locally or from the DART works, implement penalties for adverse impacts on people/environment, do not allow vehicle movement or piling at night, only undertake the earthworks if a storage facility is necessary, and to conceal the airport structure using trees to improve the view from Breachwood Green.</p>	12	<p>Please see responses to refs 16.1.1, 16.1.4 and 16.1.5.</p> <p>The ground investigation report will be provided as part of the ES.</p> <p>Earthwork phasing has been developed to ensure the maximum volume of material is retained and reused on site. Details of this are set out in the Construction Method Statement and Programme Report in Appendix 4.1 of Volume 3 of the PEIR.</p>	No
16.2.18	<p>Suggest that the proposed landscaping mitigation works be implemented prior to the main construction works commencing. Respondents suggest that trees/earthworks could shield neighbours from noise/dust and that any hoardings used should be attractive and of sufficient height.</p>	5	<p>Landscape mitigation works will, wherever feasible, be implemented prior to the main construction works commencing. However, some of the proposed landscape mitigation measures (e.g. Work Nos. 5a or 5c) will require other works to take place in advance. Please refer to the Works Description Report for more information on the Works. The decision maker (in the case of a DCO application, the Secretary of State) will require us to meet commitments made and monitor areas to ensure their successful establishment and future management.</p>	No

Ref	Comment	No CC	Response	Change
			Mitigation, including during construction, where required is included within the PEIR. The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR sets out measure specific to construction.	
16.2.19	Suggest that the proposed transport mitigation measures be implemented prior to the main construction works commencing. Respondents suggest the following; complete highway/parking improvements early to ensure that they can support increased surface access (including Darley Road), assess the existing highways' impact on airport passengers prior to any changes, and implement mitigation measures (including respite routes) early.	15	Please see response to ref 16.1.13.	No
16.2.20	Suggest that Wigmore Valley Park be delivered prior to the main construction works commencing. Respondents suggest the following; new trees be planted as early as possible to allow them to mature and facilitate biodiversity, prioritise the play area/café/skate park and enable a continuity of available public space.	18	Please see response to ref 16.1.14.	Yes
16.2.21	Suggest that the applicant consider certain measures in relation to the phasing of construction works. Respondents suggest the following; delay the expansion over a longer	9	Please see response to ref 16.1.4.	No

Ref	Comment	No CC	Response	Change
	period (including to accommodate improvements in greener technology), complete construction in a short timeframe to minimise impact on neighbours, improve upon the phasing of works to Terminal 1, and align phasing to development in the surrounding area (especially involving road closures).			
16.2.22	Suggest that the applicant review air travel demand throughout the Proposed Development's phased construction. Respondents suggest the following; arrange contingencies to adjust or cancel the project should demand not match predicted forecasts and take into account the impact that Brexit/climate change may have on demand.	16	Please see response to ref 16.1.4.	No
16.2.23	Suggest that the applicant implement construction management proposals that avoid impacting on existing airport operations. Respondents suggest the following; ensure the construction works don't cause delays, clarify the duration of 'rapid turn off' periods, and eliminate impacts on passenger access (including disabled access).	8	Please see response to ref 16.1.8.	No
16.2.24	Suggest that the applicant complete construction works at a specific time of day/night. Respondents suggest the following; no construction works to occur during the	54	Please see response to ref 16.1.10.	No

Ref	Comment	No CC	Response	Change
	night/on Saturdays/on Sundays/on bank holidays, no construction works to occur during the day, complete noisy work in the middle of the day, impose a limit of 8-9 hours of work a day, implement construction breaks during rush hour, do not allow noise/vibration during the night, ensure working hours meet the relevant Code of Construction Practice, and impose time restrictions on construction vehicle surface access.			
16.2.25	Suggest that the applicant complete construction works faster. Respondents suggest that front loading the work will reduce the period of disturbance for neighbours.	17	Please see response to ref 16.1.4.	No
16.2.26	Suggest that the applicant consider certain measures in relation to proposals to manage construction. Respondents suggested the following; implement a consolidation centre, provide a contact number for neighbours, ensure mitigation measures are enforced, ensure regular risk assessments are carried out, and promote green construction practices.	17	Please see response to ref 16.1.5. The use of a consolidation centre has not been dismissed and requires further investigation to ensure it is viable. The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR sets out that contractors would be required to specify materials with lower embodied GHG emissions for example by using materials with a higher recycled content, locally sourced materials etc, where practicable.	Yes
16.2.27	Suggest that the applicant implement surface vehicle cleaning measures to minimise the mess on surrounding roads. Respondents suggest that wheel washing is necessary	5	Please see response to ref 16.1.5. The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR outlines the environment management and mitigation requirements to be implemented by us and the lead	No

Ref	Comment	No CC	Response	Change
	before construction vehicles enter public highways and that roads should be hosed down to prevent a build up of mud, which can also present a slipping hazard.		contractors. This includes good housekeeping measures such as wheel washing.	
16.2.28	Suggest that the applicant consider the use of electric vehicles and trains in relation to the management of construction works. Respondents suggest that electric vehicles would have less negative impacts and that trains should be used to transport materials to reduce surface vehicles on surrounding roads. Some respondents suggest building a rail siding access alongside the DART route to transport materials and then embedding it into the DART system after construction ceases.	18	<p>The UK construction industry is adopting the use of electric vehicles and the UK Government's targets for net zero will accelerate the adoption which can be seen in the supply chain. We are aiming for our construction to be net zero, for more information see the Draft Sustainability Statement.</p> <p>Construction of an additional railway siding for the delivery of bulk materials to the Proposed Development is not technically feasible. There is no available space at the Luton Parkway station for railway sidings and infrastructure required to handle bulk materials. The Luton DART is physically separated from the main line railway network.</p> <p>The Luton DART rail corridor does not have physical capacity for the required infrastructure. At the time of the proposed construction the Luton DART will be fully operational.</p>	No
16.2.29	Suggest that local materials are used in the construction. Respondents suggest that using local soil will minimise disruption, reduce the amount of vehicles on the road and offer some noise absorption.	6	<p>Please see response to ref 16.1.1.</p> <p>Chapter 6 Agricultural Land Quality and Farm Holdings of the PEIR includes an assessment of the operational impacts of the Proposed Development on agricultural land quality, soil resources and farm holdings.</p>	Yes

Ref	Comment	No CC	Response	Change
			<p>The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR sets out that contractors would be required to specify materials with lower embodied GHG emissions. For example, by using materials with a higher recycled content and/or are locally sourced, where practicable.</p> <p>Earthwork phasing has been developed to ensure the maximum volume of material is retained and reused on site.</p>	
16.2.30	<p>Support towards the earthwork proposals. Respondents support the following; it is a good idea/sensible plan/good use of space, considerate towards locals and the environment, minimal risk regarding health and safety, minimal impact on retained park area and time efficient. Some respondents support the proposals if the earthworks can cope with more extreme weather events and they offer noise insulation.</p>	64	Noted.	No
16.2.31	<p>Support the use of earth from surrounding areas for the earthwork proposals. Respondents noted that using locally sourced soil will reduce the amount of surface vehicle movements in the area, simplify logistics, be more environmentally friendly and makes economic sense.</p>	14	Noted.	No

Ref	Comment	No CC	Response	Change
16.2.32	Support the proposals to manage construction in general. Respondents noted that the proposals are well thought through, deliver long term benefits to the area, considerate, address issues of working hours/noise/tyre washing/air pollution, minimise disruption, and that 'off site' airfield works are sensible.	43	Noted.	No
16.2.33	Support the proposed preparatory works in general. Respondents believe the proposals are reasonable, responsible, sensible, thoroughly considered and logical.	20	Noted.	No
16.2.34	Suggest that the applicant review environmental limits prior to beginning each phase of construction.	6	Please see response to ref 16.1.5.	Yes
16.2.35	Concern that the proposals to manage the construction works are of poor quality and/or do not enable the applicant to act as a 'good neighbour'. Specific concerns included; lack of confidence following management of current works, the scale of potential disruption, an increase in traffic congestion, proposed mitigations not going far enough to minimise impacts, and a lack of trust in mitigation enforcement.	51	Please see responses to refs 16.1.4 and 16.1.5.	No

Ref	Comment	No CC	Response	Change
16.2.36	Concern about proposed preparatory works, including; the works will cause disturbance locally (including mess and mud), the best use of the area has not been explored, the work will not be of sufficient quality, and that there needs to be more transparency regarding the works being done.	64	Please see response to ref 16.1.12.	No
16.2.37	Support towards the phasing and timeline of the construction works. Respondents believe that the proposals are; sensible, well thought out, minimise disruption to airport operations, look realistic, are achievable, can accommodate changes in demand, ensure progress can be made swiftly, meet demand as it arises and give a clear indication of what will happen in the future.	33	Noted.	No
16.2.38	Concern that the earthworks may pose a health and safety risk. Specific concerns included; stability of the land/soil/chalk, scale of material movement, disturbance of hazardous waste/contaminated earth/toxic material, pollution of groundwater, drainage provisions and risk of disturbing dormant WWII explosives. Some respondents are concerned that the proposals are so minimal that they are unnecessary and do not warrant the potential safety implications on neighbours.	18	<p>Please see response to ref 16.1.27.</p> <p>A Remediation Strategy can be found in Appendix 17.2 of Volume 3 of the PEIR. This sets out the regulatory regime under which the works are to be undertaken and all regulatory controls. It also identifies the methods for the works, including monitoring, recording and reporting of the works.</p> <p>The CoCP will outline the environment management and mitigation requirements to be implemented by us and the lead contractors. The lead contractor will comply as a minimum with all appropriate environmental legislation at</p>	No

Ref	Comment	No CC	Response	Change
			<p>the time of construction. Further guidance on specific areas such as the management of earthworks and ground water control will be considered from industry best practice guidance documents as established in each environment topic section of the CoCP.</p> <p>It will be a legal requirement for the contractor to comply with the CoCP under the DCO. A Draft CoCP is available in Appendix 4.2 of Volume 3 of the PEIR.</p>	

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Table 0.9: Regard had to statutory consultation responses on Planning - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with and interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
17.1.1	Concern that there is a conflict of interest between LBC's ownership role and role as Local Planning Authority. With some respondents opposing the expansion on the grounds of this conflict of interest. Some respondents cite that as the airport is owned by LBC there is a bias towards extension plans; LBC has not taken enforcement action for planning condition breaches as it receives economic benefits from its operation; and LLAL (which is owned by LBC) are not publicly accountable. Some respondents also cite that LBC has failed to remain impartial and prioritise profit over residential amenity; and have financially incentivised rapid growth; and sums produced by FIRST will distort local decision making.			22	<p>The ownership and operation of the airport is different to many other airports. We, Luton Rising (a trading name of London Luton Airport Limited), own the airport and are the Applicant for the application for development consent for the Proposed Development under the Planning Act 2008.</p> <p>Luton Rising is wholly owned by Luton Borough Council (LBC) (100% shareholder), which means that the airport is effectively in public ownership.</p> <p>In 1998, we and LBC entered into a Concession Agreement with London Luton Airport Operations Limited (LLAOL) for the management, operation</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>and development of the airport. This agreement, which lasts until 2031, means that LLAOL has complete responsibility for, and control over, the day-to-day running of the existing airport.</p> <p>LBC and LLAOL are both key stakeholders to the Proposed Development and have been consulted extensively as part of the application process.</p> <p>Therefore LBC is neither the applicant nor the Planning Authority for this application so there is no prospect of any conflict of interest for LBC.</p> <p>LBC is instead a statutory consultee in same way as other host local authorities. LBC will consider the proposals and prepare a Local Impact Report in the same way that the other host authorities will. This will be considered by the</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Planning Inspectorate in its assessment of the proposals before making a recommendation to the Secretary of State for Transport who will make the final decision.</p> <p>In respect of compliance with existing planning conditions and enforcement action this is a matter for the local planning authority and the current airport operator, LLAOL.</p>	
17.1.2	<p>Concern that the Applicant has historically not delivered on previous commitments made, including those in planning conditions. Particular reference is made to noise conditions being breached in relation to Project Curium; and lack of enforcement action and/or lack of addressing complaints raised. Some respondents have cited that these breaches in conditions are at odds with the local plan; National Planning</p>			23	<p>Please see response to ref 17.1.1.</p> <p>Compliance with existing planning conditions is a matter between the current operator, LLAOL, and the local planning authority.</p> <p>We are consulting on our Proposed Development which is an application for a development consent order (DCO) made by the airport owner, Luton Rising, to central Government, so it is not appropriate to compare</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Policy Framework; and Aviation Policy.				<p>it to historic commitments made in planning applications by the operator. Additionally, the DCO is a Statutory Instrument, as a result the Requirements (planning conditions) set within it will be enshrined in legislation.</p> <p>A Green Controlled Growth (GCG) framework which will ensure that the airport operates within particular “limits” is proposed. Limits will be set in respect of air quality, noise, surface access and carbon emissions. The relevant “limit” will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Draft Green Controlled Growth Proposals. However, one of our GCG proposals is that where a “limit” is breached, the airport will be unable to declare additional</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					capacity until such time that it can be demonstrated that any growth would not cause a breach of the "limit". An independent body is proposed to monitor and enforce such "limits".	
17.1.3	Object to the Proposed Development as Luton Airport have continued to breach existing planning conditions.			3	Please see response to ref 17.1.2.	No
17.1.4	Concern that Luton Airport has not delivered effective impact mitigation historically. Particular reference is made to Project Curium; and the failure to deliver mitigation measures for noise (including the use of modern aircraft); air pollution; and carbon emissions. Some respondents object to the Proposed Development as previous commitments to mitigate impact have not been delivered.			15	<p>Please see response to ref 17.1.2.</p> <p>Project Curium (LBC ref: 12/01400/FUL) was a planning application submitted by the airport operator, LLAOL. Any comments regarding Project Curium generally and specifically in connection with the delivery of its proposed mitigation measures should be addressed to LLAOL.</p> <p>Details on Project Curium are included in Chapter 2</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Site and Surroundings of the PEIR.	
17.1.5	Suggest that current impacts are mitigated.			1	The comment is not clear, however we believe the comment is referring to previous breaches in planning conditions. In this instance please see response to ref 17.1.2.	No
17.1.6	Consider the Application Site boundary to be unnecessary as the airport should not be expanded.			1	Noted.	No
17.1.7	Support the DCO development boundary and proposed layout for the airport expansion.			1	Noted.	No
17.1.8	Suggest that the Proposed Development remains within Luton Borough Council's boundary and/or remains within the host county boundaries.			1	The Proposed Development has been designed to minimise land required which is not within our existing ownership, however a certain amount of additional land will be required to deliver the Proposed Development.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>With our shareholder, LBC, we own or control the majority of land needed for the proposed expansion. The boundary of the Proposed Development has been designed to incorporate all the land necessary to implement the Proposed Development and no more. We will submit a Statement of Reasons as part of the application for development consent explaining why it will be necessary for the DCO to contain powers to enable us to acquire compulsorily land and rights over land, and to take possession of land temporarily, to enable the construction and delivery of the Proposed Development.</p> <p>Minor development is proposed in the Green Belt outside of the LBC boundary and the Planning Statement submitted with the application for development consent will</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					set out the very special circumstances justifying this development and its potential impact. Other aspects of the Proposed Development which are outside of the LBC boundary are where there are highway improvements in Hertfordshire and Central Bedfordshire. Please also see response to ref 17.1.69.	
17.1.9	Suggest that the Applicant and operators abide by all planning conditions and/or deliver mitigation measures.			5	Please see response to ref 17.1.2.	No
17.1.10	Concern that the Application Site boundary proposal is too large and/or that there is not enough space for expansion. Particular reference is made to the encroachment outside of the existing boundary; and outside of the LBC boundary into the Green Belt; landscaping; open space (including Wigmore Park);			10	Please see response to ref 17.1.8. Details of land ownership will be provided in a Book of Reference which will be submitted as part of the application for development consent.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Hertfordshire, Berkshire; Breachwood Green; Wigmore; Chilterns AONB; Someries; and close proximity to residential communities. Some respondents cite that there is no detail of the land ownership of the extended land required. With some respondents suggesting that the boundary does not extend beyond the existing boundary and/or remains within the airport's land ownership boundary.</p>					
17.1.11	<p>LLAOL wish to ensure that it has ability to seek changes to the DCO via variations. This should be possible provided that the "undertaker" is defined in the DCO to include the concessionaire as well as LLAL.</p>			1	<p>We are seeking to introduce into the DCO a proportionate and justified level of flexibility to allow the current, or a future concessionaire, the necessary latitude to ensure that the Proposed Development can be delivered incrementally and operated effectively.</p> <p>It is currently envisaged that the DCO will contain a "transfer of benefits" mechanism, such that</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>appropriate powers to implement and operate the DCO can be transferred by Luton Rising to the current concessionaire, and a future concessionaire. We are engaging with LLAOL to discuss how any future applications to develop the airport (be they amendments to the DCO proposals, or otherwise) would be managed in this context.</p> <p>Please see also the response to ref 17.1.2 above and the reference to the GCG framework which is intended to ensure that the airport will operate within defined environmental 'limits'.</p>	
17.1.12	Concern that proposals to manage and mitigate the impacts of the Proposed Development are inadequate and/or will not be delivered.			12	The level of impact from the Proposed Development has been assessed within the PEIR and provides mitigation measures appropriate to the impacts identified. Further	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					assessment will be undertaken and reported in the ES submitted with the application for development consent. It will be a legal requirement of the DCO to deliver all mitigation proposed.	
17.1.13	Suggest the Applicant abide by national guidance; legislation; and industry best practice.			1	All relevant guidance, legislation and industry best practice is informing the Proposed Development and any future DCO.	No
17.1.14	The airport, even once expanded by the DCO, will have only a single runway, and will necessarily need to be operated as a single entity, with a single set of operational controls and caps. It will therefore be important for LLAL and LLAOL to work together to put forward in the draft DCO: a set of operational requirements which are acceptable to LLAOL in terms of its operation of the airport up to 2031.			1	It is acknowledged that continued dialogue between the airport's owner and operator is vital, in order to identify precisely how and when the airport would transition to the operational regime that would be set up by the DCO (e.g. including the GCG framework). In broad terms, it is currently envisaged that the switch over would take place once the airport implements DCO	No

Ref	Comment	PC	LA	No PILs	Response	Change
					permitted growth, beyond its current permitted cap. Engagement with LLAOL is underway in order to establish an appropriate mechanism, which would be set out in the application for development consent.	
17.1.15	It will be important to address in the DCO when and how the DCO supersedes the existing planning permission. This will be complicated by the fact that LLAOL may have obtained new planning permissions by the time the DCO is granted.			1	The application for development consent will include a Planning Statement which will set out the relationship between the application for development consent and any existing planning permissions.	No
17.1.16	As a preliminary point, it is important to recognise the effect which the DCO will have on any existing planning permissions governing the airport. The most recent planning permission granted in relation to the airport is in the process of being implemented. However, that permission contains various ongoing			1	Please see response to ref 17.1.15.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	planning conditions relating to the operation of the airport: in particular, noise restrictions and a restriction on passenger capacity to 18 mppa.					
17.1.17	As recognised in LLAL's consultation, the planning permission currently governing the airport (dated 23 June 2014 Ref 12/1400/FUL) restricts capacity to 18 mppa, and this capacity will shortly be reached. LLAOL and LLAL agree that it is important that this restriction is raised incrementally to match the increase in passenger demand, in order to avoid capacity stagnation.			1	Noted. Since LLAOL's response to consultation in 2019, it is further noted that LLAOL has received planning consent to increase the permitted cap to 19 mppa.	No
17.1.18	There is a considerable amount of engagement required between LLAOL and LLAL to ensure that the DCO application achieves our joint aim of expanding the airport to meet passenger demand in the short, medium and long-term without operational disruption. We are keen to continue and			1	Please see response to ref 17.1.14.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	indeed accelerate our discussions with LLAL between now and submission of the DCO application, and in particular we would request the opportunity to input into LLAL's drafting of the DCO application in relation to the matters set out in this representation. In closing, we would like to re-iterate our support for LLAL's ambition for growth at London Luton Airport, and look forward to continuing our close collaboration in order to drive our respective planning applications for short, medium and long-term capacity expansion to a successful conclusion.					
17.1.19	Concern that the approval of the Proposed Development will destroy local trust in the planning process.			3	The application for a development consent order will be subject to the processes set out for nationally significant infrastructure projects (NSIP). The NSIP regulations were put in place by Government in recognition that major	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>infrastructure requires an independent process.</p> <p>Please also see response to ref 17.1.1.</p>	
17.1.20	<p>Our clients object to the inclusion of the land hatched in red on the attached plan being included within the DCO. The land shown hatched red is identified in the new North Herts District Councils Local Plan to be removed from the Green Belt and allocated for housing to assist in meeting Luton's housing need. The proposed DCO will directly impact upon the deliverability of providing housing efficiently on this site. The national planning policy approach is that once land is removed from the Green Belt for a purpose, the land should be used efficiently for that purpose; the reason being to reduce pressure for further releases of the Green Belt. The airport expansion proposals directly impact upon the ability to use the land efficiently and</p>			1	<p>Discussions with all affected landowners are underway and will continue.</p> <p>Please see response to ref 17.1.69.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>will prevent the optimum level of housing being provided. It will hinder and fetter the development of the site and will be prejudicial to the delivery of much need housing. Our clients object to the inclusion of the land hatched green on the attached plan being included within the DCO. Our clients farm the land. The proposals will impact upon the agricultural operations and increase costs whilst reducing the productivity of the agricultural unit. It is unclear from the plans provided whether this includes our clients land hatched blue on the attached plan. Notwithstanding this our clients object to the proposals as they affect the northern boundary of their ownership. Our clients are in the process of re-developing this part of the site which will involve a new building abutting the northern boundary. Any landscaping or hedge planting should be a minimum of 6 metres from our clients boundary so root protection</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>zones do impact on the ability of our clients to construct the new building. When considering the substantial environmental damage created by the expansion of the airport, the small amount of environmental gain proposed on our clients landholding interests is negligible, but the impact upon them and their ability to develop and use their land is very substantial. There is not an over-riding need or case for the inclusion of our clients land in the DCO and it should be removed.</p>					
17.1.21	<p>It is important to LLAOL that proposals for capacity increases beyond 21.5 mppa on the terminal 1 site in the event that there is a delay to the opening of terminal 2 are included within the DCO application, subject to acceptable mitigation of impacts.</p> <p>It is also important to LLAOL that the DCO does not reduce</p>			1	<p>Please see response to ref 17.1.11.</p> <p>We are seeking to introduce into the development consent order a proportionate and justified level of flexibility to allow the current, or a future concessionaire, the necessary latitude to ensure that the Proposed Development can be</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the cap on passenger use of terminal 1 once terminal 2 is open. The balance of passenger use between the two terminals should be a matter for commercial negotiation between LLAOL and LLAL having regard to operational factors and efficiencies, rather than a matter which we see as requiring control through the DCO, provided planning impacts are acceptable. It is unclear from the consultation whether such a cap on terminal 1 is proposed by the DCO once terminal 2 opens. We would welcome clarity on this point.</p> <p>LLAL's terminal 2 is proposed to be built over a significant part of the existing airport site leased to LLAOL, and construction of terminal 2 is proposed by LLAL to commence during the period of LLAOL's concession. It is therefore important to understand the ways in which LLAL proposes to implement the terminal 2 works without</p>				<p>delivered incrementally and operated effectively.</p> <p>We are fully cognisant of the need to ensure that expansion under the DCO is compatible with the safe, effective and efficient operation of the existing operational airport. We note that, since the previous statutory consultation in 2019:</p> <ul style="list-style-type: none"> a) the impact of Covid-19 has had a significant impact on aviation demand, and by extension has impacted the timing and nature of expansion plans compared to those envisaged by both Luton Rising and LLAOL in 2019; and b) the currently anticipated phasing of development, included in particular the development of Terminal 2, has 	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>impacting the safe and efficient operation of the airport. At present, it is not clear whether LLAL will be seeking powers under the DCO which could impact LLAOL's operational responsibilities. We would welcome clarification in this regard.</p> <p>We understand that early enabling works (such as drainage) may need to be carried out on LLAOL's land, and that LLAL may seek some shared use of facilities on LLAOL's land (such as internal roads). Further information is required from LLAL as a matter of urgency in order to understand these issues and any potential impacts on LLAOL.</p>				<p>reduced the likely impact on LLAOL's operations for the remainder of the existing concession.</p> <p>Engagement with LLAOL is underway on these matters and will continue through to submission of the application for development consent and beyond.</p>	
17.1.22	The construction impacts [referred to below] would also negatively affect heritage assets on the site. As required by national policy and legislation, these harmful effects need to be given great			1	Chapter 10 Cultural Heritage of the PEIR includes an assessment of the potential impacts on heritage assets including during construction. This will be updated after	No

Ref	Comment	PC	LA	No PILs	Response	Change
	weight in the decision-making process.				consultation and included in the ES submitted with the application for development consent. The Planning Inspectorate will consider this, alongside all information submitted, in their examination of the application.	
17.1.23	LLAL's proposals should not interfere with the safe and efficient operation of the existing airport during the concession period; LLAL's proposals should align with LLAOL's proposals to incrementally increase passenger capacity within the existing airport prior to the opening of the new terminal; and LLAL's proposals should provide LLAOL with the power and flexibility it needs to operate the airport during the concession period. The Planning Act 2008 is intended to be a front-loaded process in which all key issues are addressed with stakeholders before submission. There is an			1	Please see responses to ref 17.1.11 and 17.1.21. It is acknowledged that continued dialogue between the airport's owner and operator is vital. Engagement with LLAOL is underway and will continue through to submission of the application for development consent and beyond.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>urgent need for LLAL and LLAOL to engage in relation to all these issues, in order to enable LLAOL to fully support the DCO proposals at examination. We would be grateful if our respective planning lawyers could engage on these points of detail as soon as possible.</p>					
17.1.24	<p>This consultation exercise forms the statutory consultation for the proposed development as required by section 42 of the Act. Elite Hotel's concerns must be fully reviewed and responded to (in line with section 47 of the Act) within the Consultation Report required to be submitted in support of the DCO application.</p>			1	<p>The application for development consent will include a Consultation Report setting out how we have had regard to comments raised in response to statutory consultation and other stakeholder engagement, including how these have informed the design. This 2019 Statutory Consultation Feedback Report sets out how comments from the 2019 consultation have been considered.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
17.1.25	When considering the case for a Development Consent Order the Inspector and Secretary of State will balance the benefits of the scheme against its negative impacts. Consequently mitigation of the negative impacts on TUI and the local jobs it provides will support LLAL's case for the DCO.			1	Please see response to ref 17.1.19.	No
17.1.26	Concern that the Applicant has historically not delivered on planning conditions and no enforcement action has been taken by Luton Borough Council.	Kings Walden Parish Council		1	Please see response to ref 17.1.2.	No
17.1.27	The expanded site is far too large and shifts a greater proportion of inherently noisy activities, such as aircraft movements, service vehicles, refuelling activities and car parking towards/into North Herts Green Belt at the east of the site. The scheme will not increase public open space, rather it absorbs most of the	Kings Walden Parish Council		1	Please see response to ref 17.1.8.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	existing Wigmore Park and the provision of the additional open space actually comes from taking over North Herts fields and what was until recently Tea Green golf course.					
17.1.28	Concern that the Application Site boundary proposal is too large.	Kings Walden Parish Council		1	Please see response to ref 17.1.8.	No
17.1.29	Concern that the Application Site boundary is too large and breaching into unspoilt landscape.	Chilterns Conservation Board		1	Please see response to ref 17.1.8.	No
17.1.30	It is clear that this airport is not adequately regulated, and there is no evidence that the Applicant will make any better custodian of the residential amenity of surrounding communities, since Luton Borough Council is still the primary host authority.	Kings Walden Parish Council		1	Please see responses to refs 17.1.1 and 17.1.2.	No
17.1.31	The current breaching of noise conditions and retrospective planning application	Chilterns Conservation Board		1	Please see response to ref 17.1.2.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	undermines public and stakeholder confidence; the solution is to limit noise not change the limits.					
17.1.32	At this stage of consultation and when considering our response to the future planning application, Stevenage Borough Council will be looking to ensure that the residents of Stevenage will not be adversely affected, particularly in terms of noise, air and surface access. Stevenage Borough Council trust that these representations will be given due consideration and that the Applicant will address the concerns raised directly in any application for planning permission that is made.		Stevenage Borough Council		Noted.	No
17.1.33	Dacorum Borough Council note and support the principle of focusing on providing the necessary airport development to enable growth to the north of the runway, largely within the current envelope of the airport.		Dacorum Borough Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	DBC have no objection per se, to the relocation of Wigmore Park into North Hertfordshire.					
17.1.34	No issues raised regarding proposals to expand as there will be no building within the Hertfordshire boundary.	Hertfordshire Fire and Rescue			Noted.	No
17.1.35	Dacorum Borough Council are reassured by the fact that Government will be the decision-maker for LLALs expansion proposals this time. DBC acknowledge that the recent growth in passenger numbers has outstripped that previously envisaged by LLAL, hence the need to consider expansion, however remain concerned that expansion is being considered whilst current noise issues are still unresolved. DBC acknowledge that the emerging proposals for growth of the airport put forward by LLAL, are being developed in line with Government aviation policy.		Dacorum Borough Council		Noted. The current airport operator, LLAOL, is responsible for managing existing noise levels. Chapter 16 Noise and Vibration of the PEIR includes an assessment of noise and proposed mitigation measures are covered in the Draft Operational Noise Management Plan in Appendix 16.2 of Volume 3 of the PEIR.	No

Ref	Comment	PC	LA	No PILs	Response	Change
17.1.36	More information is needed to demonstrate how stakeholder engagement has informed the design of the proposed development and the EIA process. Of particular interest is the influence of the host authorities engagement. The ES will need to include a detailed response to the scoping exercise, in addition to subsequent consultation and ongoing engagement to clearly identify consultee comments and how they have been addressed in the EIA process.		WSP for Host Authorities		<p>Please see response to ref 17.1.24.</p> <p>Engagement and sharing of information will continue during the application process. If the application is subsequently accepted by the Planning Inspectorate for examination, engagement will continue through that period too.</p>	No
17.1.37	Assurances will be sought, in any event, that any agreed mitigation measures are adequately controlled by legal agreement and/or planning condition and that robust review and monitoring triggers are put in place to ensure those mitigation measures are implemented successfully. Each phase of the proposed expansion should only be permitted to continue if that		St Albans District Council		Please see response to ref 17.1.2.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	review process shows that the assumptions made by the airport in relation to noise, pollution or highway matters have been effectively realised as predicted, and that any agreed mitigation measures have been implemented.					
17.1.38	The Council will comment further at later stages when the exact flight frequency and times are confirmed and updated noise contour maps are available. The Council response to the planning application, if and when submitted, we will be looking to ensure that the residents of Stevenage will not be adversely affected, particularly in terms of noise and vibration.		Stevenage Borough Council		Noted.	No
17.1.39	Given the inaccuracies in the modelling, assumptions and projections adopted within the original 2012 application and more recently between the March and August 2019 forecasts, the Council will seek		St Albans District Council		We have been working with the local authorities to agree the scope, methodology, baseline and modelling for the assessments, for example those in the Draft Need	No

Ref	Comment	PC	LA	No PILs	Response	Change
	assurances that the data submitted to the Planning Inspectorate within the DCO application are appropriate, sound and reliable.				Case, PEIR and Getting To and From the Airport – Our Emerging Transport Strategy.	
17.1.40	Suggest that the ES should include more information on the scoping exercise to demonstrate how comments have been considered and influenced the design and ES.		Central Bedfordshire Council		<p>The relevant technical chapters of the PEIR describe how comments received in the scoping opinion and ongoing technical stakeholder engagement, have been addressed. This will be updated and included in the ES which will be submitted with the application for development consent.</p> <p>The application for development consent will include a Consultation Report setting out how we have had regard to comments raised in response to statutory consultation and other stakeholder engagement, including how these have informed the design. This 2019 Statutory</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Consultation Feedback Report sets out how comments from the previous consultation have been considered.</p>	
17.1.41	<p>According to HSE's records there are two major ancient hazard pipelines within the proposed application boundary of the expansion of Luton Airport for this nationally significant infrastructure project. This is based on the current configuration for the proposed DCO boundary as illustrated in, for example, Figure 2.1 (proposed development boundary): Preliminary Environmental Information Report, non-technical summary, October 2019. However, according to Figure 2.2 (proposed Development layout at 32mppa capacity) of the same report, these areas are either for adjustments to existing terminal, landscaping and habitat creation or no defined use within the proposed DCO boundary; therefore, for</p>	Health and Safety Executive			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	land use planning HSE would not advise against the proposal.					
17.1.42	<p>Looking at the proposed works for the Windmill Rd / St. Mary's Rd Crawley Green Road Gyratory (Z6.19) the plan shows a widening of the road along St Marys way. Has this taken account of the planning permission granted for the Power Court development? That planning permission will be amending this section of road so the two schemes may be incompatible. It appears that it would also being built over the newly culverted section of the River Lea. If this is the case a Food Risk Activity Permit will be required for the works. - See above on new HEWRAT. Could this be undertaken again with any updated screening assessment from the updated DMRB. If the Windmill Road/St Mary s Road/Crawley Green Road Gyratory works are still screened out, please could the methodology and justification</p>	Environment Agency			Discussions are underway between the Applicant and LBC to understand and address any matters related to compatibility of surface access measures included in the Proposed Development and other planning applications.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	for this specific site be published.					
17.1.43	Suggest that the Transport Plan to accompany the DCO takes full account of the potential impact of airport expansion on Dacorum Borough Council's local road network and wish to be involved in the continued development of that assessment, and/or any group which is formed to test the ability to maximise public and sustainable travel to the airport.		Dacorum Borough Council		Analysis on modelling on Dacorum roads shows that the impact is not significant. We will work with local authorities as appropriate to mitigate any significant impact as part of the monitoring programme. A Transport Assessment which sets out the impact of the Proposed Development on local roads will be included in the application for development consent.	No
17.1.44	Suggest a requirement within the DCO to ensure that achievement of job targets benefit residents and businesses in the county.		Buckinghamshire County Council and Aylesbury Vale District Council		The application for development consent will include an Employment and Training Strategy (ETS) which is being developed with the relevant local authorities and stakeholders. A Draft ETS is available as part of this consultation. Consideration is being given as to how	No

Ref	Comment	PC	LA	No PILs	Response	Change
					commitments in the Draft ETS can be secured where appropriate.	
17.1.45	A Health Impact Assessment should be submitted with the DCO application.		Host Authorities		Chapter 13 Health and Community of the PEIR assesses the potential implications of the Proposed Development on the physical and mental health and wellbeing of local residents. This will be updated in the ES to be submitted with the application for development consent.	No
17.1.46	Unless and until there is evidence to demonstrate, and mechanisms to ensure, that the Airport can grow and be operated in a responsible manner, in the spirit of the Government's aspiration for a partnership for sustainable growth set out in Aviation 2050, which contains its environmental impacts to within prescribed acceptable and		Hertfordshire County Council		Please see response to ref 17.1.2.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>agreed limits that are enforceable, can achieve an overall betterment in the amenity and health of the communities impacted by it both immediate and further afield, and can adequately provide for the surface access needs required of it, the County Council has an in-principle objection to growth of the Airport. This evidence does not currently exist.</p>					
17.1.47	<p>It is acknowledged that certain factors are evolving, and the assessment can only be based on current conditions. However, Central Bedfordshire Council supports the comments highlighted in the WSP report and the Vincent and Gorbings report but acknowledges that some of the identified issues are more prevalent to other host authorities. In summary, the authority has serious concerns regarding the impact of the proposed expansion of London Luton Airport on the communities that live and work</p>		Central Bedfordshire Council		<p>The 2019 PEIR was not a final ES. Neither is the 2022 PEIR. Comments will be addressed/noted in the preparation of the ES which will be submitted as part of the application for development consent. Additional information has been provided within the 2022 PEIR in response to the WSP review comments received on the 2019 PEIR.</p> <p>In regards to the assessment of impacts</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	in the local area, which could be adversely affected in terms of highway impact, noise and disturbance, visual impact. The authority also considers that the impacts on climate change, heritage assets and the long-term economic benefits for residents have not been properly assessed and evidenced at this stage of the process.				please see response to ref 17.1.12.	
17.1.48	The ES should address how mitigation is secured with reference to DCO requirements or other legally binding agreements.		Host Authorities		Mitigation measures will be secured via the DCO, compliance with which will be a legal requirement. Please also see response to ref 17.1.12.	Yes
17.1.49	As the host authority collective response indicates, in some areas considerable further evidence and engagement is required. In particular, the County Council will expect there to be a substantive focus on noise - (including the rationale for why a ban on night flights is not being considered),		Hertfordshire County Council		We have been engaging regularly and will continue to engage with the relevant local authorities on all of the issues.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>surface access impacts in Hertfordshire and mitigations (the impacts on the network and potential mitigations required, for all modes, are currently not satisfactorily evidenced and explored), employment and skills strategy (which is not yet even in draft form), bringing forward a comprehensive monitoring, mitigation and compensation strategy [including exploring how to apply the principles of environmentally managed growth (growth conditional upon environmental and other limits/targets/parameters being met) and unforeseen local impacts mitigation]; the scale, geographic scope and proposed operating mechanisms of the proposed FIRST scheme; air quality (aircraft and road traffic-related), specific analysis as to how the scheme in terms of its development/design/mitigation will minimise the impact on the aim and purposes of the Green Belt; the purpose and future</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	management of the Wigmore Valley Park and associated open space, etc.					
17.1.50	DCO itself will need to include control mechanisms that provide safeguards for affected communities. We will need to agree a compliance assessment process, designed to monitor and manage implementation in consultation with local communities.		Host Authorities		The draft DCO submitted to the Planning Inspectorate as part of the application for development consent will include appropriate Requirements to provide safeguard to affected communities	No
17.1.51	ECC welcomes ongoing engagement on the London Luton proposals and welcomes discussions on existing and future aviation matters.		Essex County Council		Noted.	No
17.1.52	Section 5.96 of the Aviation National Policy Statement notes the need to consider the avoid-mitigate-compensate hierarchy prior to consideration of compensatory measures.	Natural England			Noted. This has informed the approach to the Proposed Development.	No
17.1.53	Suggest more detail on construction impacts, mitigation and monitoring regimes. Should		Host Authorities		Relevant chapters of the PEIR include an assessment of construction	No

Ref	Comment	PC	LA	No PILs	Response	Change
	be a suite of documents agreed before DCO submission.				<p>impacts. The Draft CoCP in Appendix 4.2 of Volume 3 of the PEIR sets out further details of mitigation and monitoring regimes. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.</p> <p>The Draft Construction Traffic Management Plan (CTMP) sets out the arrangements and management practices that will be adopted to manage construction traffic.</p> <p>We will consult with the local authorities on some of the key DCO application documents before they are submitted to the Planning Inspectorate.</p>	
17.1.54	Note that some further assessments may be required as the application progresses and we would strongly welcome the opportunity to be involved in		Dacorum Borough Council		Engagement with relevant local authorities has continued since the 2019 consultation and will continue through to the submission of the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	their continued development as they emerge.				application for development consent.	
17.1.55	The DCO application should demonstrate that the Proposed Development minimises the impacts on the Green Belt both in principle and in practice. Particular reference is made to the pressure for long term parking in the southern areas of Central Bedfordshire which are designated Green Belt.		Central Bedfordshire Council		Please see response to ref 17.1.8. Regarding pressure for long term parking in the southern areas of Central Bedfordshire, this does not form part of the Proposed Development. Therefore, this is a matter for the local planning authority to determine any such planning application on its merits.	No
17.1.56	In terms of mitigation measures, a Noise Envelope is being designed and CBC Officers have been engaged in this through the Noise Envelopment Design Group (NEDG). It is imperative that this involvement continues.		Central Bedfordshire Council		Noted. Engagement with relevant local authorities has taken place since the 2019 consultation and will continue.	No
17.1.57	Unfunded East Luton Study highway works need to be		Host Authorities		It has been agreed with LBC officers that for modelling purposes it is acceptable to include the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	included in the DCO and not in the baseline.				East Luton improvements in the 'Do Minimum' scenarios being tested.	
17.1.58	It is necessary to assess the Do-Nothing scenario to inform the future baseline scenario as required by Schedule 4 of the Infrastructure Planning EIA Regulations 2017. Lack of detail across all topics as to future monitoring and environmental management allied to a comprehensive Mitigation Route Map. This is a key area of concern as enforcing compliance with the DCO will fall to the host authorities.		Host Authorities		Chapter 5 Approach to the Assessment of the PEIR presents a description of the future baseline scenario. Where relevant, further information on the future baseline is provided within the technical chapters of the PEIR (Chapters 6 -20). The technical chapters of the PEIR also present proposals for mitigation and monitoring, as relevant to their specific technical assessments. A Mitigation Route Map will be submitted with the application for development consent.	No
17.1.59	Luton is subject to the obligations of the Airport Charges Regulations 2011, which we enforce and which place non-discrimination, consultation (including on major	Civil Aviation Authority			The application for development consent is proceeding on the basis that we will not be subject to direct regulation and financial viability	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>infrastructure projects) and transparency obligations on airports serving over five million passenger a year. However, Luton is not subject to the more wide-ranging obligations normally associated with Airport Economic Licences. The CAA can regulate an airport operator by means of an Airport Economic Licence, but before doing so, it must determine that the given operator meets the market power test in section 7 of the Civil Aviation Act 2012 (CAA12) - The market power test consists of three parts, all of which must be met if the airport operator is deemed to have met the market power test: a) that the airport operator has, or is likely to acquire, substantial market power in a market, either alone or taken with other such persons as the CAA considers appropriate; b) that competition law does not provide sufficient protection against the risk that the airport operator may engage in conduct that results in an abuse</p>				<p>assessments are being undertaken on that basis.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>of the substantial market power; and c) that, for users of air transport services, the benefits of regulating the airport operator by means of a licence are likely to outweigh the adverse effects. - While we are required to keep under review the provision of airport operation services in the United Kingdom, we are not required to make market power determinations for all UK airports or to make market power determinations at regular intervals. We may, however, make a market power determination whenever we consider it appropriate to do so, or may be required to make one in response to a request from airport operators or another person whose interests are likely to be materially affected by the determination. - Currently, we only economically regulate Heathrow and Gatwick airports. Stansted airport was deregulated in 2014 when we determined that this airport did not meet the market power test</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	above. - We currently have no information that suggests Luton airport s DCO proposals would lead us to launch a market power determination process under CAA12 or an investigation under the Airport Charges Regulations 2011. In addition to our economic regulation functions, the CAA also has concurrent competition powers regarding the provision of airport operation services.					
17.1.60	The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in the Planning (Hazardous Substances) Regulations 2015 as amended. Hazardous	Health and Safety Executive			Noted. All necessary additional consents for the proposed fuel storage facility will be sought at the appropriate time.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Substances Consent would be required to store or use any Names Explosive Sites Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these regulations. Further information on HSC should be sought from the relevant Hazardous Substances Authority. This is a licensed site in the vicinity in that part of the development around Junction 10 of the M1. The nature of the development is such that we do not expect there to be a significant interaction.</p>					
17.1.61	<p>Public Health England acknowledge that the policy and legislation context is well defined in each of the Chapters. However, this should be kept under review between now and submission of the ES to reflect any changes/alterations. Assessments are generally at a very early stage of development. There is a</p>	Public Health England			<p>We have been engaging with PHE and will seek to continue to engage on baseline characterisation, predicted impacts and mitigation. Policy and legislation will continue to be reviewed and where necessary our Proposed Development will be revised</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>general lack of baseline data and detail on assessment scenarios, and as such, there is insufficient evidence within the PEIR to provide confidence that the outcomes reported are correct. Further baseline characterisation, informed by on-going stakeholder engagement, is required to provide PHE with more confidence on predicted impacts and mitigation.</p>				<p>to take account of new requirements.</p>	
17.1.62	<p>Meanwhile, airspace change processes continue to seek to address the adverse noise impacts of an airspace change brought into effect in 2015, impacts exacerbated by the mismanagement of recent accelerated growth. On top of this, communities are now expecting a planning application to raise the consented passenger throughput cap from 18mppa to 19mppa - again, because the airport has mismanaged growth.</p>		Hertfordshire County Council		<p>The airport has expanded quicker than expected and reached its consented capacity of 18 million passengers per annum in 2019 instead of 2028 as expected. On 1 December 2021, the local planning authority (LBC) resolved to grant permission for the current airport operator (LLAOL) to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>As part of the Proposed Development, we are developing a Noise Envelope. The Noise Envelope will contain control measures to ensure that the Proposed Development cannot go ahead unless certain noise targets are met. This will be a statutory requirement for the expansion if it is consented and will provide a means to share the benefits of new, quieter aircraft with local communities.</p> <p>The Noise Envelope will be the mechanism through which our GCG framework is monitored and enforced in respect of noise.</p>	
17.1.63	Breaches of planning control have occurred, are occurring and are predicted to continue to do so. There is a current live planning application seeking planning permission to, in effect, authorise those		Hertfordshire County Council		Please see response to ref 17.1.2.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	breaches for a temporary period of 5 years.					
17.1.64	The PEIR documentation submitted for review is substantial. Our review and comments have focused on the assessment methodology and the presentation of the results, with an understanding that the Applicant will ensure that the methodology is correctly applied throughout the assessment, and that calculation methods and modelling are properly validated. The Applicant acknowledges that key data and evidence is lacking in some areas of the PEIR, and further detailed work and assessments are being developed to inform the Environmental Statement (ES). Therefore, this response is without prejudice to any future responses. We have identified areas for acknowledgement followed by concerns and our detailed	Public Health England			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	technical response can be found in Appendices A and B.					
17.1.65	<p>General EIA Compliance</p> <p>WSP have undertaken a review of the PEIR against the requirements of Schedule 4 of the Infrastructure Planning EIA Regulations 2017, as detailed in Chapter 2 of the review. This has identified a number of shortcomings and areas where further work is required to inform the Environmental Statement (ES). Of particular note is the need for clearer explanation regarding the description of the proposed development; assessment of alternatives; and scoping and consultation. It is not considered necessary to provide further explanation on these points as these are clearly explained in the Executive Summary and relevant chapters of the WSP Review. CBC fully support the comments made by WSP, and</p>		Central Bedfordshire Council		<p>The 2019 PEIR was not a final ES, comments will be addressed/noted in the preparation of the ES as part of the proposed application for development consent. Additional information has been provided within the 2022 PEIR in response to the WSP review comments received on the 2019 PEIR.</p> <p>A detailed response to all comments on the PEIR raised by WSP can be found in Appendix B of this 2019 Statutory Consultation Feedback Report.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	points highlighted in the Vincent and Goring report.					
17.1.66	Object to the Proposed Development and suggest funding should be used to improve the function of the existing facilities without the need for expansion.			1	Noted. The Proposed Development includes an extension to Terminal 1, however this terminal alone is not sufficient to meet the forecasted demand.	No
17.1.67	Oppose the construction of the new fuel pipeline and/or fuel storage within the Green Belt due to the adverse impacts including on the Green Belt and rural areas, especially during construction.			3	<p>Noted. Due the location of the existing pipeline, which is in the Green Belt, it is necessary for construction to be undertaken in the Green Belt. The land under which the pipeline is to be located will be reinstated. The proposal is to build a short spur connection, between the existing fuel pipeline and the proposed fuel storage facility at the airport.</p> <p>It is proposed the short pipeline be installed below ground to minimise the damage to biodiversity. The</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>habitats above the pipeline route will be restored on completion of construction, and as such there will be no visible trace of the pipeline, apart from pipeline markers, after installation.</p> <p>Careful consideration has been given to addressing the Green Belt around Luton and adjacent to the airport. Apart from the proposed new installation at the connection to the fuel pipeline for which very special circumstances will have to be demonstrated, the proposed fuel pipeline does not result in built development encroaching on Green Belt boundaries adjacent to the airport. The Surface Movement Radar also needs to be located within the Green Belt for operational reasons.</p>	
17.1.68	Concern that the Proposed Development will lead to loss of Green Belt land (including that		Host Authorities Central	5	Careful consideration has been given to addressing the Green Belt around	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>in Hertfordshire and Bedfordshire). In addition, concern that the Green Belt will be negatively impacted from increased air, light and noise pollution, as well as traffic congestion and visual intrusion from the Proposed Development.</p>		<p>Bedfordshire Council</p>		<p>Luton and adjacent to the airport. Apart from the proposed new installation at the connection to the fuel pipeline for which very special circumstances will be demonstrated, the proposed fuel pipeline does not result in built development encroaching on Green Belt boundaries adjacent to the airport.</p> <p>Minor development is proposed in the Green Belt outside of the LBC boundary and the Planning Statement submitted with the application for development consent will set out the very special circumstances justifying this development and its potential impact. Other aspects of the Proposed Development which are outside of the LBC boundary are where there are highway improvements in Hertfordshire and Central Bedfordshire.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
17.1.69	While terminal 2 is not 'in the Green Belt' it does negatively impact the Green Belt which is in breach of the National Planning Policy Framework.	Kings Walden Parish Council		1	The Planning Statement submitted with the application for development consent will set out the very special circumstances justifying this development and its potential impact.	No
17.1.70	The PEIR seems to use the year of maximum capacity as the year of maximum environmental impact without any justification. However, the year of maximum environmental impact may vary depending on the environmental topic or pollutant.	Civil Aviation Authority			Each technical topic within the PEIR identifies a reasonably foreseeable worst-case scenario for the environmental assessment. Where relevant, the three assessment phases are assessed and reported separately. In addition, sensitivity testing has been undertaken to consider how the environmental effects of the Proposed Development may vary under certain scenarios. Further information on the assessment phases and scenarios is provided within Chapter 5 Approach to the Assessment of the PEIR.	No

Table 0.10: Regard had to statutory consultation responses on Planning - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
17.2.1	Concern that there is a conflict of interest between LBC's ownership role and role as Local Planning Authority. With some respondents opposing the expansion on the grounds of this conflict of interest. Some respondents cite that as the airport is owned by LBC there is a bias towards extension plans; LBC has not taken enforcement action for planning condition breaches as it receives economic benefits from its operation; and LLAL (which is owned by LBC) are not publicly accountable. Some respondents also cite that LBC has failed to remain impartial and prioritise profit over residential amenity; and have financially incentivised rapid growth; and sums produced by FIRST will distort local decision making.	208	Please see response to ref 17.1.1.	No
17.2.2	Concern that the Applicant has historically not delivered on previous commitments made, including those in planning conditions. Particular reference is made to noise conditions being breached in relation to Project Curium; and lack of enforcement action and/or lack of addressing complaints raised. Some respondents have cited that these breaches in conditions are at odds with the local plan; National Planning Policy Framework; and Aviation Policy.	246	Please see response to ref 17.1.2.	No
17.2.3	Object to the Proposed Development as Luton Airport have continued to breach existing planning conditions.	3	Please see response to ref 17.1.2.	No

Ref	Comment	No CC	Response	Change
17.2.4	Concern that Luton Airport has not delivered effective impact mitigation historically. Particular reference is made to Project Curium; and the failure to deliver mitigation measures for noise (including the use of modern aircraft); air pollution; and carbon emissions. Some respondents object to the Proposed Development as previous commitments to mitigate impact have not been delivered.	195	Please see response to ref 17.1.2.	Yes
17.2.5	Concern that benefits from previous expansion have not materialised. Particular reference is made to the commitment of increased employment.	4	Please see response to ref 17.1.48.	No
17.2.6	Proposals to mitigate the impacts of airport expansion would be unnecessary if the airport was not expanded.	63	Noted.	No
17.2.7	Suggest that current impacts are mitigated. With some respondents citing that the current expansion should reach completion prior to any further additional increase in capacity; the FIRST scheme should be implemented under Project Curium; and present impacts should be mitigated rather than expanding. Some respondents also cite opposition to the Proposed Development and suggest that current planning conditions are met and mitigation measures delivered.	61	Please see response to ref 17.1.2. Community First represents a unique approach to sharing the benefits of airport growth with the surrounding area. By its nature it is linked to growth and should not include current passengers.	Yes
17.2.8	Concern that planning rules were broken by LBC in approving a previous application for a road through the airport site and New Century Park , a speculative	1	The New Century Park planning application was submitted under the Town and Country Planning	No

Ref	Comment	No CC	Response	Change
	<p>airport-related development on a public park which, like the airport, is supposed to be managed by the council on behalf of and in partnership with residents. This application conflicts with the Local Plan in several ways, and should have been submitted to govt as a DCO, because of the size of the road and development, but was only submitted as an EIA. The obvious conclusion is that this was to avoid proper scrutiny. The DCO application for a second terminal to facilitate expansion from 18 to 32 million passengers (80,000 flights) a year is in conflict with the New Century Park application.</p>		<p>Act 1990 as it did not meet the DCO thresholds as set out in the Planning Act 2008.</p> <p>The interaction between the Proposed Development and the New Century Park planning permission will be set out within the Planning Statement submitted with the application for development consent.</p>	
17.2.9	<p>Consider the Application Site boundary to be unnecessary as the airport should not be expanded.</p>	12	<p>Noted.</p>	No
17.2.10	<p>Concern raised over potential conflict of interest in relation to LBC approving compensation for local areas.</p>	1	<p>Compensation proposals are guided by the Compensation Code and are not determined by LBC. Further information is set out in the Draft Compensation Policies and Measures consultation document.</p> <p>Please see response to ref 17.1.1.</p>	No
17.2.11	<p>Support the DCO development boundary and proposed layout for the airport expansion. Some respondents cite that the boundary and layout make sensible use of the existing infrastructure. With some respondents particularly referencing support for the increase in green space.</p>	48	<p>Noted.</p>	No

Ref	Comment	No CC	Response	Change
17.2.12	Consider there to be minimal land take required for the proposed development therefore have no issues with the DCO development boundary proposals.	1	Noted.	No
17.2.13	The National Trust are seeking additional information at this stage in the process so that any likely effects on Trust land and designated features present on that land can be properly assessed prior to the submission of the DCO application next year. The National Trust note that further engagement is programmed in the new year, and would welcome a direct dialogue with the project team in order to be reassured that these matters will be appropriately addressed in the Environmental Impact Assessment (EIA).	1	<p>All designated heritage assets within 2km of the Proposed Development have been described in the desk-based assessment and potential impacts to their physical form, or impacts arising from changes within their setting, have been assessed as set out in Chapter 10 Cultural Heritage of the PEIR.</p> <p>We will liaise with National Trust to ensure that concerns regarding particular National Trust heritage assets, or heritage assets on National Trust land, are discussed and addressed appropriately in the ES submitted with the application for development consent.</p>	Yes
17.2.14	Consider that expansion plans should not be limited by the current Green Belt status of the surrounding the application site given the strategic importance of the airport.	1	Please see response to ref 17.1.8.	No
17.2.15	Suggest that the Proposed Development remains within Luton Borough Council's boundary and/or remains within the host county boundaries. Some respondents cited that the DCO development boundary should not cross into neighbouring	8	Please see response to ref 17.1.8.	No

Ref	Comment	No CC	Response	Change
	authorities and counties including Hertfordshire; and Green Belt land.			
17.2.16	Suggest that the Applicant and operators abide by all planning conditions and/or deliver mitigation measures.	32	Please see response to ref 17.1.2.	No
17.2.17	Concern that the Application Site boundary proposal is too large and/or that there is not enough space for expansion. Particular reference is made to the encroachment outside of the existing boundary; and outside of the LBC boundary into the Green Belt; landscaping; open space (including Wigmore Park); Hertfordshire, Berkshire; Breachwood Green; Wigmore; Chilterns AONB; Someries; and close proximity to residential communities. Some respondents cite that there is no detail of the land ownership of the extended land required. With some respondents suggesting that the boundary does not extend beyond the existing boundary and/or remains within the airport's land ownership boundary.	82	Please see response to ref 17.1.8.	No
17.2.18	Suggest that the Proposed Development takes place in less populated areas.	1	Please see responses to refs 17.1.8 and 17.1.10.	No
17.2.19	Concern that the current location of the airport is not suitable for expansion. Some respondents cited that the the current location is unsuitable due to its location on a plateau resulting in fog and bad weather; and it is too close to residential communities, including Luton;	22	Government policy supports making the best use of existing runways. Please also see response to ref 17.1.10.	No

Ref	Comment	No CC	Response	Change
	Breachwood Green; Hertfordshire; the Chilterns AONB.			
17.2.20	Suggest that any agreed mitigation measures are adequately controlled by legal agreement and/or planning condition.	1	Please see response to ref 17.1.2.	Yes
17.2.21	Concern that the Applicant is seeking permission for preparatory works related to the expansion of the Airport prior to determination of the DCO application which would pre-empt approval and undermine the planning process.	4	It is not the intention to seek planning permission for any preparatory works ahead of the application for development consent. In addition, planning applications for preparatory works are well-precedented in planning terms and do not act to pre-determine the consent of major projects.	No
17.2.22	At the Pre-application stage of the DCO process Luton Borough Council has a role as a statutory consultee and will, in due course, prepare a Local Impact Report (LIR) for submission during the examination of an application. There can be little confidence that LBC will take a wholly objective stance in this process because it has a substantial vested interest in the success of the DCO application to the extent that it should be regarded, for all practical purposes, as being the applicant.	1	Please see response to ref 17.1.1.	No
17.2.23	Suggest it would be appropriate for the Planning Inspectorate to eliminate the clear conflict of interest between Luton Borough Council as owner and financial beneficiary of Luton Airport and Luton	1	Please see response to ref 17.1.1.	Yes

Ref	Comment	No CC	Response	Change
	Borough Council as the putative but clearly ineffective Local Planning Authority bearing in mind that the same staff control both operations; and put Luton Borough Council in special measures since its planning department is significantly under-resourced and unable to discharge its duty of care under the Localism Act to apply due and proper scrutiny to the operation of Luton Airport.			
17.2.24	Suggest that LBC declare their conflict of interest and remove themselves from all decision making processes relating to London Luton Airport and an independent agency should be created to audit past, present and future claims attached to the expansion of the airport.	3	Please see response to ref 17.1.1.	No
17.2.25	Suggest that LBC sell the airport to an independent third party and/or have no role in the decision making process.	2	Please see response to ref 17.1.1.	No
17.2.26	Concern that proposals to manage and mitigate the impacts of the Proposed Development are inadequate and/or will not be delivered. Some respondents cite that the measures proposed are reliant on goodwill of the operators; will be too expensive; no details have been provided on how the proposed measures will be enforced and/or legally bound; and no timescales for implementation provided.	186	Please see response to ref 17.1.12.	Yes
17.2.27	Oppose the DCO development boundary proposals.	10	Noted.	No

Ref	Comment	No CC	Response	Change
17.2.28	Suggest expansion to the east on unused land.	3	<p>Airport expansion is predominantly to the east of the existing terminal.</p> <p>Chapter 3 Alternatives of the PEIR sets out the alternatives considered as part of the scheme development. A three stages sift process was used to decide the location of the development. The most recent sift report is appended to the Works Description Report (WDR), and previous sift reports can be found on the Luton Rising website.</p>	No
17.2.29	Suggest that the Proposed Development boundary does not extend towards residential areas.	1	<p>Please see response to ref 17.1.8.</p> <p>Chapter 3 Alternatives of the PEIR sets out the alternatives considered as part of the scheme development. A three stages sift process was used to decide the location of the development. The most recent sift report is appended to the WDR, and previous sift reports can be found on the Luton Rising website.</p>	No
17.2.30	Suggest training and resource be provided at LBC to ensure adequate oversight of LTN within all its current planning conditions until Project Curium has completed all the mitigation measures.	1	<p>Please see response to ref 17.1.4.</p>	Yes
17.2.31	Suggest the Applicant abide by national guidance; legislation; and industry best practice.	3	<p>Please see response to ref 17.1.13.</p>	No

Ref	Comment	No CC	Response	Change
17.2.32	Suggest that the application for development consent should document past condition breaches and failure to deliver mitigation measures. Respondents consider this to be a material consideration.	2	Please see response to ref 17.1.2.	No
17.2.33	Suggest that the current airport boundary is reduced.	1	Please see response to ref 17.1.8.	No
17.2.34	Suggest that LBC and LLAL and LLAOL should not be allowed to proceed with this proposed expansion and should be made accountable for the planning agreements that have already been breached.	1	Please see response to ref 17.1.2.	No
17.2.35	Suggest that the conflict of interest be addressed prior to any expansion.	1	Please see response to ref 17.1.1.	No
17.2.36	Concern that the approval of the Proposed Development will destroy local trust in the planning process.	29	Please see response to ref 17.1.1.	No
17.2.37	Luton Council, with responsibility for managing the park on behalf of residents, licensed the whole park to LLAL in 2015 to draw up development plans without informing the public. This licence has been renewed regularly since then. To take forward any development, LLAL would have to apply to LBC (they have the same CEO) for a lease, which would require public consultation.	1	<p>We have a licence over Wigmore Valley Park from LBC, for which we pay an annual fee to LBC. The licence has been renewed regularly as noted and it is also correct to note that, should LBC wish to grant a long term lease to us, or any other party, then it would need to go through the proper process to do so. That process includes consultation as noted.</p> <p>It is incorrect to state that Luton Rising and LBC have the same person in the role of Chief</p>	No

Ref	Comment	No CC	Response	Change
			Executive. This was historically correct but it no longer is the case, the two organisations each have their own (different) Chief Executive.	
17.2.38	Request clarity on the term DCO.	1	DCO is a Development Consent Order which is applied for to the Planning Inspectorate. If consented, by the Secretary of State, it provides Luton Rising with the necessary consent to construct and operate the Proposed Development. It is necessary to apply for a DCO, because the proposed expansion exceeds the thresholds set out in the Planning Act 2008.	No
17.2.39	Request clarity on what is defined as public open space.	1	Public Open Space is a special category of land for the purposes of the Planning Act 2008. Investigations are on-going through land referencing exercises to determine if there is any open space (within the definition of the Planning Act 2008) and the position will be confirmed by the time the application for DCO is submitted.	No
17.2.40	The CCG welcome that the decision on the application for development consent rests with the Secretary of State for Transport. As LLAL is wholly owned by Luton Borough Council this is essential to avoid potential conflict of interest.	1	Noted.	No
17.2.41	All preparatory works should be subject to planning permission.	1	Please see response ref 17.1.20.	No

Ref	Comment	No CC	Response	Change
17.2.42	Suggest that resource and training should be provided to ensure adequate scrutiny and oversight the operation of LTN by Luton Borough Council (LBC) in accordance with the planning conditions set to protect residential amenity. It would be appropriate to governance-review this lack of scrutiny particularly during the critical early years after expansion permission was granted in 2013. LBC dispensed with its airport planning officer and for an extended period failed to attend the London Luton Airport Consultative Committee meetings. According to its head of place and infrastructure there was no airport scrutiny committee in place during much or all of the period to date during which the incentivised rapid expansion took place.	1	Please see response to ref 17.1.1. The matters set out in this comment should be addressed to LBC rather than Luton Rising.	Yes
17.2.43	Support proposals to manage and mitigate the impacts of airport expansion.	19	Noted.	No
17.2.44	Suggestion that the Green Belt should be protected throughout the construction and operation of the Proposed Development, including avoiding further development on Green Belt land, full restoration of Green Belt land affected by the fuel pipeline, agreeing a green field recovery plan with affected authorities for Green Belt land and agreeing a specific plan for dealing with potential fuel spills. Some respondents noted that the optimum way to ensure there is no further harm to the Green Belt, is to make sure that there are no increases in flights. The following	10	Please see response to ref 17.1.70.	No

Ref	Comment	No CC	Response	Change
	locations were specifically mentioned: Luton, Kidney Wood.			
17.2.45	Replacements for any Green Belt land lost should be provided; a greenfield recovery plan should be agreed with impacted authorities with a commitment to return Green Belt and other designated area to a better condition than currently.	4	Please see response to ref 17.1.69.	No
17.2.46	Concern that the Proposed Development will lead to loss of Green Belt land (including that in Hertfordshire and Bedfordshire). In addition, concern that the Green Belt will be negatively impacted from increased air, light and noise pollution, as well as traffic congestion and visual intrusion from the Proposed Development; specific concern was raised on the location of the proposed fire training facility in proximity to Green Belt land. Furthermore, concern that any expansion of the airport will lead to increased demand for housing, which may end up being developed within the Green Belt.	63	Please see response to ref 17.1.69.	No
17.2.47	Concern that the proposed fuel pipeline will have adverse impacts on the Green Belt and associated wildlife; many respondents noted that the fuel pipeline was preferable to fuel delivery via tanks, but highlighted that this should not be at the expense of Green Belt land and an alternative solution should be considered. In addition, concerns were raised on the likelihood of leaks from the pipeline, fire hazards and	75	Please see response to ref 17.1.68.	No

Ref	Comment	No CC	Response	Change
	ongoing need for maintenance. Suggestion that a green-field recovery plan should be agreed with impacted Authorities to ensure affected land is appropriately restored after construction of the pipeline.			
17.2.48	Concern and opposition for any development that will result in adverse impacts to, or loss of, Green Belt land. It was noted that proposed fencing and floodlighting are not within Green Belt land but have potential to negatively impact adjacent countryside.	4	The Landscape and Visual Impact Assessment (LVIA) , which is provided in Appendices 14.4-5 in Volume 3 of the PEIR considers the impact of the Proposed Development on visual amenity experienced by people within the area surrounding the airport. The LVIA takes into consideration the impact of fencing and lighting. A Preliminary Light Obtrusion Assessment is provided in Appendix 5.1 in Volume 3 of the PEIR.	No

A18 Consultation

Table 0.11: Regard had to statutory consultation responses on Consultation - Planning Act 2008: Section 42 – Prescribed consultees, local authorities and persons with an interest in the land

Ref	Comment	PC	LA	No PILs	Response	Change
18.1.1	Concern that the consultation events were not of a high quality.			2	<p>Information was provided in a variety of formats - an information booklet providing a high-level summary, the Guide to Statutory Consultation providing more detail and signposting technical material such as the 2019 PEIR, and the detailed technical documentation. A suite of plans was also available. A balance was sought in providing the necessary technical detail whilst also ensuring documents were written in a non-technical style and in plain English. Where there were acronyms, their meaning was explained in a glossary.</p> <p>In addition, consultation events were held across the area so that people</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>could talk directly with the project team to ask questions.</p> <p>A feedback form was available at events, online and via the post on request, this was used to capture feedback in a clear and unambiguous way. All feedback has been considered and is reported in this 2019 Statutory Consultation Feedback Report. A final Consultation Report will also be submitted with the application for development consent.</p>	
18.1.2	<p>Concern that consultation documents/materials were lacking in clarity/accuracy/level of information. Respondents were concerned that documents; were not easy to follow, were inappropriately written for residents, did not sufficiently define key terms (e.g. DCO), contained chapters that were not self-contained and referred to other documents, contained diagrams/maps that were hard to interpret (too small, unclear boundaries,</p>			11	Please see response to ref 18.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	badly labelled), were too technical/long (including the PEIR), were badly formatted, and were unclear/vague/superficial/generic/inaccurate. Some respondents were concerned that there was not enough information on noise, air quality, surface access, phasing, health impacts, mitigation measures, environmental impacts, public transport, fuel pipelines, demand forecasts, the impact on Wigmore Valley Park and the influence of Local Authority plans. Other respondents were concerned that the consultation materials left communities feeling uncertain about the impacts of the proposal.					
18.1.3	The consultation material does not provide any detail on the likely noise environment following the Airspace Modernisation and Airspace Change Process with the Civil Aviation Authority (CAA), noting that this will be part of a separate application and subject to different timescales.			1	Please see Flight paths and Fleet mix topic responses.	No
18.1.4	Concern that the consultation questionnaire comprised questions that were misleading/inadequate/unclear.			3	A range of questions which were mostly open-ended were used to allow respondents the opportunity to express their opinion on a range of	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>topics clearly. Respondents were also able to submit their views in a freeform letter or email. All responses received, regardless of their format, have been carefully considered in developing our proposals.</p> <p>We have taken these comments on board and are using a simplified feedback form for this statutory consultation.</p>	
18.1.5	Consider the questionnaire too long.			2	This comment has been noted and a more concise feedback form is being used for this statutory consultation.	Yes
18.1.6	Concern that the consultation was predetermined in favour of the Proposed Development and that expansion of the airport was presented as inevitable throughout the process.			2	The 2019 consultation was undertaken to meet the Planning Act 2008 requirements to consult with people in the vicinity of the Proposed Development and other stakeholders. The 2022 consultation will meet the	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>same requirement. All information received through the previous consultations has been carefully considered and we have made changes to the scheme in response, as described in this report. We will also be carefully considering the feedback received from this consultation.</p> <p>All feedback will be reported as part of the application for development consent which will be examined by the Planning Inspectorate, who will make a recommendation to the Secretary of State for Transport for a decision. Information presented sought to present an accurate view of the Proposed Development including the potential impacts. For further information in respect of</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					prior determination please refer to the Planning topic.	
18.1.7	Concern that the Applicant has not justified a short-circuiting of the consultation process, by proposing an increase in airport capacity/growth on a trajectory of increasing noise until 2039, which goes against Project Curium's intention to reduce noise.			3	The 2019 and 2022 consultations relate to the Proposed Development to expand the airport to 32 mppa. This is separate to Project Curium which is subject to its own planning process and requirements.	No
18.1.8	Luton Hoo Estate and Luton Hoo Elite Hotels look forward to continuing a dialogue with the Applicant and will be engaging fully in the DCO process to ensure any negative effects are comprehensively addressed at an early stage prior to submission, to enable the introduction of mitigation measures. The bodies request that draft DCO documents be shared prior to submission, as well as a review into how they, as landowners, can actively support the airport's growth through an assessment of future initiatives or development of existing activities, in order to benefit the local community and assist in delivering meaningful growth. They also reserve the right to comment on certain technical details of the Proposed Development as further details are made			2	Further information on the Proposed Development, including draft application documents, are available as part of this statutory consultation. Comments about further engagement are noted.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	available and are happy to meet with the Applicant to discuss their concerns further.					
18.1.9	Support towards the consultation events.			1	Noted.	No
18.1.10	Support towards the consultation documents provided.			1	Noted.	No
18.1.11	Conclusion - LGC support the expansion of the Airport in principle. However, LGC considers that the concerns raised in this representation must be addressed in order to make the detailed aspects of the Airport expansion proposals acceptable and sustainable. LGC is open to discussing these matters with LLAL in order to arrive at an acceptable accommodation.			1	Noted.	No
18.1.12	Suggest that the Applicant carry out further engagement with local communities and those with an interest in the Proposed Development.			4	A further round of statutory consultation is being undertaken, allowing a further opportunity to comment on the Proposed Development. This 2019 Statutory Consultation Feedback Report sets out the comments received in	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>2019 along with our response.</p> <p>We will continue to work with local communities and provide regular and timely updates on the project. Updates on the project will be sent to all members of the public who request them.</p> <p>A range of methods are being used to engage local communities, stakeholders and MPs as part of this consultation, including an online engagement platform and exhibitions (subject to Covid-19 regulations at the time). The consultation is open to all and will last eight weeks, allowing time to participate. Copies of all consultation materials are available online and at our exhibitions and document inspection venues.</p>	
18.1.13	The following statutory consultees and landowners also requested further	Kings Walden	North Hertfordshire	3	Engagement with statutory consultees has continued	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	engagement: Host and surrounding local authorities, TUI, EasyJet, Environment Agency, Legal and General Capital.	Parish Council Environment Agency	District Council Harrow London Borough Council WSP for Host Authorities Dacorum Borough Council Central Bedfordshire Council Hertfordshire County Council		since 2019 and this 2022 statutory consultation provides a further opportunity to comment on the Proposed Development.	
18.1.14	Concern that the consultation process, documents and materials did not meet the standards expected from consultees. Respondents expressed concern that the consultation process; used corporate language, ignored local people, was too generic and didn't detail specific impacts, was inappropriately timed before Christmas and did not record verbal comments.			8	Please see response to ref 18.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
18.1.15	Concern regarding the lack of consultation Kings Walden Parish Council have received on the proposed park to replace Wigmore Valley Park.	Kings Walden Parish Council		1	This additional round of statutory consultation provides an additional opportunity for Kings Walden Parish Council to comment on the proposals for Wigmore Valley Park and your comments are welcomed.	Yes
18.1.16	Clarity is required with regard to what projects are to be considered in the assessment of cumulative impacts. The PIER does not identify how comments raised in the Scoping Opinion have been addressed in relation biodiversity, comprehensive assessment in relation to local plans and the 5-year criteria. Further engagement and dialogue with host authorities is needed to agree of the list of projects to be considered. - Baseline information is incomplete in some topics (e.g. health and population; cultural heritage; economics and employment) or unclear (e.g. in noise modelled baseline cannot be fully correlated with measurements). In some topics, it is not clear where the data presented in the baseline information has been obtained from. References to all sources will need to be included in the ES. - Future baseline		WSP for Host Authorities		The long and short lists of cumulative schemes are assessed within Chapter 21 In-combination and Cumulative Effects Assessment of the PEIR. The list of cumulative schemes has been consulted on with host authorities through the Planning Officers Coordination Group. Final responses to all comments received during Scoping will be provided in an appropriate format in the ES. Additional baseline information and referencing has been	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>scenarios and assessment years need to be clearly identified as part of the general EIA Methodology (Chapter 4 of the PEIR) and be carried throughout the specialist environmental topics. Sensitive receptors are not always identified (geology and soils; water resources; landscape and visual; cultural heritage) and study areas are not always justified, for example in air quality, the study area is not clearly linked to traffic impacts. - The description of the development is not clear on the future baseline assessment years, it lacks detail in relation to phasing of the development and on construction methodologies, whilst not all embedded mitigation proposals (e.g. drainage) appear to have been set out. - Not all chapters within the PEIR have identified all relevant EU and UK legislation and policy, up-to date Local Development Plans, and other relevant supporting that are relevant to the assessment. - Operational embedded mitigation measures and opportunities to adopt circular economy action are not included in the PEIR and should also be considered and reported in the ES. Noise mitigation ignores night-time noise, falling short of current good practice at other airports. Additional mitigation measures in relation to GHGs (e.g. carbon neutrality commitments, and additional low carbon</p>				<p>provided throughout the 2022 PEIR.</p> <p>Chapter 5 Approach to the Assessment of the PEIR presents a description of the future baseline scenario. Where relevant, further information on the future baseline is provided within the technical chapters of the PEIR (Chapters 6-20). Each technical chapter of the PEIR also presents a summary of sensitive receptors and the study area relevant to the assessment under a separate sub-heading.</p> <p>Future baseline scenarios are described in Chapter 5 Approach to the Assessment of the PEIR, whilst Chapter 4 The Proposed Development of the PEIR presents a description of the development in line with the requirements of the EIA Regulations.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	flight incentivisation) will need to be identified in the ES.				<p>Additional information on the construction methodology has also been provided within the Construction Method Statement and Phasing Plan document in Appendix 4.1 of Volume 3 of the PEIR. All embedded mitigation as relevant to the technical assessments has been listed out within the technical chapters of the PEIR (Chapters 6–20).</p> <p>Chapters 6–20 of the PEIR have been reviewed and updated to include all relevant legislation and policies.</p> <p>Further information on mitigation for waste and materials, noise and GHG emissions is provided within Chapter 19 Waste and Resources, Chapter 16 Noise and Vibration and Chapter 12 Greenhouse Gases respectively.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
18.1.17	In recognition of the additional work required for the ES and the scale and nature of the proposed development PHE would expect additional targeted consultations to be undertaken prior to the completion of the ES. It is disappointing to note that some of the comments within the PHE scoping response have not been addressed within the PEIR and have therefore been repeated. Having considered the submitted PEIR we wish to make the following specific comments and recommendations in Appendix 2. If you require any clarification on the above points or wish to discuss any particular issues please do not hesitate to contact us.	Public Health England			<p>An additional round of statutory consultation is being held.</p> <p>Additional meetings with stakeholders have been arranged, including PHE, to discuss comments received during the 2019 statutory consultation. A summary of the meetings held with PHE is provided within Chapter 13 Health and Community of the PEIR.</p> <p>Final responses to all comments received during Scoping will be provided in an appropriate format in the ES.</p> <p>This additional round of statutory consultation will also allow stakeholders to review and comment on any further information provided within the PEIR.</p>	Yes
18.1.18	In some areas the consultation is premature as work still needs to be done. The PIER lacks transparency across a number of		Host Authorities		Engagement with host authorities has continued to discuss feedback	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	topics including for example; noise, air quality, surface access, phasing, health, mitigation and the draft DC Order. To achieve adequate consultation much more information is required as is a step change in technical engagement. Need a project plan to provide this information and ensure the right engagement takes place. This will avoid technical debate during the examination. Further detail on necessary areas of work are set out.				received from the 2019 statutory consultation. This additional round of statutory consultation will also allow stakeholders to review and comment on any further information provided within the PEIR.	
18.1.19	Affinity's area covers all the red line area indicated for the London Luton Airport Limited proposals and the surrounding area. We have prepared a plan overlaying LLAL's red on Affinity's area on the enclosed plan, which also indicated Affinity's principal existing infrastructure, some of which is expressly referred to below. In order to meet our security obligations, we will require an undertaking from LLAL that the plan will be held in confidence before we are able to provide it.	Affinity Water			Noted. Engagement with landowners in accordance with the requirements of the Planning Act 2008 is ongoing.	No
18.1.20	There is a table setting out the Scoping Opinion comment and how it is addressed in the PEIR, table 18-3. This covers a number of points on which we would like to comment: It notes that the study area will continue to	Historic England			Noted. Historic England will continue to be engaged as a statutory consultee and this additional round of	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	be reviewed as further surveys and assessments are carried out. We would be pleased to be kept informed of this in relation to cultural heritage.				Statutory consultation provides further opportunity to formally comment.	
18.1.21	The consultation contains a discussion of the built development, landscaping and car parking. Some wireframe images have been provided of views from or close to these assets. These are helpful but once additional information is available on the proposed works, we would welcome the opportunity to provide further advice.	Historic England			Please see response to ref 18.1.20.	Yes
18.1.22	Table 18-6 [of the PEIR] refers to measures set out in the Draft CoCP to mitigate the construction noise, vibration and dust on Someries Castle. It would be helpful to have sight of this.	Historic England			This is outlined in the Draft Code of Construction Practice in Appendix 4.2 of Volume 3 of the PEIR. It will be a legal requirement for the contractor to comply with the CoCP under the DCO.	Yes
18.1.23	Should these changes be considered as materially different to those that formed part of the consultation, LLAL may be required to undertake further statutory consultation. It is recommended that the [Surface Access] Strategy is completed, reviewed and agreed		WSP for Host Authorities		Please see response to ref 18.1.18.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	by the relevant authorities, prior to the submission of the DCO application.					
18.1.24	The outline need case should set out if/How it proposes to factor in the latest growth proposals outlined by Gatwick or London City in their latest masterplans. Whilst this capacity is not consented, the potential delivery and timing of these proposals will Likely have implications for the passenger allocation model used to estimate Luton's share of the market within the catchment area Currently shown within the ONC. The above sensitivity tests / scenarios will need to be used to inform the Assessment of effects in the Environmental Statement (ES) prepared to accompany the application for development consent. Should the outputs of the sensitivity modelling materially alter the findings from the PEIR, LLAL will need to consider its requirement to undertake further statutory consultation prior to the submission of the DCO application.		WSP for Host Authorities		Please see response to ref 18.1.18. For further information please see Need case topic responses.	Yes
18.1.25	The majority, if not all, of the evidence and material identified as required by the host authorities will also be of interest to other local authorities, other parties and to communities. Given the scale of this material and evidence still to be compiled to underpin		Hertfordshire County Council		Please see response to ref 18.1.18.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the scheme and to address its impacts, there would appear to be a strong case, within the spirit of national guidance, for a further period of statutory consultation to be programmed into the DCO process. The purpose of such further consultation would be to engage parties more meaningfully with a more advanced scheme.</p>					
18.1.26	<p>The County Council appreciates that the scheme is still within its development stages further evidence and material to support it is not yet available. The Planning Inspectorate's Advice Note two: The role of local authorities in the development consent process states the following: Engaging in developer consultation</p> <p>6.1 Local authorities are able to influence the preparation of the developer s application. The preparation of the application will be an iterative process which means that the amount of detail should increase as the preparation proceeds.</p> <p>6.2 Local authorities should engage proactively with a developer even if they disagree with the proposal in principle. It is important to recognise that a local authority is not the decision maker but will want to contribute towards the development of the emerging proposals with the benefit of their</p>		Hertfordshire County Council		<p>Advice Note two is noted. Engagement with relevant local authorities has continued since the 2019 consultation and will continue through to the submission of the application for development consent. This 2022 round of statutory consultation provides a further opportunity for local authorities to comment on the proposals.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>detailed local knowledge. Local authorities are not undermining any in principle objections to a scheme by engaging with a developer at the pre-application stage.</p> <p>6.3 Nothing is to be gained by disengaging from the pre-application consultation process. It is in a local authority's own interests to engage in shaping a scheme. Once an application has been submitted it cannot be changed to the extent that it would be a materially different application, so as to constitute a new application. It is therefore important for local authorities to put any fundamental points to the developer during the pre-application stage.</p> <p>It is within this context that the County Council is engaging with you on your proposal. You will be aware of the resources the County Council and other host authorities have committed to the process to date and, in relation to this consultation, the commissioning of specialist independent technical advice. That advice, the views of the host authorities articulated in their collective response and the responses of the individual hosts will hopefully provide a positive platform from which to further engage over the coming months in shaping the scheme in preparation for the further stages of the DCO process to come. As the</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	host authority collective response indicates, in some areas considerable further evidence and engagement is required.					
18.1.27	Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our Discretionary Advice Service.	Natural England			Noted.	No
18.1.28	[They] believe there is a case for a further statutory consultation when the additional work has been done. The implications of the likely future change in climate change/aviation policy needs to be further considered though sensitivity testing. -The assumptions as to capacity at other airports within the south east will need to be updated to reflect the latest published master plans for Gatwick and London City Airport. Whilst we accept that this capacity is not presently consented, the potential delivery and timing of these proposals will have implications for the passenger allocation model used to estimate Luton's share of the market within Luton's catchment area. -It will be necessary to sensitivity test capacity scenarios and consider how these influence the assessment of effects within the Environmental Statement. Such sensitivity		Host Authorities		A further round of statutory consultation is being undertaken, allowing a further opportunity to comment on the Proposed Development. See also Need Case, Land and Compensation and Noise topic responses.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>testing could materially alter the findings from the PEIR. As per our comments on consultation above, this will require further engagement across all topics, potentially on a statutory basis with all stakeholders. -Need meaningful engagement over the operation of the FIRST Scheme. Comments provided on how the scheme could be applied. Affects on specific community groups need to be assessed as part of a comprehensive Health Impact Assessment. -Further discussion needed on the noise impact scheme. -Noise is a key environmental issue in terms of the acceptability of the Proposed Development and they believe that significant further engagement, monitoring, (including attended monitoring and assessments) will be required. The conclusions of the noise assessment in the PEIR are not robustly supported by the analysis and no monitoring regime is articulated.</p>					
18.1.29	<p>The pre-application consultation process Pre-application consultation is a key requirement for applications for Development Consent Orders for major infrastructure projects. Effective preapplication consultation will lead to applications which are better developed and better understood by the public, and in which the important issues</p>		Hertfordshire County Council		Noted. The 2019 consultation was undertaken to meet the Planning Act 2008 requirements. This 2022 consultation will meet the same requirements.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>have been articulated and considered as far as possible in advance of submission of the application to the Secretary of State. This in turn will allow for shorter and more efficient examinations.</p> <p>The Planning Act regime provides the ability to anyone interested in or affected by a major infrastructure proposal to both object in-principle to a proposed scheme and at the same time suggest amendments to design out unwelcome features of a proposal. Engaging in a developer s preapplication consultation including for example offering constructive mitigations to reduce a scheme s impact on the local community, does not per se undermine any submission on the principle of whether or not development consent should be granted.</p> <p>Early involvement of local communities, local authorities and statutory consultees can bring about significant benefits for all parties, by: -Helping the applicant identify and resolve issues at the earliest stage, which can reduce the overall risk to the project further down the line as it becomes more difficult to make changes once an application has been submitted; -Enabling members of the public to influence proposed projects, feedback on potential options, and encouraging the community to help shape</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the proposal to maximise local benefits and minimise any downsides; -Helping local people understand the potential nature and local impact of the proposed project, with the potential to dispel misapprehensions at an early stage; -Enabling applicants to obtain important information about the economic, social and environmental impacts of a scheme from consultees, which can help rule out unsuitable options; -Enabling potential mitigating measures to be considered and, if appropriate, built into the project before an application is submitted; and -Identifying ways in which the project could, without significant costs to promoters, support wider strategic or local objectives.</p> <p>The pre-application consultation process is crucial to the effectiveness of the major infrastructure consenting regime. A thorough process can give the Secretary of State confidence that issues that will arise during the six months examination period have been identified, considered, and as far as possible that applicants have sought to reach agreement on those issues. Without adequate consultation, the subsequent application will not be accepted when it is submitted. If the Secretary of State determines that the consultation is inadequate, he or she can recommend that</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	the applicant carries out further consultation activity before the application can be accepted.					
18.1.30	Concern that staff were not well prepared for consultation events and inhibited the quality of information given.		Buckinghamshire County Council and Aylesbury Vale District Council		Comments about staff at events is noted and all staff in attendance at exhibitions have been briefed in advance of this 2022 statutory consultation.	No
18.1.31	Support towards the opportunity to respond to the consultation.	Public Health England	Buckinghamshire County Council and Aylesbury Vale District Council Dacorum Borough Council Milton Keynes Council		Noted.	No

Table 0.12: Regard had to statutory consultation responses on Consultation - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No CC	Response	Change
18.2.1	<p>Concern that the location/timings of consultation events did not enable all interested parties to attend. Respondents were concerned that; there was a lack of events in Leighton Buzzard, Welwyn Garden City, Kings Langley, Apsley, Tring and Pitstone, there was a lack of documents made available for inspection and that timing events just before Christmas was purposefully done to minimise opposition.</p>	14	<p>The locations of events were decided in consultation with the host and local authorities through engagement with them on the SoCC. In total 35 exhibitions were held covering a wide geographical spread. Events were deliberately held at different times to facilitate attendance; most events which took place started in the afternoon and went on until 8pm, allowing people to attend after work. Additionally, six events were held on Saturdays. Several pop-up events were also held.</p> <p>In addition to the physical events, consultees were able to access the information in a variety of ways: they could view documents on the website or at a Document Inspection Venues (DIVs) described in section 2.7 of this 2019 Statutory Consultation Feedback Report. They could also email questions, call us, or request documents on USB sticks.</p> <p>At the start of statutory consultation, in response to requests from the public, an additional event was held in Leighton Buzzard on 22 November 2019 and was attended by 138 residents. The documents were also sent to Leighton Buzzard Library. A consultation event was held in Welwyn Civic Centre and</p>	Yes

Ref	Comment	No CC	Response	Change
			<p>documents were made available at Welwyn Library, in relatively close proximity to Welwyn Garden City. Consultation events were held within 15 miles of Kings Langley, to the north in Hemel Hempstead and to the south in Watford. A consultation event was held in Hemel Hempstead which neighbours Apsley. Consultation events were held in Tring at Nora Grace Hall on 4 December 2019, and Pitstone at Pitstone Memorial Hall on 1 November 2019.</p> <p>Consultation ran from 16 October to 16 December 2019, allowing time outside of the Christmas period to engage. This 2022 consultation is 'digital led' making it easier for people to participate online.</p>	
18.2.2	<p>Concern that the consultation events were not of a high quality. Respondents were concerned that; there was a lack of honesty/information regarding the Proposed Development, staff could not answer certain questions, staff were patronising or did not sufficiently engage with attendees, airport owners/operators were not in attendance, a lack of existing plans meant the impact of the proposals were hard to understand and that events were not consultative in nature but presented established designs, with only one staff member taking notes.</p>	8	<p>Please see responses to refs 18.1.1 and 18.1.30.</p>	No
18.2.3	<p>Concern that consultation events were not adequately promoted across a broad area. Respondents were concerned that this led to poor attendance to events and</p>	4	<p>In total 35 consultation events were attended by 3,894 people. Events were spread across a wide geographical area. Those unable to</p>	No

Ref	Comment	No CC	Response	Change
	did not allow local people to study plans in detail and ask questions.		attend a physical event were still able to participate in the consultation by viewing materials online or at DIVs and submitting a feedback form online or by post, or a freeform letter or email. The 2022 consultation is 'digital led' making it easier for people to participate online.	
18.2.4	Concern that staff were not well prepared for consultation events and inhibited the quality of information given. Respondents were concerned that staff; refused or were unable to answer questions (including the interpretation of maps), gave conflicting/inaccurate/misleading information (including regarding noise) and left attendees feeling less confident or more confused about the plans than before the event.	12	Please see response to ref 18.1.30.	No
18.2.5	Concern that some people were not able to attend a consultation event.	7	Please see response to 18.2.3.	Yes
18.2.6	<p>Consultation Inadequacies</p> <p>The consultation is on the basis of an increase from 18mppa to 32 mppa, but given the ability to expand the existing terminal operations from 18 to 22.5 mppa, then the overall growth would be more accurately assessed as up to 38mppa (with the new second terminal providing for 14Mppa). This would mean even more flights to the airport, GHG emissions, noise and traffic impacts. While passenger caps and planning conditions</p>	1	The Proposed Development is seeking to expand the existing terminal from 21.5 mppa to 32 mppa with the construction of a second terminal, all material available during consultation presented information on this basis. The Proposed Development is not seeking consent to expand to 38 mppa and it is therefore not appropriate to present information on this.	No

Ref	Comment	No CC	Response	Change
	<p>may be suggested as part of any planning permission in practice these are often amended later on. The proposal should be seen and assessed for the overall capacity that is being designed into the proposal, as up to 38mppa rather than the notionally lower figure of 32mppa. This adds to the overwhelming case to object to the expansion.</p>			
18.2.7	<p>Concern that consultation documents/materials were lacking in clarity/accuracy/level of information. Respondents were concerned that documents; were not easy to follow, were inappropriately written for residents, did not sufficiently define key terms (e.g. DCO), contained chapters that were not self-contained and referred to other documents, contained diagrams/maps that were hard to interpret (too small, unclear boundaries, badly labelled), were too technical/long (including the PEIR), were badly formatted, and were unclear / vague / superficial / generic / inaccurate. Some respondents were concerned that there was not enough information on noise, air quality, surface access, phasing, health impacts, mitigation measures, environmental impacts, public transport, fuel pipelines, demand forecasts the impact on Wigmore Valley Park and the influence of Local Authority plans. Other respondents were concerned that the consultation materials left communities feeling uncertain about the impacts of the proposal.</p>	89	Please see response to ref 18.1.1.	No

Ref	Comment	No CC	Response	Change
18.2.8	Concern that consultation documents/materials were not read due to a lack of promotion or being too long to read in the review period.	8	Please see response to ref 18.1.1.	No
18.2.9	Concern that consultation multimedia and presentations delivered inaccurate or lacking information, including; unclear existing and proposed boundaries, illegible maps, a lack of information on the impact of flight landings and incorrect figures on forecasted demand.	5	Please see response to ref 18.1.1.	No
18.2.10	Concern that the consultation questionnaire comprised questions that were misleading/inadequate/unclear. Respondents expressed concern that questions; were badly formulated, irrelevant, obscure, confusing, contributed to a greenwashing effect, assumed the Proposed Development will go ahead, were biased/leading/loaded, did not allow respondents to express their concerns sufficiently or address the proposed development overall, focused too much on details, took too long to complete, and did not differentiate between the construction works and the overall expansion.	62	Please see response to ref 18.1.4.	Yes
18.2.11	Concern that the online version of the consultation questionnaire was difficult to navigate, not mobile friendly, badly designed, could not be filled in, did not send an email confirmation or copy of the response upon completion, and does not enable respondents to	10	The feedback form contained a mixture of open and closed questions allowing respondents to freely express views. Responses were also received via freeform letter and emails which allowed respondents to express their views in a format they felt most	Yes

Ref	Comment	No CC	Response	Change
	review responses or fully express their principal concerns.		comfortable with. All responses received have been carefully considered in developing our proposal. Comments have been noted and this 2022 Statutory Consultation is 'digital led' offering an easy to use online feedback form. As before, responses can also be submitted in hard copy feedback form or freeform letter or email.	
18.2.12	Concern that the consultation questionnaire was biased, did not enable respondents to object to the Proposed Development as a whole, collected personal information at the end, lacked the opportunity to comment on flights paths and noise levels, and assumed support from respondents.	8	We chose to provide a range of questions and keep them open-ended to allow respondents the opportunity to express their opinion on a range of topics clearly. As part of this Proposed Development we are not seeking to amend flight paths and as such it was not appropriate to ask questions specific to this. Nevertheless, respondents were able to express their views on flight paths in response to other questions. The feedback form included a specific question on noise. Personal information could be added voluntarily to feedback forms. Comments have been taken on board in designing the 2022 feedback form.	Yes
18.2.13	Concern that the length of questionnaire is not appropriate for residents/not public friendly and put people off completing it. Respondents were concerned	20	Please see responses to refs 18.1.4 and 18.1.5.	Yes

Ref	Comment	No CC	Response	Change
	that the questionnaire was too difficult/complicated/ time consuming to fill in, asked repetitive questions and should have been more concise.			
18.2.14	Concern that the consultation period was too short to allow respondents to review documents and respond sufficiently, that there was too much material to read, that consultation took place at a late stage of the development, and that the consultation was badly timed in the run up to Christmas and close to a general election, which did not give enough time for newly elected MPs to review the material and discuss with their constituents.	7	<p>The consultation process ran from 16 October to 16 December 2019, with public events spread across weekdays and weekends, during the daytime and in evenings, to ensure they were as accessible to as wide a range of stakeholders as possible. The consultation was also advertised ahead of the General Election being called.</p> <p>Information was provided in a variety of formats, an information booklet providing a high-level summary, the Guide to Statutory Consultation providing more detail and signposting technical material such as the PEIR, and the detailed technical documentation.</p>	No
18.2.15	Concern that the consultation was predetermined in favour of the Proposed Development and that expansion of the airport was presented as inevitable throughout the process. Respondents expressed concern that; the process presented a biased view in support of the proposals, assumed that expansion is necessary, potential negative impacts were ignored, consultees lacked belief in the consultation, the process came across as a box ticking exercise that did not offer the opportunity for debate, responding to the consultation	92	Please see response to ref 18.1.6.	No

Ref	Comment	No CC	Response	Change
	would be futile, Luton airport do not care, people's voices were not heard, the process was undemocratic / manipulative / disingenuous / prejudiced, the commencement of the DART implied that the Proposed Development is guaranteed, and that the applicant undermined the consultation process by seeking permission for the proposed preparatory works prior to the main works.			
18.2.16	Concern that the previous consultation process for Project Curium in 2018; manipulated or did not adequately respond to concerned responses, resulted in the breach of promises/agreements made (concerning overall growth and noise), comprised inaccurate consultation materials, and contradicts the current Proposed Development's increase in growth.	10	In the first round of consultation, we were clear that the feedback gathered would be used to inform the proposals. It was explained at the time that we could not respond to individual feedback. Feedback from the Summer 2018 consultation was taken on board and a Feedback Report published in February 2019. We are committed to reviewing the feedback and taking it into account when making any decisions on the proposals.	No
18.2.17	Concern that the Applicant has not justified a short-circuiting of the consultation process, by proposing an increase in airport capacity/growth on a trajectory of increasing noise until 2039, which goes against Project Curium's intention to reduce noise.	26	Please see response to ref 18.1.7.	No
18.2.18	Suggestion that consultation events do not start too early in the morning and stop at 9pm, or should be in the	2	Consultation events in 2022 cover a range of times including evenings and weekends (subject to Covid-19 restrictions at the time). The 2022 consultation is also 'digital led'	Yes

Ref	Comment	No CC	Response	Change
	two hour slot for the presentation and questions from the public.		meaning people can access all consultation materials and provide feedback at all times through the online consultation platform.	
18.2.19	Suggest that the Applicant: implement simpler forms of consultation that are more appropriate for local residents, hold separate consultations for businesses/organisations, provide an opportunity for respondents to set out their opinion in prose and provide an option for response that does not involve lengthy forms.	3	A more concise feedback form is being used for the 2022 consultation and respondents are also able to respond in free form letter or email. We will continue to engage other stakeholders, including businesses/ organisations outside of the formal consultation period, and such organisations are also able to participate in the consultation.	Yes
18.2.20	Support towards the consultation events, including; clear and well explained displays, realistic and relevant reasons given in support of the Proposed Development, good explanations on noise contours, invitations given well in advance and events were held over a broad area with extra venues.	8	Noted.	No
18.2.21	Support towards the consultation documents provided, including; fair explanation of proposed benefits of expansion, clear explanation of the justification for growth led by demand, good levels of detailed information and useful maps.	12	Noted.	No
18.2.22	Support towards the consultation's multimedia and presentation, including; the quality of the YouTube video, the helpfulness of presenters, and the balanced	3	Noted.	No

Ref	Comment	No CC	Response	Change
	and well thought through portrayal of the proposals in the portal.			
18.2.23	Support towards the consultation process, including; the effort inputted by the Applicant, further consultations occurring with appropriate parties, the opportunity for consultees to respond, the availability of materials, the acknowledgement of previous concerns, engagement with the local community, and the Proposed Development being based on sound analysis.	9	Noted.	No
18.2.24	Suggest that the Applicant carry out further engagement with local communities and those with an interest in the Proposed Development. Respondents suggested that the Applicant; maintain an ongoing form of consultation with residents to feedback on issues, keep respondents informed throughout the whole process (without relying on social media), hold a referendum on the Proposed Development, employ alternative methods of consultation to engage with a broader range of people, educate the public on climate change, engage with people in towns/villages outside the scope of the consultation, undergo an independently assessed risk analysis/ impartial review, distribute copies of proposals via email or memory stick on request, acknowledge receipt of responses, email back copies of the response, make reports publicly available (e.g. acoustic report), do not rely on respondents to provide links to relevant papers, communicate more effectively with MPs and extend the consultation period to give them time to	48	Please see response to ref 18.1.12. The application for development consent, like all DCO applications, will be examined by the Planning Inspectorate who will make a recommendation to the Secretary of State; it is not appropriate to hold a referendum. Consultation events will be held in Luton at Wigmore Church and Stockwood Park Academy (subject to Covid-19 restrictions at the time).	Yes

Ref	Comment	No CC	Response	Change
	review materials, provide more community stands at Mall Arndale, provide more information on the anti-poverty regeneration strategy, consult with Govia and invite Chilterns Conservation Board to consultation earlier.			
18.2.25	Concern that the consultation process, documents and materials did not meet the standards expected from consultees. Respondents expressed concern that the consultation process; did not publish certain responses, was too short in duration, did not adhere to government/statutory requirements, was not democratic, ignored local people (including young people and significant stakeholders), was disingenuous/dishonest, was biased/unbalanced towards the proposed benefits, did not give sufficient attention to mitigation measures, did not evaluate environmental data prior to consultation, lacked thought in proposals, did not take issues seriously, was of a scale/complexity that put off or overwhelmed consultees, asked consultees about irrelevant issues, was too expensive, was conducted at an inappropriate time, placed the burden of proof upon the applicant to demonstrate the impact of pollution on health, did not consider the impact of changes to electoral constituency boundaries, was unclear on whether responses submitted outside the questionnaire format would be captured, and resulted in a lack of trust in the planning system. Other respondents expressed concern that; the material would not be read, the language used was overly corporate, information boards	62	Please see responses to refs 18.1.1, 18.1.6, and 18.2.1.	Yes

Ref	Comment	No CC	Response	Change
	did not provide enough information, documents were not produced using environmentally friendly materials, documents were too descriptive, information was inaccessible online and documents assumed that an expansion was positive.			

L3 Due regard tables in response to comments on the PEIR from WSP on behalf of Host Authorities

Statutory Consultation 2022

**2019 Statutory
Consultation Feedback
Report Appendix B
Response to WSP
Comments on the PEIR**

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Table B1.1: 2019 PEIR Chapters 1-4

Table B2.1: Air quality

Table B3.1: Traffic and transport

Table B4.1: Climate Change (Climate Change Resilience)

Table B5.1: Greenhouse Gases

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Table B7.1: Soils and Geology

Table B8.1: Water resources

Table B9.1: Waste and Resources

Table B10.1: Economics and Employment

Table B11.1: Health and Community

Table B12.1: Agricultural Land & Farm Holdings

Table B13.1: Biodiversity

Table B14.1 Landscape and Visual Impact Assessment

Table B15.1: Cultural Heritage

Table B16.1: Major Accidents and Disasters

Table B17.1: Cumulative Effects

Table B18.1 Cole Jarman noise assessment

Introduction

The host authorities (Hertfordshire County Council, North Hertfordshire District Council, Luton Borough Council and Central Bedfordshire Council) commissioned WSP to undertake a review of the 2019 Statutory Consultation documents. This review provided detailed comments on the Preliminary Environmental Impact Report (PEIR) which were submitted in response to the 2019 consultation. These comments on the 2019 PEIR, along with the project's response to them are set out in this Appendix. The WSP submission also provided some comments on other consultation documents, and these are covered in Appendix A.

WSP used a coding system in their review and these codes are repeated in the tables below in the 'WSP code' column. Where WSP identified a question that is relevant to the PEIR, they used the following grading system to categorise the robustness of the information provided:

- a. A: Full provision of information in line with the EIA Regulations and relevant guidance;
- b. B: Adequate provision of information in line with the EIA Regulations and relevant guidance with areas of minor non-compliance; or
- c. C: Weak provision of information with significant areas of non-compliance.

B1 2019 PEIR Chapters 1-4 review checklist and summary

Note: 'Ref.' is to tables 2-3 and 2-4 of the WSP on behalf of host authorities response.

Table B1.1: 2019 PEIR Chapters 1-4

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)		
	1. A description of the development including in particular:	Chapter 2 – The Proposed Development		N
	(a) a description of the location of the development;	Section 2.2 Location	<p>The description of the proposed development in the PEIR includes, in broad terms, the information set out in sub-section 2(a) of Schedule 4. There are some areas, however, where additional information is required especially with regards to the relationships with the existing airport-related developments (i.e. Project Curium; Luton DART; Re-use and placement of spoil from DART and Project Curium; and, Enterprise Zone (Bartlett Square and New Century Park). Comments on where further information is recommended are provided below:</p>	<p>A new chapter, Chapter 2: Site and Surroundings is now included in the 2022 PEIR. This chapter will also be updated and included in the ES. The chapter describes the other airport related developments and how, where relevant, the Proposed Development relates to them.</p> <p>Where available, additional information</p>

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>Section 2.2 Location. The description of the location of the proposed development is structured around four components:</p> <ul style="list-style-type: none"> • the Main application site • Off-site car parks • Off-site highways interventions • Off-site planting. <p>The total area of the Main Application Site is provided. Information on the areas of the key elements described such as Wigmore Valley Park; historic landfill; overall area of agricultural land and the total area of existing airport operations land should be included in the ES. Information on the areas of the other three components is also missing in the PEIR and should therefore be included in the ES.</p>	on other areas (off-site car parks, highways interventions and planting) has been provided in the 2022 PEIR . This information will also be updated and provided in the ES.	
		Section 2.3: Current airport infrastructure	Section 2.3: Current airport infrastructure. Dimensions of the existing airport areas / zones and of the main structures outlined in Section 2.3 should be included in	A new chapter, Chapter 2: Site and Surroundings is now included in the 2022	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>the ES. Figure 2.3, if to be carried through to the ES, should also include numeric references of each of the airport areas as some of the colours might not be distinguishable to some readers. It is recommended to include supporting photographic material as an Appendix to complement the written description. A figure showing the local transport network would also be beneficial in this section of the ES to help understand the operation of the existing airport. Alternatively, if these figures are to be provided in a different chapter of the ES, relevant cross-references should be included in the description chapter.</p> <p>Information on existing drainage strategy / facilities supported by figures should also be included.</p>	<p>PEIR. This chapter will also be updated and included in the ES. The chapter describes the other airport related developments and how, where relevant, the Proposed Development relates to them.</p> <p>Numeric references to appropriately labelled figure is provided. Reference to local transport network provided. Reference to drainage and utilities will be confirmed in the ES.</p>	
		Section 2.4: Outline of existing airport related developments	Section 2.4: Outline of existing airport related developments. Further information on the relationship of each of the projects outlined with the proposed development is needed as well as	Chapter 2: Site and Surroundings is now included in the 2022 PEIR and will be updated for the ES, which describes the	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			supporting material such as figures. The interactions of those developments with the proposed development need to be addressed and sufficiently considered as part of the EIA. The overlaps and/or amendments brought up by the proposed development need to be identified and described. The level of information required for the Assessment of Cumulative effects also need to be considered fully in the ES in line with PINS Advice Note 17: Cumulative Effects Assessment.	other airport related developments and how, where relevant, the Proposed Development relates to them.	
	(b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;	Section 2.5: Description of Proposed Development	Section 2.5: Description of Proposed Development The description of the development in the PEIR includes some but not all of the information set out in sub-section 2(b) of Schedule 4. It is noted that the PEIR has partly addressed the comments provided in the Scoping Opinion provided by the Planning Inspectorate in May 2019 (Case Reference: TR020001). Below,	The document reviewed by WSP was a PEIR and where appropriate the comments provided will be addressed in the ES . Where information is available at the time of writing the 2022 PEIR , a brief comment of how comments have	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>there are some examples of where information is still missing or not clear enough. It is recommended that the Applicant carefully reviews all the comments provided in the Planning Inspectorate’s Scoping Opinion. Examples of where further information would be expected are provided in the paragraphs below. It is noted that the Scheme Development and Construction Report (October 2019) may contain some of the information noted as missing or requiring clarification including supporting visual material. There is therefore the need to incorporate this information as part of the final ES. All mitigation embedded in the design should be clearly identified as part of the description of the relevant components. Any further reference to control documents as well to demonstrate how the mitigation is going to be secured, that would also be of benefit for this section e.g. Design Principles,</p>	<p>been addressed is provided below.</p> <p>Final responses to all comments received during Scoping will be provided in an appropriate format in the ES.</p> <p>Further design and mitigation information is provided (including areas and heights of Work No.) or crossed referenced as appropriate. How mitigation is secured will be described, and summarised in a ‘Mitigation Route Map’ or similar, as part of the ES.</p> <p>The Worst Case is described with reference to further</p>	

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	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>Design and Access Statement, etc.</p> <p>Maximum height and areas are provided for many of the components but not for all. Areas and maximum parameters/envelope of all the zones and sub-zones should also be included, not just of buildings. There are some small discrepancies between dimensions noted in the text and the figure 2.4a. Figure 2.4a is the only key figure supporting the written description of the development. It is recommended that the ES includes more supporting figures and illustrations providing separate figures for each zone. Chapter 4 of the PEIR states that the EIA is based on maximum horizontal and vertical extents (i.e. “worst case” scenario”). The “worst case” scenario should be clearly described in the Description of the Development chapter and the specialist topic sections of the ES should clearly state the</p>	<p>description and assumptions in the PEIR and will be in the ES.</p> <p>The phasing of the works is described clearly in 2022 PEIR and will be in the ES, including an indicative schedule.</p> <p>The energy and surface access strategies are referred to in the 2022 PEIR, and will be similarly covered in the ES.</p> <p>The Draft Landscape and Biodiversity Management Plan is clearly referred to in 2022 PEIR, and appended (see Appendix 8.2 of the 2022 PEIR), and will</p>	

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			<p>assumptions the assessments are based on. They should all be consistent throughout the ES.</p> <p>The phasing of the development is also considered of key importance due to the extent and duration of the works, and should be provided within the Description of the Proposed Development even if illustrative/indicative.</p> <p>The drainage strategy needs to be described in detail including required diversions and a figure or figures provided. The proposed energy and surface access strategies (which should also describe any road closures) should also be included as part of the description of the development and should be supported by figures as appropriate.</p> <p>Figure 2.5 should show habitats anticipated in the Replacement Open Space Area but when opening the document, it is Figure 17.1. Reference to long-term landscape and biodiversity management, maintenance and</p>	<p>be submitted with the ES.</p> <p>Further information of highways will be provided on the finalisation of traffic modelling and engagement with the highway authority, in the ES.</p> <p>Construction phasing is described in the 2022 PEIR in several locations, including the Proposed Development description and will be in the ES.</p> <p>Construction information is summarised in Chapter 4, Proposed Development description of the 2022 PEIR, with reference to</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>enhancement plans should be part of the description. Information on the dimensions of the proposed highways interventions is missing from the PEIR. The provisions of drawings for each in Volume 2 of the PEIR is noted and welcomed. It is not clear whether the description of Z6.8 A1081 New Airport Way / A505 Kimpton Road / Vauxhall Way should include a reference to replacement of the roundabout with a 4-arm signalised junction, as shown on drawing SK022. There is no detailed information on construction phasing or methodology. The assessment of construction effects in the PEIR is therefore constrained by the level of information available (see Sections 3 to 18 of this document for further information on the assessment of construction effects). It is expected that the ES will include a detailed description as part of the Proposed Development Chapter which will in turn inform the assessment of</p>	<p>a full preliminary Construction Method Statement which is appended (see Appendix 4.1), as the information to extensive. a similar approach is expected for the ES.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>effects on the environmental factors. Due to the extent and long duration of the works it should be considered whether the construction information should be provided by Zones or by construction phases. The written description should be supported by visual material.</p> <p>Information required and hence expected in the ES includes but is not limited to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Earthworks including location, dimensions, quantities of materials involved, historic landfill presence <input type="checkbox"/> Demolition requirements identifying specific assets and their dimensions <input type="checkbox"/> Construction compound(s): number, location, layout <input type="checkbox"/> Road diversions <input type="checkbox"/> Utilities diversions <input type="checkbox"/> Plant and equipment <input type="checkbox"/> Type of activities to take place in the different areas of the proposed development and duration 		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<ul style="list-style-type: none"> <input type="checkbox"/> Phasing programme (year on year programme) <input type="checkbox"/> Understanding of interfaces (programme and others) between the various components of the proposed development and between on-site and off-site works and with existing airport developments <input type="checkbox"/> Construction activities <input type="checkbox"/> Number of construction workforce <input type="checkbox"/> Expected provenance <input type="checkbox"/> Working hours <input type="checkbox"/> Other information requested as detailed in the Planning Inspectorate’s Scoping Opinion. <p>The information in Figure 2-7: Outline Construction Programme does not match the written description that follows in some places i.e. Phase 2 in the figure covers 2022 – mid 2027 whilst the text refers to 2022 to 2024; Phase 3 in the Figure goes from 2028 - 2034 whilst the text refers to the period 2027 – 2038. There are also references to Phase 3 concluding in 2039. In essence,</p>		

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	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>the description of the phasing is not clear. Given the complexity and extent of the works it would be very useful to illustrate the phasing of the works as part of the description of the proposed development in the ES. This could be shown by providing an indicative year by year plan to show these works areas and potential interactions.</p> <p>The outline construction programme presented in the PEIR is based around airport capacity rather than actual construction activities and phasing of works. As noted above, the EIA needs to be informed an indicative year by year plan to show the construction work areas and potential interactions.</p>		
		2.7 Airspace Change	An overview of the timings and implications of the airspace change process is provided within section 2.7. Reference is made to the 'Explanatory Note on Airspace' included as part of the statutory consultation.	Comment is to note only.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>The Note confirms that LLAL intends to undertake further sensitivity analysis of the scope for any improved procedures and potential route changes, including respite routes, as design work progresses under the airspace change process and that this will inform sensitivity testing in the ES. Section 4.8 of the PEIR provides a comparison of the EIA and CAP1616 assessment methodologies to address the request by PINS in their Scoping Opinion to ensure that compatibilities and any differences are identified and where inconsistencies exist, these are highlighted.</p> <p>The Note states that there is a reasonable expectation that future airspace changes at LTN will include beneficial changes to aircraft climb profiles over neighbouring settlements and potential for respite routes.</p>		
	(c) a description of the main characteristics of the operational phase of the	Not available in Chapter 2	The description of the proposed development in the PEIR does not include the information set out in	A description of the main operational characteristics has	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
	development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;		<p>sub-section 2(c) of Schedule 4. The PEIR is missing a section summarising the airport operations once construction is complete describing how in 2039 once fully operational the airport will result in xxx flights per day, there will be xx,000car parking spaces, xx,000 employees etc.</p> <p>Whilst some of this information is presented in the assessment chapters of the document, it is expected that the Proposed Development Chapter of the ES will cover all these operational elements as part of a distinct section outlining the airport operations once the proposed development construction works are complete. It is therefore expected that the ES will describe energy demand and energy use as well as nature and quantity of materials and natural resources to be used in the operational phase of the development.</p>	been added to Chapter 4 , Proposed Development of the 2022 PEIR and will be similarly addressed in the ES . Cross references are used as appropriate to avoid repetition.	
	(d) an estimate, by type and quantity, of expected residues and emissions	Not available in Chapter 2	The description of the development in the PEIR does not include the information set out in	This information is described in the results of the technical	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
	(such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.		sub-section 2(d) of Schedule 4. Even if some of this information might be presented in other chapters of the ES, it is recommended that the Proposed Development Chapter of the ES also covers these elements.	assessments, and therefore, described in the relevant assessment chapters. There is no need to repeat this information in a chapter used to describe the Proposed Development to inform the assessment.	
	2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	Chapter 3 Assessment of Alternatives plus Appendix 3.1 Alternative Options Appraised	The PEIR includes a discrete section providing information on the alternatives considered supported by Appendix 3.1. The description of the sifting process (Sift 1, 2 and 3) refers to a series of criteria and sub-criteria but these are not included. It is recommended that the ES includes these. Comparison of the alternative layouts considered within the 'design development' section provides only a summary of the preferred option. It would have been helpful to see the results of the appraisal included as part of	Accepted. These comments have been addressed within Chapter 3 of the 2022 PEIR . A future baseline scenario without the Proposed Development is described within each technical chapter of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>Appendix 3.1, including the tabulated scores and to assist the readers in understanding the reasoning for the selection of the chosen option, allowing for a comparison of the environmental effects.</p> <p>The Do-Nothing alternative was discounted from the sifting process on the basis that it does not deliver LLAL's strategic economic objectives. It is, however, considered necessary to assess the Do-Nothing scenario. The consideration of the Do-Nothing scenario is needed to inform the future baseline scenario which in line with Schedule 4 of the Infrastructure Planning EIA Regulations 2017 requires "... <i>an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental</i></p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p><i>information and scientific knowledge</i></p> <p>It is also recommended that the Assessment of Alternatives Chapter of the ES describes how the EIA process, environmental effects and consultee responses have influenced the design.</p>		
	<p>3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.</p>	<p>Chapter 4 Environmental Assessment Methodology plus Chapters 5 to 19</p>	<p>Chapter 4 Environmental Assessment Methodology provides a general overview to the approach to describing the baseline scenario whilst Chapter 5 to 19 provide detailed descriptions.</p> <p>The information on future baseline scenarios provided in section 4.4 is confusing, especially when compared with the information on phases in section 2.5. It is recommended that the phases are set out in section 4.4. and then the assumed future assessment years explained. Specific comments:</p> <p><input type="checkbox"/> Currently Phase 1 is the only phase referred to here, other three phases need to be referred to. This will provide the reassurance</p>	<p>Further clarity has been provided on assessment years and future baseline in the 2022 PEIR and will be described the ES.</p>	<p>N</p>

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>that all phases of the project have been assessed.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Para 4.4.10 bullet 2 implies that the Future baseline conditions (with and without the Proposed Development) are only considered for 2020. The with and without scenario should be applied to all assessment years/phases. <input type="checkbox"/> This section should also provide details of the year of predicted maximum environmental effect during operation, not just construction. <input type="checkbox"/> Maximum predicted environmental effects may arise over more than one year so this section should acknowledge this. <p>Future baseline scenarios and assessment years should be clearly identified in the ES as part of the general EIA Methodology and be carried throughout the specialist environmental topics Please refer to Sections 3 to 17 of this document for the review by environmental factors.</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
	4. A description of the factors specified in regulation 5(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.	Chapter 4 Environmental Assessment Methodology plus Chapters 5 to 20.	Chapter 4 Environmental Assessment Methodology provides a general overview to the approach to describing the baseline scenario whilst Chapter 5 to 19 provide detailed descriptions. Please refer to Sections 3 to 18 of this document for the review by environmental factors.	Comment is to note only.	N
	5. A description of the likely significant effects of the development on the environment resulting from, inter alia:	Chapter 4 Environmental Assessment Methodology plus Chapters 5 to 20.	Chapter 4 Environmental Assessment Methodology provides a general overview to the approach to assessing the likely significant effects whilst Chapter 5	Comment is to note only.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
	<p>(a) the construction and existence of the development, including, where relevant, demolition works;</p> <p>(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;</p> <p>(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;</p> <p>(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);</p> <p>(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular</p>		<p>to 20 provide detailed descriptions.</p> <p>Please refer to Sections 3 to 18 of this document for the review by environmental factor.</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
	<p>environmental importance likely to be affected or the use of natural resources;</p> <p>(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;</p> <p>(g) the technologies and the substances used.</p> <p>The description of the likely significant effects on the factors specified in regulation 5(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project,</p>				

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
	including in particular those established under Council Directive 92/43/EEC and Directive 2009/147/EC.				
	6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	Chapter 4 Environmental Assessment Methodology plus Chapters 5 to 20.	Chapter 4 Environmental Assessment Methodology provides a general overview to the approach to describing the baseline scenario whilst Chapter 5 to 19 provide detailed descriptions. Please refer to Sections 3 to 18 of this document for the detailed review by topic. Paragraph 4.2.1 of the PEIR makes an introduction to the overview of the EIA process that follows. This paragraph refers to “relevant guidance” which is assumed to be general EIA guidance. It is recommended that the ES clearly identifies the relevant guidance being referred to. General limitations are included in this section. The section on Parameters, Uncertainty and Flexibility states that the EIA is based on maximum horizontal and vertical extents (i.e. “worst case”	References to specific guidance will be provided in ES. Further description of the ‘worst case’ is described, with additional information specific to each aspect chapter provided in the 2022 PEIR and will be included in the ES .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>scenario”). The “worst case” scenario should be clearly described in the Description of the Development chapter and should be consistent throughout the ES. It is important that the specialist topic sections of the ES clearly state the assumptions the assessments are based on including the maximum extents. Section 4.5 describes the approach to defining significance. The sources of Table 4–1 and Table 4–2 should be included in the ES.</p> <p>Given the presence of Natura 2000 sites and issues around Climate Change, both international issues and the inherent international nature of the airport, it is not clear why the Generic description of “Major” effects in Table 4-4 does not include “International” alongside “regional and national”. It is therefore recommended that “international issues” are included within the Major effects description. If these are to be</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>excluded full justification is required.</p> <p>Paragraph 4.5.11 identifies what effects are to be considered as being significant in the EIA process.</p>		
	<p>7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.</p>	<p>Methodology plus Chapters 5 to 20.</p>	<p>As mentioned under the review of Schedule 4 2(b) above, primary (i.e. “embedded” mitigation) should be clearly described in the Proposed Development Chapter. It is also expected that the ES will address how any mitigation proposed is secured, with reference to specific DCO requirements or other legally binding agreements/mechanisms. A draft Code of Construction Practice (CoCP) is included as Appendix 2- 1. The CoCP should also comprise drafts of the following: Construction Environmental Management Plan; Site Waste Management Plan; Construction Traffic Management Plan; Materials Management Plan; Soils Management Plan; Construction Noise Management Plan; Air Quality Management</p>	<p>Where relevant embedded mitigation has been described in the Proposed Development description and will be further described in the ES. However it is not necessary to explicitly list all measures in multiple places in the ES.</p> <p>The Draft CoCP (Appendix 4.2 of the 2022 PEIR) provides the information to constitute outline management plans describing the requirements for the lead contractor to develop full plans.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
			<p>Plan; Surface Water Management Plan.</p> <p>Please refer to Sections 3 to 18 of this document for the review by environmental factor.</p>	Where appropriate, additional outline plans are or will be provided for submission with the development consent application.	
	<p>8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or UK environmental assessments may be used for this purpose provided that the</p>	<p>Chapter 19 – Major Accidents and Disasters</p>	<p>Major accidents and / or disasters are considered in the PEIR. Please refer to section 17 of this document for the review of Chapter 19 of the PEIR.</p>	<p>Comment is to note only.</p>	<p>N</p>

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Infrastructure Planning EIA Regulations 2017 Schedule 4	Available in the 2019 PEIR (Location)	Comment / Recommendation		
	requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.				
	9. A non-technical summary of the information provided under paragraphs 1 to 8.	Separately bounded Non-Technical Summary provided	Please refer to Sections 3 to 18 of this document for the review by environmental factor.	Comment is to note only.	N
	10. A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	References located at the end of the PEIR	The references are labelled as 1.1, 1.2, 2.1, 2.2 etc to relate them to the chapter they are in.	Comment is to note only.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	Available in the 2019 PEIR (Location)	Comment		
	Scoping				
s.1	<p>Does the PEIR state what environmental topics will be addressed and how this decision was reached? Does the PEIR identify the environmental topics, raised during the scoping process, that will not be assessed and explain why they are not being considered further?</p> <p>Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?</p>	<p>Scoping stage is discussed in section 1.2 of the PEIR and again in Chapter 4. The EIA Scoping Report is included as Appendix 1-1 in Volume 3 of the PEIR</p> <p>Preliminary responses to the Scoping Opinion comments are presented as Appendix 1-2 in Volume 3 of the PEIR.</p>	<p>The PEIR only includes a short overview of the Scoping exercise. It is expected that the ES will include more information on the Scoping exercise including information on elements scoped in and elements scoped out of the assessment and the justifications behind.</p> <p>It is also expected that a full response to the scoping opinion will be included as part of the ES as the PEIR is not clear on whether / how all the scoping comments are to be addressed. The ES should clearly identify which consultee the comments come from and how they have been addressed in the EIA process. The Host Authorities should be able to easily identify how their comments have been addressed.</p>	Final responses to all comments received during Scoping will be provided in an appropriate format in the ES.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	Available in the 2019 PEIR (Location)	Comment		
s.2	Are the potential impacts relevant to the proposed development?	Chapters 5 to 20.	Please refer to Sections 3 to 18 of this document for the review by environmental factor.	Comment is to note only.	N
	Have the main sensitive receptors been considered?	Chapters 5 to 20.	Please refer to Sections 3 to 18 of this document for the review by environmental factor.	Comment is to note only.	N
Consultation					
c.1	<p>Does the description of any consultation include an indication of those contacted, including statutory and non-statutory consultees, and the public?</p> <p>Does the main text of the PEIR provide a summary of the main issues, pertinent to the EIA, raised by consultees?</p> <p>Does the main text of the PEIR provide a justification of why any issues pertinent</p>	<p>Chapter 4 – Environmental Assessment Methodology Paragraphs 4.6.23 to 4.6.32 outline the stakeholder engagement and consultation carried out with Table 4-5 listing the meetings held to inform the preparation of the PEIR.</p> <p>Paragraph 4.6.28 refers to a programme of non-statutory consultation</p>	<p>The PEIR recognises that consultation is an ongoing process that feeds back into the design of the proposed development. Paragraph 4.6.24 states that the ES will include a summary of:</p> <ul style="list-style-type: none"> <input type="checkbox"/> stakeholders consulted (and what they have been consulted on); <input type="checkbox"/> key issues, pertinent to the EIA, that have been raised by consultees; <input type="checkbox"/> how these issues have been addressed; and <input type="checkbox"/> should any issues pertinent to the EIA not have been dealt with in the ES, a clear 	<p>The 2022 PEIR technical chapters report on the technical engagement undertaken to inform the PEIR assessments. Furthermore this 2019 Consultation Feedback Report provides a summary of how consultation has influenced the scheme development. Cross-referencing to the 2019 Consultation Feedback Report is also provided within Chapter 3, Alternatives and Design Evolution of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	Available in the 2019 PEIR (Location)	Comment		
	to EIA raised by consultees are not considered in the PEIR?	<p>completed between June and August 2018.</p> <p>Further information on consultation is also provided in the chapters dealing with the different environmental factors.</p>	<p>justification will be provided for this.</p> <p>It is recommended that the information on consultation in the ES clearly identifies how the stakeholder engagement has informed the design of the proposed development and the EIA process. Of particular interest is the influence of the Host Authorities' engagement. The PEIR refers to a Consultation Report to be submitted as part of the DCO Application. It is important to note that any consultation information related to the EIA needs to appear in the ES. Should the Consultation Report contain information that expands on what is provided in the ES, appropriate cross-references should be included in both reports.</p> <p>Please refer to Sections 3 to 18 of this document for the review by environmental</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	Available in the 2019 PEIR (Location)	Comment		
			factor. One key finding from the review of many of the topics is that further engagement with relevant statutory bodies and the Host Authorities is required.		

B2 Air quality review checklist and summary

Note: 'Ref.' is to tables 2-5 and 2-6 of the WSP on behalf of host authorities response.

Table B2.1: Air quality

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	A	<p>Section 5.2 sets out key legislation and policies in the form of a bullet list, together with relevant guidance. No omissions have been identified. Table 5-1 sets out the requirements of the ANPS in relation to what should be contained within the Air Quality chapter of an Environmental Statement (ES), and how the PEIR addresses these. In relation to local policy, the chapter only lists the relevant local plans and does not include reference to the policies relevant to/those that have informed the assessment.</p> <p>Further details of the interpretation of the policies will be required in the ES. ANPS states that air quality considerations are likely to be particularly relevant where the proposed scheme, after mitigation “would lead to a significant air quality</p>	Accepted. This will be included in Chapter 7 of the 2022 PEIR and ES , any updates to policy or legislation since this review will be reflected in Chapter 7 of the 2022 PEIR and ES .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>impact in relation to Environmental Impact Assessment and/or a deterioration in air quality in a zone or agglomeration'. As such, whilst Appendix 5.4 sets out details of how impacts will be described and the framework within which significance will be assessed, it is unclear how 'a deterioration in air quality in a zone or agglomeration' will be assessed.</p> <p>Footnote 5 in the chapter states that, for the PEIR, the term air quality standard has been used to refer to both the UK objectives and European limit values. Clarity will be required as to whether a distinction will be drawn between these terms and the legislation from which they derive in the ES.</p>		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	A	<p>The data collection methods are identified as</p> <p>A desk review of air quality data collected by relevant local authorities</p> <p>Monitoring undertaken by LLAOL</p> <p>The majority of the monitoring is undertaken using diffusion tubes, but continuous monitoring is also</p>	Accepted. Information regarding the continuous monitoring is presented in Appendix 7.1 of the 2022 PEIR.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			undertaken. Further information in relation to the type of continuous monitoring undertaken by LLAOL, including the QA/QC procedures will be required in the ES.		
2.2	Do the data collection methods follow relevant guidance?	B	At a high level, the data collection methods follow appropriate guidance, such as LAQM TG(16), in relation to the types of monitoring that can be used to inform air quality assessments. The level of information provided in the PEIR in relation to the data collection methods is appropriate. However, as noted above, further clarity will be required in relation to the type of continuous monitoring undertaken by LLAOL, including the QA/QC procedures, if the data are to be linked to mitigation and/or model verification	Accepted. Information regarding the continuous monitoring is presented in Appendix 7.1 of the 2022 PEIR.	N
2.3	Is the study area identified appropriately?	B	The study area is defined as the area 15km x 15km centred on the airport and additional roads meeting the DMRB screening criteria (Section 5.6.2). Based on published impacts from other airports, the 15km x 15km study area is appropriate for the consideration of airport- related impacts, and it is appropriate to	Accepted. This is included in Chapter 7, section 7.3 in the 2022 PEIR.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>consider surface access impacts outside of this area where roads trigger appropriate criteria for the change in traffic with the development.</p> <p>It is, however, unclear as to why the Affected Road Network is defined within the 15km x15km study area using IAQM/EPUK criteria for roads outside of AQMA, but using less stringent DMRB criteria outside of this 15km x 15km area, whilst the IAQM/EPUK criteria for roads within AQMA have not been used at all. It is possible that the criteria selection is a pragmatic application of guidance, taking into account the area within which the forecast of traffic changes associated with the project are meaningful. As such, reference to a DMRB-type traffic reliability area is warranted. It is recommended that the ES provides a clarification / explanation on this aspect.</p> <p>In relation to potential impacts on ecological receptors, clarity will be required as to how cumulative changes in traffic will be defined.</p>		

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
2.4	Have all the resources/receptors been considered?	B	<p>Notwithstanding minor clarifications required in relation to the study area definition, all relevant resources/receptors have been considered for construction works and, at a strategic level in terms of impacts during operation and from construction traffic</p> <p>For operation (and construction traffic), model results are presented at 117 illustrative receptors. It is not possible to ascertain at present whether the illustrative receptors are worst case receptors. Given the scale of the study area, further justification for the selection of receptors and/or increased density of receptors will be required.</p> <p>The selected receptor locations are set out in Appendix 5.2.3. However, further details of the representative receptors is required i.e. at the moment, they are identified as R1, R2 etc, without information on the nature of the receptor (residential property, school etc), whether they are in an AQMA.</p>	<p>Accepted. Justification for the selection of receptors is included in Chapter 7, section 7.3 in the 2022 PEIR.</p> <p>Further information regarding receptor locations is included in Appendix 7.1.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	A	<p>The sensitivity of receptors for construction impacts is appropriately identified following IAQM guidance (Section 5.8).</p> <p>Receptor sensitivity is not required for operational impacts. This is in accordance with guidance. All areas of potential human exposure are potentially high sensitivity. Instead, the assessment of significance takes into account total exposure to pollution and whether air quality approaches or exceeds the standard which reflects the increasing potential for significant effects with increased exposure as the standard is approached/exceeded.</p>	Accepted.	N
2.6	Has there been consultation with the relevant statutory bodies?	A	<p>Extensive and appropriate air quality-specific consultation has been undertaken with all appropriate statutory bodies. Agreement has been reached in relation to the location of monitoring and assessment methodology (Table 5.2).</p> <p>Linked consultations with relevant highways authorities and nature conservation bodies have been undertaken by the relevant specialists</p>	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			(transport / ecology), but no comment is made here on their adequacy.		
2.7	Is the future baseline scenario adequately described?	C	No specific discussion of the future baseline is included within the PEIR or supporting appendices. Future pollutant concentrations without the project were modelled (and presented in Appendix 5.12), but no formal justification for the assumed improvements in vehicle technology, background concentrations (and in the ES deposition) has been included. Given the lack of consistent trend in monitoring data, this should be included in the ES in a discussion on the future baseline scenario.	Accepted. This is included in Chapter 7 of the 2022 PEIR and Appendix 7.1 of the 2022 PEIR .	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	B	Uncertainty has been noted in relation to model verification (Appendix 5.10) and uncertainty in emissions factors and traffic activity data, and considered in terms of model verification. The uncertainty in the modelled concentrations is not discussed outside of the Appendix. There appears to be a residual very slight underprediction within the Hitchin AQMA. It is not explicitly stated that the verification factors are applied to the total modelled	Accepted. Further clarification is included in Appendix 7.1 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>increment from airport/landside sources or only the road increment.</p> <p>Given the modelled impacts (and the negligible effects), there has been little requirement to apply professional judgement to the model results. However, if uncertainty in the future trends is considered, there may be a requirement to apply judgement in the assessment of significance. This will need to be clearly set out in the ES.</p> <p>The ES will focus on impacts associated with NO_x, NO₂, PM₁₀ and PM_{2.5}, although the emissions will also contain other air pollutants. However, taking into account legislated and non-statutory standards for air quality and the protection of health, and the relative magnitude of emissions, the current evidence base indicates that the proposed approach is appropriate. This evidence base will continue to evolve and the ES pollutant focus should be subject to ongoing review.</p>		
2.9	Which are the key receptors for the local authorities?	A	The key receptors for the local authorities are the locations of potential exposure within the Air	Accepted. This is included in Chapter 7, section 7.9 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Quality Management Areas. These are discussed in Table 5.4 in the baseline, but not specifically described in the results section and will need to be addressed in the ES.		
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	A	<p>Insofar as is possible at this stage, high level embedded mitigation has been included in the PEIR (Section 5.7) and best practice mitigation measures proposed.</p> <p>It is not clear how the embedded mitigation has been taken into account in the assessment e.g. details of how CPAR has been considered in the operational assessment and its impact. This should be included in the ES.</p> <p>Best practice mitigation measures for construction are provided in Appendix 5-13; A Draft Air Quality Plan is included in Appendix 5-14. The key omission from the draft AQP is detail of how the plan will be monitored and are targets for emissions reduction. These should be included in the AQP</p>	Accepted. This is included in Chapter 7, sections 7.8 and 7.10 in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			developed at the time of submission of the ES		
3.2	Are the mitigation measures included for significant adverse effects appropriate?	N/A	At present no significant adverse effects are identified during operation. It is assumed, following guidance, that significant effects during construction can be avoided by mitigation. The key to mitigation during construction is the agreement of an appropriate monitoring plan with the local authorities.	Accepted. This is included in Chapter 7, sections 7.10 and 7.13 in the 2022 PEIR .	N
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	A	The level of detail for securing the mitigation is appropriate for this stage of the assessment i.e. a constructor Code of Construction Practice, and LTN will own the Air Quality Plan.	Accepted.	N
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	B	Reference is made to monitoring during construction (Appendix 5-13). Monitoring will be required for the Air Quality Plan. This will need addressing at ES stage. Consideration should be given to an independent review of the monitoring plan.	Accepted. This is included in Chapter 7, section 7.13 in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3.5	How could the proposed mitigation measures and/or the proposed development be improved?		<p>As noted above, the key improvements required to the mitigation plan for operation are to secure commitments to specific targets for each action, and to identify appropriate monitoring of progress against targets. The air quality plan should aim to reduce all impacts from the airport controlled /influenced sources, whether significant effects have been identified or not. Commitments for increased modal shift from private transport should be pursued.</p> <p>The draft AQ plan could be separated into actions which are fully within the control of the airport, and those where the airport can only influence other operators to reduce emissions.</p>	<p>Accepted. This is included in Chapter 7, sections 7.10 and 7.13 in the 2022 PEIR.</p> <p>The draft Air Quality Plan is included in Appendix 7.2 of the 2022 PEIR.</p>	N
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	B	<p>There is extensive description of the assessment methodology and airport sources (landside and airside) in Appendices 5-2 and 5-3. A detailed review of the input data has not been undertaken, however, the assumptions are clearly set out.</p>	<p>Accepted. This is included in Appendix 7.1 of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>In relation to surface access, a high-level summary of the impact of the project should be included i.e. increase of X vehicles on approach road A etc, together with the increase in freight, and its initial dispersion onto the strategic network.</p> <p>The description of the methodology for odour assessment has been deferred to the ES stage. It will be semi-quantitative.</p>		
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	A	<p>Table describing magnitude criteria for modelled impacts is included in Appendix 5-4.</p> <p>The criteria for defining the magnitude of the dust emissions are set out in IAQM guidance and appropriately applied in the PEIR.</p>	Accepted.	N
4.3	Are the methods for evaluating significance clearly defined/?	A	<p>Appendix 5-4 sets out criteria for describing impacts and then states that impacts described as major or moderate are 'usually' judged to result in significant effects. Minor or Negligible impacts 'usually' result in effects which are not significant.</p> <p>Since the modelled impacts were all described as negligible, there was little requirement to specify any</p>	Accepted. This is included in Appendix 7.1 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			refinement to the above approach. If non-negligible impacts are modelled, greater detail will be required as to the use of professional judgement.		
4.4	Do the assessment methods used follow relevant guidance?	B	<p>The assessment methods generally follow relevant guidance (departures or bespoke methods are set out below). There is, however, a degree of selection of methods from different guidance.</p> <p>For example. for ecological impacts, it is stated that the DMRB approach that a change of NOX of 0.4ug/m3 does not require assessment of nitrogen deposition. However, the DMRB is based on a deposition velocity for nitrogen dioxide of 1mm/s, whereas the actual deposition velocities proposed for use are 1.5mm/s for grassland and 3mm/s for woodland, as per AQTAG (Environment Agency) guidance (Appendix 5-4).</p> <p>For human health: significance of impact is judged with reference to criteria set out by IAQM/EPUK (Appendix 5-4) rather than the DMRB criteria. In this case, it is</p>	Accepted. This is included in Appendix 7.1 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>acknowledged that IAQM is more stringent/comprehensive than DMRB.</p> <p>The ES should clearly state which guidance takes primacy and where departures from it have been included.</p> <p>The modelling of background concentrations is an approach used in this assessment which is not covered in guidance. It is stated that emissions have been taken from the NAEI and modelled to provide background concentrations that vary on an hour by hour basis. However, it is not clear whether/how the time varying nature of the background sources has been taken into account and, as such, it is not certain that the time variations in background concentrations have been appropriately represented. Therefore, any modelled short term total pollutant concentrations should be treated with caution.</p> <p>Similarly, further details/justification is required in relation to the use of Clapp and Jenkin methodology for NOx to NO2 conversion.</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.5	Have potential effects been considered both during construction and operation?	A	Impacts have been considered during construction and operation. Overall, the potential effects considered are comprehensive	Accepted.	N
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	N/A	No significant effects have been identified, therefore their duration/reversibility etc is not relevant.	Accepted.	N
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	A	No significant effects have been identified. The judgement of significance follows the methodology set out in Appendix 5-4 for operation, and in IAQM guidance for construction.	Accepted.	N
4.8	Are the residual significant effects clearly stated?	N/A	No significant effects have been identified, therefore there are no residual effects.	Accepted.	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	B	Cumulative effects have not been explicitly considered at this stage. They are included implicitly for operation via their inclusion in future year traffic data. Little consideration of cumulative impacts in relation to habitats sites and any requirement for HRA. Explicit consideration of cumulative traffic	Accepted. This is included in Chapter 7, section 7.3 of the 2022 PEIR . Assessment of ecological sites is included in Chapter 7 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			growth may be required where project related traffic growth is less than 1000 vehicles. This should be the subject of discussion with nature conservation bodies and the project ecologists.		
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	B	Further discussion of the uncertainties in the modelling of operational impacts should be included in the ES.	Accepted. This is included in Chapter 7, section 7.6 and Appendix 7.1 of the 2022 PEIR .	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	B	Table 5-3 sets out the Scoping Opinion comments and how they have been addressed within the PEIR. A number of items are postponed for addressing in full in the ES including further justification for the study area (which is picked up elsewhere in this review), addressing intermediate years between opening and completion (hence precautionary grading of response), and operational mitigation, but the extent to which the opinions have been taken into account in the PEIR is appropriate for this stage of the assessment. The postponed items will require addressing within the ES.	Accepted. This is included in Chapter 7, section 7.3 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	B	<p>The conclusion of the assessment is that all effects are negligible, but this is reported without context or discussion. Further description of the magnitude and spatial distribution of impacts from airport sources / surface access etc is required to improve clarity and interpretation.</p> <p>Specific mention is made of deterioration of air quality in any zone or agglomeration in para 5.13.2, but no previous mention of zones was found. This should be expanded in the ES.</p> <p>Further analysis of the uncertainties in the assessment is warranted in the ES.</p> <p>Since effects are negligible, no formal policy assessment is necessary. However, if during the ES non-negligible effects are identified, then such an assessment will be warranted.</p>	Accepted. This is included in Chapter 7, section 7.9 in the 2022 PEIR .	N
5.2	Is the summary of the significant environmental effects and associated	A	Table 5-10 contains this information	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	mitigation measures presented in tabular format?				
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	B	<p>The PEIR is comprehensive and transparent.</p> <p>The lack of discussion on uncertainty of future forecasts is an omission that could lead to a challenge to the assessment on grounds of balance or bias. There is no discussion on whether conservative assumptions have been applied.</p>	Accepted. This is included in Chapter 7, section 7.6 and Appendix 7.1 of the 2022 PEIR.	N
6.2	Is the PEIR readable to the audience for which it is intended?	A	The PEIR is readable, although further description of results would improve clarify in understanding the modelled impacts.	Accepted. This is included in Chapter 7, section 7.9 of the PEIR.	N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	B	<p>Overall, the NTS is clear and free from technical jargon.</p> <p>However, it is unclear why pollutants such as black carbon, ozone, benzene, naphthalene and toluene are explicitly named in the paragraph 5.1.1 when they are not described in the PEIR.</p>	Accepted. This is addressed in the 2022 PEIR NTS.	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	B	The NTS largely reflects the findings of the PEIR. There are, however, some areas that could be clarified.	Accepted. This is addressed in the 2022 PEIR NTS.	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
			<p>The summary para 5.3.3 states that “<i>with proposed mitigation in place no significant effects on existing air quality during operation were identified</i>”. There is no indication within the PEIR that mitigation methods are required to give no significant effects. This should be clarified i.e. are no significant operational effects contingent upon mitigation and if so, what is the magnitude of the assumed impact of the mitigation.</p> <p>Para 5.1.2 ‘Production of NO2 by road traffic’ should read production of nitrogen oxides (NO2 and NOx).</p> <p>Para 5.4.1 notes sensitivity testing will be required. There is no mention of this in the conclusions of the PEIR. It is not clear whether ‘sensitivity testing’ refers to intermediate assessment years, but they should be different tests.</p>		
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? –	B	Figures generally acceptable. Further figures illustrating the results will be helpful in the ES.	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Please provide further commentary if required.				
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	A	Appendices are comprehensive and as generally expected.	Accepted.	N
Conclusion					
	Legislation, Policy and Guidance Overall conclusion - Meets the requirement at the PEIR stage.		It is recommended that at the ES stage interpretation is included in relation to the criteria in ANPS setting out where air quality considerations are likely to be particularly relevant and Host Authorities policies.	Accepted. This is included in Chapter 7, Section 7.2 of the PEIR	N
	Baseline Information Overall conclusion - Current Baseline information appropriate for the PEIR stage has been submitted. Appropriate Future Baseline information has not been provided.		It is recommended that justification for the use of national projections of emissions and rural background concentrations is requested. This assumption underpins the entire assessment since it is integral to the conclusion of no significant effects. Further justification for the setting of the extended study area (outside of the 15km x 15km area) is required, specifically in relation to use of a mixture of DMRB and IAQM/EPUK	Accepted. This is included in Chapter 7, section 7.6 and Appendix 7.1 of the 2022 PEIR .	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
			<p>criteria for defining roads affected by the development.</p> <p>At the ES stage, a full description of the future baseline is required, together with additional information on selected receptors such as the type of receptor and street/building names.</p>		
	<p>Mitigation, Enhancement and Monitoring</p> <p>Overall conclusion -</p> <p>Embedded and good practice mitigation measures are identified at a level appropriate for PEIR stage.</p>		<p>At the ES stage, the mitigation plan should be progressed to secure commitments to specific targets for reducing emissions to air, and the methods by which progress will be measured. Clarity is required in relation to which sources the airport has full control over, and those for which it can merely influence 3rd parties.</p>	<p>Accepted. This is included in Chapter 7, section 7.10 and 7.13 in the 2022 PEIR.</p>	N
	<p>Assessment of Significant Effects</p> <p>Overall conclusion -</p> <p>The assessment is comprehensive and identifies potential impacts and their significance.</p>		<p>Further justification should be requested to ensure that the assessment is based on appropriately precautionary assumptions and takes account of uncertainty particularly in relation to the assumed improvements in vehicle technology and air quality over time. Agreement should be sought on sensitivity testing.</p>	<p>Accepted. This is included in Chapter 7, section 7.6 and Appendix 7.1 of the 2022 PEIR.</p>	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
			<p>At the ES stage, further details could be included in relation to primacy of various overlapping guidance documents and bespoke aspects of the methodology.</p> <p>Further liaison with stakeholders should be undertaken to ensure that cumulative impacts are appropriately taken into account in relation to recent case law regarding habitats sites.</p>		
	<p>Conclusions</p> <p>Overall conclusion -</p> <p>The overall conclusions are clearly presented.</p>		<p>The principle concern in relation to the conclusions has been dealt with above and relates to ensuring that the assumptions underpinning the assessment are robust and are appropriately precautionary.</p> <p>At the ES stage, a policy assessment, relating to interpretation of impacts in light of ANPS and Host Authorities policies, should be included together with additional description of the project impacts to place the overall conclusions in context.</p>	Accepted. This is included in Chapter 7, section 7.2 of the 2022 PEIR .	N
	<p>Presentation (including Figures and Appendices)</p> <p>Overall conclusion -</p>		Adjustments to the NTS are required to ensure that it is fully compatible with the chapter conclusions i.e. discussion on the impact of mitigation	Accepted. This is addressed in the 2022 PEIR NTS .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	The chapter is clearly presented.		should be made consistent between the NTS and the main chapter. Additional figures on the model results are required at the ES stage.		

B3 Traffic and transportation review checklist and summary

Note: 'Ref.' is to tables 2-7 and 2-8 of the WSP on behalf of host authorities' response.

Table B3.1: Traffic and transport

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement ¹ ?	A	<p>Table 1-1 provides an overview of relevant legislation and policy and where it has been applied. In terms of the Transport Chapter the following guidance is referenced:</p> <p>Airports National Policy Statement (ANPS) June 2018</p> <p>NPS for National Networks - December 2014 – shown as not applicable to proposed works at M1 Jn10 so not used</p> <p>Aviation Policy Framework (APF) – March 2013</p> <p>Draft Aviation Strategy – December 2018</p>	<p>Accepted. These policies have been referenced within Chapter 18 of the 2022 PEIR. TAG is also included in the list of guidance in the 2022 PEIR.</p> <p>After further review, NPS for National Networks has also been considered in the 2022 PEIR.</p>	N

¹ Department for Transport (June 2018). Airports National Policy Statement: new runway capacity and infrastructure at airports in the south-east of England.

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>National Planning Policy Framework (NPPF) – June 2019</p> <p>Luton Local Plan (2011-2031)</p> <p>Luton Local Transport Plan (2011-2026)</p> <p>Local Plan for Central Bedfordshire / South Beds Local Plan (2004-2011)</p> <p>Central Bedfordshire Council Transport Strategy (LTP3 2011-2026)</p> <p>North Herts District Local Plan No2 (1996) / NHDC Proposed Submission Local Plan (2011-2031)</p> <p>Hertfordshire Local Transport Plan (2018-2031)</p> <p>Guidance is also referenced in Chapter 6 as follows:</p> <p>Institute of Environmental Assessment (IEA, now Institute of Environmental Management (IEMA) guidance notes 1 – Guidelines for the Environmental Assessment of Road Traffic</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Volume 11 of Design Manual for Roads and Bridges (DMRB)</p> <p>DfT Circular 02/2013: strategic Road Network and the delivery of sustainable development</p> <p>The reference to WebTAG (now TAG) should be provided in para 6.2.1</p>		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	C	<p>High level details of the 2017 data collection exercise are identified and described.</p> <p>These are also reported separately in base model and forecasting reports which WSP has not had sight of so it is not possible to confirm how the data has been used</p>	<p>The reports listed below were circulated to Luton Borough Council (LBC), Central Bedfordshire Council (CBC), and Hertfordshire County Council (HCC). In addition, the documents were also sent to and reviewed by Highways England and its consultant Jacobs in March 2019 and discussed at follow-up meetings.</p> <ul style="list-style-type: none"> Data Collection Report Highway Local Model Validation Report 	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<ul style="list-style-type: none"> Public Transport Local Model Validation Report Variable Demand Model Development Report <p>It is understood that WSP has now been provided with those reports and WSP now attends meetings between the Applicant's team and HCC.</p>	
2.2	Do the data collection methods follow relevant guidance?	C	These are reported separately in base model and forecasting reports which WSP has not had sight of so it is not possible to confirm this, however the approach seems to be reasonable. The locations of the traffic data and development of the matrices / how it has been applied in the model update could further verify the suitability of the exercise.	See response to Ref. 2.1.	N
2.3	Is the study area identified appropriately?	B	The extent of the assessed highway network (study area) referred to as the 'Fully Modelled Area' is identified as an area agreed with the four local authorities as part of the scoping exercise for TA (para 6.1.5). The	The area was identified as part of the scoping for the Transport Assessment Report (TAR). The Strategic Model that is being used, referred to as CBLTM-LTN, which is a combination of the	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>assumptions regarding the identification of the study area seem to be reasonable but WSP cannot comment on whether the study area is adequate for the purpose of the assessment without further detail on the scoping being provided. Section 6.6 provides an overview of the baseline conditions including a description of the connections surrounding the airport.</p> <p>CBLTN that has been used by both LBC and CBC to examine strategies for their local plans and the COMET model used by HCC to review its highways strategy. Both models are managed by AECOM. The study area is described in Chapter 18, Section 18.3 of the 2022 PEIR.</p> <p>In addition, AECOM and Arup have a long history of advising on the expansion of the airport. Arup has been retained to provide advice regarding the airport and AECOM, through URS, prepared the TAR that supported the successful 2012 application to expand the airport to cater for 18mppa.</p> <p>Together the four authorities, the Applicant, and the surface access advisory team, have an unrivalled knowledge of the local transport network and the pattern of trips</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				associated with the airport and its expansion. The analysis of the output from the CBLTM-LTN has confirmed that the study area includes all links that are covered by the two rules set out in paragraph 6.4.8 of the 2019 PEIR.	
2.4	Have all the resources/receptors been considered?	B	<p>Receptors with high sensitivity are identified in the vicinity of highway links with an increase in traffic of more than 10%. A1081 to M1, Vauxhall Way and Airport Way low sensitivity. M1 Jn10 and other links medium sensitivity.</p> <p>Effect on rail services considers passengers travelling on services calling at Luton Airport Parkway Station only – there may also be impacts on feeder rail services which are not picked up through the assessment.</p> <p>Effect on existing bus users has not been considered.</p>	<p>At the time of the preparation of the 2019 PEIR the review of rail passengers was at an early stage. A more detailed assessment of travel to and from Luton Airport Parkway station is included in Chapter 18 of the 2022 PEIR and a more detailed review of feeder services will be provided in the ES.</p> <p>A detailed assessment on existing bus passengers is not being undertaken. The local bus service provides little opportunity for serving air passengers because of the small catchment area in relation to the overall</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				catchment area for air passengers. Discussions have been held with Arriva and National Express who have both expressed a strong interest to adapt their services to respond to new patterns of demand. The new terminal will expand provision of both coach and bus services beyond a pro rata increase.	
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	A	Yes - +/- 30% increase in areas of moderate sensitivity / +/-10% in high sensitivity	The opportunity has been taken to review the sensitivity of a range of receptors and the degree of sensitivity is set out in Table 18.17 of Appendix 18.1 'Traffic and Transportation Methodology' of the 2022 PEIR for those links where one of more receptors has a sensitivity that is either more or less than 'medium'. This has increased the number of where there is a variation from 'medium'.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.6	Has there been consultation with the relevant statutory bodies?	A	<p>Inspectorate issued Scoping Opinion on 9 May 2019. Table 6-3 lists main comments and how these are covered in the PEIR.</p> <p>Stakeholder consultation is reported as being undertaken with:</p> <p>Highways England</p> <p>Luton Borough Council</p> <p>Central Bedfordshire Council</p> <p>Hertfordshire County Council</p> <p>Buckinghamshire County Council</p> <p>No discussions with Network Rail undertaken to date – these will be necessary to agree the expected patronage loadings can be accommodated</p>	<p>Stakeholder consultation has continued since 2019 and a further round of meetings will be held with all interested parties.</p> <p>Contact has been made with GTR which operates the Thameslink services.</p>	N
2.7	Is the future baseline scenario adequately described?	C	Transport modelling and forecasting is described as following WebTAG methodology which is reported in the public transport model and validation reports (not supplied or reviewed)	See response to Ref. 2.1.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	C	<p>The text suggests that the ‘worst’ case constructional and operational assessment has been assessed, however the scenario may include the worst-case construction traffic but it is modelled alongside the best case passenger demand traffic forecasts so a ‘worst case’ traffic scenario has not been tested.</p> <p>Reasoned judgement has been used in the PEIR on receptors that have low magnitude impacts on receptors of high sensitivity being minor or moderate</p> <p>Traffic modelling assumes highway works proposed by LBC as part of the East Luton Study will be implemented and form part of the future baseline against which the airport impact is assessed. This may be unrealistic in terms of funding for delivery. A full review of the schemes included for each forecast year needs to be fully understood.</p>	<p>Regarding the comments on the assessment for the construction phases, it is not clear why the base against which the construction traffic flows are being assessed are referred to as ‘best case passenger flows’. There may be a misunderstanding of the text. Because the assessment traffic flows relate to the facilities provided in each assessment phase operating at capacity, there are no model flows for period of peak construction traffic for each assessment phase. The construction traffic is therefore assessed against the predicted flows that provide the closest reflection of the level of traffic when the construction traffic is on the network.</p> <p>The status of the highway works proposed by LBC as part of the East Luton Study are the subject of ongoing discussions with the Council</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Assumptions and limitations are listed in 6.5 with the following having direct impacts on the traffic levels being assessed in the PEIR, these assumptions are not fully substantiated by the information and data analysis that has been provided, further information is requested to be able to accept these as valid for the purposes of the traffic and other assessments being made:</p> <p>Public transport mode share for passengers of 45%</p> <p>Public transport mode share for employees of 40%</p> <p>Public transport operators provide the services to meet demand</p> <p>Design year of 2039 without airport expansion requires some form of motorway capacity improvement on M1 between junctions 9 and 10, this has been included in the modelling, but there is not an approved scheme for this, nor is there funding for it</p>	<p>in order to ensure that the modelling that forms the basis of the application for development consent reflects the commitments at that time.</p> <p>The assumptions will be fully justified as part of the TAR. All assumptions have been discussed with the relevant authorities.</p> <p>The approach that has been adopted regarding the M1 capacity has been agreed with Highways England.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			The assumed highway schemes that have no funding allocated will also have an impact		
2.9	Which are the key receptors for the local authorities?	N/A	All existing areas of local congestion both on the highway, bus and rail networks	Noted.	N
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	B	No significant effects are identified as a result of the traffic flow changes in Table 6-15 for the operational impact. It is not clear whether the modelling in the peaks includes the Proposed measures identified. i.e. the DART extension to T2 / minor off-site highway mitigation measures. These are shown as adequate on the basis of the assumptions around traffic flows which are based around high mode shares by public transport which have not been demonstrated as achievable from the information that is available to review.	<p>There is a commitment that DART will be extended to T2 and be available from the first day of operation of the terminal.</p> <p>The highway flows in the traffic model reflect the target of 45% because the Applicant has committed to achieve that target and will accept Planning Requirements that ensure that the target is achieved. A study of mode share at other London Airports, in particular London Stansted has demonstrated that the target is not unrealistic.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				The Civil Aviation Authority; (2019); Passenger Survey Report shows an increase in the proportion of travellers travelling by public transport between 2017 and 2019. That is before the introduction of the half hourly EMR Connect rail service and the opening of the DART link.	
3.2	Are the mitigation measures included for significant adverse effects appropriate?	N/A	No significant effects are identified and no mitigation measures are proposed.	Accepted.	N
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	N/A	No mitigation measures are proposed – all highway interventions form part of the development scheme	Accepted.	N
3.4	Does the PEIR refer to monitoring requirements	C	A Construction Traffic Management Plan will be prepared to cover the	Monitoring of the operational phase of the airport expansion is to be discussed	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	where it would be considered as being required / appropriate?		<p>construction phase – no details provided but good practice would suggest monitoring and implementation of further mitigation measures would be integral to this process. Further information expected in the EIA.</p> <p>A Construction Workers Travel Plan is also proposed.</p> <p>For the operational stage a Framework Travel Plan is proposed, however this is primarily aimed at managing employee travel accessing the airport.</p> <p>The Surface Access Strategy provides targets for the passenger mode shares. but monitoring is not included in the current version.</p>	<p>as part of the series of workshops to develop the Travel Plan.</p> <p>The Framework Travel Plan covers both air passengers and employees. WSP now attends the Travel Plan Workshops at which the Applicant discussed potential measures and requests the highway authorities to identify any measures that they would like to see incorporated into the Plan.</p>	
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	N/A	The above documents need to be more comprehensive to include monitoring methods and potential additional measures that could be implemented to achieve the target / estimated / assumed mode shares	The monitoring will be the subject of one of the Travel Plan Workshops. This will consider the relationship between progress towards modal shift targets and also a mechanism to monitor any potential rat-running resulting	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			and resulting traffic generation associated with the development.	from the additional airport related traffic. The monitoring process will be fully detailed in the Framework Travel Plan.	
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	B	<p>Assessment methodology is provided in 6.4, being based on construction stage and full operational stage and on the net change in journeys as a result of the proposed development. Methodology follows standard practice and uses the following key areas:</p> <p>Severance</p> <p>Pedestrian Delay</p> <p>Pedestrian Amenity</p> <p>Driver stress and delay</p> <p>Accidents and safety</p> <p>Hazardous loads</p> <p>Impact is considered on road and transport users including public</p>	The highway flows in the traffic model reflect the target of 45% because LLAL the Applicant has committed to achieve that target and will accept Planning Requirements conditions that ensure that the target is achieved. The Multi-Model is not the most appropriate tool in this case as the modal shift is controlled rather than occurring 'naturally'.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>transport, cyclists and pedestrians as well as drivers and passengers of vehicles and those living close to the highway network</p> <p>Table 6-1 provides details of how the ANPS requirements are addressed in the PEIR for transport.</p> <p>Within this it suggests that for the tested scenarios 'These flows reflect the targets that have been adopted to achieve the mode shift.' This suggests that the vehicular traffic is informed by the imposed mode share target rather than the multi-modal model. Best practice would take the multi-modal model outcomes</p>		
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	A	4.5.8 gives the general classification of magnitude of impact	Accepted.	N
4.3	Are the methods for evaluating significance clearly defined/?	B	4.5.9 gives the general classification for evaluating the significance. For Transport the significance is based on the IEMA guidelines to delimit the scale and assessment of impacts.	The effects on rail and bus and coach passengers has been considered and is reported in Chapter 18, Section 18.9 of the 2022	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>These are based on defined highway link flow changes and subject to professional judgement.</p> <p>The significance effects have been determined using a combination of the magnitude and sensitivity with significance ratings of Major and Moderate or above considered significant.</p> <p>The impact on existing public transport users, notably rail and bus is not considered by this assessment. The sensitivity of receptors also does not include public transport users. The most sensitive users and those primarily covered in the assessment are sensitive groups including children/elderly/disabled; sensitive location including hospitals, churches, schools, historic buildings; people walking and cycling.</p> <p>This provides a reasonable assessment of the most sensitive but could also be recognised that certain train / bus journeys may become</p>	<p>PEIR. A level for sensitivity has been assigned to passengers.</p>

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			more stressful if growth in supply does not meet demand for these services. This aspect is not currently covered in any of the documentation.		
4.4	Do the assessment methods used follow relevant guidance?	A	The assessment methods do follow relevant guidance.	Accepted.	N
4.5	Have potential effects been considered both during construction and operation?	B	The document states that separate assessments for construction and operational phases have been undertaken and these are presented. The peak construction traffic being included in the 2024 strategic model. There is no indication that the construction flows have been included in the VISSIM modelling. The construction traffic peaks are in the off-peak period and the impacts are identified for the off-peak in Table 6-14 for 2024. Construction traffic routing has 2 scenarios tested for travel north and south on the M1. Not clear whether construction traffic has been included in the AM and PM peak models.	The VISSIM AM and PM peak models do not include construction traffic. It is not considered appropriate because the models are looking at the impact of airport growth on a typical day. The arrival and departure of construction traffic will be controlled with very little or no activity during this peak period.	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	A	<p>Magnitude of impact is provided in 6.4.14 to 6.4.29 adapts DMRB methodology using high, medium, low, very low and no change as the descriptors. Uses a mix of qualitative and quantitative approach.</p> <p>Severance – includes definitions relating mainly to pedestrian activity</p> <p>Driver stress and delay – uses DMRB definitions of thresholds by road type (motorway, dual carriageway and single carriageway)</p> <p>Pedestrian delay – based mainly on judgement rather than specific thresholds</p> <p>Pedestrian fear and intimidation – categorised based on traffic flow, HGV flow and average speed</p> <p>Accidents and safety – professional judgement based on existing KSI incidents</p> <p>Hazardous and dangerous loads – generally related to construction or</p>	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			decommissioning stages, also in this case could be related to fuel delivery Probability, duration and significance of impacts have been considered in the text analysis.		
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	N/A	No significant effects are identified	Accepted.	N
4.8	Are the residual significant effects clearly stated?	N/A	No residual significant effects are identified	Accepted.	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	C	Cumulative effects are mentioned and recognised that full consideration will be provided in the ES once all of the respective parts of the assessment are considered. Recognition that Transport, Noise & Vibration and Air Quality are related is made.	Accepted. It should be noted that the accepted methodology for TARs is to include cumulative schemes into the future year baseline, therefore it is not possible to assess the effect of the Proposed Development and then add on the cumulative schemes. This approach would mean that the assessment routed the additional traffic without reference to the increased	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				flows from the other schemes.	
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	C	Uncertainties around the modelling assumptions is not recognised, the assessment uses WebTAG guidance for inclusion of developments and schemes in the modelling, however this inevitably has an impact on the results of the assessment. It is recognised that the modelling work still needs to be completed and agreed.	This information is set out in the documentation supporting the development of the CBLTN-LTN strategic model prepared by AECOM, which has been provided to WSP's clients. The correct procedures have been adopted.	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	C	The PEIR review provides an outline of the scoping and consultation carried out to date but it is not clear how the engagement has advised / inform the assessment process.	The responses to the Scoping Opinion are set out in Table 6-3 of the PEIR .	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	C	A Conclusion section is not provided specifically in relation to Transport, however a preliminary assessment summary is provided in tabular form along with a section on completing the assessment including updates to reflect amendments to the design;	The same format is provided in the 2022 PEIR but the conclusions and outstanding tasks are updated to reflect the additional assessment that have been undertaken since the 2019 PEIR.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			further transport modelling; analysis of the personal injury collision data; and an assessment of the adverse effects on the rail network using the public transport model.		
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	A	Table 6-18 provides a summary of the transport preliminary assessment	Noted. This is updated following further analysis of the revised forecasts in Chapter 18 of the 2022 PEIR .	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	n/a			N
6.2	Is the PEIR readable to the audience for which it is intended?	n/a			N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	n/a			N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	n/a			N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	n/a			N
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	n/a			N
Conclusion					
	Legislation, Policy and Guidance Adequately covered.		n/a		N
	Baseline Information Insufficient information available to provide a fully informed response. ANPS requires that the mode split is fully substantiated and this is not currently evident.		The text suggests that the ‘worst’ case constructional and operational assessment has been assessed, however the scenario may include the worst-case construction traffic but it is modelled alongside the best case passenger demand traffic forecasts	See responses to (Ref. 2.8).	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>so a 'worst case' traffic scenario has not been tested.</p> <p>Traffic modelling assumes highway works proposed by LBC as part of the East Luton Study will be implemented and form part of the future baseline against which the airport impact is assessed. This may be unrealistic in terms of funding for delivery. A full review of the schemes included for each forecast year needs to be fully understood.</p> <p>Assumptions are not fully substantiated by the information and data analysis that has been provided, further information is requested to be able to accept these as valid for the purposes of the traffic and other assessments being made:</p> <p>Public transport mode share for passengers of 45%</p> <p>Public transport mode share for employees of 40%</p>	

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>Public transport operators provide the services to meet demand</p> <p>Design year of 2039 without airport expansion requires some form of motorway capacity improvement on M1 between junctions 9 and 10, this has been included in the modelling, but there is not an approved scheme for this, nor is there funding for it</p>	
	<p>Mitigation, Enhancement and Monitoring</p> <p>Shown as adequate on the basis of the assessments made, however the assumptions need to be better understood (see above) to be able to confirm acceptance of this.</p>		<p>These are shown as adequate on the basis of the assumptions around traffic flows which are based around high mode shares by public transport which have not been demonstrated as achievable from the information that is available to review.</p> <p>A Construction Traffic Management Plan will be prepared to cover the construction phase – no details provided but good practice would suggest monitoring and implementation of further mitigation measures would be integral to this process. Further information expected in the EIA.</p>	<p>See responses to (Ref. 3.4 and 3.5).</p> <p>N</p>

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>A Construction Workers Travel Plan is also proposed.</p> <p>For the operational stage a Framework Travel Plan is proposed, however this is primarily aimed at managing employee travel accessing the airport.</p> <p>The above documents need to be more comprehensive to include monitoring methods and potential additional measures that could be implemented to achieve the target / estimated / assumed mode shares and resulting traffic generation associated with the development</p>		
	<p>Assessment of Significant Effects</p> <p>No significant effects are identified; however, the assumptions need to be better understood (see above) to be able to confirm acceptance of this.</p>		<p>This provides a reasonable assessment of the most sensitive but could also be recognised that certain train / bus journeys may become more stressful if growth in supply does not meet demand for these services. This aspect is not currently covered in any of the documentation.</p>	<p>Further information on impact on rail passengers is included in Chapter 18 of the 2022 PEIR.</p> <p>See response to (Ref. 4.10.)</p> <p>See response to (Ref. 3.1).</p> <p>The additional employee traffic has been included in the Do-Something matrices for the traffic models. The</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Uncertainties around the modelling assumptions is not recognised, the assessment uses WebTAG guidance for inclusion of developments and schemes in the modelling, however this inevitably has an impact on the results of the assessment. It is recognised that the modelling work still needs to be completed and agreed.</p> <p>The assessment of the traffic impacts is based on a ‘best case’ mode share by public transport of 45% by 2029. However, it is not certain that this level of mode share is achievable from the measures being implemented. This assumption is key to determining the wider traffic impacts.</p> <p>The main focus is on passengers, the increased employee traffic impacts are not well represented throughout the document. In this document it does reference the reduction in employee car mode share from 76%</p>	<p>lower figure only applies to the new employees. The additional trips are incorporated into the matrices.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>to 40% by 2039, with the number of employees increasing by 90%. It is not clear how these additional trips are represented in the transport modelling or whether this is an achievable target.</p> <p>It is understood the DART will significantly improve the passenger experience from Luton Airport Parkway station, however the associated growth in activity at this location providing enhanced car parking for staff and passengers as well as access to hotels is not fully represented in the analysis presented. Given that the congestion associated with the shuttle buses from the existing car parks without the DART is identified as problematic, it could be expected that this area is explored further.</p> <p>Impacts are mainly covered towards the M1 and in the local vicinity. Wider potential impacts are not covered</p>		
	Conclusions		n/a		N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Presentation (including Figures and Appendices)		n/a		N

B4 Climate change review checklist and summary

Note: 'Ref.' is to tables 2-9 and 2-10 of the WSP on behalf of host authorities response.

Table B4.1: Climate Change (Climate Change Resilience)

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B	<p>Section 7.2 of the PEIR identifies the relevant legislation, policy and guidance however this is only provided in a bullet point list. A summary or details of these and how the project meets their requirements would be beneficial at the ES stage. Detail of the policies with relevance to climate resilience within the LBC and CBC Local Plans and the NHDC Proposed Submission Draft Local Plan are particularly important to note.</p> <p>The LBC Climate Change Adaptation Action Plan listed in the policy section is out of date (it was produced in March 2010). The applicant is advised to take into account the emerging climate change action plan</p>	The LBC Climate Change Action Plan has been listed in Chapter 9, Section 9.2 of the 2022 PEIR , however this primarily focusses on reducing GHG emissions.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			(draft) that would shape the council policy for the coming years. Should this not be publicly accessible a copy should be made available to LLAL. ANPS requirements and how they are addressed in the PEIR are presented in Table 7-3.		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	A	As identified in 7.4.2, baseline data has been collected through desk studies. In relation to the UKCP18 projections used to inform the assessment, it is clear of the representative concentration pathway (RCP), probability levels and project design life for which the assessment has been based on. (Section 7.1.6-7.1.8)	Accepted.	N
2.2	Do the data collection methods follow relevant guidance?	A	Data were sourced from UKCP18, Met Office observational data and the London Luton Airport climate change adaptation report to inform the existing and future baseline. This is in line with the ANPS and the relevant guidance identified in 7.2.	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.3	Is the study area identified appropriately?	A	The study area is defined in 7.6.1 as being the proposed development, clarifying that this includes future assets only, not including existing airport infrastructure.	Accepted.	N
2.4	Have all the resources/receptors been considered?	B	Table 7-1 presents the assets scoped into the climate resilience assessment by phase (construction and operation). The table heading is labelled 'Asset group' however this would be more useful if separated by type of receptor for example structures, roads, materials, equipment and landscaping. It is considered that a number of the scheme assets would have similar receptors. In addition, identification of the receptors in this way would reduce the risk that receptors belonging to assets are missed.	Accepted. Asset groups have been separated by type of receptor in Chapter 9 of the 2022 PEIR .	N
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	N/A	Value (sensitivity) has not been used for the climate resilience assessment, the value of all receptors appears to be the same.	Accepted.	N
2.6	Has there been consultation with the relevant statutory bodies?	B	Section 7.3 presents the stakeholder engagement and consultation. The main comments relevant to the Climate Change assessment are	Accepted. This is included in Table 9.5 of Chapter 9 of the 2022 PEIR . Table 9.5 provides information on engagement with Natural	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
			<p>presented in Table 7-4 with an explanation of how these comments have been addressed within the PEIR or will be addressed in the ES.</p> <p>It is not clear (from Table 7-4 in isolation) which statutory bodies (including the Lead Local Flood Authority) have provided the comments, this information should be provided in the ES. A Scoping Opinion identification (ID) is provided, e.g. 3.2.17 and 4.3.3, however it is not clear if this relates to another document such as an appendix. It seems that this Scoping IDs refer to those used in Appendix 1-2 of the PEIR therefore a cross-reference should be provided to this Appendix if this is the case. It is expected that the ES will comprise the final Scoping Opinion and that the use of IDs in the tables will be defined as appropriate.</p> <p>Aside from the Scoping Opinion, it is not clear if any other consultation (such as meetings/discussions) has</p>	<p>England, the Environment Agency and the Lead Local Flood Authorities on the potential impacts of climate change.</p> <p>Responses to all comments received from stakeholders consulted by PINS is provided in Appendix 1.3 in Volume 3 of the 2022 PEIR.</p> <p>Tabel 9.8 of Chapter 9 of the 2022 PEIR provides a summary of engagement with the climate change and greenhouse gas working group, which includes representatives from the host authorities undertaken to inform the EIA to date. This includes the date and time of meetings and a summary of discussions to resolve matters raised.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>been undertaken in relation to climate resilience with the relevant authorities (including the Lead Local Flood Authority) and how effective any engagement has been.</p> <p>Section 7.3.2 identifies statutory bodies whom will continue to be consulted throughout the DCO process. The nature and aim of this consultation in relation to climate resilience is ambiguous.</p> <p>The response to the scoping report on behalf of the Host Authorities (April 2019) does not seem to be included in Table 7-4. Their responses should be included in this table or in a separate table, especially as it does appear that the comments made by the Host Authorities have been addressed in the chapter though confirmation that the comments have been integrated would be welcomed.</p>		
2.7	Is the future baseline scenario adequately described?	A	The future baseline is identified for a 25km grid square where the proposed development is located. It would be beneficial if the location of	Accepted. The location of this grid square is presented in Inset 9.3 in Chapter 9 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>this grid square was presented in a diagram.</p> <p>Projected changes in temperature (mean annual, summer and winter, maximum summer and minimum winter), precipitation (annual, summer and winter) and specific humidity (annual, summer and winter) are presented in Tables 7-13, 7-14 and 7-15. These are presented in relation to the 1981-2000 baseline for the time period of 2020-2099 to include the 60-year project design life.</p> <p>Further data for other climate variables and extreme events such as heatwaves, frost days, heavy rain days, dry spells and summer highest daily maximum temperature have been assessed using land projections at a 12km resolution. These are presented in Table 7-16 and 7-17.</p>		
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	A	Section 7.5 identifies the assumptions and limitations associated with the assessment. These address the availability of the climate projections used and the uncertainty associated with the projections. The use of professional judgement within the	Accepted. These have been reviewed and updated in Chapter 9 of the 2022 PEIR , as appropriate.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			assessment is highlighted as a limitation.		
2.9	Which are the key receptors for the local authorities?	B	Refer to comment 2.4.	Accepted As per response to comment Ref. 2.4	N
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	A	Section 7.8 'Preliminary Assessment' states that no significant effects are identified at either the construction or operation stage of design. This has taken into account the incorporation of embedded and best practice mitigation measures. Embedded and good practice mitigation measures are identified in Section 7.7 and Table 7-20. The measures identified propose to avoid and reduce the effects of climate change. ICCI embedded and good practice mitigation measures are outlined in Table 7-18 and 7-19.	Accepted. Chapter 9 has been reviewed and updated in the 2022 PEIR as appropriate.	N
3.2	Are the mitigation measures included for significant adverse effects appropriate?	N/A	Section 7.8 'Preliminary Assessment' states that no significant effects are identified at either the construction or operation stage of design. This has considered the incorporation of embedded and best practice mitigation measures.	Accepted. This has been reviewed and updated in Chapter 9 of the 2022 PEIR , as appropriate.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	B	Table 7-20 includes a column on 'how mitigation secured'. This provides a high level description of the mechanism to secure the mitigation e.g. through the draft CoCP, drainage strategy, design standards and operating policies. Further detail could be provided in the table in relation to with whom the responsibility for these mitigation measures lie. The responsibility for the measures is somewhat identified in Section 7.7 (for example, the CoCP being the responsibility of the contractor) however this is not explicit for all the embedded and best practice mitigation measures for example 'additional standards and measures will continue to be explored as the design develops between now and DCO submission and post-consent once a contractor is appointed'.	Securing mechanisms for mitigation will be confirmed in the ES.	N
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	A	A few of the embedded mitigation measures identify monitoring requirements for example post-planting monitoring and the monitoring of deterioration and	Accepted. A separate section on monitoring is included in Chapter 9 of the 2022 PEIR , including the measures suggested.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>damage to assets caused by extreme weather events.</p> <p>Further monitoring measures which could be considered include:</p> <p>Maintaining a list of extreme weather-related incidents (for example, road surface deformations, snow and ice etc.) to assist in identifying thresholds which, when exceeded, require maintenance.</p> <p>It might be helpful to create a separate section on monitoring to make it clear what monitoring is recommended.</p>		
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	B	It would be useful if the embedded measures were identified in relation to the assets scoped into the assessment as highlighted in Table 7-1. The measures in section 7-7 are not specific to particular development assets.	Accepted. Table 9.26 and Table 9.27 in Chapter 9 of the 2022 PEIR identify embedded measures in relation to the assets scoped into the assessment. Chapter 9, Section 9.8 provides a summary of these measures.	N
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	A	Section 7.4 presents the methodology for assessing the likely significant	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>effects of climate change impacts on the construction and operation of the Proposed Development and the ICCI assessment.</p> <p>The key terms relating to the assessment are detailed in 7.4.10 followed by the assessment methodology. A flow diagram of the assessment methodology is provided in Figure 7-1 (resilience assessment) and Figure 7-2 (ICCI assessment). This is a useful visual representation of the methodology.</p>		
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	N/A	<p>Magnitude has not been used for the climate resilience assessment, instead, the likelihood of climate hazards occurring and the level of consequence has determined the level of significance. This is consistent with guidance/good practice.</p> <p>Tables 7-5, 7-6 and 7-7 outline the criteria for the identification of likelihood and consequence for the climate resilience assessment and Tables 7-9, 7-10 and 7-11 for the ICCI assessment.</p>	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.3	Are the methods for evaluating significance clearly defined/?	A	Significance criteria for the climate resilience assessment is defined in 7.4.19 and Table 7-8 and for the ICCL assessment in 7.4.3 and Table 7-12. 7.4.20 describes that significance is derived through combining outcomes from the likelihood impact with the consequence to determine the level of effect.	Accepted.	N
4.4	Do the assessment methods used follow relevant guidance?	A	The likelihood levels are identified in 7.4.13 to have been taken from the IPCC fifth assessment report. The criteria for assessing consequence, and for the significance assessment, has been noted to be 'based on the approach from the Luton Climate Change Adaptation report and varies from typical EIA methodology'. Where they have said 'varies from typical EIA methodology', is this referring to other disciplines in the EIA?	Accepted. Yes, this is referring to other disciplines in the EIA.	N
4.5	Have potential effects been considered both during construction and operation?	B	Effects have been considered both during construction and operation within section 7.8.2 and Table 7-20. At the PEIR stage, it is not expected that a full assessment of effects be	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			undertaken, and it is noted that the preliminary assessment in Table 7-20 is an assessment summary. Table 7-20 however only identifies a handful of potential impacts during the construction phase for example the impact on materials during construction is an omission. Furthermore, it is suggested that the assessment could be split down further by asset class at the ES stage e.g. materials, structures, drainage, end users.		
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	B	Refer to comments 4.2 and 4.3 in relation to magnitude and significance of impacts. The probability levels for the climate projections (future baseline) are identified in 7.6.7. In addition, the level of likelihood (Table 7-5, 7-6 and 7-9) is determined by the probability of the impact occurring during the life of the project. It is not clear which level of probability (in relation to the UKCP18 projections) the assessment is based on (would assume the 50% percentile but it is recommended this is made clear).	Accepted. This has been made clearer in Chapter 9 in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			It is not explicit if the construction assessment has considered the temporary nature of the construction stage.		
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	A	The assessment of significance is presented in Table 7-20. This presents the climate hazard and subsequent impact on the project. Significance is justified through consideration of the embedded and good practice mitigation measures and the identification of the likelihood of the climate hazard and impact occurring and the consequence of effects.	Accepted. This has been reviewed and updated in Chapter 9 of the 2022 PEIR , as appropriate.	
4.8	Are the residual significant effects clearly stated?	N/A	No significant effects have been identified. Section 7.10 therefore states that the residual effects remain those identified in the Preliminary Assessment.	Accepted. This has been reviewed and updated in Chapter 9 of the 2022 PEIR , as appropriate.	
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	B	Section 7.11 states that the resilience assessment is only concerned with the assets of the Proposed Development and a broader consideration of existing interdependent infrastructure, therefore a cumulative assessment is not required.	Accepted. This is included in Chapter 9 of the 2022 PEIR . The suggested additional impacts for agriculture and land quality have been considered and added to the assessment. Vegetation failure has been considered as part of the ICCI assessment for biodiversity.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>The ICCI assessment considers the extent to which climate change exacerbates effects on aspect receptors which have already been identified in the other discipline chapters.</p> <p>The topic chapters and receptors which this assessment has been undertaken for have been identified in Table 7-2 of the Climate Change (Resilience) chapter. The topic chapters where the ICCI assessment has been scoped out (traffic and transportation, waste and resources and major accidents and disasters (already embedded in the assessment) have been identified.</p> <p>The topics chapters containing the ICCI assessment have been reviewed.</p> <p>From a climate resilience specialist perspective, we have no comments on the following chapters:</p> <p>Air quality Section 5.12, Table 5-9</p>	Potential benefits of proposed planting have also been considered.	

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>Noise and Vibration Section 9.12, Table 9-31</p> <p>Soils and Geology Section 10.12, Table 10-21</p> <p>Water Resources Section 11.12, Table 11-9</p> <p>Health and Community Section 14.12, Table 14-16</p> <p>Biodiversity Section 16.12, Table 16-17</p> <p>Cultural Heritage Section 18.12</p> <p>Comments on:</p> <p>Agricultural land quality section 15.12. Soil resources are identified as at risk if handled when too wet, have drought conditions been considered and impacts associated with the cracking of soils?</p> <p>Landscape and visual section 17.12. The climate hazard of increased precipitation and the impact on vegetation failure is not considered.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Also, could the benefits of proposed planting in relation to climate resilience (i.e. water retention and soil stability) be mentioned?		
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	B	<p>Uncertainty in climate models and regarding how global climatic trends will be reflected at the regional scale are identified in 7.5.3. In addition, projections for changes in wind speed and direction are identified in Table 7-21.</p> <p>The chapter does not highlight if there are uncertainties in the design or mitigation which may affect the assessment. If this is the case, this should be made explicit.</p>	Accepted. Potential uncertainties in the design and mitigation which may affect the assessment have been added to Chapter 9, Section 9.6 in the 2022 PEIR .	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	A	The main Scoping Opinion comments relevant to the Climate Change assessment are presented in Table 7-4 with an explanation of how these comments have been addressed within the PEIR or will be addressed in the ES.	Accepted. This is included in Chapter 9, Section 9.3 of the 2022 PEIR .	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	A	Section 7.10 identifies that as there are no likely significant effects identified, there are no residual effects. Section 7.12 presents the	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			preliminary assessment summary and section 7.13 identifies the ongoing actions to complete the assessment.		
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	A	Table 7-20 presents the preliminary climate resilience assessment summary which includes the embedded mitigation measures. Table 7-21 does the same for the ICCI assessment.	Accepted.	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	A	It is considered that the PEIR Chapter 7 Climate Change is unbiased, balanced, comprehensive and transparent in its logic and presentation.	Accepted.	N
6.2	Is the PEIR readable to the audience for which it is intended?	A	It is considered that the PEIR Chapter 7 Climate Change is readable to the audience for which it is intended.	Accepted.	N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	A	The Non-Technical Summary is suitably clear and free from technical jargon.	Accepted.	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	A	The Non-Technical Summary presentation matches the findings of the PEIR.	Accepted.	N
6.5	Are the Figures generally expected to support this type of document provided either	B	There are no Figures within Volume 2 associated with the Climate Change Chapter. Figures 7-1 and Figures 7-2	Accepted. The location of this grid square is presented	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	in Volume 2 or Volume 3? – Please provide further commentary if required.		within the chapter text are considered beneficial to the assessment. As stated in 2.7, the inclusion of a figure/diagram, to portray the location of the 25km grid square used to present the future baseline would be beneficial to supplement the baseline assessment.	in Inset 9.3 in Chapter 9 of the 2022 PEIR .	
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	N/A	Appendix 7-1 contains a Greenhouse Gas Emissions/Climate Change Resilience Management Strategy. This is not something typically expected as an appendix to the Climate ES chapter but is a welcome addition.	Accepted. Mitigation for GHG emissions and climate change resilience is set out within Chapters 12 and 9 of the 2022 PEIR respectively. A separate Draft GHG Management Plan is also included in Appendix 12.1 of the 2022 PEIR .	N
Conclusion					
	Legislation, Policy and Guidance Meets all the requirements at the PEIR stage.		Detail of the policies with relevance to climate resilience within the LBC and CBC Local Plans and the NHDC Proposed Submission Draft Local Plan are particularly important to note and should be included in the ES.	Accepted. This is included in Chapter 9 in the 2022 PEIR .	N
	Baseline Information		It is recommended to provide clarity on which statutory bodies have provided the scoping opinion comments.	Accepted. Table 9.5 of Chapter 9 of the 2022 PEIR provides information on engagement with Natural	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	A detailed baseline has been presented in line with relevant guidance.		The responses to the scoping report on behalf of the Host Authorities (April 2019) is an omission in Table 7-4 however, it does appear that the comments made have been addressed in the chapter though would welcome confirmation.	<p>England, the Environment Agency and the Lead Local Flood Authorities on the potential impacts of climate change.</p> <p>Responses to all comments received from stakeholders consulted by PINS is provided in Appendix 1.3 in Volume 3 of the 2022 PEIR.</p> <p>Tabel 9.8 of Chapter 9 of the 2022 PEIR provides a summary of engagement with the climate change and greenhouse gas working group, which includes representatives from the host authorities undertaken to inform the EIA to date. This includes the date and time of meetings and a summary of discussions to resolve matters raised.</p>	
	Mitigation, Enhancement and Monitoring		Further detail could be provided with whom the responsibility for these mitigation measures lie.	Accepted.. Accepted. A separate section on monitoring is included in	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Embedded and good practice mitigation measures are clearly identified.		It might be helpful to create a separate section on monitoring to make it clear what monitoring is recommended.	Chapter 9 of the 2022 PEIR , including the measures suggested.	
	<p>Assessment of Significant Effects</p> <p>A robust assessment has been undertaken.</p>		It is recommended that the assessment could be split down further by asset class at the ES stage.	Accepted. This is included in Chapter 9 of the 2022 PEIR .	N
	<p>Conclusions</p> <p>Conclusions are clearly presented.</p>		N/A	N/A	
	<p>Presentation (including Figures and Appendices)</p> <p>The chapter is clearly presented and offers a very robust method and assessment.</p>		N/A	N/A	

B5 Greenhouse gases review checklist and summary

Note: 'Ref.' is to tables 2-11 and 2-12 of the WSP on behalf of host authorities response.

Table B5.1: Greenhouse Gases

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B	Climate change policy and legislation is a fast-evolving area, as such more attention should be paid to how the proposed development is compatible with the UK government's new net zero 2050 target, and how the proposed development will meet carbon budgets that will respond to this new target, and the likely inclusion of aviation emissions within the budgets. Key national policy documents that need to be considered when preparing the ES include the Airports National Policy Statement, the Climate Change Act 2008, and the Clean Growth Strategy.	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Additional policies within the Hertfordshire local plan and any other strategic documents related to climate change should be referenced.		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	B	Data sources are in some cases referred to using broad categories – for example [8.5.3] “ <i>activities are based on estimated activities provided by the AECOM Constructability Team</i> ” or [Table 8-3] “ <i>Airport Operations: GHG emissions from the operation of airport, buildings, assets, infrastructure and airside/land side vehicles – LLAOL</i> ”. This data will have taken a variety of forms (tonnes of materials, litres of fuel etc), and are likely to have come from various sources within the AECOM Constructability Team and within LLAOL, and it is likely that some assumptions will have been made to provide these estimates. So, although data collection is adequately described, best practice	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			would be to provide additional transparency.		
2.2	Do the data collection methods follow relevant guidance?	A	The appropriate guidance is referenced and followed	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N
2.3	Is the study area identified appropriately?	A	It is not appropriate for a defined study area to be defined	Accepted.	N
2.4	Have all the resources/receptors been considered?	A	Receptors are not relevant to GHG emissions assessments	Accepted.	N
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	N/A	Receptors are not relevant to GHG emissions assessments	Accepted.	N
2.6	Has there been consultation with the relevant statutory bodies?	A	Broadly statutory consultation on GHG emissions is not required, however consultations have been undertaken.	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N
2.7	Is the future baseline scenario adequately described?	A	The future baseline is clearly defined	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	B	In some small areas estimates/assumptions could be clearer. For example [8.6.9] "Emissions from the transportation of freight was based on estimated journey distances made by HGVs to	Accepted. Estimates and assumptions have been made clear in Chapter 12 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			transport freight to and from the airport per annum". It is not clear how this estimated distance was formulated – is it based on supplier locations? Is it based on assumptions from RICS? Is it based on Professional judgement? This is not completely clear. However, in general the uncertainties, data limitations, assumptions, difficulties and the use of professional judgment are clearly stated.		
2.9	Which are the key receptors for the local authorities?	N/A	Receptors are not relevant to GHG emissions assessments.	Accepted.	N
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	A	The chapter provides a range of mitigation options relevant to the proposed development. Significant effects are identified (although not the magnitude of significance) – in so far as the effects are significant WSP agrees.	This has been reviewed and updated in Chapter 12 of the 2022 PEIR . The magnitude of the effect for GHG emissions from construction and operation are included in Table 12-31 of Chapter 12 . Construction: High magnitude Operation: High magnitude	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3.2	Are the mitigation measures included for significant adverse effects appropriate?	A	The chapter provides a range of mitigation options relevant to the proposed development.	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	A	The information regarding mitigation proposed at this stage is commensurate with the PIER stage	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	B	Monitoring could be required in the PIER (however UK and EU policies mandate this to an appropriate extent already) – so there would be little value in this requirement.	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	B	The level of mitigation development is excellent for the PIER stage – the PIER also states further specific mitigation policies may be identified as appropriate at the ES stage.	Mitigation measures have been reviewed and updated as appropriate in Chapter 12 of the 2022 PEIR .	N
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	B	There are some areas where additional information could be provided to aid transparency. For example, [8.5.11] it is stated that a strategic transport model was used to quantify Surface access journeys.	Accepted. Assessment methods and techniques have been reviewed and updated as appropriate and	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			However, the method used to convert the traffic model data to carbon data is not clear. Were WebTAG data tables used? Was a bespoke method used? Further information should be provided in the ES.	made clear in Chapter 12 of the 2022 PEIR .	
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	A	The methods used to quantify emissions are clearly stated	Accepted.	N
4.3	Are the methods for evaluating significance clearly defined/?	A	The methods used to evaluate significance are clearly stated	Accepted.	N
4.4	Do the assessment methods used follow relevant guidance?	A	The methods follow relevant guidance	Accepted.	N
4.5	Have potential effects been considered both during construction and operation?	A	Construction and operational effects are considered	Accepted.	N
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	A	These items have been dealt with in as far as is relevant to GHG assessments.	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	B	The significance decision is used before the emissions are contextualised (into the carbon budgets etc), this context may aid in the assessment of significance as described. Significant effects are identified (although not the magnitude of significance) – in so far as the effects are significant WSP agrees.	Accepted. Contextualising the emissions before the significance decision is noted for the 2022 PEIR . The magnitude of the effect for GHG emissions from construction and operation are included in Table 12-31 of Chapter 12 of the 2022 PEIR . Construction: High magnitude Operation: High magnitude	N
4.8	Are the residual significant effects clearly stated?	A	The residual effects will be clearly stated in the ES – this is appropriate	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	A	cumulative effects have been considered in as far as they are relevant to GHG assessments	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	A	Uncertainties are identified and discussed throughout the chapter	Accepted. This is included in Chapter 12 of the 2022 PEIR .	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	A	the scoping opinion has been considered	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	A	The conclusions are clearly reported	Accepted. This has been reviewed and updated in Chapter 12 of the 2022 PEIR as appropriate.	N
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	N/A	N/A	Accepted.	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	C	The exclusion of radiative forcing is justified on the grounds of uncertainty. However, this is not appropriate. A PEIR and ES should present a realistic worst-case assessment. The exclusion of radiative forcing is not realistic, as radiative forcing will undoubtable occur, nor should it be justified in terms of uncertainty, as what is required is a worst-case assessment (as such uncertainty is not relevant), There are numerous publicly available sources of information on	The impact of radiative forcing and non-GHG emissions is presented in Chapter 12 of the 2022 PEIR but are not included in the assessment against the 6th carbon budget. The inclusion of departing flights only has been adopted by the DfT and has informed its policy on aviation and climate change. It is also used as the basis for the approach taken in the Airport National Policy Statement for	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
			<p>worst case radiative forcing – these should be used.</p> <p>The exclusion of one leg of climate cruise decent (CCD) does not provide a realistic worst-case assessment. One leg is excluded based on the logic that the emissions from half of the flight should be apportioned to the airport at the other end of the flight to Luton Airport. If the goal of the assessment was to establish the level of emissions Luton Airport should report within their scope 3 emissions inventory, then this approach has some merit, as responsibility for the emissions could be shared. However, that is not the purpose of the assessment.</p> <p>The purpose of the assessment is to provide a realistic worst-case assessment of the increase in emissions due to the Proposed Development (regardless of how</p>	<p>assessing GHG emissions from aviation.</p> <p>The advice of the Committee on Climate Change with regard to aviation and the UK carbon budgets is to consider emissions from departing flights only. The test used for this PEIR is against the UK carbon budgets, hence to include arrivals would therefore not align.</p> <p>Additionally, the UNFCCC recommends that for carbon accounting, airports only consider departing flights to avoid double counting with other airports.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>responsibility for emissions can be apportioned).</p> <p>Given that it is reasonable to consider that the additional flights to and from Luton Airport would not occur without the proposed development (the difference in flight between the with and without development scenarios is exactly that – flights that would not happen without the proposed development), from the perspective of a realistic worst case assessment of the increase in emissions due to the Proposed Development, emissions from both legs are due to the proposed development (neither leg would take place without the proposed development), and therefore both leg should be included.</p> <p>This is fundamentally because the assessment should examine the total GHG impact of the propose development, not the partial GHG impact of the proposed development (even if justified through</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			apportionment based on reasonability).		
6.2	Is the PEIR readable to the audience for which it is intended?	B	It represents good practice of communicating complex technical issues. However additional definition would probably be possible. In some places text can be slightly misleading (e.g. [8.8.49] where it is not stated that the UK Climate Change Act 80% reduction has been superseded); a diagram of LTO and CCD could be used for clarity;;the use of MtCO2e rather than KtCO2e or just tCO2e is potentially misleading (even though described), and the use of the PAS2080 lifecycle references (A1-3, A4 B2 D etc) would provide some additional clarity around the scope.	Accepted. This has been reviewed and updated in Chapter 12 of the 2022 PEIR as appropriate.	N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	B	Given the content it is reasonably clear, however the use of MtCO2e rather than KtCO2e or just tCO2e is potentially misleading.	Accepted. Noted for the 2022 PEIR .	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	A	The findings match	Accepted.	N
6.5	Are the Figures generally expected to support this type of document provided either in	N/A	N/A	N/A	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Volume 2 or Volume 3? – Please provide further commentary if required.				
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	A	The appendixes provide appropriate information	Accepted. This has been reviewed and updated in Chapter 12 of the 2022 PEIR , as appropriate.	N
Conclusion					
	Legislation, Policy and Guidance Overall Conclusion B		Climate change policy and legislation is a fast-evolving area, as such more attention should be paid to how the proposed development is compatible with the UK government's new net zero 2050 target, and how the proposed development will meet carbon budgets that will respond to this new target, and the likely inclusion of aviation emissions within the budgets. Climate change policy and legislation is a fast-evolving area, as such more attention should be paid to how the proposed development is compatible with the UK	Accepted. This has been reviewed and updated in Chapter 12 of the 2022 PEIR , as appropriate.	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
			<p>government's new net zero 2050 target, and how the proposed development will meet carbon budgets that will respond to this new target, and the inclusion of aviation emissions within the budgets. Key national policy documents that need to be considered when preparing the ES include the Airports National Policy Statement, the Climate Change Act 2008, and the Clean Growth Strategy.</p> <p>Additional policies within the Host Authorities local plans and any other strategic documents related to climate change should be referenced.</p>		
	Baseline Information Overall Conclusion B		<p>Additional methodological transparency should be provided in the ES, and the logic for exclusion of radiative forcing and return legs of flights, should be re-examined in the context of a 'realistic worse case' assessment.</p>	Accepted. This has been reviewed and updated in Chapter 12 of the 2022 PEIR , as appropriate.	N
	Mitigation, Enhancement and Monitoring		<p>It is recommended that additional mitigation measures are identified (perhaps carbon neutrality</p>	Accepted. This has been reviewed and updated in	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Overall Conclusion B		commitments, and additional low carbon flight incentivisation).	Chapter 12 of the 2022 PEIR , as appropriate.	
	Assessment of Significant Effects Overall Conclusion C		<p>The assessment is not a realistic worst-case assessment. The exclusion of radiative forcing on the grounds of uncertainty is not realistic as radiative forcing will occur), and is not worst case (as it is excluded. Uncertainty does not preclude a worse case being used).</p> <p>Furthermore, only one leg of the CCD element of each flight is accounted for. This is also not a realistic worse case. The assessment should account for the total increase in emissions due to the increase in flights due to the Proposed Development. The assessment only accounts for half of this increase, justifying it in terms of the responsibility of other airports. However, the responsibilities of other airport are not relevant, what is relevant is the total increase in emissions due to the proposed development – a significant underestimate is therefore presented.</p>	<p>The impact of radiative forcing and non-GHG emissions is addressed in Chapter 12 of the 2022 PEIR but are not included in the assessment against the 6th carbon budget. The 6th carbon budget only accounts for GHG's recognised under the Kyoto Protocol. It is therefore not appropriate to include non-CO₂ impacts and radiative forcing as part of the GHG assessment.</p> <p>The inclusion of departing flights only has been adopted by the DfT and has informed its policy on aviation and climate change. It is also used as the basis for the approach taken in the Airport National Policy Statement for assessing GHG emissions from aviation.</p> <p>The advice of the Committee on Climate Change with</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>regard to aviation and the UK carbon budgets is to consider emissions from departing flights only. The test used for this PEIR is against the UK carbon budgets, hence to include arrivals would therefore not align.</p> <p>Additionally, the UNFCCC recommends that for carbon accounting, airports only consider departing flights to avoid double counting with other airports.</p>	
	<p>Conclusions Overall Conclusion A</p>		No recommendations	N/A	
	<p>Presentation (including Figures and Appendices) Overall Conclusion A</p>		No recommendations	N/A	

B6 Noise and vibration review checklist and summary

Note: 'Ref.' is to tables 2-13 and 2-14 of the WSP on behalf of host authorities response.

Table B6.1: Noise and vibration

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	A	See Appendix A	Accepted.	N
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	B	Not fully. Weather conditions not described and reasons for omitting certain data due to weather conditions not explained.	Weather conditions during noise monitoring periods used for validation have been included in Appendix 16.1 of the 2022 PEIR . Additionally, reasons for omitting noise data due to adverse weather conditions have been provided.	N
2.2	Do the data collection methods follow relevant guidance?	C	Uncertain, as full description not presented in PEIR (e.g. omission of description of weather conditions). See Noise Addendum included as Appendix A .		N
2.3	Is the study area identified appropriately?	A	Study area is extensive, much larger than the area likely to be affected by noise levels above LOAEL	The Study Area has been updated and is based on a combination of radar track data	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				showing aircraft at an altitude of below 4,000 ft and not by the maximum extents of LOAEL noise contours for all modelled scenarios.	
2.4	Have all the resources/receptors been considered?	B	We assume key relevant resources/receptors have been identified through the Noise Working Group, although PEIR does not elaborate. No reference is made to noise important areas. The ES should clarify how relevant resources have been selected and identify any noise important areas within the study area. See also Appendix A .	Details on how relevant resources/ receptors were selected and any identified noise important areas will be included in the ES .	N
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	C	Standards for different receptor types provided, however nature of receptors and sensitivity standards not provided at each measurement location.	More detail on the nature of receptors will be provided in the ES .	N
2.6	Has there been consultation with the relevant statutory bodies?	A	Consultation was held through the Noise Working Group	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.7	Is the future baseline scenario adequately described?	B	Future noise conditions in the absence of development (DN) modelled using consistent techniques. Noise model not currently calibrated with Annual Monitoring Report results, so further work needed to reduce the margin of error. See Appendix A .	As Annual Monitoring Reports only present LASmax noise data, Sound Exposure Level (SEL) noise data from permanent and temporary noise monitoring locations was obtained from LLAOL instead. The aircraft noise model has been calibrated using the SEL noise data for individual aircraft. This provides a better method for validating noise contours than using LASmax information within the Annual Monitoring Report as LAeq,T noise contours are calculated from SEL data for individual aircraft. However, due to the differences in noise modelling software, modelling assumptions and application of latest calculation methodologies, noise contour outputs are not directly comparable with LLAOL's.	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	C	No information provided within the PEIR. The vast majority of noise surveys were unattended, so detailed description of the nature and causes	Primary and Secondary sound sources are provided in Appendix 16.1 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>of prevailing noise levels is not included in the PEIR.</p> <p>Query whether one days' worth of shortened road traffic (02/11/18) at ML23 & ML25 is sufficient. It doesn't look as though there has been any road traffic noise monitoring undertaken in the quieter locations, eg: Mangrove Green/ Tea Green. These areas may see the greater impact of increased traffic once the numbers of passengers increase.</p> <p>There are properties closer to the development site (eg: Dane Street, Darley Road) in which monitoring may also be undertaken or LLAL to advise whether these have been considered</p>	<p>Traffic data for the 2022 PEIR suggests negligible noise change (<1 dB) for ML23 and ML25 so would suggest short-term measurements are sufficient. As Mangrove Green / Tea Green get larger changes in traffic because of the low flow, noise monitoring has been undertaken to help determine baseline noise levels.</p> <p>Noise monitoring locations were consulted with the NWG. It was agreed that the monitoring locations chosen provided sufficient coverage of receptors within the Study Area.</p>	
2.9	Which are the key receptors for the local authorities?	B	<p>Predominately residences, but we assume all sensitive receptors including schools and hospitals have been identified through Noise Working Group consultation. The ES should be clear on this.</p>	<p>Identified assessment locations were discussed with the Noise Working Group (NWG). An additional review of assessment locations will be undertaken for the ES.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	C	<p>Our comments in section 3 pertain to operational noise only, as we consider the treatment of construction noise and vibration to be appropriate for a PEIR. It is expected that the ES will include a detailed assessment of construction noise and vibration effects in line with relevant standards and good guidance practice.</p> <p>Commitment is made to a Noise Envelope which is expected to constitute a suite of noise controls. A revised sound insulation scheme is proposed, which extends qualification to properties exposed to daytime lower noise levels than the limits contained in the current scheme but the revisions do not address night-time noise levels.</p>	<p>A detailed assessment of construction noise and vibration will be included in the ES.</p> <p>Revisions to the noise insulation scheme were undertaken with reference to the Aviation Strategy 2050 document, which proposes: “...to extend the noise insulation policy threshold beyond the current 63dB LAeq 16hr contour to 60dB LAeq 16hr”.</p> <p>The existing noise insulation scheme thresholds are 63 dB LAeq, 16h and 55 dB LAeq, 8h. Based on feedback from 2019 statutory consultation, we have extended the draft noise insulation scheme so properties within the 54 dB LAeq, 16h would qualify for a contribution to noise insulation.</p>	N
3.2	Are the mitigation measures included for significant adverse effects appropriate?	C	In the absence of full consideration of night-time noise, they fall short of what would be expected at a similarly	Clarity will be provided in the ES as to why the noise insulation scheme focuses on daytime noise.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			sized UK commercial airport, and therefore do not necessarily reflect best practice.		
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	C	Proposals for monitoring and reporting actual noise against the Noise Envelope are not provided, but a helpful 'Compensation Proposals' document is provided. The full details of how measures are to be secured and responsibilities are not included, however, we would not necessarily expect such details until later in the ES process.	Details on how monitoring and reporting will feed into Noise Envelope control measures will be included in the ES .	N
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	C	Monitoring proposals are not provided, and it is expected that these details would be provided in draft in the ES and that the Host Authorities will be consulted as part of their formulation.	Consultation on noise monitoring was undertaken with the NWG and locations were agreed.	N
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	C	The revised sound insulation scheme should acknowledge night time noise as well as day time noise. LLAL may wish to consider, or advise on whether they have considered a	The compensation scheme follows guidance in national policy that advises that insulation should be provided for properties within the 60 dB	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			commitment ensure all qualifying properties benefit from mitigation before the qualifying effects occur.	LAeq,16h noise contour. The proposed compensation scheme goes further and offers insulation for properties within the 54 dB LAeq,16h noise contour. Details on when properties will be eligible for compensation will be provided as part of the application for development consent.	
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	B	Yes, although there is a little confusion as to whether high sensitivity for residences is defined by them being exposed to noise levels above SOAEL prior to or after any changes associated with application.	The assessment criteria for air noise have been updated so it no longer refers to receptor sensitivity. The effect of changes in noise on residential properties are considered differently for residential properties experiencing 'with development' noise levels between LOAEL and SOAEL, and those experiencing 'with development' noise levels exceeding the SOAEL.	N
4.2	Are the methods for establishing the 'magnitude'	B	Yes, although we take issue with the daytime differentiation based on	The method for evaluating significance has been refined in	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	of effects on the receiving environment clearly defined?		absolute noise levels, which is not replicated for night-time.	line with current industry best practice.	
4.3	Are the methods for evaluating significance clearly defined/?	B	Yes, although we consider the approach to be flawed. See Noise Addendum included as Appendix A .	The method for evaluating significance has been amended to that used in the Bristol Airport EIA, which has gone through public inquiry.	N
4.4	Do the assessment methods used follow relevant guidance?	C	There is some latitude on the assessment method to be adopted, but we believe there are a number of issues requiring to be addressed. See Noise Addendum included as Appendix A .	These points are addressed in Section A19 of this document.	N
4.5	Have potential effects been considered both during construction and operation?	C	Insufficient information provided. As noted above is expected that the ES will include a detailed assessment of construction noise and vibration effects in line with relevant standards and good guidance practice. See Noise Addendum included as Appendix A .	A detailed assessment on construction noise and vibration will be included in the ES .	N
4.6	Has the magnitude, probability, duration (temporary and permanent),	B	Yes, but airborne aircraft noise level changes being different at different geographical locations should be	As different aircraft have a different noise footprint, variation in fleet proportions affect the shape of the noise contours.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	reversibility and significance of impacts been considered?		explained. See Noise Addendum included as Appendix A .		
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	B	Yes, although it is not clear whether the 2,500 people identified as likely to experience a significant effect (Table 9.32) are worse affected daytime or night-time or where they are. Beneficial effects minor, limited to ground noise.	Details on the population exposed to significant noise effects and identification of assessment locations are provided in the 2022 PEIR. Additional detail on the locations of population affected by significant effects and how they are affected during the day and night periods will be provided in the ES .	N
4.8	Are the residual significant effects clearly stated?	B	Only in summary terms in Table 9.32. Residual effects remain unchanged by the proposed mitigation.	Accepted.	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	N/A	Not addressed in the PEIR, as expected given the preliminary nature of the analysis. This should be addressed in the ES.	A cumulative effects assessment has been provided within Chapter 21 of the 2022 PEIR .	N
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	B	The imprecise nature of the noise modelling and the limited assessment undertaken have been noted. Proposals for future, more detailed work are set out.	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.1 1	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	B	Yes, although the noise section has not responded to some scoping report points. See Noise Addendum included as Appendix A .	These points are addressed in Section B18 of this document.	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	B	Yes, although this is limited by the preliminary nature of the analysis.	Accepted.	N
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	A	Yes	Accepted.	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	A	Although we take issue with a number of factors, the document appears to be internally consistent.	Accepted.	N
6.2	Is the PEIR readable to the audience for which it is intended?	B	More detail would be beneficial in some areas (air noise analysis for 2029/30, ground noise analysis at identified receptors, location of people significantly affected by noise).	Details on analysis of likely significant effects at assessment locations are provided in the 2022 PEIR. Full details of air noise analysis, ground noise analysis at identified receptors, location of people significantly	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				affected by noise will be provided in the ES .	
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	B	Reference to LOAEL and SOAEL could be avoided using less technical descriptors.	LOAEL and SOAEL are defined in national policy as a means of describing the effect of noise impacts so reference is considered necessary. LOAEL and SOAEL have been defined in the 2022 PEIR NTS .	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	C	NTS refers to an analysis of noise and vibration effects from DART, but these are not included in the PEIR. NTS states that worst case noise levels expected to occur in 2039, which differs to what is stated in the PEIR (see Noise Addendum, 4.4)	This was covered in paragraph 9.8.45 of the 2019 PEIR . Paragraph 9.1.4 of the 2019 PEIR indicated that 2029/2030 was included as a potential worst-case year; however, analysis indicated that this was not the case as stated in Paragraph 9.8.20 .	N
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	B	The figures are comprehensive, although there is no analysis of the impacts associated with the 2029/2030 noise contours.	The 2022 PEIR includes analysis of the worst-case year. All assessment years will be further detailed in the ES .	N
6.6	Are the Appendices generally expected to support this type of document provided in	B	Missing is a clear analysis of a peak noise year and when it is expected to occur, normally before the year of full	The peak noise year was identified in the 2019 PEIR as 2039, which is also the full	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Volume 3? – Please provide further commentary if required.		capacity, but this is dependent on the rate of uptake of new generation low noise aircraft.	<p>capacity year. The was due to the majority of the fleet transitioning to new generation aircraft by 2039 so the increased noise from additional aircraft movements is not offset by less noisy aircraft.</p> <p>The highest noise level year was identified as 2043 in the 2022 PEIR, which is also the full capacity year. The is due to the majority of the fleet transitioning to new generation aircraft by 2039 so the increased noise from additional aircraft movements is not offset by less noisy aircraft.</p>	
Conclusion					
	Legislation, Policy and Guidance Overall conclusion A		None	Accepted.	N
	Baseline Information Overall conclusion B		The noise contour baseline is set for 2017, raising the following issues: Explanation as to how noise sensitive receptors have been selected would be helpful at this stage;	An explanation on how noise sensitive receptors were selected will be included in the ES .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>The contour cannot be correlated with baseline measurements, made in 2018/2019 outside the 92-day summer contour period;</p> <p>Night noise levels breached current planning condition 10 in 2017 and 2018. Day and night noise levels breached the condition in 2019.</p>	<p>Validation of noise predictions for individual aircraft has been undertaken using data provided by LLAOL. As individual aircraft are validated using weather conditions during the measurement period, there is no requirement to use noise data from the 92-day summer period.</p> <p>It is noted that noise contour Planning Requirement limits were exceeded in 2019; however, an assessment of aircraft noise requires comparison of future aircraft noise with the Proposed Development against future aircraft noise without the expansion. Consequently, the baseline year is set at the last year of typical operations.so context may be provided against on how noise will change in future.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	<p>Mitigation, Enhancement and Monitoring</p> <p>Overall conclusion B</p>		<p>The revised Sound Insulation Scheme ignores night-time noise, falling short of current good practice at other airports, and may need to be revised to fully reflect the policy proposals outlined by the government in Aviation 2050.</p> <p>It is expected that monitoring proposals are included in draft in the ES.</p>	<p>Clarity will be provided in the ES as to why the noise insulation scheme focuses on daytime noise.</p> <p>Noise monitoring proposals will be detailed in the ES.</p>	N
	<p>Assessment of Significant Effects</p> <p>Overall conclusion B</p>		<p>The preliminary nature of the PEIR findings needs to be emphasised. A considerable amount of technical work needs to be done to ensure that the ES contains an accurate and comprehensive assessment of noise effects.</p> <p>Air noise impact criteria should be justified by supporting evidence, and may require revision/expanding to</p>	<p>The PEIR covers a preliminary assessment of likely worst-case noise effects that may result due to the proposed expansion. Where there was uncertainty over predictions, a conservative approach was adopted to ensure that impacts were not underestimated. The ES will provide more detail on noise modelling, assessment criteria and the assessment. This will be undertaken with reference to</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>reflect the full noise effects of the proposed expansion.</p> <p>The air noise assessment does not appear to fully account for the existing noise controls (planning conditions).</p> <p>The noise model is either insufficiently accurate to identify the future benefits of new generation, low noise aircraft or these benefits will not arise as might reasonably be expected.</p> <p>It is expected that the ES will include a detailed assessment of construction noise and vibration effects in line with relevant standards and good guidance practice. Commitments to days and hours of working need to be clearly set out.</p>	<p>best practice and appropriate guidance.</p> <p>Validation of noise predictions for individual aircraft has been undertaken using data provided by LLAOL. As individual aircraft are validated using weather conditions during the measurement period, there is no requirement to use noise data from the 92-day summer period. The noise model uses validated aircraft data for the majority of new generation aircraft. Where aircraft are not currently operational at the airport, data was used from the Air Noise and Performance database to ensure predictions are robust and follow best practice. This approach ensures that benefits from fleet transition to less noisy aircraft are realised in noise modelling.</p> <p>It is noted that noise contour planning condition limits were exceeded in 2019; however, an assessment of aircraft noise</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>requires future aircraft noise with the Proposed Development against future aircraft noise without the expansion. Consequently, the baseline year is set at the last year of typical operations.so context may be provided against on how noise will change in future.</p> <p>The DCO application will include details on how noise will be controlled throughout the lifespan of the Project through the Noise Envelope. This will supersede existing control measures.</p> <p>The ES will include a detailed construction noise and vibration assessment to expand on the assessment of likely significant effects in the 2022 PEIR. Details on construction working hours are provided in the Code of Construction Practice (Appendix 4.2 of the 2022 PEIR)</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	<p>Conclusions</p> <p>Overall conclusion A</p>		<p>The conclusions may reflect the likely noise outcomes, but they are not robustly supported by the analysis set out in the PEIR</p>	<p>The PEIR is an assessment of the likely worst-case effects that may result due to the proposed expansion. The conclusions provide a summary of the noise assessments detailed in the PEIR. More detail on the assessments of noise and vibration will be provided in the ES.</p>	N
	<p>Presentation (including Figures and Appendices)</p> <p>Overall conclusion B</p>		<p>Ground noise analysis contains no results at designated receptors.</p> <p>Construction and surface access assessments are for daytime only. These either need to be expanded or clear justification for omitting the night-time provided.</p>	<p>Ground noise predictions will be included in the ES.</p> <p>Where relevant, night-time traffic assessments will be included in the ES.</p>	N

B7 Soils and geology review checklist and summary

Note: 'Ref.' is to tables 2.-15 and 2-16 of the WSP on behalf of host authorities response.

Table B7.1: Soils and Geology

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B	<p>The PEIR Volume 1 Section 10.2 refers to legislation, policy and guidance including the Airport NPS.</p> <p>Consideration should be given to Central Bedfordshire Local Plan 2034, Pre-submission, January 2018 policies relating to contaminated land. Consideration also needs to be given to North Hertfordshire District Council Proposed Submission Draft Local Plan for 2011-2031, October 2016. Consideration also need to be given to the Hertfordshire Minerals Local Plan Review 2002-2016 and the Hertfordshire Minerals Local Plan (2016-2031) Consultation Draft Published in 2017.</p>	The Local Plans listed have now all been referred to in Chapter 17 of the 2022 PEIR and the reference to PPG has been updated	Y

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			The Planning Practice Guidance date needs to be updated to July 2019.		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	A	Described in Section 10.6	Accepted.	N
2.2	Do the data collection methods follow relevant guidance?	B	<p>The data collection methods do follow guidance as mentioned within Section 10.2.</p> <p>It should be noted that the Methodology has been updated to DMRB Geology and Soils now LA 109 Geology and Soils, however for the purpose of this EIA it is considered appropriate to continue with the methodology as set out in the Scoping Opinion. This should be agreed with the relevant consultees. It should be noted that there has been an update to DMRB Volume 11, Section 2 Part 5 Assessment and Management of Environmental Effects now LA 104 Environmental assessment and monitoring, however for the purpose of this EIA it is</p>	<p>A Working Group meeting was held on 26 July 2021 in which the methodology set out in the scoping opinion was presented and agreed with the relevant consultees. Further details of the stakeholder engagement and consultation are provided in Chapter 17, Section 17.4 of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			considered appropriate to continue with the methodology as set out in the Scoping Opinion. This should be agreed with the relevant consultees.		
2.3	Is the study area identified appropriately?	B	<p>Reference has been made to the Study Area in 10.6.8 however it needs to be more defined that the zone of influence for controlled water receptors (surface water and groundwater) is 1km and a reason stated for this based on rational and professional judgment. This zone of influence should also be added in for all further investigation, data analysis and modelling regarding controlled waters.</p> <p>However, in some parts of the PIER it mentions groundwater will be assessed in Chapter 11 Water Resources, if this is the case then cross reference to Chapter 11 should be added in at 10.6.8.</p>	<p>A Contaminated Land Working Group meeting was held on 26 July 2021 in which the study area, zone of influence and receptors was presented and agreed with the relevant consultees. Further details of the stakeholder engagement and consultation are provided in Chapter 17, Section 17.4 of the 2022 PEIR.</p> <p>Clarification on the Study area and Zol is provided in Chapter 17, Section 17.3 of the 2022 PEIR and consideration and justification of the distances included. The assessment study area for groundwater, surface water and potable water abstraction as potential receptors to any land contamination has been addressed and the study area has been extended to 2km.</p>	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
2.4	Have all the resources/receptors been considered?	B/C	<p>All receptors have been considered however the scoping opinion responses suggest that geology receptors relating to the excavation of chalk leading to potential features of geological interest being revealed should be considered in respect of future management and use of the site. This is a direct consequence of the development and so will be an effect of the proposals.</p> <p>Needs to be made clear and link with section 10.6.8 if groundwater and surface water receptors are being assessed in Chapter 11 Water Resources.</p> <p>No reference to below ground services receptors / building structures (e.g. potable water supply pipes and buried concrete). These have been referenced in the significance criteria assessment tables 10-4 and 10-5, needs to be carried through the rest of the PIER.</p>	<p>Geological and geomorphological features of scientific interest and importance were scoped out on the basis that there are none located within (or immediately adjacent to) the Application Site. The excavation work in the Chalk may expose features of interest, therefore a watching brief will be undertaken during earthworks and a record made if any features of significance are identified.</p> <p>Clear cross-referencing to interrelated chapters is included in Chapter 17 of the 2022 PEIR and will be in the ES.</p> <p>Service and building receptors have been included and clearly included in the assessment tables in the Chapter 17 of the 2022 PEIR.</p>	N
2.5	Is the value (sensitivity) of the resources/receptors	A / B	Yes, however needs to be clear that controlled waters are assessed within Chapter 11 Water Resources. Need	<p>Please see above response for geological receptor and building receptors.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	identified using appropriate criteria?		to clarify if building structures / below ground services are being assessed and add in geology receptors in terms of relating to the excavation of chalk leading to potential features of geological interest.	Clear cross-referencing to interrelated chapters is included in Chapter 17 of the 2022 PEIR and will be in the ES .	
2.6	Has there been consultation with the relevant statutory bodies?	A	Consultation has been undertaken with the relevant statutory bodies (Table 10-2).	A Contaminated Land Working Group meeting was held on 26 July 2021. A programme of consultation and further meetings is currently being developed which will be shared with the relevant statutory bodies. Further details of the stakeholder engagement and consultation is provided in Chapter 17, Section 17.4 of the 2022 PEIR .	N
2.7	Is the future baseline scenario adequately described?	C	Future baseline has not been described so it will need to be added in for the ES.	Chapter 17, Section 17.7 of the 2022 PEIR includes detail of the future baseline. This will also be in the ES Chapter.	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of	A	All is made clear; assumptions and limitations are discussed in Section 10.5.	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	professional judgment made clear?				
2.9	Which are the key receptors for the local authorities?		<p>To be discussed with LPAs.</p> <p>Likely to be Human Health Receptors including construction / maintenance workers, site users and adjacent site users.</p> <p>Existing soils affected by contamination due to the importation of material. Introduction of soil contamination to the area to be developed to public open space, from any material to be imported from the main airport site. Controlled Waters (Surface and Groundwater) and possible migration of ground gases and leachate from the former landfill site, located on the main development area within LBC area, following disturbance associated with the preparation and construction works however these seem to appear to be discussed in Chapter 11.</p>	<p>A Contaminated Land Working Group meeting was held on 26 July 2021 in which the receptors were discussed and agreed with LPAs. Further details of the stakeholder engagement and consultation are provided in Chapter 17, Section 17.4 of the 2022 PEIR.</p> <p>All soils/materials proposed to be reused within the Proposed Development will be subject to controls in accordance with current waste management legislation and guidance, and materials will either be reused under an environmental permit or in accordance with CL:AIRE Definition of Waste Code of Practice see Chapter 17, Section 17.8 of the 2022 PEIR and the Waste and Resources Chapter 19 of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				The receptors (human health, controlled waters) are identified in Chapter 17, Section 17.5 and overview of conceptual site model identifying potential contaminant linkages is in Chapter 17, Section 17.7 of the 2022 PEIR , these elements are discussed in detail in Appendices 17.1, 17.2, 17.3 and 17.4 of the 2022 PEIR .	
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	A/B	Refers to embedded and good practice mitigation in Section 10.7. Refers to additional mitigation in Section 10.9. Even though all mitigation measures are listed, measures will need to be included for below ground structures. It should be made clear that controlled waters mitigation is discussed in Chapter 11. Reference needs to be made to what mitigation measures will be in place	Accepted. Clear cross-referencing to interrelated chapters is included in Chapter 17 of the 2022 PEIR and will be in the ES . A remediation strategy is provided within Appendix 17.5 of the 2022 PEIR , this will also be included with the ES . The mitigation measures set out in the remediation strategy are summarised	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>to prevent ground gas migration during the construction phase.</p> <p>Reference needs to be made to how LLAL are going to ensure that imported material will not introduce any contamination to the soils in regard to the creation of the new park.</p> <p>Reference to the potential exposure of Chalk Geology following excavation of material, should be considered in the management of the site / any remediation proposals.</p> <p>Reference to mitigation measures for prevention of migration of ground gases and leachate from the former landfill with and without a building during both construction and operation stages should be included. The ES should include more information on the proposed 'perimeter gas protection'/ 'virtual gas curtain' to potentially be placed around 'Area A'.</p>	<p>within the 2022 PEIR and includes:</p> <ul style="list-style-type: none"> mitigation measures for ground gas migration for the construction and operational phase. This includes measures such as venting trench or 'virtual gas curtain' at the landfill boundary to prevent off-site migration, management of excavation and placement process and monitoring for reuse of landfill material, incorporation of gas protection measures in buildings and in service corridors; a watching brief during earthworks in the Chalk to record if any features of geological importance are identified. measures to control leachate during operation and construction, including collection wells, monitoring and disposal 	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>via on-site water treatment plant or off-site disposal;</p> <ul style="list-style-type: none"> • monitoring and installation of cover system to prevent infiltration and further generation of leachate; and • the remediation strategy sets out suitable criteria for reuse of materials (imported and site won) to be agreed with the regulators and the Draft Code of Construction Practice (Appendix 4.2 of 2022 PEIR) sets out control and monitoring measures that contractors will be required to implement to ensure no contamination is introduced into the area of the new park. <p>Summary of measures will also be included with the ES.</p>	
3.2	Are the mitigation measures included for significant adverse effects appropriate?	A/B	Mitigation measures are detailed in Section 10.7 and 10.9. It should be made clear that controlled water mitigation measures are discussed in	Accepted. Clear cross-referencing to interrelated chapters is included in	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Chapter 11 rather than the geology and soils chapter.	Chapter 17 of the 2022 PEIR and will be in the ES .	
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	A/B	Mitigation measures are detailed in Section 10.7 and 10.9. It should be made clear that controlled water mitigation measures are discussed in Chapter 11 rather than the geology and soils chapter.	Accepted. Clear cross-referencing to interrelated chapters is included in Chapter 17 of the 2022 PEIR and will be in the ES .	N
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	A	Refers to monitoring as part of the good practice mitigation measures section 10.7.11. Additional mitigation measures required as part of the construction stage includes further GI and groundwater and ground gas monitoring detailed in section 10.9.2.	Accepted.	N
3.5	How could the proposed mitigation measures and/or the proposed development be improved?		Construction works should include measures to ensure that they do not create any preferential pathways for ground gases and leachate. If any are created they should be detected and, if necessary, treated. Currently no reference to this has been found in the PEIR document. This is particularly important in relation to the former landfill and proposed building.	A remediation strategy is included as Appendix 17.5 to the 2022 PEIR and will also be appended to the ES . The mitigation measures set out in the remediation strategy are summarised in the 2022 PEIR in Chapter 17, Section 17.8 and will be summarised within the ES and will include: <ul style="list-style-type: none"> mitigation measures for ground gas migration for 	Y (gas mitigation measures for aviation apron also now required)

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Proposed mitigation and monitoring strategies should be further discussed and agreed with the relevant statutory bodies and Host Authorities.	<p>the construction and operational phase .This includes measures such as venting trench or 'virtual gas curtain' to prevent off-site migration, management of excavation and placement process and monitoring</p> <ul style="list-style-type: none"> measures to control leachate during operation and construction, including collection wells, monitoring and installation of cover system to prevent infiltration and further generation of leachate. <p>Further meetings with the Contaminated Land Working Group are proposed to agree the details of the remediation measures for gases and leachates with the relevant statutory bodies and Host Authorities. Further details of the stakeholder engagement and consultation is provided in Chapter 17, Section 17.4 of the 2022 PEIR.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	A	Yes, detailed in Paragraph 10.4.9, 10.4.10 and 10.4.15 and 10.4.16	Accepted	N
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	A	Yes, detailed in Section 10.4 and Table 10-4	Accepted.	N
4.3	Are the methods for evaluating significance clearly defined/?	A	Yes, clearly defined in paragraph 10.4.9, 10.4.10	Accepted.	N
4.4	Do the assessment methods used follow relevant guidance?	A / B	<p>Yes, as there is no specific methodology for determining the significance effects to soils and geology.</p> <p>It should be noted that the Methodology has been updated to DMRB Geology and Soils now LA 109 Geology and Soils, however for the purpose of this EIA it is considered appropriate to continue with the methodology as set out in the Scoping Opinion. This should be agreed with the relevant consultees. It should be noted that there has been an update to DMRB Volume 11,</p>	A Working Group meeting was held on 26 th July 2021 in which the methodology set out in the scoping opinion was presented and agreed with the relevant consultees.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Section 2 Part 5 Assessment and Management of Environmental Effects now LA 104 Environmental assessment and monitoring, however for the purpose of this EIA it is considered appropriate to continue with the methodology as set out in the Scoping Opinion. This should be agreed with the relevant consultees.		
4.5	Have potential effects been considered both during construction and operation?	B	<p>Yes, all potential effects have been considered both during construction and operation. However, no effects have been identified for building structures / below ground services. These are included in the Impact Magnitude Criteria table (Table 10-4) but have not been assessed elsewhere in the report, needs to be clear if they are to be assessed in this chapter or not.</p> <p>Effects on geology receptors relating to the excavation of chalk leading to potential features of geological interest being revealed have not been considered in respect of future management and use of the site.</p>	<p>Service and building receptors have been included and clearly included in the assessment tables in Chapter 17, Section 17.14 of the 2022 PEIR.</p> <p>Geological and geomorphological features of scientific interest and importance were scoped out on the basis that there are none located within (or immediately adjacent to) the Proposed Development. The excavation work in the Chalk may expose features of interest, therefore a watching brief will be undertaken during earthworks and a record made if any features of</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				geological importance are identified.	
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	B / C	The magnitude, probability and significance impacts have been considered. The duration is mentioned in 10.4.11 by saying that short to medium impacts are considered to be those associated with the construction phase and long-term impacts relate to those issues that will have a lasting effect on the site and surrounding areas once the development is complete. Temporary effects are considered to be reversible, whereas permanent effects are considered to be irreversible. Table 10-4 Impact Magnitude include duration and reversibility. These terms are included in the table however are not included in the assessment text.	Temporary and permanent effects are considered in Chapter 17, Section 17.9 of the 2022 PEIR .	N
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	A / B	These are identified and described with a justification for the construction and operation stages in Section 10.8. Also included in Table 10-20, and 10-22.	Accepted.	N
4.8	Are the residual significant effects clearly stated?	A / B	Yes, stated in Section 10.10 that residual effects remain as those	Service and building receptors have been included	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			reported in section 10.8 of the PIER. Also shown in Table 10-22 Need to clarify if building structures / below ground services are being assessed and add in geology receptors.	and clearly included in the assessment tables in Chapter 17, Section 17.14 of the 2022 PEIR .	
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	B/ C	Cumulative assessment outlined in Section 10.11, however it is expected that the interaction of effects and cumulative effects would be fully considered as part of the ES. The cumulative assessment outlines effects associated with soils and geology on human health (excluding groundwater). The effects on groundwater are covered in Chapter 11, further cross referencing would be beneficial here. The effects on below ground services / structures due to contamination have not been assessed, neither have the effects of chalk extraction, these would need to be considered as part of the ES.	Service and building receptors have been included and clearly included in the assessment tables in Chapter 17, Section 17.14 of the 2022 PEIR . Comment noted. Clear cross-referencing to interrelated chapters is included in Chapter 17 of the 2022 PEIR and will be in the ES Geological and geomorphological features of scientific interest and importance were scoped out on the basis that there are none located within (or immediately adjacent to) the Proposed Development. The excavation work in the Chalk may expose features of interest, therefore a watching brief will be undertaken during	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				earthworks and a record made if any features of importance are identified.	
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	A	As outlined in Section 10.5, this details assumptions and limitations associated with dynamic nature of the environment where conditions may change during the construction and operational phases as well as where GI has not been carried out there is potential for contamination to exist.	Accepted.	N
4.11	Has the scoping opinion been considered in the preparation of the PIER as applicable at this stage?	B	The main Scoping Opinion comments relevant to the Geology and Soils assessment are presented in Table 10-3 with an explanation of how these comments have been addressed within the PIER or will be address in the ES, however further cross referencing to the Water Resources Chapter is needed.	Accepted. Clear cross-referencing to interrelated chapters is included in Chapter 17 of the 2022 PEIR and will be in the ES .	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	B / C	Yes, conclusions are summarised in the PIER, however it is hard to find what is included in the conclusions as it is listed as Preliminary Assessment (Section 10.8) and the mitigation measures are talked about in Section 10.9 and Residual effects in 10.10,	Accepted. Chapter 17, Section 17.14 in the 2022 PEIR provides a clear summary table of the impacts, significance of effect, mitigation measures and residual effect.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			would benefit from a clear defined structure.		
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	A	Yes, these are in Table 10-22	Accepted.	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	B	It is considered that the PIER Chapter 10 Geology and Soils is unbiased, balanced, comprehensive and transparent in its logic and presentation. As outlined above, there are some sections that require further information to make them more comprehensive.	Accepted.	N
6.2	Is the PEIR readable to the audience for which it is intended?	A	It is considered that the PIER Chapter 10 Geology and Soils is readable to the audience for which it is intended, however (as outlined above) could benefit from more cross referencing between chapters.	Accepted. Clear cross-referencing to interrelated chapters is included in the Chapter 17 of the 2022 PEIR and will be in the ES .	N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	A / B	Yes, however does not contain maps showing where the high risk UXO and old landfills sites are etc.	Table 17.16 in Chapter 17 of the 2022 PEIR provides a clear summary of the UXO risks in different areas of the site. The existing airport, historical landfill and contractors compound are the	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				only areas which are considered to have a very high risk. Measures to address these risks are detailed in Chapter 17, Section 17.8.19 of the 2022 PEIR and the draft Code of Construction Practice (Appendix 4.2 of the 2022 PEIR) sets out control and monitoring measures that contractors will be required to implement	
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	A	The Non-Technical Summary presentation matches the findings of the PIER.	Accepted.	N
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	A	Pier Volume 2 Figure 10-1 and 10-2	Accepted	N
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	A	Appendix 10.2 PRA and Appendix 10.1 Figures are what is expected to support this type of document.	Accepted	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
Conclusion					
	<p>Legislation, Policy and Guidance</p> <p>This section contains a good number of Legislation, policy and guidance documents however some key local plan policies have been omitted and guidance dates need updating.</p>		<p>Consideration needs to be given to the emerging Central Bedfordshire and North Hertfordshire District Local Plans, as well as Hertfordshire Minerals Local Plan.</p> <p>The ES chapter should go beyond just listing the relevant local plans and policies by describing how those have informed the scope/methodology/mitigation.</p> <p>The Planning Practice Guidance date needs to be updated to reflect recent updates.</p>	<p>Chapter 17, Section 17.2 of the 2022 PEIR provides summary tables of the legislation, policy and guidance including the local plans identified and how these have informed the scope/methodology/mitigation</p>	N
	<p>Baseline Information</p> <p>Good level of baseline information provided, however to aid the viewer further cross referencing between chapters should be implemented. There needs to be further clarification on what receptors are being assessed in this chapter e.g. Table 10-4 mentions building structures however these are</p>		<p>Clarity is needed on whether building structures / below ground services are being assessed as part of this chapter.</p> <p>Further cross referencing to Chapter 11 – Water Resources would be beneficial.</p> <p>Geology receptors in terms of relating to excavation of chalk leading to potential features of geological interested need to be mentioned.</p>	<p>Clear cross-referencing to interrelated chapters is included in Chapter 17 of the 2022 PEIR and will be in the ES.</p> <p>Service and building receptors have been included and clearly included in the assessment tables in Chapter 17, Section 17.14 of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	not mentioned anywhere else in the chapter.		Future baseline needs to be considered in the context of the phases and submission of the ES.	Geological and geomorphological features of scientific interest and importance were scoped out on the basis that there are none located within (or immediately adjacent to) the Proposed Development. The excavation work in the Chalk may expose features of interest, therefore a watching brief will be undertaken during earthworks and a record made if any geological features of importance are identified. Chapter 17, Section 17.7 of the 2022 PEIR includes detail of the future baseline.	
	<p>Mitigation, Enhancement and Monitoring</p> <p>Generally good level provided for Mitigation, Enhancement and Monitoring, however there needs to be clarification on what receptors are being assessed in this chapter.</p>		Clarity is needed on whether building structures / below ground services are being assessed as part of this Chapter, if so mitigation measures will need to be updated to reflect this. Reference needs to be made to what mitigation measures are in place to prevent ground gas mitigation during the construction phase. Reference to mitigation measures for prevention of	<p>Accepted. Clear cross-referencing to interrelated chapters is included in Chapter 17 of the 2022 PEIR and will be in the ES.</p> <p>Service and building receptors have been included and clearly included in the assessment tables in</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Further reference is required for mitigation measures relating to ground gas and leachate, imported material and, potential exposure of Chalk Geology.		<p>ground gases and leachate from the former landfill and without a building during both construction and operation stages.</p> <p>Reference needs to be made to how they are going to ensure that imported material will not introduce any contamination to the soils in regard to the creation of the new park.</p> <p>Reference to the potential exposure of Chalk Geology following excavation of material, should be considered in the management of the site / any remediation proposals. Further cross referencing to Chapter 11 – Water Resources would be beneficial.</p>	<p>Chapter 17, Section 17.14 of the 2022 PEIR.</p> <p>A remediation strategy is included as Appendix 17.5 to the 2022 PEIR and will be appended to the ES. The mitigation measures set out in the remediation strategy are summarised in the PEIR 2022 and will be summarised within the ES. The mitigation includes:</p> <ul style="list-style-type: none"> mitigation measures for ground gas migration for the construction and operational phase are included in Chapter 17, Section 17.8 of the 2022 PEIR. This includes measures such as venting trench or 'virtual gas curtain' to prevent off-site migration, management of excavation and placement process and monitoring for reuse of landfill materials and gas control within buildings and service corridors; 	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<ul style="list-style-type: none"> measures to control leachate during operation and construction, including collection wells, monitoring and installation of cover system to prevent infiltration and further generation of leachate; and the remediation strategy will set out suitable criteria for reuse of materials and the Draft Code of Construction Practice (Appendix 4.2 of 2022 PEIR) sets out control and monitoring measures that contractors will be required to implement to ensure no contamination is introduced into the area of the new park. <p>Geological and geomorphological features of scientific interest and importance were scoped out on the basis that there are none located within (or immediately adjacent to) the Application Site. The</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				excavation work in the Chalk may expose features of interest, therefore a watching brief will be undertaken during earthworks and a record made if any geological features of importance are identified.	
	<p>Assessment of Significant Effects</p> <p>Generally good level of assessment however there needs to be clarification on what receptors are being assessed in this chapter.</p>		Clarity is needed on whether building structures / below ground services are being assessed as part of this Chapter, if so mitigation measures will need to be updated to reflect this. Geology receptors in terms of relating to excavation of chalk leading to potential features of geological interest need to be mentioned.	<p>Service and building receptors have been included and clearly included in the assessment tables in Chapter 17, Section 17.14 of the 2022 PEIR.</p> <p>Geological and geomorphological features of scientific interest and importance were scoped out on the basis that there are none located within (or immediately adjacent to) the Application Site. The excavation work in the Chalk may expose features of interest, therefore a watching brief will be undertaken during earthworks and a record made if any geological</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				features of importance are identified.	
	<p>Conclusions</p> <p>Generally good level of information, however the structure needs to be defined.</p>		<p>Could benefit from being better structured so that the reader can easily see where the conclusions are for both the construction and operation stage.</p> <p>Will need to be updated when geology receptors have been assessed and clarification on building services / below ground structures have been made.</p>	<p>Chapter 17, Section 17.9 of the 2022 PEIR clearly describes the preliminary assessment of effects for each phase of development in terms of construction and operational effects.</p> <p>See above comments on geology receptors and buildings.</p>	N
	<p>Presentation (including Figures and Appendices)</p> <p>The Chapter is presented well however, could benefit from more cross referencing between Chapters.</p>		<p>The PEIR is well presented but could benefit from more cross referencing between this Chapter and the Water Chapter.</p>	<p>Accepted. Clear cross-referencing to interrelated chapters is included in Chapter 17 of the 2022 PEIR and will be in the ES.</p>	N

B8 Water resources review checklist and summary

Note: 'Ref.' is to table 2.17 of the WSP on behalf of host authorities response.

Table B8.1: Water resources

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B / C	<p>DMRB HD 45/09 was replaced by LA 113 in August 2019 and should be considered for the ES assessment in terms of defining receptors importance value (sensitivity) and magnitude of impacts. As a result, the applicant should also consider the use of the Highways England Water Risk Assessment Tool (HEWRAT) for the ES assessment or as otherwise agreed with the relevant statutory bodies.</p> <p>The reason for selecting a highways-specific assessment methodology, in terms of defining receptors importance value (sensitivity) and magnitude of impacts, is not clear and should be justified.</p>	<p>Accepted. LA113 has been used to undertake assessment and appropriate justification is included in Chapter 20 of the 2022 PEIR and will be included in the ES. This has included the use of HEWRAT as recommended.</p> <p>Chapter 20 of the 2022 PEIR includes reference to appropriate legislation and policy. Section 20.2 of the chapter outline how and where the relevant requirements of appropriate legislation and policy have informed the assessment.</p>	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>The EU Nitrates Directive (1991), Anti-Pollution Works Regulations (1999), Environmental Damage (Prevention and Remediation) (England) Regulations (2015) and Environmental Permitting (England and Wales) Regulations (2016) (as amended) are recommended to be considered relevant to this assessment to inform the ES assessment.</p> <p>We acknowledge the use of the current climate change guidance embedded within the National Planning Policy Framework however UK Climate Projections (UKCP) 2018 are recommended to be considered. Where updates have not been brought through into national policy, the approach should be agreed in consultation with Luton Lead Local Flood Authority (LLFA) and the Environment Agency due to the strategic nature of the proposed development and vulnerability</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>classification considered within the application (essential infrastructure) and associated significant increase of impermeable surface and resultant potential for increase in peak and volumetric runoff at the top of the surface water catchment.</p> <p>Consideration of Luton Local Plan Policy LLP6 'London Luton Airport Strategic Allocation: should be made; namely, Part E and Part F: where Part F: iii states: "provision is made for sustainable drainage and the disposal of surface water in order to ensure protection of the underlying aquifer and prevent any harm occurring to neighbouring and lower land".</p> <p>The chapter lists only the relevant local plans and does not include reference to the policies relevant to/that have informed the scope/methodology/mitigation. Detail on the guidance's and specific policies used in this assessment should be provided.</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	B	<p>Groundwater sections include a comprehensive set of data sources, including the Environment Agency's Vale of St Albans groundwater model. More detail on groundwater model calibration points and representation of the site-specific conditions would be useful. Groundwater level monitoring methods are not defined; discrete manual dip method applied and therefore maximum groundwater levels and variations carry uncertainty (greater variation and higher groundwater elevations likely) – this needs to be outlined in the report in the assumptions and limitations.</p> <p>It is acknowledged that the Environment Agency Catchment Data Explorer has been considered, it is also recommended to obtain Water Framework Directive (WFD) related data directly from the Environment Agency to compliment this data set. Consultation with the Environment</p>	<p>Accepted.</p> <p>A Hydrogeological Risk assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES. This will include consideration of groundwater modelling and site-specific conditions where relevant.</p> <p>Ongoing engagement with the Environment Agency and relevant LLFAs has been undertaken throughout the duration of the project and a summary of the consultation is provided in Chapter 20 of the 2022 PEIR and will be included in the ES.</p> <p>An assessment of water quality undertaken using HEWRAT will be included in the ES.</p> <p>A Flood Risk Assessment has been prepared that is</p>	N

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			<p>Agency, Luton LLFA and utility statutory undertakers should be undertaken to inform a more comprehensive understanding of any local receptor sensitivities.</p> <p>Linked to the update of LA 113, in terms of defining receptors importance value and magnitude of impacts. As a result, the applicant should also consider the use of the Highways England Water Risk Assessment Tool (HEWRAT) for the ES assessment or as otherwise agreed with the relevant statutory bodies. The reason for selecting a highways-specific assessment methodology, in terms of defining receptors importance value (sensitivity) and magnitude of impacts, is not clear and should be justified.</p> <p>Critical drainage areas that overlap with the proposed development should be recognised and specific design measures should be proposed to reduce the flood risk in these areas where practicable alongside</p>	<p>provided as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.1). Assumptions undertaken in each assessment will be clearly stated in the relevant documentation.</p>	

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			measures throughout the overall proposed development.		
2.2	Do the data collection methods follow relevant guidance?	B / C	<p>Identification of sensitive surface water receptors (e.g. other watercourses outside of the Main River network and surface water features including ponds/ lakes and including but not limited to the TW basin in Eaton Green Rd/Wigmore Lane) should be agreed with the relevant LLFA's and informed by surveys as deemed appropriate. Groundwater level monitoring has been completed but the data collection technique has not been described in the PEIR document. Groundwater quality monitoring mentioned but monitoring frequency or results not described in PEIR, however, a statement reports this will be included in the ES.</p>	<p>Accepted. Chapter 20 of the 2022 PEIR identifies all sensitive surface water receptors located within the Proposed Development study area.</p> <p>A Hydrogeological Risk assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES.</p> <p>The Hydrogeological Characterisation Report prepared as an appendix to Chapter 20 of the 2022 PEIR and Chapter 17 of the 2022 PEIR provide additional information on groundwater level monitoring undertaken as part of the GI for the Proposed Development (refer to Appendix 20.3). Ongoing engagement with the Environment Agency and relevant LLFAs has been</p>	N

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				undertaken throughout the duration of the project and a summary of the consultation is provided in Chapter 20 of the 2022 PEIR and will be included in the ES .	
2.3	Is the study area identified appropriately?	B-C	<p>Any receptors outside of the 1km study area that are in hydraulic connectivity to the Proposed Development should be considered as informed by the baseline assessment to encapsulate receptors affected by discharges from sewers, groundwater and surface water flows, for example Luton Hoo Lakes. This approach should be carried through for the cumulative assessment.</p> <p>As the groundwater flow is predominantly fracture driven flow, consultation with the Environment Agency to agree the groundwater study area is recommended. Likely Environment Agency will request a 4-5km search radius for the ES.</p>	<p>Accepted. Relevant receptors outside of the 1km study area have been included in the assessment undertaken in Chapter 20 of the 2022 PEIR. Ongoing engagement has been undertaken with the Environment Agency, at this stage they have not identified any specific requirements to extend the study area.</p> <p>The Zone of Influence (Zol) for the cumulative assessment is 1km from the Proposed Development but will be extended where required to account for receptors located outside of the Zol that are in hydraulic connection with the Proposed Development.</p>	N

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2.4	Have all the resources/receptors been considered?	B-C	<p>Groundwater:</p> <p>Groundwater abstractions are not discussed in the report text but are included on Figure 11-2 – it would be useful to describe these potential receptors in the report. Report should include both licensed and unlicensed groundwater abstractors as receptors.</p> <p>Licensed groundwater discharges are included as receptors but WSP would question whether these should be included.</p> <p>Degradation of chalk geology as a consequence of infiltration should be assessed.</p> <p>Surface Water:</p> <p>Based on the updated LA113 it is expected that the sensitivity of all WFD waterbodies to be high, unless appropriately justified.</p> <p>The assessment should consider extreme weather surface water overland flow routes (also referred to</p>	<p>Accepted. A Hydrogeological Risk assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES.</p> <p>Chapter 20 of the 2022 PEIR includes both licensed and private groundwater abstractions where the data is available.</p> <p>Chapter 20 of the 2022 PEIR outlines the importance values assigned to all WFD bodies in alignment with LA113.</p> <p>A Flood Risk Assessment has been prepared that is provided as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.1) that assesses the potential impacts of surface water flooding on all surface water features located in the study area for the Proposed Development. Receptor sensitivity of flood risk</p>	N

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			<p>as dry/ winterbourne watercourses) in relation to the wider surface water features.</p> <p>Indirect effects on surface water receptors (e.g. discharges directly from sewerage outfalls) should be considered/ receptors and assessment in the context of flood risk and water quality.</p> <p>Indirect effects on surface water receptors (e.g. discharges directly from sewerage outfalls) should be considered.</p> <p>Surface water and groundwater receptors should be assessed against the baseline scenario and against the expected standards for pollution prevention in relation to existing surface water and groundwater discharges.</p> <p>Flood Risk Receptors: It would be expected that consideration of roads includes A505 Vauxhall Way as well as Kimpton</p>	<p>receptors is defined in line with the NPPF and stated in FRA. The FRA also includes an assessment of groundwater flood risk (scoped in) and specific impacts on Kimpton.</p> <p>The assessment undertaken in Chapter 20 of the 2022 PEIR considers direct and indirect effects on surface water receptors.</p> <p>A Water Cycle Strategy will be prepared to accompany the ES which will focus on potential impacts of the project on water infrastructure and supply.</p> <p>A Hydrogeological Characterisation Report has been prepared as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.3) that considers the impacts of infiltration as a result of the Proposed Development on the underlying aquifer.</p>	

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			<p>Road and New Airport Way (A1081). As these roads provide the primary access to the Airport it would be expected to consider this development component as essential infrastructure and as such would be considered to have 'high importance' receptor sensitivity unless otherwise justified.</p> <p>Residential properties receptor group should not be limited to specific roads and should be considered as a catchment in its entirety.</p> <p>Flood risk receptors as a consequence of potential increase discharge to surface watercourses (e.g. River Lea) and changes to groundwater flows/ emergence should be considered – fluvial flooding has been scoped out.</p> <p>Groundwater flooding has been scoped out but consideration should be given to the effects of discharging increased volumes of water to soakaways and the potential for, and</p>	

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			<p>implications of, groundwater mounding.</p> <p>Surface water impacts to surface water receptors from the proposed development, including existing discharges to all surface water bodies, both directly and indirectly (through infiltration, groundwater, overland flow, sewer outfall) should be assessed in terms of water quality and flood risk.</p> <p>Water infrastructure:</p> <p>Increase in demand on clean water usage should specifically be assessed including the increase associated with the additional terminal operations.</p> <p>Changes to demand and water quality on surface water wastewater infrastructure should be considered.</p> <p>Overview:</p> <p>A map showing all these receptors would be helpful.</p>		

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2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria? (to be checked against comments in Appendix 17)	B-C	<p>Importance values (sensitivity) and magnitude of impacts have been adapted from DMRB HD 45/09, however this has been superseded by LA 113. The reason for selecting a highways-specific assessment methodology is not clear and should be justified. The applicant should ensure the importance values and magnitude of impacts are consistent with the current guidance.</p> <p>The description of each importance value refers to 'quality and rarity' - it is considered that this should refer to 'quality or rarity' as receptors may be valuable based solely on their quality, independent of their rarity.</p> <p>For clarity, Table 11-1 would benefit from identifying the basis upon which each receptor has been assigned its importance value.</p> <p>Groundwater does not include for licensed and unlicensed groundwater abstractors, these should be noted as</p>	Accepted. Reference to appropriate guidance has been included in Chapter 20 of the 2022 PEIR and will be included in the ES . The importance value of all water receptors located in the study area has been defined using DMRB LA113.	N

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			high. Head deposits value could be reduced to a low value receptor. It is recommended that the assessment uses a consistent approach for defined terms (e.g. either receptor 'importance value' or 'sensitivity')		
2.6	Has there been consultation with the relevant statutory bodies?	A	The Environment Agency, Lead Local Flood Authorities, Thames Water and Affinity Water have been consulted. The approach to continue consultation with regards to Environmental Permits is supported, however it is expected that fundamental principles are agreed as part of the ES through consultation with relevant statutory bodies.	Accepted. Ongoing engagement has been undertaken with the Environment Agency, relevant LLFAs, Thames Water and Affinity Water. A summary of the consultation is provided in Chapter 20 of the 2022 PEIR and will be included in the ES .	N
2.7	Is the future baseline scenario adequately described?	C	No future baseline considered; this should form part of the ES.	Accepted. A description of the future baseline for water resources will be provided in the ES .	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	B	Assumptions as part of the PEIR are noted. The source of considered groundwater levels have not been defined; if these are from discrete	Accepted. A Hydrogeological Risk assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES .	N

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			<p>manual dips then groundwater levels may be in excess of these levels. Uncertainty exists around the proposed discharge to ground (likely to be one of the largest in the UK) and the extent of groundwater mounding and flooding impacts are unknown.</p>		
2.9	Which are the key receptors for the local authorities?	B-C	<p>A summary table preceding the baseline section summarising all individual receptors with justification of the receptor 'importance value' (sensitivity) in accordance with Table 11-4 should be provided. Cross reference to a map with specific illustration of all the receptors would be helpful.</p> <p>Key receptors include:</p> <p>All identified flood risk receptors</p> <p>Groundwater water bodies (Principal Chalk Aquifer)</p> <p>Groundwater abstractions;</p> <p>Surface water features (note that Main Rivers are principally considered by the Environment Agency), however impacts through</p>	<p>Accepted. Chapter 20 of the 2022 PEIR includes a summary table of all individual water receptors outlining receptor 'importance value' and justification for the 'importance value' assigned for each receptor in line with Table 11-4 in LA113.</p> <p>Chapter 20 of the 2022 PEIR cross-references accompanying figures (provided in Volume 4 of the 2022 PEIR) that show key receptors.</p>	N

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			overland flow to the wider surface water catchments are relevant to the LPA's		
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	B-C	<p>Embedded mitigations:</p> <p>Suggest separating Paragraph 11.7.4 into quality and quantity. Piling risks are not discussed, it would be useful for the reader to have the risks presented here before the mitigation is listed.</p> <p>Groundwater levels are said to have been considered in the design to avoid groundwater interaction (11.7.4). Suggest rephrasing this to outline/preliminary design. The source of considered groundwater levels has not been defined; if these are from discrete manual dips then groundwater levels may be in excess of these levels (this should be defined in the assumptions and limitations). Would also recommend a seasonal mitigation i.e. mineral extraction</p>	<p>Accepted. A Hydrogeological Risk Assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES. This will outline the potential impacts of the scheme on groundwater quality and levels.</p> <p>Paragraph 11.7.4. has been superseded and is no longer included in the PEIR. A Piling Risk Assessment will be prepared by the contractor in consultation with the Environment Agency.</p> <p>The Drainage Design Statement is provided as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.4) and outlines the design</p>	N

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			<p>works are to take place outside a winter period to avoid elevated groundwater conditions.</p> <p>A Piling Risk Assessment, Remediation Options Appraisal (ROA) and remediation strategy, Detailed Quantitative Risk Assessment (DQRA) and introduction of a capping layer over the landfill (to prevent leachate generation) have been included as groundwater mitigations. The DQRA will be completed for the ES. Due to the sensitive groundwater area the statutory bodies may request a Preliminary Piling Risk Assessment be completed to support the ES, the requirement for this assessment should be identified through consultation with statutory bodies.</p> <p>Construction – Code of Construction Practice (CoCP):</p> <p>Key components of the CoCP relevant to surface and groundwater regime are supported</p>	<p>of the surface water and foul water management system. It includes plans to illustrate the existing and proposed surface water drainage catchments. The Drainage Design Statement has informed by best practice industry guidance.</p> <p>The drainage design for the Proposed Development has applied a 40% allowance to account for the impacts of climate change.</p> <p>Ongoing engagement has been undertaken with the Environment Agency, relevant LLFAs, Thames Water and Affinity Water. A summary of the consultation is provided in Chapter 20 of the 2022 PEIR and will be included in the ES.</p> <p>Further details on groundwater monitoring during will be provided in the ES.</p> <p>The Draft CoCP (refer to Appendix 4.2 of the 2022</p>	

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			<p>in principle and are expected to be developed as part of the ES and Flood Risk Assessment as informed through consultation with statutory bodies.</p> <p>The proposal for a site-specific flood risk management plan is supported, it is expected that a temporary Drainage.</p> <p>Construction:</p> <p>Strategy would form part of the Drainage Strategy proposed to be submitted as part of the ES to ensure that the assessment demonstrates that there is no temporary adverse effect to the flood risk receptors.</p> <p>Support the proposal for a Construction Stage Surface Water Management Strategy (CSWMS), and would expect the principles to be discussed and agreed in principal with the LLFA and EA as part of the ES and to form part of the Drainage Strategy. Appropriate drainage calculations/ modelling to support the</p>	<p>PEIR) includes reference to best practice guidance from CIRIA, Environment Agency, LLFA and National Highways.</p>	

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			<p>Drainage Strategy (construction and operation) including consideration of exceedance events in accordance with ANPS paragraph 5.162 should be included as appropriate and agreed within the LLFA's.</p> <p>The CoCP includes for groundwater quality and groundwater level monitoring during construction – the type and duration of monitoring, and contamination release response mitigation, will need to be agreed with the statutory bodies.</p> <p>Suggest the CoCP includes reference to EA and CIRA best practices.</p> <p>Operation – Drainage Strategy:</p> <p>General approach is supported in principle, subject to consideration of the below:</p> <p>In accordance with ANPS paragraph 5.162 “surface water management should be able to cope with events that exceed the design capacity of the system, so that excess water can be</p>	

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			<p>safely stored on or conveyed from the site without adverse impacts".</p> <p>Particular attention should be made to the potential linkages to the high risk extreme surface water flow paths to ensure flood risk is not increased offsite and design exceedance does not result in adverse effect off-site. The applicant should consider design in relation to flood risk to a higher return period, which should be explored through sensitivity testing with the FRA as part of the ES.</p> <p>Design of a 1 in 100 year storm plus 40% allowance for climate change on surface water drainage design is supported however to ensure the proposed development remains resilient in the future (with continued uncertainties of climate change effects on rainfall intensity) it is recommended that consideration, through design or exceedance sensitivity testing is undertaken in regard to more severe effects of</p>		

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			<p>climate change as informed by and agreed with the EA and LLFA's to take into account the expected implementation/ changes from UKCP18 and ANPS paragraph 5.162. Appropriate drainage calculations to support the Drainage Strategy (construction and operation) should be included as appropriate and agreed within the LLFA's.</p> <p>Paragraph 11.7.12: It is recommended that surface water treatment, which is proposed to form part of the Drainage Strategy within the ES, is developed in accordance with best practice including: CIRIA Report C753 'The SuDS Manual' and gov.uk/ Environment Agency guidance including but not limited to: Pollution prevention for businesses (2016), and Discharges to surface water and groundwater: environmental permits (2016). Consideration for</p>	

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			<p>isolating surface water drainage components at low risk of surface water pollution should be sought to limit the requirement for water treatment to maximise the quality of discharge of 'clean' direct rainfall.</p> <p>Paragraph 2.5.27: describes 'foul water system discharges into the Thames Water sewage network' however paragraph 11.7.14 states 'new dedicated foul drainage system and combined with surface water run-off prior to treatment. Clean and treated effluent would be discharged into the ground via two sub-surface soakaways under an Environmental Permit regulated by the Environment Agency'. These statements are contradictory, the applicant should clearly demonstrate the intent for all forms of foul and surface water management throughout the proposed development. It is recommended that a full catchment</p>		

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			<p>plan/ schematic forms part of the Drainage Strategy to illustrate the proposed development ‘sub-catchments’ alongside each ‘sub-catchments’ pollution risk in accordance with the above reference guidance. Where practicable foul and surface water should be kept independent and if combined discharge is proposed this should be suitably justified. It is recommended that the applicant discuss the proposed approach for all elements of the drainage strategy with all relevant statutory bodies.</p> <p>Where practicable consideration for removing and exiting, if any, trade effluent or foul discharges to surface water sewers should be made.</p> <p>The proposed Drainage Strategy should make specific consideration of existing surface water discharges and the impacts of snow melt in relation to the potential impacts on flood risk,</p>	

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			<p>surface water and groundwater receptors in terms of water quality, quantity, value and flood risk.</p> <p>Use of greywater reuse and rainwater harvesting is supported in line with Luton Local Plan Policy LLP36, furthermore in support of Luton Local Plan Policy LLP6</p> <p>Part F opportunities should be explored to incorporate SuDS, in balance with the risk of bird strikes – SuDS (for example: blue roofs/ permeable paving) should be considered, where practicable, throughout the proposed development to maximise attenuation of surface water as close to the source as practicable; thus, minimising the risk of 'clean' direct rainfall becoming contaminated from the wider proposed development surface water drainage network where higher pollutant risks are likely to be present.</p>		

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3.2	Are the mitigation measures included for significant adverse effects appropriate?	B/C	<p>Construction – Groundwater Quality: Existing landfill understood to have limited leaching, therefore benefit not expected to be as much as presented within the PEIR. Worst-cast therefore presented.</p> <p>Construction – Surface Water quality and quantity: Paragraph 11.8.7 to 11.8.9: Principles supported; however, ES should provide robust justification of how the measures proposed as part of the CSWMS will ensure a ‘very low’ magnitude of impact on the receptors and must be in line with Environmental Permitting requirements.</p> <p>Flood Risk: Paragraph 11.8.10: As part of the CSWMS outline calculations should be provided to demonstrate appropriate space allocation has been provided to attenuate surface</p>	<p>Accepted. A Hydrogeological Risk Assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES. This will outline the potential impacts of the scheme on groundwater quality and levels.</p> <p>The Drainage Design Statement is provided an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.4) and outlines the design of the surface water and foul water management system.</p> <p>Ongoing engagement has been undertaken with the Environment Agency, relevant LLFAs, Thames Water and Affinity Water. A summary of the consultation is provided in Chapter 20 of the 2022 PEIR and will be included in the ES.</p> <p>An FRA has been prepared as an appendix to Chapter 20 of the 2022 PEIR that includes an assessment of</p>	N

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			<p>water in accordance with LLFA surface water drainage expectations.</p> <p>Paragraph 11.8.11: Impacts to the actual road infrastructure should also be considered and mitigated as part of the CSWMS.</p> <p>Impacts associated to groundwater flow and emergence should be considered associated to the proposed earthworks.</p> <p>Operation – Groundwater quality:</p> <p>Paragraph 11.8.14: it is recognised that the applicant is proposing to provide betterment from the existing surface water runoff from the 'Main Application Site', consideration for the control of existing groundwater discharges should be made as part of the assessment.</p> <p>Paragraph 11.8.13 limited benefit as minimal leachates currently identified</p> <p>Justification is required for the minor adverse (not significant) residual effects of discharging increased</p>	<p>flood risk on individual flood risk receptors considering the potential impacts of climate change using Environment Agency climate change allowances.</p> <p>An assessment of water quality undertaken using HEWRAT will be included in the ES.</p> <p>The assessment included in Chapter 20 of the 2022 PEIR considers potential impacts on all individual receptors looking at surface water quality and quantity.</p>	

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			<p>volumes of effluent to the groundwater, and of localised groundwater flooding.</p> <p>Operation – Surface Water quality and quantity:</p> <p>Paragraph 11.8.20: Impacts on all identified surface water receptors should be individually assessed and should consider the proposed development and existing discharges in terms of both surface water quality and quantity as appropriate.</p> <p>Paragraph 11.8.21: the potential increase in volume and risk of pollutants is a key consideration due to the ‘importance value’ (sensitivity) of the surface water and groundwater receptors. It is recognised that consultation with statutory bodies is proposed throughout to inform the ES, which we would strongly recommend.</p> <p>Paragraph 11.8.22: proposed approach for the assessment of impacts on water supply network as</p>	

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			<p>part of the ES is supported in principle, and should consider clean water demand requirements (terminal operations) from all aspects of the proposed development (existing and proposed) including any likely future increases throughout the lifetime of the proposed development.</p> <p>Paragraph 11.8.23: HEWRAT assessment should be used, with evidence provided to demonstrate where the assessment is not required for highways where assessment is not proposed as agreed with relevant statutory bodies.</p> <p>Operation – Flood risk:</p> <p>Consideration of impacts on each individually identified flood risk receptor and impacts to the receptor should be made, for current day scenario and future scenario taking into consideration the impacts of climate change. Consideration for the use of UKCP18 should be made as agreed with relevant statutory bodies</p>		

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			<p>alongside consideration of exceedance in accordance with ANPS paragraph 5.162 and design for more extreme return periods due to the strategic nature of the proposed development – see comments in 3.1.</p> <p>General:</p> <p>Groundwater flow should be assessed.</p> <p>Paragraph 11.8.17/11.8.18, the applicant should also consider the use of the Highways England Water Risk Assessment Tool (HEWRAT) for the ES assessment or as otherwise agreed with the relevant statutory bodies. The scope of HAWRAT or HEWRAT assessment should be agreed with relevant statutory bodies as part of the ES.</p> <p>ES assessment should consider the different receptors and mitigation proposed individually to limit the potential impacts associated to each receptor in the context of water supply and wastewater infrastructure,</p>		

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			flood risk, surface water and groundwater in terms of water quality and quantity as appropriate. Secondary effects to receptors from potential impacts on quality and quantity from wastewater receptors in hydraulic connectivity should also be considered.		
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	B	<p>Further detail should be provided to demonstrate the level of detail to be provided as part of the ES. Where elements will be deferred to post-DCO, the applicant should demonstrate the proposed principles to be taken forward during the detailed design prior to the works to demonstrate the design intent is practicable. Consultation should be undertaken with relevant statutory bodies in order to inform what elements should be provided as part of the ES to demonstrate the practicability of the proposals and what can be provided post ES.</p> <p>Paragraph 11.9.2: it would be preferable to undertake further</p>	<p>A. Accepted. This will be included in the ES. Ongoing engagement has been undertaken with the Environment Agency, relevant LLFAs, Thames Water and Affinity Water. A summary of the consultation is provided in Chapter 20 of the 2022 PEIR and will be included in the ES.</p> <p>Scope of GI has been agreed with key stakeholders.</p>	N

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			<p>ground investigation (GI) in the proposed off-site car parks prior to the DCO, rather than after it, so that the ES assessment can take this information into account.</p> <p>Responsibility for delivering the mitigation detailed in paragraphs 11.9.2 and 11.9.3 isn't attributed.</p> <p>Paragraph 11.14.2: proposed FRA and WFD compliance assessment to be undertaken as part of the ES is supported, subject to agreement of their scope with relevant statutory bodies, it is expected that the FRA, including Drainage Strategy, will provide sufficient evidence of the design intent to manage surface water (flood risk and water quality) during construction and operation. WFD should consider both groundwater and surface water receptors and scope agreed in consultation with the Environment Agency.</p>		
3.4	Does the PEIR refer to monitoring requirements	B/C	Groundwater quality and level monitoring indicated, and these are to	Accepted. A Hydrogeological Risk Assessment will be	N

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	where it would be considered as being required / appropriate?		<p>be confirmed as appropriate with the relevant stakeholders.</p> <p>The Drainage Strategy for the Main Application site also includes for real-time monitoring of surface water contaminants. GI monitoring, including ground gas monitoring, is also recommended for the off-site car parks.</p>	<p>undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES. This will outline the potential impacts of the scheme on groundwater quality and levels.</p> <p>The Drainage Design Statement is provided as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.4) and outlines the design of the surface water and foul water management system including the design of the real-time monitoring system. Scope of GI has been agreed with key stakeholders.</p>	
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	B	<p>ES assessment should consider receptors and associated mitigations individually where practicable to clarify what measures are proposed to manage specific potential receptor impacts.</p> <p>Clear sections for water supply and wastewater infrastructure, flood risk, surface water and groundwater</p>	<p>Accepted. This will be included in the ES. Ongoing engagement has been undertaken with the Environment Agency, relevant LLFAs, Thames Water and Affinity Water. A summary of the consultation is provided in Chapter 20 of the 2022 PEIR and will be included in the ES.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>receptors. Secondary effects to surface water receptors from potential impacts on quality and quantity from conveyance through other receptors in hydraulic connectivity should be made. Clear division for impacts and mitigation for water quality and quantity elements should be provided.</p> <p>EA flagged issues with current soakaway discharges introducing perfluorooctanesulfonic acid (PFOS), hydrocarbons and other hazardous substances to ground. If the current drainage to these soakaways could be diverted through the new treatment system this would provide betterment to the groundwater environment.</p> <p>Luton LLFA flagged potential issues associated from discharges through drainage infrastructure to the River Lea/ Luton Hoo Lakes. If current drainage could be diverted through the new treatment system this would</p>	<p>The Drainage Design Statement prepared as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.4) includes a description of water reuse and rainwater harvesting measures included as part of the Proposed Development.</p> <p>The relevant policies (LLP6, LLP36, LLP37 and LLP38) Luton Local Plan has been used to inform the assessment undertaken in Chapter 20 of the 2022 PEIR.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>provide betterment to the surface water receptors.</p> <p>Luton LLFA flagged issues of surface water flooding issues associated to the Airport access roads/ underpasses. If drainage infrastructure can be improved to reduce flood risk this would provide betterment to the flood risk receptors. Consideration of Luton Local Plan Policy LLP6 'London Luton Airport Strategic Allocation: should be made; namely, Part E and Part F: where Part F: iii states: "<i>provision is made for sustainable drainage and the disposal of surface water in order to ensure protection of the underlying aquifer and prevent any harm occurring to neighbouring and lower land</i>". Rainwater harvesting and greywater recycling should also be considered.</p>		
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	B-C	Further detail of the proposed assessment methods used should be provided as part of the ES.	Accepted. Reference to appropriate guidance and justification for selection of	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			The reason for selecting a highways-specific assessment methodology is not clear and should be justified. The applicant should ensure the methods/techniques are relevant and consistent with the current guidance.	highways-specific assessment methodology has been included in Chapter 20 of the 2022 PEIR and will be included in the ES .	
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	B-C	<p>Importance values (sensitivity) and magnitude of impacts have been adapted from DMRB HD 45/09, however this has been superseded by LA 113, this should be reviewed to align with the latest guidance. The reason for selecting a highways-specific assessment methodology is not clear and should be justified. The applicant should ensure the importance values and magnitude of impacts are relevant and consistent with the current guidance.</p> <p>With reference to the magnitude of effects table, it is recommended that specific quantitative or qualitative examples relative to the water environment are included to inform the ES.</p>	Accepted. Reference to appropriate guidance has been included in Chapter 20 of the 2022 PEIR and will be included in the ES .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.3	Are the methods for evaluating significance clearly defined/?	B-C	<p>With reference to the magnitude of effects table, it is recommended that specific quantitative or qualitative examples relative to the water environment are included to inform the ES.</p> <p>The reason for selecting a highways-specific assessment methodology is not clear and should be justified. The applicant should ensure the methods for evaluating significance are relevant and consistent with the current guidance.</p>	Accepted. Reference to appropriate guidance has been included in Chapter 20 of the 2022 PEIR and will be included in the ES . This includes specific examples of magnitudes of impact relative to the water environment as recommended.	N
4.4	Do the assessment methods used follow relevant guidance?	B	<p>DMRB HD 45/09 has been superseded by LA 113.</p> <p>The reason for selecting a highways-specific assessment methodology is not clear and should be justified. The applicant should ensure the methods for evaluating significance are relevant and consistent with the current guidance.</p> <p>Consideration of UKCP18 should be made for future scenarios.</p>	<p>Accepted. Reference to appropriate guidance has been included in Chapter 20 of the 2022 PEIR and will be included in the ES.</p> <p>The future baseline in Chapter 20 of the PEIR has been informed by UKCP18 projections for precipitation and flood risk.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.5	Have potential effects been considered both during construction and operation?	B-C	<p>Section 11.8. does not clearly consider all receptors identified within Section 11.6.</p> <p>Uncertainties remain as to whether groundwater quantity will be impacted during construction. Maximum groundwater levels to be defined before these can be scoped in or out.</p> <p>There is no discussion of groundwater quantity impacts and this has not been scoped out. Introduction of soakaway will impact recharge to one specific location which will impact flows locally. Note, only groundwater flooding has been scoped out.</p> <p>Impacts to groundwater users (licensed and unlicensed abstractions) have not been included. Surface water quality effects during construction are addressed through the requirement to implement a CoCP and CSWMS, but would benefit from further expansion. Operational effects are to be addressed through the Drainage Strategy.</p>	<p>Accepted. The assessment included in Chapter 20 of the 2022 PEIR covers all surface water receptors identified in the study area of the Proposed Development unless clearly specified.</p> <p>A Hydrogeological Risk Assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES. This will outline the potential impacts of the scheme on groundwater quality and levels. The Drainage Design Statement is provided as an appendix to Chapter 20 of the 2022 PEIR and outlines the design of the surface water and foul water management system including the design of the real-time monitoring system.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	B-C	<p>Table 11-6 outlines the approach for assessing significance. Probability, duration and reversibility are not considered in the table, but are addressed briefly and generically in paragraphs 11.4.4 and 11.4.5.</p> <p>Table 11-10 doesn't consider the probability, duration (temporary and permanent), reversibility or significance of impacts.</p> <p>Any professional judgement to determine significance should be justified.</p>	Accepted. The assessment undertaken in Chapter 20 of the 2022 PEIR has been undertaken in line with appropriate guidance which will also be used in the ES . Professional judgement has been applied to determine significance and is explained in Chapter 20 in the 2022 PEIR .	N
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	C	<p>Table 11-10 identifies the outcome of the preliminary assessment. All adverse effects are identified as low or very low, with minor adverse (not significant) residual effects for each. Only beneficial effects are assigned a moderate or medium magnitude, with associated moderate or major beneficial (and significant) residual risks. Further justification for this is required, including why the proposed discharge of additional volumes of effluent to soakaways won't result in an adverse effect on groundwater.</p>	<p>Accepted. The assessment undertaken in Chapter 20 of the 2022 PEIR has clearly outlined the justification for any impacts.</p> <p>A Hydrogeological Risk Assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES to assess the potential impacts of the</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				Proposed Development on groundwater.	
4.8	Are the residual significant effects clearly stated?	B	Residual effects are presented in Table 11-10. However, further justification of these would be beneficial.	Accepted. The assessment undertaken in Chapter 20 of the 2022 PEIR has been undertaken in line with appropriate guidance which will also be used in the ES .	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	B	Cumulative assessment is proposed to be undertaken as part of the ES, which is supported. It should be noted that this should consider cumulative impacts on all identified sensitive receptors and future scenarios where practicable.	Accepted. A cumulative assessment has been provided within Chapter 21 of the 2022 PEIR .	N
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	B-C	Limited demonstration of uncertainties. The applicant should recognise the scale of the proposed increase in surface water and discharge to groundwater generated at the top of the catchment and potential impacts to the identified receptors (namely surface water and groundwater flood risk, and associated water quality impacts). Applicant should recognise the 'high' 'importance value' (sensitivity) of the	Accepted. The assessment undertaken in Chapter 20 of the 2022 PEIR and the assignment of importance values to baseline receptors has been undertaken in line with appropriate guidance which will also be used in the ES . A Hydrogeological Characterisation report has been undertaken that is provided as an appendix to Chapter 20 of the 2022 PEIR	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>surface water and groundwater receptors and technical complexities in managing surface water generated as a consequence of the proposed development in terms of quantity and flood risk, importance of managing the potential pollutants from the proposed development and consequence of any pollution from the proposed development.</p> <p>The design of the treatment should be fully explored as part of the ES to demonstrate the practicability of the proposed approach of treatment and disposal in consultation with relevant statutory bodies.</p> <p>The source of considered groundwater levels has not been defined; if these are from discrete manual dips then groundwater levels may be in excess of these levels. If extraction takes place below water table then groundwater dewatering will be required to support remediation of the landfill.</p>	<p>(Appendix 20.3). This outlines baseline groundwater conditions including groundwater levels.</p> <p>A Hydrogeological Risk Assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES to assess the potential impacts of the Proposed Development on groundwater.</p> <p>The Drainage Design Statement is provided as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.4) and outlines the design of the surface water and foul water management system including the design of the real-time monitoring system. The design has been developed in consultation with relevant stakeholders as outlined in point E.</p> <p>Ongoing engagement has been undertaken with the</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Uncertainty exists around the proposed discharge to ground (potentially the largest in the UK) and the extent of groundwater mounding and flooding impacts are unknown. These have been scoped out at present, with confirmation from the EA – this agreement may be subject to change once more detail is provided.	Environment Agency, relevant LLFAs, Thames Water and Affinity Water. A summary of the consultation is provided in Chapter 20 of the PEIR and will be included in the ES .	
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	B	Yes – see Table 11-3	Comment noted. No change required.	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	B	Table 11-10 provides a summary of the preliminary assessment however the detail provided within Section 11.8 is not consistent with the summary provided in Table 11-10 in terms of discussing each receptor individually.	Accepted. This has been addressed in Chapter 20 of the 2022 PEIR where a clear and consistent summary is provided.	N
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	B	Yes, in Table 11-10. All reports should consider and assess receptors individually, or group receptors as appropriate based on sound justification.	Accepted. This has been addressed in Chapter 20 of the 2022 PEIR where a clear and consistent summary is provided for all water receptors.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			For groundwater “Impact to Groundwater During Construction Works from Excavations” and “Increased localised groundwater flooding in vicinity of soakaways due to potential for infiltration mounding” have been presented in the summary table but not included in the assessment report. These should be added.		
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	B-C	Assessment text needs refinement or direction to the appendix for further information. If all considered impacts are included in the assessment text, this would create a more transparent assessment.	Accepted. This has been addressed in Chapter 20 of the 2022 PEIR and will be addressed in the ES .	N
6.2	Is the PEIR readable to the audience for which it is intended?	B-C	<p>It would be helpful to carry through the identified receptors into the assessment to ensure each receptor is appropriately assessed and classified.</p> <p>Additional figures or maps as part of the ES would be recommended to identify all surface water catchments, discharge locations and assessed risk of pollutants both during</p>	<p>Accepted. Chapter 20 of the 2022 PEIR provides an assessment of all surface water/ groundwater receptors located within the study area. The summary table has been updated to provide a clear reference to each receptor and risk.</p> <p>The Drainage Design Statement is provided as an</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>construction and operation. A map showing the former landfill in relation to proposed infiltration basin and permeable carparks and any other features including infiltration, would also be helpful.</p> <p>The readability of the PEIR could be improved. It appears to be rather disjointed and, because it doesn't clearly reference back to each receptor and risk and continue them through the assessment, it is not as clear as it could be.</p>	<p>appendix to Chapter 20 of the 2022 PEIR (Appendix 20.4) and outlines the design of the surface water and foul water management system and includes plans showing existing and proposed surface water catchments.</p> <p>The historic landfill is shown on figures prepared to accompany Chapter 17 of the 2022 PEIR.</p>	
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	B	Yes	Accepted.	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	B	Yes	Accepted.	N
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	B	Additional figures of maps as part of the ES would be recommended to identify all surface water catchments, discharge locations and assessed risk of pollutants both during construction and operation.	Accepted. The Drainage Design Statement is provided an appendix to Chapter 20 of the 2022 PEIR and outlines the design of the surface water and foul water management system	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>including figures showing existing and proposed catchments and drainage/discharge infrastructure.</p> <p>A Hydrogeological Risk Assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES to assess the potential risk of pollutants associated with the Proposed Development and will include figures where relevant.</p>	
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	A / B	The groundwater appendix appears comprehensive but there is a lack of cross referencing in the PEIR to navigate the reader to the relevant works and piece the full puzzle together. Suggest more cross references and explanatory text included in the PEIR to lead to reader.	<p>Accepted. Chapter 20 of the 2022 PEIR has been updated to include clearer cross references to the Hydrogeological Characterisation Report.</p> <p>A Hydrogeological Risk Assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES to assess the</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				potential impacts of the Proposed Development on groundwater.	
Conclusion					
	<p>Legislation, Policy and Guidance</p> <p>Overall conclusion</p> <p>B / C</p>		<p>Assessment should also include:</p> <ul style="list-style-type: none"> ■ LA 113 ■ UKCP18, as agreed with relevant statutory bodies ■ Highways Agency Water Risk Assessment Tool (HAWRAT) now updated (HEWRAT). ■ The EU Nitrates Directive (1991), ■ Anti-Pollution Works Regulations (1999), ■ Environmental Damage (Prevention and Remediation) (England) Regulations (2015) ■ Environmental Permitting (England and Wales) Regulations (2016) (as amended) ■ The Drinking Water Directive 1998 ■ The Anti-Pollution Works Regulations 1999 <p>The chapter lists only the relevant local plans and does not include reference to the policies relevant</p>	Accepted. Chapter 20 of the 2022 PEIR includes reference to all relevant guidance and legislation.	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			to/that have informed the scope/methodology/mitigation		
	<p>Baseline Information</p> <p>Overall conclusion</p> <p>B / C</p>		<p>Receptors identified should also consider:</p> <ul style="list-style-type: none"> ■ All flood risk receptors, including critical drainage areas, downstream surface water and groundwater flood risk catchments, overland flow routes ■ Direct and indirect surface water receptors due to hydraulic connectivity ■ Licensed groundwater abstractions ■ Unlicensed groundwater abstractions ■ Water infrastructure (water supply and wastewater) <p>It is recommended to include a summary table of all identified receptors with commentary of the assessed 'importance value' (sensitivity). The ES should then carry through assessment of these receptors within the assessment. Appendix containing detailed information is rarely referenced in the PEIR report, more cross referencing and dialog around this referencing needs to be added.</p>	<p>Accepted. Chapter 20 of the 2022 PEIR has considered all of these receptors within the study area. A summary table has been provided and will also be included in the ES.</p> <p>Chapter 20 of the 2022 PEIR appropriately references the accompanying appendices.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	<p>Mitigation, Enhancement and Monitoring</p> <p>Overall conclusion</p> <p>B / C</p>		<p>The in-principle mitigations proposed, including; CSWMS, CoCP, Environmental Permitting, Drainage Strategy, Water Cycle Strategy, Piling Risk Assessment, Remediation Options Appraisal, Remediation Strategy and a Detailed Quantitative Risk Assessment (DQRA), groundwater quality monitoring during construction, groundwater level monitoring during construction and introduction of a capping layer over the landfill (to prevent leachate generation) are supported. The applicant should ensure appropriate engagement is undertaken with the LLFA and Environment Agency and other statutory bodies in undertaking the ES assessment to agree the principles of the above noted strategies, enhancements and monitoring.</p> <p>Applicant should recognise the ‘high’ ‘importance value’ (sensitivity) of the surface water and groundwater receptors and technical complexities in managing the scale of surface water generated by the proposed development in terms of quantity and</p>	<p>Accepted. Chapter 20 of the 2022 PEIR has been completed in line with appropriate guidance used to define receptor importance values.</p> <p>Ongoing engagement has been undertaken with the Environment Agency, relevant LLFAs, Thames Water and Affinity Water. A summary of the consultation is provided in Chapter 20 of the 2022 PEIR and will be included in the ES.</p> <p>The Drainage Design Statement is provided as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.4) and outlines the design of the surface water and foul water management system including figures showing existing and proposed catchments and drainage/discharge infrastructure.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>flood risk, importance of managing the potential pollutants from the proposed development and consequence of any pollution from the proposed development.</p> <p>Identification of a practicable design options to be implemented will be essential for the proposed development and appropriate detail of principles for surface water/ groundwater water management/ pollution control and disposal will form a key part to the ES.</p>		
	<p>Assessment of Significant Effects</p> <p>Overall conclusion</p> <p>B / C</p>		<p>Assessment of significant effects should consider each identified receptor individually, as well as recommended additional receptors noted above.</p> <p>Further detail of the proposed assessment methods used should be provided as part of the ES.</p> <p>The reason for selecting a highways-specific assessment methodology is not clear and should be justified. The applicant should ensure the methods/techniques are relevant and consistent with the current guidance. There is no discussion of groundwater quantity impacts and</p>	<p>Accepted. Chapter 20 of the 2022 PEIR clearly outlines the assessment methodology to be applied during construction and operation and provides justification for the assessment approach. It also includes a summary table which clearly outlines the potential impacts and effects on each receptor included in the assessment.</p> <p>The Drainage Design Statement is provided as an appendix to Chapter 20 of</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>this has not been scoped out. Introduction of soakaway will impact recharge to one specific location which will impact flows locally. Note, only groundwater flooding has been scoped out.</p> <p>Impacts to groundwater users (licensed and unlicensed abstractions) have not been included. The design of waste water treatment should be fully explored as part of the ES to demonstrate the practicability of the proposed approach of treatment and disposal in consultation with relevant statutory bodies.</p>	<p>the 2022 PEIR (Appendix 20.4) and outlines the design of the surface water and foul water management system including waste water treatment.</p> <p>Groundwater flooding has been scoped in and is assessed in the FRA prepared as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.1).</p> <p>A Hydrogeological Characterisation Report has been prepared as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.3) which outlines the potential impacts of the Proposed Development on the underlying aquifer as a result of the use of infiltration tanks.</p> <p>A Hydrogeological Risk Assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				20 of the ES to assess the potential impacts of the Proposed Development on groundwater.	
	Conclusions Overall conclusion B / C		Justification of residual effects needs to be provided for all sensitive receptors. The PEIR does not present assessment of all summary table assessments – this needs to be addressed. Missing receptors need to be agreed with relevant statutory bodies in line with the above comments.	Accepted. Chapter 20 of the 2022 PEIR includes a summary table which clearly outlines the potential impacts and effects on each receptor included in the assessment. Ongoing engagement has been undertaken with the Environment Agency, relevant LLFAs, Thames Water and Affinity Water. A summary of the consultation is provided in Chapter 20 of the 2022 PEIR and will be included in the ES .	
	Presentation (including Figures and Appendices) Overall conclusion B		Additional figures as part of the ES would be recommended to identify all surface water catchments, discharge locations and assessed risk of pollutants both during construction and operation.	Accepted. The Drainage Design Statement is provided as an appendix to Chapter 20 of the 2022 PEIR (Appendix 20.4) and outlines the design of the surface water and foul water management system including figures showing existing and proposed catchments and	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>drainage/discharge infrastructure.</p> <p>A Hydrogeological Risk Assessment will be undertaken in line with Environment Agency requirements and this will form an appendix to Chapter 20 of the ES to assess the potential impacts of the Proposed Development on groundwater.</p>	

B9 Waste and resources review checklist and summary

Note: 'Ref.' is to table 2.19 of the WSP on behalf of host authorities response.

Table B9.1: Waste and Resources

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B	<p>Under paragraph 12.2.1, it is recommended that reference is made to the Environment Impact Assessment Directive (2014/52/EU), unless referenced elsewhere</p> <p>The Waste (England and Wales) Regulations 2011 were amended in 2014 (http://www.legislation.gov.uk/uksi/2014/656/regulation/6/made). It is recommended that this is updated in the chapter and in the references section.</p> <p>Given the nature of the Scheme the author may consider referencing the following pieces of legislation:</p>	<p>The Environment Impact Assessment Directive (2014/52/EU) is referenced in Chapter 19, Section 19.2 legislation, policy and guidance of the waste and resource 2022 PEIR chapter.</p> <p>Waste (England and Wales) Regulations 2011 (as amended) is referenced in Chapter 19, Section 19.2 legislation, policy and guidance of the waste and resource 2022 PEIR chapter.</p> <p>Other legislation and policy as listed in the comments is referenced in Chapter 19, Section 19.2 legislation, policy and guidance of the waste and resource 2022 PEIR chapter.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<ul style="list-style-type: none"> ■ The Controlled Waste (England and Wales) Regulations 2012 (SI 2012/811) ■ Clean Neighbourhoods and Environment Act 2005 ■ The Control of Pollution Act 1974 ■ Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 (SI 2013/3113) (as amended); ■ The Waste Batteries and Accumulators Regulations 2009 (SI 2009/890) (as amended); and ■ The Control of Asbestos Regulations 2012 (SI 2012/632). It is recommended that the Resources and waste strategy for England policy document is referred to correctly as “<i>Our Waste, Our Resources: A Strategy for England 2018</i>”. <p>It is also recommended acknowledging Highways England's LA110 Material assets and waste (published August 2019) in this section, though additional context for not applying / referencing it in the</p>	<p>In response to comments a review of available EIA waste and resources assessment guidance, including Highway's England LA110 Material Assets and Waste, has been undertaken. The IEMA Guide to Materials and Waste in EIA methodology was selected and agreed with the host authorities as being the most appropriate methodology.</p> <p>The scoping opinion comments in the waste and resources PEIR chapter are from the Planning Inspectorate, as outlined in Chapter 19 of the 2022 PEIR. Final responses to all comments received during Scoping will be provided in an appropriate format in the ES.</p> <p>The Waste and Resources Action Programme (WRAP) Designing Out Waste: A Design Team Guide for Civil Engineering and Designing Out Waste: A Design Team</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>methodology would need to be provided.</p> <p>It is recommended to provide clarity on which statutory bodies have provided the scoping opinion comments.</p> <p>The responses to the scoping report on behalf of the Host Authorities (April 2019) appear to have been omitted.</p> <p>Guidance: note that WRAP also has Designing out Waste guidance for buildings, which are an inherent part of the proposed development.</p> <p>The report authors should review and assess all new legislation once available in terms of the findings of the assessment. For example, new legislation is likely to be in place in 2023.</p> <p>Local waste plans and policies should also be considered in the ES.</p>	<p>Guide for Buildings are referenced in Chapter 19, Table 19-4: Waste and resources guidance of the 2022 PEIR.</p> <p>New legislation and policy will be reviewed and included in the ES as appropriate.</p> <p>Local plans are referenced and considered in the assessment (Chapter 19, Table 19-2: waste and resources policy of the 2022 PEIR).</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	B	<p>The methodology section (12.4) has limited description of the data collection techniques, however these are explained further in the Baseline (paragraph 12.6.10 to paragraph 12.6.23) for both waste generation and resource consumption. It is recommended that the Methodology section includes the baseline data collection method.</p> <p>Section 12.6.17 - Data in Tables 12-6 & 12-7 show figures available to 2017. 2018 figures are available and we would therefore recommend updating these.</p> <p>Table 12-6 – need to align top header with columns below.</p> <p>Table 12-6 – Scoping Response by Host Authorities para 4.85 states that 609,000 tonnes of waste input refers</p>	<p>Baseline data collection method is included in Chapter 19, Section 19.5 of the 2022 PEIR.</p> <p>All baseline data presented in the waste and resources PEIR chapter has been updated as appropriate since 2019.</p> <p>Formatting has been updated as appropriate since 2019.</p> <p>Further review of the baseline will be undertaken with the host authorities and reported in the ES submitted with the application for development consent.</p> <p>All landfill capacity is listed for completeness within Chapter 19 of the 2022 PEIR.</p> <p>All baseline data presented in the waste and resources PEIR chapter has been updated as appropriate since 2019. Further review of the baseline will be undertaken</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>to inert waste not non-hazardous. It is recommended that this is reviewed and updated accordingly.</p> <p>Table 12-7 – if Restricted landfill capacity is not to be included in the assessment (as stated in para 12.6.15) is it necessary to show Hazardous Restricted waste in the table?</p> <p>Table 12-8 – is this the most up to date information available?</p>	and reported in the ES submitted with the application for development consent.	
2.2	Do the data collection methods follow relevant guidance?	B	No guidance is available in relation to waste and material resources specific to airports or buildings. Highways England, as part of the Design Manual for Roads and Bridges, has released LA110 Material Assets and Waste. It is considered that reference to this should be included in the chapter, with justification as to why this approach has not been used or tailored.	A review of available EIA waste and resources assessment guidance, including Highway's England LA110 Material Assets and Waste, and has been undertaken. The IEMA Guide to Materials and Waste in Environmental Impact Assessment methodology was selected and agreed with the host authorities as being the most appropriate methodology.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.3	Is the study area identified appropriately?	A	The study areas are clearly set out in Paragraphs 12.6.1 – 12.6.8 and are considered suitable.	Comment noted. The study areas are also set out within Chapter 19, Section 19.3 of the 2022 PEIR .	N
2.4	Have all the resources/receptors been considered?	B	Paragraphs 12.4.1 – 12.4.4 set out the receptors assessed. The approach is considered suitable; however, it is suggested that the authors should not necessarily consider non-landfill waste infrastructure (for example, Materials Recovery Facilities (MRFs)) as a sensitive receptor: infrastructure that is used to process and recover arisings (and hence divert them from landfill) is a beneficiary of waste feedstock, and could reduce adverse impacts. Such facilities are therefore an influencing factor in the reduction of the magnitude of waste impacts on landfill void capacity, rather than being a sensitive receptor in their own right.	In accordance with the IEMA Guide to Materials and Waste in Environmental Impact Assessment methodology; <i>“...does not consider waste processing and recovery facilities as sensitive receptors, rather: they are part of a system that has the potential to reduce the magnitude of adverse impacts associated with waste generation and disposal. Waste processing and recovery facilities are, hence, different to landfills, in that the latter are finite resources.”</i> This is referenced in Chapter 19, Section 19.3 of the 2022 PEIR .	N
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	B	Paragraphs 12.4.1 identifies why sensitivity is not considered appropriate for the assessment of	A review of available EIA waste and resources assessment guidance including Highway’s England LA110 Material Assets and	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>waste and resources. This approach is considered suitable.</p> <p>It is considered, however, that reference could be made to the Highways England DMRB LA110 document. Although this relates specifically to road schemes, it is currently the only published document for the assessment of material assets and waste. Discussion for the reasons for not using various elements of LA110 should be included, as appropriate.</p>	<p>Waste has been undertaken. The IEMA Guide to Materials and Waste in Environmental Impact Assessment methodology was selected and agreed with the host authorities as being the most appropriate methodology. As such, sensitivity is now applied to receptors as referenced in within Chapter 19, Section 19.3 of the 2022 PEIR.</p>	
2.6	Has there been consultation with the relevant statutory bodies?	B	We acknowledge that consultation has taken place and is ongoing and expect this will be outlined in detail in the ES.	Stakeholder engagement and consultation is outlined in Chapter 19, Section 19.4 of the 2022 PEIR . An update on the engagement undertaken will also be provided within the ES .	N
2.7	Is the future baseline scenario adequately described?	C	No future baseline scenario is currently provided. Paragraph 12.5.2 identifies that the future baseline for landfill capacity is in discussion with stakeholders. There is no discussion	A future baseline for landfill capacity has been developed in discussion with the host authorities and using the Microsoft Excel 'Forecast' function. However, linear forecasting of landfill capacity	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>of future baseline for resource availability.</p> <p>It is considered that, in the absence of further input from the stakeholders, simple statistical forecasting for the defined study areas could be used to establish future landfill capacity.</p>	<p>can result in unrealistic scenarios e.g. landfill capacity does not necessarily reduce over time. Professional judgement has been used to set a landfill capacity for use in the assessment. This is outlined in Chapter 19, Section 19.7 of the 2022 PEIR.</p> <p>As outlined in Chapter 19, Section 19.7 of the 2022 PEIR, there is no publicly available information on any potential long-term changes to this national demand by the time of construction of the Proposed Development or operation during this period or beyond.</p> <p>Construction material demand such as ready mixed concrete is closely aligned to both the quantity of construction taking place and the general economy, therefore it is deemed inappropriate to forecast future demand. The assessment considers the</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				influence of material consumption during construction and operation on the current baseline.	
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	B	Section 12.5 (Assumptions and limitations) would benefit from text outlining the effects that the assumption / limitation may have on the outcomes of the assessment.	Text outlining the effects that the assumption / limitation may have on the outcomes of the assessment is included on Chapter 19, Section 19.6 of the 2022 PEIR .	N
2.9	Which are the key receptors for the local authorities?	A	The proposed development will impact on landfill capacity and consume material resources within the local authorities' regions. The ES should also provide information on waste disposal facilities that might receive material excavated from the historic landfill and provenance of construction materials to be used.	<p>At this early stage of design and in the absence of a contractor, receiving sites have not been identified. Local presence of waste management infrastructure and inputs as outlined in the most recently published Environment Agency Waste Data Interrogator are included in Chapter 19, Table 19-7 of the 2022 PEIR.</p> <p>At this early stage of design and in the absence of a contractor, specific construction materials have not yet been selected. Potential recycled content for the key construction materials</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				are listed in Chapter 19, Table 19-8 of the 2022 PEIR .	
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	A	Embedded and Tertiary mitigation is clearly set out in section 12.7.	Comment noted. Chapter 19, Section 19.8 of the 2022 PEIR sets out embedded and tertiary mitigation.	N
3.2	Are the mitigation measures included for significant adverse effects appropriate?	N/A	No significant effects were identified.	Comment noted.	N
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	C	<p>Embedded mitigation measures for construction (described in Paragraph 12.7.1) are secured through the Draft CoCP, which includes a site waste management plan. The Scoping Opinion comment with regards to the Draft CoCP also makes a reference to the need to include a Materials Management Plan.</p> <p>Reference is also made to a 'Designing out waste workshop', however it is not known if this is being</p>	<p>The excavation operations are currently proposed to be undertaken under a waste recovery permit and its associated conditions, a Materials Management Plan will be produced by the contractor for non-landfill excavated material reuse.</p> <p>Designing out waste evidence has been gathered throughout the design phase (via workshops and discussions with the design team) and a summary</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>documented within the PEIR / ES to secure the embedded mitigation.</p> <p>Operational embedded mitigation measures for waste are discussed in 12.7.3, however it is not clear how these will be secured.</p> <p>Operational embedded mitigation measures for material resources are not discussed.</p>	<p>included in Chapter 19, Section 19.8 of the 2022 PEIR.</p> <p>Securing mechanisms for mitigation measures will be confirmed within the ES.</p> <p>Operational measures to reduce material resources and waste are referenced in Chapter 19, Section 19.8 of the 2022 PEIR.</p>	
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	C	<p>It may be helpful to create a separate section on monitoring to make it clear what monitoring is recommended. It is expected that the Site Waste Management plan will incorporate appropriate monitoring arrangements and that monitoring of future operational waste and resources use will be undertaken as part of the operational management procedures. Monitoring of materials use would be required during construction, this would be outlined in the Draft CoCP.</p>	<p>The outline SWMP (refer to Appendix 19.1 of the 2022 PEIR) sets out monitoring to be undertaken during the construction stage to ensure that the mitigation measures embedded in the design and those considered essential to mitigate the effects of construction activities, are appropriately implemented.</p> <p>A Materials Management Plan will be produced by the contractor for non-landfill excavated material reuse.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			The re-use of suitable arisings generated by the Proposed Development will be managed through implementation of a Materials Management Plan.		
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	B	Operational embedded mitigation measures for material resources should be included in the ES. Opportunities to adopt circular economy action could also be included.	Operational measures to reduce material resources and waste are referenced in Chapter 19, Section 19.8 of the 2022 PEIR . Circular economy actions are included in Chapter 19, Section 19.8 of the PEIR .	N
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	B	The assessment methods for determining significant effects are set out under paragraphs 12.4.5 to 12.4.8 and are considered appropriate.	Comment noted. The updated preliminary assessment is presented within Chapter 19, Section 19.9 of the 2022 PEIR .	N
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	B	Magnitude of impacts is discussed from paragraph 12.4.6, with criteria for the assessment of effects provided in Table 12-4. it is recommended that justification is given on how the % thresholds for effects (5% for major) have been	Please see response to Ref. 2.5 above. The methodology outlines % thresholds for effects.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>determined, and whether statistical analysis has been used to validate these assertions.</p> <p>If appropriate, reference could also be made to the Highways England DMRB LA110 document. Although this relates specifically to road schemes, it is currently the only published document for the assessment of material assets and waste. Discussion for the reasons for not using the criteria set out in LA110 should be included.</p>		
4.3	Are the methods for evaluating significance clearly defined/?	B	The criteria used for the assessment and evaluating significance are provided in Table 12-4 and are considered suitable. However, as noted previously (under Ref 2.5) reference to LA110 (and justification for not using the elements of the criteria set out in that document) should be included.	Please see response to Ref. 2.5 above. The methodology outlines criteria.	
4.4	Do the assessment methods used follow relevant guidance?	B	No guidance is available in relation to waste and material resources specific to airports or buildings. Highways England, as part of the Design Manual for Roads and Bridges, has released LA110 Material Assets and Waste. It is considered that reference to this should be included in the	Please see response to Ref. 2.5 above.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			chapter, with justification as to why the approach (or elements therefore) is not used.		
4.5	Have potential effects been considered both during construction and operation?	B	<p>Yes, within section 12.8.</p> <p>Sub-headings (for example non-hazardous and inert waste generation; hazardous waste generation; resource consumption) would be beneficial to aid the readers understanding of paragraphs 12.8.3 to 12.8.21. The text clearly describes the waste and materials aspects, and summarises the significance, however, without clear delineation between sub-topics, it is not easily read.</p> <p>Similar headings for the Operational section (paragraphs 12.8.22 – 12.8.26) should also be added.</p>	Formatting has been updated as appropriate since 2019.	N
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	C	<p>Magnitude and significance of impact is provided for waste generation and material resources for construction and operation.</p> <p>However, it is considered that the consumption of resources during</p>	<p>Comment on magnitude and significant of impact is accepted. Reference to 'temporary' removed in the 2022 PEIR chapter.</p> <p>Reference to temporary reduction removed.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			construction would have a permanent effect on stocks, not a temporary one.		
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	B	<p>Yes. This is clearly set out in paragraphs 12.8.16 and 12.8.17 for non-hazardous and inert construction waste; paragraph 12.8.20 for hazardous construction waste; paragraph 12.8.21 for construction material resources; paragraph 12.8.23 for operational non-hazardous waste; paragraph 12.8.25 for operational hazardous waste and paragraph 12.8.26 for operational resources.</p> <p>Justification for the construction material resource thresholds does not include estimated material tonnages (which are provided for waste). It is considered that inclusion of such thresholds – or a clear statement on the use of professional judgement - would be beneficial to provide a more robust judgement of the effects.</p>	In response to comments, a review of available EIA waste and resources assessment guidance including Highway's England LA110 Material Assets and Waste has been undertaken since scoping. The IEMA Guide to Materials and Waste in Environmental Impact Assessment methodology has been selected and agreed with the host authorities as being the most appropriate methodology. Therefore the methodology outlined in the 2019 PEIR has been updated. The construction material thresholds are outlined in the IEMA Guide to Materials and Waste in Environmental Impact Assessment are percentage based. The waste thresholds outlined in the IEMA Guide to Environmental Impact	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				Assessment are also percentage based.	
4.8	Are the residual significant effects clearly stated?	N/A	No significant effects were identified, so discussion of residual effects is not required.	Comment noted.	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	B	It is noted (section 12.11) that the cumulative assessment will be finalised in the ES. The zone of influence is identified as the counties of Bedfordshire, Buckinghamshire and Hertfordshire.	A cumulative assessment has been included within Chapter 21 of the 2022 PEIR , and will be updated in the ES .	N
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	B	The assumptions and limitations section (12.5) notes that the assessment is based on the current design and detailed information is not available. It would be beneficial to provide text outlining the effect that the assumption / limitation may have on the assessment outcomes.	Text outlining the effects that the assumption / limitation may have on the outcomes of the assessment is included on Chapter 19, section 19.6 of the 2022 PEIR .	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	B	Table 12-3 provides the scoping opinion and how this has been addressed in the ES. The response to Scoping Opinion ID 4.8.8 does not clearly address whether the impact to the existing landfill site (within the Proposed Development boundary) is being addressed within the Waste and Resources chapter.	The likely types of waste arisings from the remediation of the existing landfill site are discussed within Chapter 19 of the 2022 PEIR . The preliminary assessment of likely significant effects associated with the management of waste on water resources, air quality, noise or traffic resulting from	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				the generation, handling, on-site temporary storage or off-site transport of waste is assessed in other relevant PEIR aspect chapters and cross referenced as appropriate. Matters scoped out and covered by other chapters are listed in Chapter 19, Section 19.3 of the 2022 PEIR .	
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	A	Yes, the conclusions are clearly stated in section 12.8 and within Table 12-11.	Comment noted. Updated conclusions are reported within Chapter 19, Section 19.14 of the 2022 PEIR .	N
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	A	Yes, Table 12-11.	Comment noted.	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	B	Yes, subject to recommendations made throughout this review.	Comment noted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
6.2	Is the PEIR readable to the audience for which it is intended?	B	It is recommended that acronyms such as NHDC, CBC, LBC and HCC are described in full at the top of the chapter, unless these have been made clear in the introductory sections. Section 12.7.1 – it is recommended that the acronym CoCP is described in full at first use unless this has been made clear in the introductory sections.	Acronyms are expanded at first use in the PEIR, all acronyms are included in the glossary and abbreviations section at the end of the waste and resources PEIR chapter.	N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	A	Yes.	Comment noted.	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	A	Yes.	Comment noted.	N
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	N/A	There are no Figures referenced within the Waste and Resources chapter. However, it would be useful if reference could be made to the Redline boundary (Fig 2-1) as the primary study area for waste and resources.	Figures outlining the proposed development study area and non-hazardous and hazardous waste management study areas are included in Volume 4 of the 2022 PEIR . An expansive study area figure for construction materials is not	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				included since the study area is the whole of the UK.	
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	N/A	There are no Appendices for the Waste and Resources chapter.	A Draft Outline Site Waste Management Plan is appended to the 2022 PEIR. Appendices outlining the presence and inputs of waste management infrastructure and construction material suppliers will be included in the ES .	N
Conclusion					
	Legislation, Policy and Guidance		<p>Review applicable legislation, policy and guidance (including local waste plans and policies) and ensure that the most recent legislation is referenced, e.g. the Waste (England and Wales) Regulations. Due to the presence of asbestos on the Proposed Scheme, the Control of Asbestos regulations should also be referred to.</p> <p>It is recommended that reference should be made to the recently published available guidance from Highways England LA110 Material Assets and Waste with justification as</p>	<p>The most up to date legislation, policy and guidance is included in the 2022 PEIR and will be reviewed and updated as appropriate in the ES. The Control of Asbestos regulations are referred to in the Draft Outline Site Waste Management Plan, Appendix 19.1 of the 2022 PEIR.</p> <p>Please see response to Ref. 2.5 above.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			to why this method has not been used or tailored.		
	Baseline Information		<p>It is acknowledged that the baseline will be reviewed and updated throughout the assessment and should include updated data (for example waste data for 2018 is now available).</p> <p>It is recommended that the inclusion of non-landfill waste infrastructure is considered a sensitive receptor as such facilities are an influencing factor in the reduction of the magnitude of waste impacts on landfill void capacity, rather than being a sensitive receptor in their own right.</p> <p>The future baseline should be included in the ES and cover</p>	<p>All baseline data presented in the waste and resources 2022 PEIR chapter has been updated as appropriate since 2019.</p> <p>In accordance with the IEMA Guide to Materials and Waste in Environmental Impact Assessment methodology “does not consider waste processing and recovery facilities as sensitive receptors, rather: they are part of a system that has the potential to reduce the magnitude of adverse impacts associated with waste generation and disposal. Waste processing and recovery facilities are, hence, different to landfills, in that the latter are finite resources.”</p> <p>A future baseline for landfill capacity has been developed in discussion with the host authorities and using the</p>	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>resource availability and landfill capacity.</p> <p>Regarding Assumptions and Limitations, it would be beneficial to provide additional text outlining the effect that the assumption / limitation may have on the assessment outcomes.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>assessment considers the influence of material consumption during construction and operation on the current baseline.</p> <p>Text outlining the effects that the assumption / limitation may have on the outcomes of the assessment is included on Chapter 19, Section 19.6 of the 2022 PEIR.</p>	
	Mitigation, Enhancement and Monitoring		<p>Further detail could be provided as to how the mitigation measures would be secured. Operational embedded mitigation measures and opportunities to adopt circular economy action could also be added. It may be helpful to create a separate section on monitoring to make it clear what monitoring is recommended.</p>	<p>Operational embedded mitigation measures for waste are outlined in Chapter 19 Section 19.8 of the 2022 PEIR.</p> <p>As no waste and resources significant effects have been identified, no monitoring of significant effects is proposed.</p> <p>The Draft Outline Site Waste Management Plan</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				(Appendix 19.1) sets out monitoring to be undertaken during the construction stage to ensure that the mitigation measures embedded in the design and those considered essential to mitigate the effects of construction activities are appropriately implemented.	
	Assessment of Significant Effects		<p>Further justification is required on how the % thresholds for effects for magnitude have been determined and if statistical analysis has been undertaken.</p> <p>The use of sub-headings (in section 12.8) would be beneficial to provide clear delineation between the sub-topics to aid the reader.</p> <p>It is considered that the consumption of resources during construction would have a permanent effect on stocks, not a temporary one</p> <p>Inclusion of material resource tonnages should be included to provide a more robust assessment.</p>	<p>Please see response to Ref. 2.5 above. The methodology outlines % thresholds for effects.</p> <p>Formatting has been updated as appropriate since 2019.</p> <p>Reference to temporary reduction removed.</p> <p>Matters scoped out and covered by other chapters are</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Responses to Scoping Opinion ID 4.8.8 and Scoping</p> <p>Response by Host Authorities para 4.85 need to be addressed.</p>	<p>listed in Chapter 19, Section 19.3 of the 2022 PEIR</p> <p>Further review of the baseline will be undertaken with the host authorities and reported in the ES submitted with the DCO application.</p>	
	Conclusions		N/A	N/A	N
	Presentation (including Figures and Appendices)		<p>It is recommended that acronyms are described in full when first used in the chapter.</p> <p>It may be helpful to refer to Figure 2-1 RLB as the primary study area for this chapter.</p>	<p>Acronyms are expanded at first use in the 2022 PEIR, all acronyms are included in the glossary and abbreviations section at the end of the waste and resources 2022 PEIR chapter.</p> <p>Figures outlining the proposed development study area and non-hazardous and hazardous waste management study areas are included in the waste and resources chapter of the 2022 PEIR. A expansive study are figure for construction materials is not included since</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				the study area is the whole of the UK.	

B10 Economics and Employment review checklist and summary

Note: 'Ref.' is to tables 2-21 and 2-22 of the WSP on behalf of host authorities response.

Table B10.1: Economics and Employment

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B/C	<p>Section 13.2 refers to legislation, policy and guidance. All legislation referred to is the latest and most up to date legislation. The Airports National Policy Statement is included. Reference to the following Local Plans should be included within the Chapter:</p> <p>Central Bedfordshire Local Plan 2004-2011.</p> <p>Saved policies from the North Hertfordshire District Local Plan No. 2 and North Hertfordshire District Council (NHDC) Proposed Submission Local Plan.</p> <p>Although key regional policies are referenced, the context for this assessment (especially in relation to</p>	Accepted. Additional documentation has been covered in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>the 2 LEP strategies) is not provided. All relevant plans and policies should be referred to in the ES and their influence in the design and assessment described.</p> <p>Examples of documents that should have been referred to in the PEIR but that appear to be missing include:</p> <ul style="list-style-type: none"> ■ Vision 2050 ■ Economic Strategy ■ All Age Skills Strategy ■ Economic Insight ■ Emerging Herts LEP Local Industrial Strategy. ■ Luton 2040 <p>Luton Inclusive Growth Strategy</p>		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	B/C	There is no specific section or paragraph(s) that identifies or describes the data collection within the Chapter, rather it is referenced ad hoc where the data is used.	Accepted. Baseline data sources have been set out in the 2022 PEIR (rather than appended).	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			No indication of the source of the baseline data identified and described in Section 13.6 Baseline Conditions. The Assumptions and Limitations section (13.5) refers to the important Appendix 13.1 and the associated methods of baseline data collection. For clarity this information should be summarised within the methodology section, with clear references of data sources provided.		
2.2	Do the data collection methods follow relevant guidance?	N/A	No standard guidance for data collection methods for this type of assessment is available and hence the assessment does not make reference to any such guidance.	Comment noted.	N
2.3	Is the study area identified appropriately?	C	<p>The study/spatial area/s are discussed within paragraphs 13.6.1-13.6.4, however it is unclear exactly which study/spatial areas apply to each of the effects assessed (provided in Section 13.8).</p> <p>The section refers to the Airport Employment Area (AEA) however it is not clear how this has been defined. Tables 13-5 and 13-6 also refer to a 20-minute drive time of the site in</p>	<p>Agree. The 2022 PEIR is clear on which spatial/study areas apply to each of the effects assessed.</p> <p>Specific narrative has been provided in the 2022 PEIR in terms of the effects of the AEA (where the activity takes place) vs Luton / Three Counties (origins of workers).</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			relation to direct off-site operational employment. For construction, the drive-time for employment is 60 minutes from the airport. It's not clear how these have been derived (i.e. are they informed by traffic analysis and do they account for constraints of the A505, A602 and B656, which all converge at Hitchin causing a severe congestion at peak times. If they assume all workers will drive in private cars (rather than use public transport, which does not accord with the stated objective of the scheme for 54% of on-site staff to travel by public transport) and how they fit with the study areas described in Section 13.6.	Disagree. The AEA definition is set out in para 13.6.1 bullet one. The section on drive time has been revisited in the 2022 PEIR .	
2.4	Have all the resources/receptors been considered?	B	There is no definitive list of receptors set out in the chapter. There is a description of the spatial/study areas that are considered in the assessment (see above for comments on this element). Generally, the areas of 'Luton and the Three counties' are referred to with regards to effects, however there is no separation of effects for each of	A definitive list has been provided in the 2022 PEIR . Disagree. The 2022 PEIR is clear on which spatial/study areas apply to each of the effects assessed. The Scoping Report, PEIR or ES do not set out to provide effects at the individual authority level of each authority in the three	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>these areas (which each independent Authority will be keen to understand). This should be considered at the ES stage.</p> <p>It is not clear how the operations areas shown on Figure 13-1 have been defined and no explanation of these areas and how the East and West areas differ/apply.</p> <p>Although it is clearly described that the business addresses considered within the assessment are not derived from the Oxford Economics forecasts (paragraph 13.6.1), it is not clear which public sources they have been obtained from or why those businesses have been identified.</p>	<p>counties, except Luton, being the location of the airport.</p> <p>Para 11.7.1 of the 2022 PEIR explains how the operation areas shown on Figure 13-1 have been defined. The West Area includes details of business locations identified from sources such as google mapping. These are existing businesses associated with the airport operations. The output areas comprising the east/west areas will be specifically noted.</p>	
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	A/B	The criteria used to determine the level of sensitivity is referred to within Table 13-3 (scoping opinion ID 4.9.7), however it would be clearer and easier to follow if the criteria for determining sensitivity was detailed within Section 13.4.	Accepted. Will clarify and amend.	N
2.6	Has there been consultation with the relevant statutory bodies?	B	Tables 13-2 and 13-3 provide a summary of consultee's comments and how they've been addressed in	(13-2) Disagree. Given the sensitive nature of the discussions at the stakeholder sessions it is not	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
			<p>the PEIR. However, it is not clear which consultee has made the comments in Table 13-3, it would be useful to include a list of the consultees' that provided comments in relation to economics and employment.</p> <p>It is also not clear which teams specifically within each of the bodies were engaged with. The consultation response from Central Bedfordshire Council has requested that the following teams be engaged, however it is not apparent if these have formed part of the stakeholder sessions and/or consultation for the preparation of the assessment:</p> <p>Business and Investment team (social value, business support, inward investment)</p> <p>Employment and Skills – strategy team</p> <p>Bedfordshire Employment and Skills Service (Adult Learning)</p>	<p>considered realistic or desirable to attribute individual consultee comments.</p> <p>(13-2) Amend – will include team titles of attendees.</p> <p>(13-3) Agree. Will clarify origin of scoping opinion comments.</p> <p>Accepted. Teams are being invited to stakeholder sessions.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.7	Is the future baseline scenario adequately described?	B/C	<p>There is no specific future baseline section in the chapter.</p> <p>The future baseline is described within paragraph 13.8.15 (then referred to as the Do Minimum case) and within Table 13-8, Table 13-9, Table 13-10 and Table 13-11 in relation to operational employment. There is no description of the future baseline for any other effects.</p> <p>The 'future baseline' only takes into account the consented capacity of the airport and planned development at New Century Park. It does not consider any other factors, such as trends in employment/unemployment in the area, or other major schemes and strategies coming forward, such as the Hertfordshire LEP Strategic Economic Plan.</p>	A more detailed review of wider strategies (point 1.1 above) will help to identify other factors or schemes that could influence the future baseline. However, it won't be possible to quantify these impacts. . A qualitative narrative is provided in Para 11.7.13 – Para 11.7.16 of the 2022 PEIR and is applied to the assessment of operational impacts on employment, GDP, business travel, inbound tourism, and journey time savings.	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	A	Assumptions and limitations are provided within Section 13.5 of the Chapter.	Comment noted	N
2.9	Which are the key receptors for the local authorities?	C	A list of receptors is not provided within the chapter.	Please refer to response in Ref. 2.4.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			It is considered that the key receptors are the businesses that are likely to be displaced as a result of the construction of the Proposed Development, as these receptors are likely to experience an adverse effect. The local authorities are keen to understand the employment potential for each area, however the effects do not split this out and just report effects for Luton and the Three counties combined. This should be considered at the ES stage.	The 2022 PEIR is clear on which spatial/study areas apply to each of the effects assessed. The Scoping Report, PEIR or ES do not set out to provide effects at the individual authority level of each authority in the three counties except Luton.	
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	A	Embedded and good practice mitigation measures are provided within Section 13.7 and potential additional mitigation measures are identified in Section 13.9.	Comment noted	N
3.2	Are the mitigation measures included for significant adverse effects appropriate?	A	All significant effects described in Section 13.8 are beneficial and therefore mitigation measures are not considered necessary for the majority of the effects. In addition, the Employment, Training and Skills (ETS) programme potentially will maximise benefits all major beneficial effects.	Comment noted	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	C	Mitigation measures in Section 13.7 and 13.9 are identified but how the measures are to be secured and implemented and the responsibility for their delivery is not provided in the chapter.	Accepted. Where mitigation is relevant to economics and employment, references to how the measures are to be secured and implemented and the responsibility for their delivery and will be included in the ES and ETS .	N
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	C	There are no monitoring requirements included within the Chapter, although reference to establishing monitoring arrangements for operational employment is made in the ETS. If no monitoring requirements are considered necessary, this should be explicitly stated in the Chapter. It is considered that monitoring of the local businesses (specifically during the construction phase) would be appropriate to ensure adverse effects are avoided where possible.	Accepted. Monitoring measures are not considered necessary to state in this chapter and this is stated in the 2022 PEIR .	N
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	N/A	The method of securing and implementing mitigation measures and with whom the responsibility for their delivery should be provided. Mitigation measures for the displacement of 100 jobs as described within 13.8.11 could be	Accepted. Where mitigation is relevant to economics and employment, references to how the measures are to be secured and implemented and the responsibility for their delivery will be included in the ES and ETS .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			included, for example in the form of financial compensation. It's proposed that monitoring of the local business adversely affected by the construction works should be implemented.	Disagree in respect of financial compensation, as this can't be treated as a form of mitigation to reduce the scale of effects.	
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	A/B	The methodology for assessing the impacts is provided within Section 13.4. The detailed methodology for employment is provided in Appendix 13.1. As outlined above, the study area for each effect is not apparent. The use of multipliers is mentioned and the statement that these are 'appropriate' and based on recent technical studies, however there is no explanation or justification as to how/why they are appropriate/relevant to the assessment.	Comment unclear – study area for each effect is apparent. Technical studies refer to past economic effects at New Century Park. The multiplier values will be further explained within the ES .	N
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	A	The methodology for determining the magnitude of impact is clearly defined in Table 13-6.	Comment noted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.3	Are the methods for evaluating significance clearly defined/?	A	The methods for evaluating significance are clearly identified in paragraphs 13.4.33, 13.4.34 which uses the matrix provided as Table 13-7 using the magnitude of impact and the sensitivity of the receptor/resource.	Comment noted.	N
4.4	Do the assessment methods used follow relevant guidance?	B	<p>The assessment methods follow the HCA Additionality Guide which is used to define the appropriate multipliers when accounting for induced and indirect employment during the construction phase, an appropriate multiplier of 1.5 has been used (as stated in paragraph 1.8.9).</p> <p>There are guidance documents referred to in the text including HM Treasury Guidance and Department for Transport's WebTAG guidance which should be added to paragraph 13.2.1.</p> <p>Paragraph 13.4.15 states that "ten construction job years is assumed to equate to one FTE job" is based on the HM Treasury's standard approach. The HM Treasury guidance document 'The Green Book'</p>	Accepted. Include in ES .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			does not contain this information, please provide the source of this approach.		
4.5	Have potential effects been considered both during construction and operation?	A/B	<p>Potential effects during both construction and operation of the Proposed Development are considered in the assessment, which is provided in Section 13.8.</p> <p>A breakdown of the effects at a more local level (i.e. by each local authority rather than combined for Luton and the Three counties) would be more appropriate to show how the employment opportunities will be spread, also taking into account constraints posed by peak hour traffic congestion. This should be considered at the ES stage.</p>	<p>Response as for Ref. 2.4</p> <p>Disagree. The 2022 PEIR is clear on which spatial/study areas apply to each of the effects assessed. The Scoping Report, PEIR or ES do not set out to provide effects at the individual authority level of each authority in the three counties except Luton.</p>	N
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	B/C	<p>The magnitude of impact and significance of effect is stated for all effects in Section 13.8.</p> <p>The duration of effects is stated for all effects with the exception of operational effects including; effects related to business travel, inbound tourism, journey time savings, air</p>	<p>Accepted. Referenced in the 2022 PEIR that the effects are permanent.</p> <p>Disagree. Operational effects are not reversible, and probability isn't a factor in the assessment methodology for economics and employment. This has been explained in the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			passenger duty and displacement of existing businesses. Probability and reversibility is not considered for any of the effects in Section 13.8.		
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	A	All effects described in Section 13.8 identify whether the effects are determined as significant or not significant. The justification for significance is provided in the methodology Section 13.4, paragraph 13.3.34 which clearly states that major or moderate effects are considered significant and minor and negligible effects are considered as not significant.	Comment noted	N
4.8	Are the residual significant effects clearly stated?	A	Residual effects are stated for each effect in the summary table provided (Table 13.15) within Section 13.13.	Comment noted	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	A	The cumulative effects assessment is not yet provided, it is anticipated the effect interactions and cumulative effects will be assessed as part of the ES. Chapter 20 Cumulative and In-Combination Effects has outlined the proposed Zones of Influence for Economics and Employment and a long list of developments with a summary of key environmental issues	Comment noted	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			to be considered in the cumulative effects assessment.		
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	B	Uncertainties with regard to expansion of the airport's capacity and its effect on GDP or employment are identified only (within paragraph 13.8.33). There is no specific statement to explicitly say that there are no other uncertainties.	Accepted. Included in 2022 PEIR .	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	A	Table 13-3 details the comments in the scoping opinion (ID) in relation to economics and employment and how these comments are addressed within Chapter 13 of the PEIR.	Comment noted	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	C	No concluding or summary text is included within the Chapter.	Accepted. The 2022 PEIR provides a table which summarises the effects of the Proposed Development on Economics and Employment.	N
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	A	A summary of all effects (both significant and not significant) is provided as Table 13-15 which comprehensively describes the key aspects of the assessment (magnitude, receptor sensitivity, embedded and additional mitigation, preliminary and residual effect).	Comment noted	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	B	<p>The chapter appears to be unbiased and comprehensive.</p> <p>The chapter would benefit from a clearer structure in places, specifically, the methodology and baseline information sections. These sections should be assembled according to each effect that is described in Section 13.8. The baseline information presented in Section 13.6 is limited and does not include reference to each effect described in Section 13.8. The information derived from Appendix 13-1 that informs the baseline information should be clearly stated or correctly signposted in Section 13.6.</p> <p>The study area for each effect assessed should be tabulated and justification for each study area used should be provided.</p>	Accepted. We have revisited the structure in the 2022 PEIR to make clearer.	N
6.2	Is the PEIR readable to the audience for which it is intended?	B	The PEIR is readable and uses language appropriate for the intended audience, however would benefit	As above (see response Ref. 6.1)	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			from a clearer structure in places (as outlined in 6.1).		
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	A	The language used in the Non-Technical Summary is suitable and free from technical jargon. Any specific more technical terms are helpfully described as footnotes.	N/A	N/A
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	A/B	<p>The text within the Non-Technical Summary matches the findings of the PEIR.</p> <p>However, paragraph 13.3.3. states “It is estimated that the Proposed Development would directly create net additional 4,400 jobs by 2039, compared to the airport being capped at 18 mppa in that year, with a total of up to 16,600 additional jobs created directly, indirectly or induced across Luton, the three counties of Hertfordshire, Bedfordshire and Buckinghamshire and elsewhere in the UK by 2039. Overall, the operation of the Proposed Development is estimated to generate £1.4 billion in additional GDP by 2039, resulting in a significant beneficial effect on the UK economy.” These values appear to have been extracted from Tables 13-</p>	Accepted. The NTS matches the findings of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			10 and 13-11 it is recommended that only net figures are included which consider displacement, induced and indirect employment. It would be helpful to include a table or bullet points to show how this is broken down into additional jobs within the Luton and the Three Counties for a simpler understanding.		
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	B	<p>The figures display the spatial areas that are included within the assessment. It is not clear how the east and west operation areas included within Figure 13-1 have been defined, there is no description of the operation area in the chapter. If the Airport Employment Area, which is described in 13.6.1, corresponds to the operations areas this needs to be stated. As stated above, it's not clear how these areas apply to the assessment.</p> <p>Figure 13-2 and Figure 13-3 are labelled incorrectly, the paragraph 13.6.1 refers to LBC and the three counties being shown on Figure 13-2 when they are actually included within Figure 13-3. Otherwise Figures 13-2</p>	<p>Please refer to response to 2.4.</p> <p>Figures have been labelled correctly in the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			and 13-3 clearly display the spatial areas described within Section 13.6 and supports the text in paragraph 13.6.1		
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	A/B	It is not clear which of the baseline information (Section 13.6) is derived from Appendix 13-1. It would provide clarity if where data extracted from Appendix 13-1 is used in the chapter, it is also referenced/signposted appropriately. Appendix 13-1 supports the information appropriately however it is not clear where in the chapter Appendix 13-1 is used.	Accepted. Baseline data sources have been set out in the 2022 PEIR (rather than appended).	N
Conclusion					
	Legislation, Policy and Guidance Overall conclusion B/C		Reference to the following Local Plans should be included within the Chapter: <ul style="list-style-type: none"> ■ Central Bedfordshire Local Plan 2004-2011. ■ Saved policies from the North Hertfordshire District Local Plan No. 2 and NHDC Proposed Submission Local Plan. A detailed review of the relevant policies of the ANPS is provided. However, for other policies, no summary of relevant policies or	Accepted. Included in 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>context to the assessment is provided.</p> <p>All relevant plans and policies should be referred to in the ES and their influence in the design and assessment described. Examples of documents that should have been referred to in the PEIR but that appear to be missing include:</p> <ul style="list-style-type: none"> ■ Vision 2050 ■ Economic Strategy ■ All Age Skills Strategy ■ Economic Insight ■ Emerging Herts LEP Local Industrial Strategy. ■ Luton 2040 <p>Luton Inclusive Growth Strategy</p>		
	<p>Baseline Information</p> <p>Overall conclusion B/C</p>		<p>It is not clear where the data presented in the baseline information has been obtained. References to the source of the information should be included.</p> <p>Section 13.6 should present baseline information that directly informs the assessment (Section 13.8), to provide clarity, it would aid the reader if the baseline section structure was split up according to each effect described in the assessment section.</p>	<p>Accepted. Clarity regarding baseline / future baseline data sources and references has been included in the 2022 PEIR The study area section has been moved in the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>The explanation and description of the study area used for the assessment could be moved to the assessment methodology section (13.4).</p> <p>A table listing the resources/ receptors and their sensitivity would be helpful and provide clarity, this could be included as an appendix.</p> <p>The future baseline (referred to as the do-minimum scenario) is described in 13.8.15 and states the future baseline is represented by the existing consented capacity of LTN (18 million passengers per annum). Three future baseline years are considered although it is not clear how the jobs and GDP for these three different years have been calculated.</p> <p>Clarification should be provided as to why jobs decrease over the future baseline when GDP increases as shown in Table 13-8. This should be described within a separate future baseline in the Chapter.</p>		
	<p>Mitigation, Enhancement and Monitoring</p> <p>Overall conclusion B</p>		<p>As included in 3.5 above, the method of securing and implementing mitigation measures and with whom the responsibility for their delivery should be provided.</p>	<p>Accepted. If mitigation and monitoring measures are considered necessary, then these will be stated in the ES. Where mitigation and</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Measures to mitigate the displacement of 100 jobs as described within 13.8.11 (a minor adverse effect) could be included, for example in the form of financial compensation.</p> <p>Monitoring of local businesses during the construction phase is also recommended.</p>	<p>monitoring is relevant to economics and employment, how the measures are to be secured and implemented and the responsibility for their delivery will be included in the ES.</p> <p>Disagree in respect of financial compensation, as this can't be treated as mitigation.</p>	
	<p>Assessment of Significant Effects</p> <p>Overall conclusion B</p>		<p>Any uncertainties in the design, mitigation or assessment should be explicitly stated, it should also be stated if there are no uncertainties.</p> <p>The probability and duration (temporary/permanent) of all effects included in the assessment should be considered and clearly stated.</p> <p>The study area for each effect should be clearly stated.</p> <p>A breakdown of the effects at a more local level (rather than Luton and 3 counties combined) should be provided at the ES stage.</p>	<p>Accepted. Clarity to be provided on whether there are any uncertainties.</p> <p>Accepted. Study areas to be stated clearly.</p> <p>Disagree. The 2022 PEIR is clear on which spatial/study areas apply to each of the effects assessed. The Scoping Report, PEIR or ES do not set out to provide effects at the individual authority level of each authority in the three counties except Luton.</p> <p>Disagree. Operational effects are not reversible, and</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				probability isn't a factor in the assessment methodology for economics and employment.	
	Conclusions Overall conclusion B		A comprehensive summary table is included at the end of the Chapter however no concluding text is provided in the Chapter.	Disagree- the summary table clearly identifies the effects of the Proposed Development on Economics and Employment.	N
	Presentation (including Figures and Appendices) Overall conclusion B		See Refs 6.5 and 6.6 within Table 1-1 above.	Figures have been labelled correctly in the 2022 PEIR .	N

B11 Health and community review checklist and summary

Note: 'Ref.' is to tables 2-23 and 2-24 of the WSP on behalf of host authorities response.

Table B11.1: Health and Community

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B/C	<p>Section 14.2 refers to legislation policy and guidance.</p> <p>The Airports National Policy Statement has been listed and a good number of local planning policy documents have been included, however, some key policy and guidance has been omitted. (See Table 12-2 below for inclusions)</p> <p>Given the type of development and the inclusion of WebTAGs within the methodology, Transport Appraisal Guidance (TAG) guidance should be included here.</p> <p>The line 'There is no specific legislation applicable to the health and community assessment' is misleading and could be rephrased to</p>	<p>Accepted. We have reviewed which of the suggested documents are most relevant and these have been included in Chapter 13 of the 2022 PEIR submission.</p> <p>We have also checked for any updates, or additions to legislation, policy and guidance since these comments were made.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>‘there is currently no established guidance on the assessment of health’. There is applicable legislation for both health and communities e.g. Health and Social Care Act 2012, Equality Act 2010.</p> <p>The chapter lists only the relevant local plans and strategies but does not include reference to the relevant policies that have informed the scope, methodology or mitigation. The national planning policy and guidance section should consider the following for inclusion:</p> <ul style="list-style-type: none"> ■ Fair Society, Healthy Lives, The Marmot Review 2010 ■ Public Health Outcomes Framework 2012 ■ The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (includes guidance on the reporting of population effects under ‘People & Communities’) ■ Health and Social Care Act 2012 ■ DfT, TAG UNIT A4.1, Social Impact Appraisal, 2019 		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<ul style="list-style-type: none"> ■ Planning Practice Guidance – Health and Safe Communities ■ Equality Act, 2010 ■ Health and Social Care Act 2012 ■ Transport, health and wellbeing: An evidence review for the Department for Transport, 2019 ■ Hertfordshire County Council Position Statement: Health Impact Assessment (HIA) ■ Hertfordshire County Council's Sustainable Hertfordshire strategy ■ NHDC District and Stevenage Borough health profiles <p>Relevant policy relating to health and wellbeing of communities in local plans.</p>		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	C	There is no identification of data collection methods or techniques within the chapter.	Accepted: This has been addressed in Chapter 13 of the 2022 PEIR submission.	N
2.2	Do the data collection methods follow relevant guidance?	C	There is no identification of data collection methods or techniques within the chapter.	Accepted: This has been addressed in Chapter 13 of the 2022 PEIR submission.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.3	Is the study area identified appropriately?	B	The assessment study areas have been well defined and represented in both Table 14-11 and Figure 14-1, however the wider study area isn't represented on the Figure 14-1 and it is not clearly defined. For example, it is not clear whether the assessment includes Stevenage.	Comment noted: It is difficult to represent the wider study area on a figure as it will be defined by the location of impacts from other relevant topics (ie air quality, noise, economic and employment effects etc) and will therefore vary with determinant.	N
2.4	Have all the resources/receptors been considered?	B	<p>All receptors have been considered at this stage, however specific vulnerable groups (children, pregnant women, elderly people, malnourished people, and people who are ill or immunocompromised) within the population for the health assessment, who might experience disproportionate effects, have not been identified.</p> <p>There appears to be no obvious reference to, or acknowledgement of, health inequalities. This is a fundamental principle of Health Impact Assessment (HIA) and one which would I imagine feature quite heavily in Luton in particular.</p>	<p>Accepted (vulnerable groups): Further details about vulnerable groups, health inequalities and pockets of deprivation are provided in Chapter 13 of the 2022 PEIR.</p> <p>Comment noted (health profile): For those communities in the wider study area a baseline is provided at county level. We looked at whether further baseline data was needed at district and borough level to supplement the existing baseline. This was done in a way that ensured this was equitably collected across the wider study area.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>The assessment of the county health profile is accurate, but it does not recognise that the general affluence masks pockets of deprivation and health inequalities. This is particularly the case with Stevenage and needs to be noted if the town is included in the wider area. It is recommended that the assessment uses NHDC District and Stevenage Borough health profiles rather than rely on the county one.</p> <p>There will be an increase in traffic using the routes to the airport and proposed new park. In addition there will be increase in air traffic movements. All of these will contribute to potential adverse affects on air quality and health. One of the routes that the traffic to the airport is likely to take is via the LAQMAs in Hitchin. There is also proposed changes to the road layout within the LAQMAs</p>	<p>Accepted (traffic): In the 2019 PEIR, the Traffic and Transport topic and the Air Quality topic did not identify any significant adverse effects on road traffic or air quality. Therefore, based on their assessment outputs, the health assessment has not assessed there to be any significant health effects arising from traffic and air quality impacts. The updated 2022 PEIR assesses the impacts from traffic and airport related emissions based on updated traffic and airport activity data, considering the scheme changes and assesses any potential impacts on the Luton, Dunstable and Hitchin AQMAs. The results inform the health assessment.</p>	
2.5	Is the value (sensitivity) of the resources/receptors	A	Yes, the criteria are clear and easy to follow.	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	identified using appropriate criteria?				
2.6	Has there been consultation with the relevant statutory bodies?	A/B	<p>Section 14.3 summaries stakeholder engagement and consultation</p> <p>Consultation requests to statutory bodies have been submitted and EIA Scoping was submitted to the Planning Inspectorate, who consulted with the relevant statutory stakeholder bodies.</p> <p>Consultation has been undertaken with stakeholders and the local community through a number of workshops. The PEIR is however not clear on how the consultation undertaken to date has informed the design and the EIA process. The ES should clearly describe all consultation related to the EIA process identifying who has been consulted and how the feedback / comments (including those from the scoping exercise and the Technical Workshop held on 26 November 2018) have been addressed. It would also be useful to understand what, if any, response PHE has made. Given this is a Nationally Significant</p>	Accepted: This is included in Chapter 13 of the 2022 PEIR submission.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Infrastructure Project (NSIP), they should have responded.		
2.7	Is the future baseline scenario adequately described?	C	A future baseline scenario has not been provided and will need to be added in for the ES.	Accepted: A future baseline scenario is provided in Chapter 13 of the 2022 PEIR.	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	B	<p>A list of assumptions and limitations have been provided in section 14.5</p> <p>Table 14.11 suggests that in respect of the local neighbourhood area there are only local communities in Luton that are affected by the construction and operation of the proposed development. This is not the case. NHDC area is also affected and should be included.</p>	Comment noted: The NHDC area is covered under the 'wider area' impacts assessment. It was highlighted in table 14.11 of the 2019 PEIR that these communities may also be affected by construction activities such as construction traffic routes.	N
2.9	Which are the key receptors for the local authorities?		The identification of key receptors needs to be discussed with LPAs, however it is considered for the health and communities topics that the key receptors for the LAs would be people living and working in the LA and the services they use.	Accepted. We have defined receptors for the health and community assessment as the population/people living and working within the study area and have defined resources as the services/facilities used by these receptors. The	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				health assessment does not define any key receptors as it is a population- based assessment. However, vulnerable groups within the population are identified in Chapter 13 of the 2022 PEIR.	
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	A/B	Section 14.7 (Embedded and Good Practice Mitigation Measures) describes some measure such as the introduction of a Community Engagement Strategy, and phased workings to limit dust, that will help. There will be health effects from the construction phase from eg: noise, air quality, dust, light, traffic, etc. These need to be considered and appropriate and sufficient mitigation measures put in place to minimise them	Comment noted: Construction mitigation measures are summarised in Chapter 13 of the 2022 PEIR and in the draft CoCP (Appendix 4.2).	N
3.2	Are the mitigation measures included for significant adverse effects appropriate?	B	Mitigation of significant adverse effects seems appropriate and matches that proposed in other	Comment noted: No further changes needed.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>relevant chapters e.g. Noise, landscape and visual.</p> <p>Embedded mitigation has sought to avoid impacts on the users of Wigmore Valley Park from the closure and re-provision of the park during construction. These measures include maintaining access, providing replacement open space and following best practice construction measures. No further additional mitigation has been proposed. It is recommended that further engagement and consultation with the Host Authorities is carried out to discuss and agree the proposed mitigation measures.</p>	<p>Further engagement and consultation with the Host Authorities regarding proposed mitigation measures for WVP has been ongoing and is reflected in Chapter 13 of the 2022 PEIR.</p>	
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	A/B	<p>Mitigation measures have been outlined in section 14.7, which includes all embedded and good practice mitigation measures identified by other topics (Air quality, Traffic and Transport, Noise and Vibration, Economics and Employment and Landscape and Visual).</p>	<p>Comment noted: No further changes needed.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>The responsibility of whom the mitigation lies with has been identified</p> <p>The section pulls out specific mitigation measure which are particularly relevant during both construction and operation as well as potential additional mitigation measures.</p>		
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	C	Monitoring requirements have not been included within the chapter.	<p>Comment noted: Due to the scale of the proposed development and study area, it is not feasible to obtain accurate health data for the study population, nor to attribute any changes in health outcomes to the Proposed Development. Therefore, monitoring of health outcomes is not proposed. However, precursors to health effects will be monitored (i.e. air quality, noise, local employment and apprenticeships) as set out in Chapter 13 of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	B	<p>Mitigation measures should be included for employees impacted by relocation from New Century Park and President Way to alternative accommodation (potential long-term impacts on employment status for some individuals identified).</p> <p>As identified within the Landscape Review, both Hertfordshire County Council and North Hertfordshire District Council state that they are broadly satisfied with the quantity of replacement and additional public open space (POS) that is to be provided, but queried the percentage of additional open space compared to Wigmore Valley Park. They are also satisfied in principle with the approach to locating the more formal park uses closer to the urban area, transitioning to the more informal provision, which is more rural in character, within the open countryside. However, they have reservations regarding the relationship between the embedded and additional mitigation (in the ownership of the applicant), and how these areas will contribute to the</p>	<p>Comment noted: No further changes needed.</p> <p>Mitigation measures for employees impacted by relocation from New Century Park and President Way to alternative accommodation will be addressed within the Economics and Employment topic, and is reflected in the health assessment in Chapter 13 of the 2022 PEIR.</p> <p>Comment noted: Further engagement and consultation with the Host Authorities regarding proposed mitigation measures for WVP is ongoing and is reflected in Chapter 13 of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			setting and presentation of the POS, and how they will function as a whole is critical.		
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	B	<p>Methodology has been presented in section 14.4 which provides methods for in combination, neighbourhood quality and quantitative assessment.</p> <p>These methods have been used within the assessment, however, they've not all been described e.g. assessment of social capital, access to services, perception and uncertainty etc.</p> <p>In-combination assessment has been undertaken for the community receptors, however it isn't clear why this has not been undertaken for health receptors as well.</p> <p>Headings are slightly confusing would be worth separating out health and communities.</p>	<p>Accepted: The methodology is clarified further in Chapter 13 of the 2022 PEIR and sub-headings are used to highlight the technical differences between the methodologies for the health and community assessment for projects of this type and scale.</p> <p>Accepted: The determinant 'Neighbourhood quality' is by nature in-combination. Combining noise, AQ, visual, light and traffic impacts. It is made clearer in Chapter 13 of the 2022 PEIR the differences in approach to community in-combination assessment and health neighbourhood quality assessment, albeit these are both similar.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>It is not clear if a standalone Health Impact Assessment (HIA) has been undertaken and, if so, if a specific methodology has been used. Reference is made to Healthy Urban Development Unit (HUDU). The ES should describe its appropriateness for development of this type and scale.</p> <p>In connection with this, 14.2.1 could therefore reference to the guidance supporting the HCC HIA Position Statement adopted last month. There is no reference to a separate Health Impact Assessment (HIA), it would be expected that due to the scale and nature of development that a full HIA would be provided to accompany the DCO application.</p>	<p>Comment noted: Commonalities between the baseline for health and community are the reason for having a shared baseline – to avoid unnecessary duplication. However, the assessments need to remain separate as they differ in their methodology.</p> <p>Comment noted: A separate HIA has not been undertaken and will not be undertaken. The health assessment methodology is akin to that used in a stand-alone HIA being based on a wider model of health that looks at potential impacts on the social determinants of health. Population health is now an EIA topic and therefore is included as Chapter 13 of the 2022 PEIR (albeit a joint chapter with the Community topic) rather than as a supporting HIA document or Appendix. This approach has been agreed with</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				stakeholders through technical workshops since the 2019 PEIR .	
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	A	Magnitude has been well defined for the assessment of both health and community determinants. Guidelines are provided in Table 14-6.	Comment noted: No further changes needed.	N
4.3	Are the methods for evaluating significance clearly defined/?	A	Magnitude has been well defined in the matrices in Table 14-10. It follows a method of impact vs sensitivity, the methods of which have been supplied in the sub-sections above.	Comment noted: No further changes needed.	N
4.4	Do the assessment methods used follow relevant guidance?	A	WebTAG assessment method has been used to evaluate the health effects arising from increased aircraft noise. Further information on quantitative assessment and the results of the WebTAG assessment are presented in Section 14.8. There is currently no prescribed guidance for the assessment of health and communities, though methods follow practice used in HIA.	Comment noted: No further changes needed.	N
4.5	Have potential effects been considered both during construction and operation?	A	Construction and operational effects have been identified.	Comment noted: No further changes needed.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	B	Duration, magnitude and significance have been considered in the assessment and are as outlined in Tables 14-6 and 14-7. These follow through into the assessment tables, however, they've not been clearly outlined.	Accepted: This is more clearly defined in Chapter 13 of the 2022 PEIR .	N
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	B	The significance decision is not always fully justified, more emphasis in the assessment table is based on mitigation. Table 14-18 includes an additional column on the impacts on health determinants, a similar column should be included in table 14-17, whereby the potential impacts of community receptors are identified. Reference needs to be made to the potential amenity value of Wigmore Park and how it could be impacted by construction activity.	Accepted: This is addressed in Chapter 13 of the 2022 PEIR .	N
4.8	Are the residual significant effects clearly stated?	A	Residual effects have been identified within the summary tables for both health and community impacts.	Comment noted: No further changes needed.	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	A	It is expected that the interaction of effects and cumulative effects would be considered as part of the ES	Accepted: This is included in Chapter 21 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>A full Cumulative effects assessment is yet to be undertaken, as outlined in Section 14.14.</p> <p>Chapter 20 (Cumulative and In-Combination Effects) has outlined the methodology, proposed 'Zones of Influences', a long list of developments and a summary of key environmental issues to be considered in the CEA.</p>		
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	C	No uncertainties have been identified	Accepted: This is included in Chapter 13 of the 2022 PEIR.	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	B	Table 14-5 includes comments from the scoping opinion and outlines how they have been addressed, either within the chapter or within the PEIR.	Comment noted: No further changes needed.	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	C	No conclusions have been made within the chapter	Accepted: This is included in Chapter 13 of the 2022 PEIR under the section 'Preliminary assessment summary'.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	A	Summary of significant effects has been presented with Chapter 21, Table 21-1.	Comment noted: No further changes needed.	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	B	In general, the PEIR is unbiased, balanced and transparent. As outlined above, there are some sections that require further information to make them more comprehensive.	Accepted: This is addressed in Chapter 13 of the 2022 PEIR .	N
6.2	Is the PEIR readable to the audience for which it is intended?	B	Yes, the PEIR is readable, however some sections (as outlined above) could benefit from a clearer structure.	Accepted: This is addressed in Chapter 13 of the 2022 PEIR .	N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	A	Yes, generally clear and concise.	Comment noted	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	B	The findings match up; however, the NTS chapter should make a clearer distinction between health and communities throughout, particularly within section 14.3 'Likely Significant Effects'.	Accepted: This is addressed in Chapter 13 of the 2022 PEIR . Sub-headings are included for distinction between health and community effects.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	B	The figures are well presented and are as expected, however, the defined study areas within Figure 14-1 could be outlined clearer, in particular the South and East of Airport, where the colour is too similar to the basemap. The wider study area could also be included either separately or as an insert map on figure 14-1.	Accepted: This is addressed in Chapter 13 of the 2022 PEIR.	N
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	N/A	No appendices relevant to health and communities have been included within Volume 3.	Accepted This is provided in Chapter 13 of the 2022 PEIR.	N
Conclusion					
	Legislation, Policy and Guidance Overall conclusion B		This section contains a good number of local planning policy documents; however, some key policy and guidance has been omitted. The chapter lists only the relevant local plans and strategies but does not include reference to the relevant policies that have informed the scope, methodology or mitigation. It is	Accepted. We have reviewed which of the suggested documents are most relevant and these have been included in Chapter 13 of the 2022 PEIR. We have also checked for any updates, or additions to legislation, policy and	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>suggested that specific policies from these plans and strategies are included within the Legislation, Policy and Guidance section.</p> <p>The national planning policy and guidance section should consider the following for inclusion:</p> <ul style="list-style-type: none"> ■ Fair Society, Healthy Lives, The Marmot Review 2010 ■ Public Health Outcomes Framework 2012 ■ The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (includes guidance on the reporting of population effects under 'People & Communities') ■ Health and Social Care Act 2012 ■ Daft, TAG UNIT A4.1, Social Impact Appraisal, 2019 ■ Planning Practice Guidance – Health and Safe Communities ■ Equality Act, 2010 ■ Health and Social Care Act 2012 ■ Transport, health and wellbeing: An evidence review for the Department for Transport, 2019 	<p>guidance since these comments were made.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<ul style="list-style-type: none"> ■ Hertfordshire County Council Position Statement: Health Impact Assessment (HIA) ■ Hertfordshire County Council's Sustainable Hertfordshire strategy ■ NHDC District and Stevenage Borough health profiles <p>Relevant policy relating to health and wellbeing of communities in local plans.</p>		
	<p>Baseline Information</p> <p>Overall conclusion B/C</p>		<p>A good level of baseline information has been provided, however, the section is lacking and key sources of information have not been used. The section does not flow well into the assessment as health and community have been combined and then separated.</p> <p>Not all key consultation comments have been captured within the Table 14-2 of the PEIR, in regard to the Health and community technical stakeholder workshop, held on the 26th November 2018. It is recommended that LLAL liaise with the Host Authorities in order to ensure that all key comments are captured. The ES should clearly describe all consultation related to the EIA process identifying who has been</p>	<p>Accepted: This is addressed in Chapter 13 of the 2022 PEIR.</p>	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>consulted and how the feedback / comments (including those from the scoping exercise and the Technical Workshop held on 26 November 2018) have been addressed.</p> <p>It would be easier to make out the receptors if the baseline within each of the study areas, if it was broken down by community and health. This could then be broken down further into subheadings which link in with assessment e.g. Access to open space, neighbourhood quality etc. There is a lack of information regarding vulnerable groups who might experience disproportionate effects to the wider population. Inclusion of indices of deprivation (2019) as well as health data from Public Health England should be considered within the baseline. Greater detail of deprivation and health inequalities can be found in the NHDC District and Stevenage Borough health profiles, and it is recommended that these are included within the baseline. Future baseline is not considered and it is recommended that this is included in the ES.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	<p>Mitigation, Enhancement and Monitoring</p> <p>Overall conclusion A/B</p>		<p>Mitigation and enhancement measures are generally good. The mitigation of significant adverse effects seems appropriate and matches that proposed in other relevant chapters e.g. Noise, landscape and visual.</p> <p>The section could be improved by including mitigation for employees impacted by relocation from New Century Park and President Way to alternative accommodation (potential long-term impacts on employment status for some individuals identified). Monitoring measures have not been included, however it is assumed that these will be included within the ES where applicable.</p> <p>Whether mitigation measures are sufficient to reduce significant adverse effects needs to be considered in consultation with the LPAs.</p>	Accepted: See responses Ref. 3.1 to 3.5.	N
	<p>Assessment of Significant Effects</p> <p>Overall conclusion B/C</p>		<p>WebTAG assessment method has been used to evaluate the health effects arising from increased aircraft noise, however, the methodology used within the assessment, isn't always clear and not all have been</p>	<p>Accepted. Comments made in the first two paragraphs are addressed in Chapter 13 of the 2022 PEIR.</p> <p>Accepted: The health assessment considers</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>described e.g. assessment of social capital, access to services, perception and uncertainty etc. Further explanation on all methods used within the assessment should be outlined within the methodology section.</p> <p>Greater clarity within the assessment is needed as the significance decision is not always fully justified. The assessment tables for both communities and health (Tables 14-7 and 14-8) need to be set out the same. Table 14-18 includes an additional column on the impacts on health determinants, a similar column should be included within table 14-17, whereby the potential impacts of community receptors are identified.</p> <p>In-combination assessment has been undertaken for the community receptors, however it isn't clear why this has not been undertaken for health receptors as well. It is</p>	<p>combination of effects from other disciplines in the neighbourhood quality assessment. It will be made clearer in the 2022 PEIR the differences in approach to community in-combination assessment and health neighbourhood quality assessment, albeit these are both similar.</p> <p>Comment noted: A separate HIA has not been undertaken and will not be undertaken. The health assessment methodology is akin to that used in a stand-alone HIA being based on a wider model of health that looks at potential impacts on the social determinants of health. Population health is now an EIA topic and therefore is included as Chapter 13 within the 2022 PEIR (albeit a joint chapter with the Community topic) rather than as a supporting HIA document or Appendix. This approach has been agreed with</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>suggested that in-combination effects on health are also considered.</p> <p>The assessment does not refer to a separate HIA, it would be expected that due to the scale and nature of development that a full HIA would be provided to accompany the DCO application, and the health assessment in the EIA would summarise the significance of effect.</p>	<p>stakeholders through technical workshops since the 2019 PEIR.</p>	
	<p>Conclusions</p> <p>Overall conclusion B</p>		<p>The chapter seems a bit muddled and it is often unclear how the methodology has been applied to determine the population sensitivity.</p> <p>The chapter would benefit from some greater detail to the population profile to identify vulnerable groups.</p> <p>Previous stakeholder comments, including those made at the Technical Workshop do not appear to be addressed.</p>	<p>Accepted. These are addressed in Chapter 13 of the 2022 PEIR.</p>	N
	<p>Presentation (including Figures and Appendices)</p> <p>Overall conclusion B</p>		<p>PEIR/NTS- Both the PEIR and NTS are well presented but could benefit from more tables and figures to support evidence, particularly within the baseline data section. The PEIR chapter could benefit from some restructuring in places in order to make clearer distinctions between health and community aspects.</p>	<p>Accepted: See responses in previous section (Ref. 6.1 to 6.6).</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Figures - The defined study areas within Figure 14-1 could be outlined more clearly, in particular the South and East of Airport, where the colour is too similar to basemap. The wider study area could also be included either separately or as an insert map on Figure 14-1. An additional figure which indicates sensitive receptors would also aid the chapter.</p>		

B12 Agricultural land and farm holdings review checklist and summary

Note: 'Ref.' is to tables 2-25 and 2-26 of the WSP on behalf of host authorities response.

Table B12.1: Agricultural Land & Farm Holdings

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	A	Yes. Relevant local policies have been considered. There are no relevant regional policies.	Comment noted.	N
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	A	Yes to 2.1 and 2.2 but there are number of inconsistencies in the reporting of data within Volume 1 and the technical appendices, which are listed at the end of this review table.	Consistencies in the reporting of baseline data between the PEIR chapter and appendices have been addressed at Chapter 6, Section 6.7 in Volume 2 of the 2022 PEIR .	N
2.2	Do the data collection methods follow relevant guidance?		None.	N/A	N
2.3	Is the study area identified appropriately?	A	None.	N/A	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.4	Have all the resources/receptors been considered?	A	None.	N/A	N
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	C	<p>Table 15-5: the magnitude of impact criteria for agricultural land quality mixes magnitude and sensitivity of receptor (e.g. 20ha or more of best and most versatile (BMV) land, 50ha or more of lower quality land). The sensitivity of agricultural land is again set out in Table 15-8.</p> <p>By mixing magnitude and sensitivity, Table 15-5 defines 20ha of Subgrade 3a as high magnitude but 2000ha of Subgrade 3b as medium magnitude of impact.</p> <p>The inclusion of “or change is likely to cause a direct adverse or permanent or long term (more than 10 years) impact on the integrity/value of the receptor” under the definition high magnitude of impact means that any area of agricultural land of any quality that is removed from agricultural use and production for the proposed</p>	The significance criteria described at Chapter 6, Table 6.13 in Volume 2 of the 2022 PEIR , was agreed by PINS during EIA Scoping and is similar to that set out in the Third Edition of the EIA Handbook (ICE Publications) published in December 2019 and the revised Highways England (HE) Design Manual for Road and Bridges (Vol 11, Section 3, Part 6), replaced by LA109 ‘Geology and soils’ in October 2019.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>development will be a high magnitude of impact. This cannot be the intention of the criteria, as it makes all other definitions redundant.</p> <p>Non-agricultural land is included within the definition of very low magnitude on agricultural land quality – but clearly non-agricultural land is not an agricultural land receptor.</p> <p>Table 15-6: the nature of the impact on soil resources is unspecified and unclear. Magnitude is related to a volume of soil but the impact that is being considered on that specified volume is not detailed; for example, do the criteria refer to the volumes of soil on site, the volumes that will be handled/disturbed or the volumes that will be damaged? The implication from the later assessment is that it is the last of these, as the magnitude of impact reduces from high (50,000m³ of soil) to very low (12,499m³ or less) with the implementation of the soil management plan as mitigation.</p>		

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>Table 15-8: sensitivity criteria are set out for non-agricultural land but the receptor is agricultural land. Aside from being non-agricultural, the table implies that woodland has very low value as a land use. The inclusion of 42% of all agricultural land in England as a receptor of the highest sensitivity appears exaggerated.</p> <p>Table 15-9: para 15.4.15 sets out that the sensitivity of soil is related to their availability for reuse. The categorisation of soils that are unsuitable for reuse (e.g. made ground, contaminated land) as being very low sensitivity therefore seems perverse.</p> <p>The medium sensitivity soils should include the lower % clay bracket (i.e. the definition should be 18-27% rather than <27%).</p> <p>Table 15-10 does not include a very low category. Many of the criteria in Table 15-10 relate to land uses rather than agricultural holdings. It is not</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			clear why tenanted farm holdings or large agricultural holdings should be categorised as low sensitivity; or marginal holdings as high sensitivity. Given that the affected farm is a large, tenanted holding, there is a sense of prejudgement with these criteria.		
2.6	Has there been consultation with the relevant statutory bodies?	A	Natural England was consulted as part of the Scoping Opinion. No further consultation has taken place with statutory bodies.	N/A	N
2.7	Is the future baseline scenario adequately described?	B	There is no future baseline section but there is some consideration of future baseline in Section 15.12, In-combination climate change impacts. It is expected that the ES will include the consideration of the future baseline scenario in the Baseline section.	<p>Chapter 6, Section 6.7 in Volume 2 of the 2022 PEIR describes the future baseline scenario.</p> <p>Chapter 6, Section 6.12 in Volume 2 of the 2022 PEIR provides a preliminary assessment of in-combination climate change effects.</p>	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of	A	None.	N/A	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	professional judgment made clear?				
2.9	Which are the key receptors for the local authorities?	A	Best and most versatile agricultural land; soil resources	N/A	N
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	B	The PEIR refers to the implementation of a Soil Management Plan (SMP) but lacks detail as to the measures within this plan to avoid, reduce or offset significant adverse effects. Further details should be provided in the ES.	Chapter 6, Section 6.8 in Volume 2 of the 2022 PEIR outlines the approach adopted within the SMP given at Appendix 6.6 in Volume 3 of the 2022 PEIR.	N
3.2	Are the mitigation measures included for significant adverse effects appropriate?	B	There is insufficient detail provided on the mitigation measures to assess their appropriateness. Further details should be provided in the ES.	Chapter 6, Section 6.8 of Volume 2 of the 2022 PEIR describes the embedded and good practice mitigation measures incorporated into the Proposed Development design or assumed to be in place before assessment. A draft SMP to be delivered as part of the Code of Construction Practice (CoCP) is given at Appendix 6.6 in Volume 3 of the 2022 PEIR.	N
3.3	Does the PEIR set out how mitigation measures are to	B	The PEIR indicates that the SMP will be delivered as part of the Code of	A draft SMP to be delivered as part of the CoCP is given	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?		Construction Practice but no further details are provided. Para 15.14.2 indicates that the outline SMP will be developed further. Further details should be provided in the ES.	at Appendix 6.6 in Volume 3 of the 2022 PEIR .	
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	B	No monitoring is proposed. Monitoring of the mitigation measures proposed for the soil resource would be expected. As noted above full details of the SMP should be provided in the ES.	A qualified soil scientist will be appointed to implement the SMP. A draft SMP to be delivered as part of the CoCP is given at Appendix 6.6 in Volume 3 of the 2022 PEIR .	N
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	B	Further details could be provided of the outline SMP and how measures will mitigate the significant adverse effect on soil resources identified.	A draft SMP to be delivered as part of the CoCP is given at Appendix 6.6 in Volume 3 of the 2022 PEIR .	N
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	A	None.	N/A	N
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	C	The assessment indicates that the proposed development will have a high magnitude of impact on 250,000m ³ of on high sensitivity topsoils and subsoils, which will give rise to a major adverse effect.	The 'magnitude' and 'sensitivity' criteria detailed at Chapter 6, Section 6.5 in Volume 2 of the 2022 PEIR are appropriate to identify potential major adverse	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Implementing the SMP reduces the magnitude of impact to very low, and gives rise to a minor adverse and not significant effect.</p> <p>However, the criteria for the magnitude of impact on soils refer only to the volume of soil affected, and a very low magnitude of impact would affect 12,499m³ or less of soil. It is not clear how this assessment has been reached when it is clear that the remaining 237,501m³ of high sensitivity soils would still be affected by the proposed development.</p>	<p>effects on soil resources, and mitigation achieved by implementing a SMP as part of the CoCP will reuse the amount of soil required for landscaping purposes. We accept there will be a residual moderate effect (significant) due to the permanent loss of some soil which is surplus to requirement as part of the landscape scheme.</p>	
4.3	Are the methods for evaluating significance clearly defined/?	C	<p>No specific reference is made to define the level of effect that is considered significant but it is apparent from the text that moderate or greater effects are considered significant. Further details should be provided in the ES.</p>	<p>Chapter 6, Section 6.5 in Volume 2 of the 2022 PEIR defines the level of effect that is considered significant.</p>	N
4.4	Do the assessment methods used follow relevant guidance?	B	<p>Yes, follow established practice.</p>	N/A	N
4.5	Have potential effects been considered both during construction and operation?	A	<p>Operational effects on agricultural land quality and soil resources have been scoped out, which has been accepted in the Scoping Opinion.</p>	<p>A preliminary assessment of construction effects is provided at Chapter 6,</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>Section 6.9 in Volume 2 of the 2022 PEIR.</p> <p>Operational effects on agricultural land quality and soil resources have been scoped out of the assessment.</p>	
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	B	Magnitude, duration and significance of impacts have been considered but there are deficiencies on how the assessment criteria has been followed (see comments under 4.2 and 4.58). There is no discussion on probability and reversibility.	The preliminary assessment of effects provided at Chapter 6, Section 6.9 in Volume 2 of the 2022 PEIR considers likelihood and reversibility of an impact.	NN
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	B	Significant effects are identified; no justification given for the significance decision. Further details should be provided in the ES.	The preliminary assessment of effects provided at Chapter 6, Section 6.9 in Volume 2 of the 2022 PEIR identifies and describes with justification the significance decision.	
4.8	Are the residual significant effects clearly stated?	B	Yes, but the methodology for arriving at the residual effect on soil resources is not clear, and does not follow the assessment criteria.	Residual effects are clearly stated at Chapter 6, Section 6.11 in Volume 2 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	C	Para 15.11.1 indicates that this assessment will follow in the ES.	A cumulative effects assessment is presented within Chapter 21 of the 2022 PEIR .	N
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	C	Little reference is made to the detailed design of the scheme in the assessment.	A reasonable worst case, as described in Chapter 5 in Volume 2 of the 2022 PEIR , is assumed in the assessment of effects provided at Chapter 6, Section 6.9 in Volume 2 of the 2022 PEIR .	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	A	Yes.	N/A	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	B	A summary is provided in Table 15-13 but there is no accompanying text, and no conclusions reached.	Chapter 6, Table 6.17 in Volume 2 of the 2022 PEIR provides a summary of the identified impacts, mitigation and likely effects of the Proposed Development. The preliminary assessment of effects provided at Chapter 6, Section 6.9 in Volume 2 of	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				the 2022 PEIR identifies and describes with justification the significance decision.	
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	A	Yes, Table 15-13.	N/A	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	B-C	The assessment of effects on soil resources is unclear. The criteria setting the sensitivity of farm holdings could give the impression of being pre-determined if they remain unexplained or unsubstantiated.	The preliminary assessment of effects provided at Chapter 6, Section 6.9 in Volume 2 of the 2022 PEIR identifies and describes with justification the significance decision.	N
6.2	Is the PEIR readable to the audience for which it is intended?	A	Yes.	N/A	N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	A	Yes.	N/A	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	A	Yes.	N/A	N
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? –	A	Yes.	N/A	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Please provide further commentary if required.				
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	A	Yes.	N/A	N
Conclusion					
	Legislation, Policy and Guidance Overall conclusion A		None.	N/A	
	Baseline Information Overall conclusion B		Inconsistencies in the reporting of baseline data between Volume 1 and the appendices need to be checked and resolved.	Consistencies in the reporting of baseline data between Volume 1 and the appendices have been addressed at Chapter 6, Section 6.7 in Volume 2 of the 2022 PEIR .	N
	Mitigation, Enhancement and Monitoring Overall conclusion B		Insufficient details provided on mitigation measures.	Chapter 6, Section 6.8 in Volume 2 of the 2022 PEIR describes the embedded and good practice mitigation measures incorporated into the Proposed Development	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				design or assumed to be in place before assessment. A draft SMP to be delivered as part of the CoCP is given at Appendix 6.6 in Volume 3 of the 2022 PEIR .	
	Assessment of Significant Effects Overall conclusion C		The criteria for identifying the magnitude of impact for agricultural land and soils need reviewing and amending. The sensitivity criteria for agricultural land, soils and farm holdings need reviewing, amending or further clarification. Significance needs to be defined. The application of the criteria to the assessment on soil resources is unclear.	The significance criteria described at Chapter 6, Table 6.13 in Volume 2 of the 2022 PEIR , was agreed by PINS during EIA Scoping and is similar to that set out in the Third Edition of the EIA Handbook (ICE Publications) published in December 2019 and the revised Highways England (HE) Design Manual for Road and Bridges (Vol 11, Section 3, Part 6), replaced by LA109 'Geology and soils' in October 2019.	N
	Conclusions Overall conclusion B		Effects are adequately summarised but no conclusions reached.	Chapter 6, Table 6.17 in Volume 2 of the 2022 PEIR provides a summary of the identified impacts, mitigation and likely effects of the Proposed Development.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				The preliminary assessment of effects provided at Chapter 6, Section 6.9 in Volume 2 of the 2022 PEIR identifies and describes with justification the significance decision.	
	Presentation (including Figures and Appendices) Overall conclusion A		None	N/A	N

B13 Biodiversity review checklist and summary

Note: 'Ref.' is to tables 2-27 and 2-28 of the WSP on behalf of host authorities response.

Table B13.1: Biodiversity

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B	<p>Chapter 16 lists all appropriate legislation and policy relevant to biodiversity including the Airports NPS. Chapter 16 includes a breakdown of NPS sections relating to biodiversity and how it is addressed in the PEIR (Table 16-1). The chapter lists only the relevant local plans and does not include reference to the policies relevant to biodiversity that have informed the scope/methodology/mitigation presented in the chapter.</p> <p>Guidance documents are limited to CIEEM 2018 (Note that that there has been minor update to this guidance in September 2019) and ODPM circular 06/2005. The latter was withdrawn in 2014 and it is difficult to see what guidance this offers that is not</p>	Accepted. This is included in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			covered by the NPS and NPPF. There are no further mentions of the circular in the chapter so removal would be appropriate.		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	A	All methodologies are fully described in Appendix 16-1 rather than the chapter itself. This is considered acceptable.	Accepted.	N
2.2	Do the data collection methods follow relevant guidance?	B/C	Overall, full provision of appropriate methodologies is given in Appendix 16-1. The methodology applied to breeding birds does lack justification on (1) number of visits applied and (2) the application/reason for of a dusk visit which does not follow Common Bird Census guidance. Full territory analysis has not been undertaken, although this is likely constrained by the limited number of visits. The definition of a breeding territory is set as an unrealistically high bar – i.e. presence in same vicinity in three or more occasions when only 3 post-dawn surveys were undertaken. It is considered that this	Accepted. This is included in the 2022 PEIR . Further detail is included within the ecology baseline report, Appendix 8.1 of the 2022 PEIR , to explain methodologies and reasoning where we have deviated from best practice guidance.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>is likely to lead to underestimation of territories present. No guidance or clear details on methodologies are presented for the Schedule 1 species – red kite and barn owl. Barn owl survey methodology (Shawyer 2012) is available through CIEEM.</p> <p>For wintering birds, it is unclear what guidance is followed. The two ‘standard’ references provided (Bibby et al and Gilbert et al) do not provide guidance for generic (non-wetland) wintering surveys. Guidance is available from the BTO – see for example Gillings (2008). More survey effort was applied to wintering than breeding bird surveys which seems unusual.</p> <p>Amphibians – methodological guidance is appropriate however it is unclear how HSI results are linked to the need for presence / absence surveys and / or eDNA surveys. Indeed, clarity is lacking on why each</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>waterbody was subjected to either survey.</p> <p>Data from previous ecological surveys and Local Site citations, which are relevant to how this landscape has evolved, should also be consulted.</p>		
2.3	Is the study area identified appropriately?	C	<p>The Study Areas are generally appropriately defined. It is however noted that breeding and wintering birds have erroneously been given two entries in 16.6.5 – under 100m and 500m. On checking Appendix 16-1 it appears that 500m is correct. Suggests that GCN is ordered before other amphibians to prevent confusion. I would also suggest that there is some confusion between ‘study area’ and ‘survey area’ – i.e. otter and water vole records have been obtained to 2km (i.e. the study area) but surveyed in the Main Application Site (the survey area). The ES should include clear definitions for each of these terms. The use of a 1.5 km ZoI for cumulative assessment has not been</p>	<p>Accepted. This is included in the 2022 PEIR and ecology baseline report Appendix 8.1 of the 2022 PEIR.</p> <p>Study areas, survey areas and zones of influence are clearly defined within the 2022 PEIR and ecology baseline report Appendix 8.1 of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			fully justified in the chapter despite a request to do so in the Scoping Opinion. Whilst it is likely to be accepted that impact pathways are not likely to be felt out to the full extent of the 10 km study area for European sites, the 1.5 km still seems arbitrary.		
2.4	Have all the resources/receptors been considered?	A	All relevant biodiversity features have been identified with surveys completed or planned.	Accepted.	N
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	C	Sections 16.4.8 – 16.4.9 define the determination of important ecological features using a geographical framework. This is acceptable; however, no definitions are provided under each criterion – this cannot therefore be efficiently related in the chapter to each feature of relevance. Section 16.6 then applies a secondary criterion on value/sensitivity based on high, medium, low etc, this is not explained in the chapters methodology and it is far from clear how that differs from ‘importance’. It is assumed that the	Accepted. This is included in the 2022 PEIR . Clarity is provided on ecological impact assessment methodology, and how the CIEEM methodology has been applied and how this translates to the EIA methodology as described in the relevant sections. Field 14 lies within the habitat creation area and not the Main Application Site, so will be enhanced and managed as part of the draft Landscape and Biodiversity Management	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			chapter should refer back to section 4.5 in this regard? One minor note – the NVC report in Appendix 16-1 notes one field (14) as being of county importance for arable species. This isn't brought out in Table 16-6.	Plan, Appendix 8.2 of the 2022 PEIR.	
2.6	Has there been consultation with the relevant statutory bodies?	C	Appropriate consultation has been undertaken with relevant statutory bodies including the set-up of a Biodiversity Technical Working Group. A summary of the discussions is provided in Table 16-2 however no detail is provided on key actions / agreements and how these have been addressed in the chapter. It is also noted that Natural England were unable to attend any TWG meetings. Main issues from the Scoping Opinion and how they are addressed in the Chapter are detailed in Table 16-3. It is stated that a full consideration of the Scoping Opinion will only be given in the final chapter – therefore all consultee responses outside of those from PINS are currently excluded. This would seem an odd decision when the PEIR could	Accepted. This is included in the 2022 PEIR. Further TWG meetings were undertaken with Natural England. , Detail on the outcomes of meetings is provided in the 2022 PEIR.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			take the opportunity to present a full overview of biodiversity issues and present a framework for this significant project. As for example Natural England were not able to attend any TWG meetings their advice on the Scheme has not been presented in the chapter.		
2.7	Is the future baseline scenario adequately described?	B/C	There is no specific future baseline section in the chapter. However, there is a 'in combination with climate change impacts' section at the end of the chapter (16.12). It is recommended that the ES includes a robust future baseline section earlier in the chapter so that population trends etc for key features can be adequately discussed (and then cross referenced to section 16.12).	Accepted. This is included in the 2022 PEIR .	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	B/C	The use of professional judgment in respect to determining the significance of impacts is discussed in paragraph 16.4.12 although it is unclear when such judgment may be required. Section 16.5 details assumptions and limitations with the reader referred to the Ecological Baseline Appendix (16-1) for all limitations with respect to surveys including difficulties with access.	Accepted. This is included in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.9	Which are the key receptors for the local authorities?	B	<p>Not identified in the chapter through consultation records. However, Scoping Opinion recognises CWS, hazel dormouse and great crested newts which are all addressed in the chapter. Some issues such as bird strike and air quality are not addressed in the PEIR and the reader is directed to the final ES / HRA on these matters. It is however expected that air quality effects on ecological features are considered in both the ecology chapter and HRA for the final submission.</p> <p>Feedback received through this review has highlighted the relatively low ecological impacts but concerns over scale of enhancements / net gain and bird strike. For example, conflicts between replacement hedgerow mentioned at 16.4.7 of the PEIR to meet biodiversity and the strategy required to ensure that there is no increase in relation to potential for bird strike incidents.</p>	<p>Accepted. This is included in the 2022 PEIR.</p> <p>Effects of changes to air quality is considered in the ecology chapter of the 2022 PEIR. A Draft Bird Strike Risk Assessment is provided as Appendix 8.4 in Volume 3 of the 2022 PEIR.</p> <p>The landscape design for the Proposed Development, including habitat creation measures, has taken account of the potential to increase bird strike risk and been designed accordingly.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	B	Detailed embedded mitigation and 'good practice' measures are provided in section 16.7. There is also prior mention of a commitment to applying the Defra biodiversity net gain metric despite it not being proposed to be mandatory for NSIPs. It is unclear at this stage when such mitigation measures would be secured and subsequently implemented.	Accepted. This will be included in the ES .	
3.2	Are the mitigation measures included for significant adverse effects appropriate?	A	Additional mitigation measures to address significant effects are provided in Section 16.9. These measures are broadly appropriate. It is worth noting that some additional measures are detailed that reduced impacts that are not deemed to be significant e.g. bird nest boxes. It would therefore be helpful to detail the scope of these commitments in section 16.9. Further enhancement opportunities are detailed in section 16.9 including reference again to biodiversity net	Accepted. This is included in the 2022 PEIR and the Landscape and Biodiversity Management Plan, Appendix 8.2 of the 2022 PEIR . Further details will be provided within the mitigation strategies to be included within the ES . Further discussions will also be undertaken with LPAs through Biodiversity Technical Working Group.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			gain. These opportunities are appropriate. It is recommended that the adequacy of these measures is discussed with LPAs.		
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	C	The chapter assumes the production of a draft CoCP with respect to control of noise/light pollution, control of INNS, watercourse, tree protection. However, the mechanism for securing embedded and additional mitigation measures specific to the chapter is not stated. Enhancement measures detail refer to securing such items through DCO requirements. Clarity is required on the level of ongoing after care of planting and habitat manipulation and management proposals.	Accepted. This is included in the 2022 PEIR . Long term habitat management and monitoring is outlined within the Landscape and Biodiversity Management Plan, Appendix 8.2 of the 2022 PEIR .	N
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	C	Whilst references are made in Section 2.1 and 4, Appendix 16-2 Draft Outline Landscape and Biodiversity Management Plan to ecological monitoring, no specific section on monitoring requirements is provided in Chapter 16 (nor indeed, is appendix 16-2 referred to).	Accepted. This is included in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	B	The mitigation measures (embedded and actual) are broadly appropriate at this preliminary stage but it is expected that the final ES will fully explore their adequacy to reduce adverse effects. As detailed in 3.6, monitoring needs to be explored. Appropriate engagement should be undertaken with the relevant authorities to agree the proposed mitigation, enhancement and monitoring strategies / programmes.	Accepted. This will be included in the ES .	N
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	B	The chapter presents a brief overview of characterisation of effects on biodiversity. The reader is directed to section 4.5 for the generic overview in approach made in the PEIR.	Accepted. This is included in the 2022 PEIR .	N
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	C	The methods for establishing magnitude are briefly described in the chapter and the reader is referred to section 4.5. It would be preferable again if clarity can be brought in how this is consistent with CIEEM guidance so that the reader can follow the ecological context of the criteria proposed.	Accepted. This is included in the 2022 PEIR . Clarity is provided on how the CIEEM methodology has been applied, how effects are characterised, and how this translates to the EIA methodology as described in	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				Section 5.4 of Chapter 5 of the 2022 PEIR.	
4.3	Are the methods for evaluating significance clearly defined/?	B	The methods for evaluating significance are briefly described in the chapter and the reader is referred to section 4.5. It is noted that the matrix approach deviates from CIEEM guidance, this should be clarified in the chapter.	Accepted. This is included in the 2022 PEIR . Clarity is provided on how the CIEEM methodology has been applied, how effects are characterised, and how this translates to the EIA methodology as described in Section 5.4 of Chapter 5 of the 2022 PEIR .	N
4.4	Do the assessment methods used follow relevant guidance?	C	The chapter states that the methods for determining ecological value and significant effects are 'in line' with CIEEM guidance, which they are in part only. Section 4.5 which presents the generic methodology across the ES does not detail any particular guidance on which the methodology is based. It would be expected that narrative is provided on how the generic methods apply to biodiversity – currently it is stated that it is used purely on a consistency basis.	Accepted. This is included in the 2022 PEIR . Clarity is provided on how the CIEEM methodology has been applied, how effects are characterised, and how this translates to the EIA methodology as described in Section 5.4 of Chapter 5 of the 2022 PEIR .	
4.5	Have potential effects been considered both during construction and operation?	B/C	Both operation and construction are considered in the Chapter. The scheme description in Volume 1 of	Accepted. This is included in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>the PEIR does clearly suggest that the phases are more complex than just 'construction' and 'operation' with multiple phases. It is unclear that this has been accounted for in the Biodiversity chapter – particularly with reference to future baseline scenarios as certain phases are >10 years distant.</p> <p>Furthermore, no narrative is provided on how impact pathways have been identified for each phase of the proposed development. It leaves the reader finding it difficult to work out what these are until the residual impact table at the end of the chapter.</p>	The 2022 PEIR assesses impacts on ecological receptors at each phase of the project.	
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	C	<p>The assessment only in part considers these factors which are briefly detailed in the methodology for characterising impacts – typically duration, magnitude and significance. Reversibility, probability nor timing or frequency are accounted for and opportunities should be taken here and in the summary of residual effects at the end of the chapter to account for all relevant factors.</p>	Accepted. This is included in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	B	The narrative supporting the justification of the significance decision is in general acceptable. Improved statements on the characterisation of effects as detailed above would further improve the clarity.	Accepted. This is included in the 2022 PEIR .	N
4.8	Are the residual significant effects clearly stated?	B	There is a clear table presented on residual effects.	Accepted.	
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	N/A	No inter topic effects have been considered and the cumulative assessment is stated to be completed only for the final ES. Further consultation with the Host Authorities is required in order to agree what projects needs to be considered as part of the assessment of cumulative effects.	Accepted. Inter-topic effects on ecology receptors are considered within Chapter 8 of the 2022 PEIR . A cumulative effects assessment with other schemes is provided within Chapter 21 of the 2022 PEIR .	N
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	B	No specific uncertainties are detailed at this stage although it is considered that for purposes of PEIR this is acceptable. It is expected however that these would be fully described in the ES. Uncertainties involved in the provision of the mitigation / enhancement proposals should be identified and in the ES.	Accepted. This will be included in the ES which will be submitted as part of the application for development consent.	N
4.11	Has the scoping opinion been considered in the	B	The Scoping Opinion has been considered with headline issues	Accepted. This is included in the 2022 PEIR . Final	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	preparation of the PEIR as applicable at this stage?		summarised and readers are directed to sections of the chapter which address main issues raised by PINS. Issues raised in the scoping from other consultees have not been considered. It is expected that the ES will explain how the scoping opinion has been taken into consideration in full.	responses to all comments received during Scoping will be provided in an appropriate format in the ES.	
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	B	No concluding statement is given. The reader is directed to the table showing a summary of the preliminary assessment only. A section is given on completing the assessment.	Further discussion with the Host Authorities is required on the assessment conclusions through the Biodiversity Working Group.	
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	B	Table 16.8 showing a summary of the preliminary assessment is comprehensive. As detailed above under 4.6 and 4.8 it would benefit from a keyed description of factors characterising the impacts along with magnitude.	Accepted. This is included in the 2022 PEIR . A summary table is included within Chapter 8 of the 2022 PEIR which includes a more detailed characterisation of effects.	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive	B	The chapter presents a balanced view of biodiversity issues. It is not considered to be comprehensive	Accepted. This is included in the 2022 PEIR ..	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	and transparent in its logic and presentation?		while understanding that it is by very definition a preliminary report.	Greater detail will be included in the ES, in particular relating to methodologies, characterisation of effects, and assessment of impacts by each phase of the Proposed Development.	
6.2	Is the PEIR readable to the audience for which it is intended?	A	The chapter is not overly complex and details all the expected issues. Text is generally readable and can be understood by non-specialists.	Accepted.	N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	A	The NTS with respect to biodiversity is clear and readable.	Accepted.	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	A	The NTS does summarise the findings of the Biodiversity chapter.	Accepted.	N
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	A	The figures presented in Appendix 2 are appropriate and provide a sufficient overview of information to support the Biodiversity Chapter. One minor point – the ‘buffers’ in figures 16-1 and 16-2 should be termed ‘Study Areas’ to be consistent with the chapter.	Accepted. This is included in the 2022 PEIR .	N
6.6	Are the Appendices generally expected to support this type of document provided in	A	Volume 3 (Appendix 16-1) provides comprehensive baseline reports on the surveys undertaken. They are	Accepted. This is included in the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Volume 3? – Please provide further commentary if required.		<p>however inconsistent in style and content – in part due to multiple third-party involvement. It is considered that recommendations on mitigation in these reports should be considered carefully.</p> <p>While splitting information over the PEIR and appendices is standard practice, the ES chapter on Biodiversity should provide a standalone function and contain the core relevant information to support an impact assessment.</p>		
Conclusion					
	<p>Legislation, Policy and Guidance</p> <p>Overall conclusion B</p>		<p>It is important to demonstrate how policies have been considered through the design process and particularly through embedded mitigation measures. Guidance documents should be those relevant and considered in the chapter only. General professional ecological guidance and standards should also be identified in the chapter; many of these are scattered across the baseline reports in Appendix 16-1.</p>	Accepted. This is included in the 2022 PEIR .	N
	Baseline Information		Clarity on methodologies on a minority of survey programmes is	Accepted. This is included in the 2022 PEIR , and within	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Overall conclusion B/C		<p>required (birds, GCN). For breeding birds, the methodology applied to breeding birds lack justification and appears to deviate from key guidance or in the case of barn owl work not detail appropriate guidance at all. GCN methodology requires clarity on the strategic approach applied through application of the different survey techniques.</p> <p>Study areas need to be defined clearly and appropriately justified. In particular, clear definitions on study area, survey and zone of influence are required. Several study areas for species features appear to actually refer to survey areas. These then need to be carried over to the relevant figures supporting the chapter.</p> <p>Additionally, as detailed in the Scoping Opinion Zol area requires justification. How does this relate to study areas which in some cases in the chapter are substantially greater than this Zol e.g. for European sites. Consultation records are limited and the views of LPAs and NE are not represented. A more effective overview will give increased</p>	<p>the ecology baseline report, Appendix 8.1 of the 2022 PEIR. Also please refer to responses Ref. 2.2 to 2.9.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>confidence in the direction of travel of the assessment.</p> <p>Future baseline currently not documented and requires consideration – at least signposting how this will be presented in the final ES. This should also be considered in the context of the phases of the proposed development which appear more complex than a basic presentation of ‘construction’ and ‘operation’.</p>		
	Mitigation, Enhancement and Monitoring		<p>The measures presented are broadly appropriate. Clarity is sought on the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The Landscape and Biodiversity Mitigation Plan is not adequately referenced in the chapter. <p>Furthermore, the plan would need to include further detail on potential enhancement measures – e.g. contributions to local biodiversity projects / offsite enhancement measures.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Implementation of mitigation works based on the phases of the proposed development. <input type="checkbox"/> Deliverability – how are measures secured? 	<p>Accepted. A draft Landscape and Biodiversity Management Plan is provided within Appendix 8.2 of the 2022 PEIR.</p>	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<ul style="list-style-type: none"> <input type="checkbox"/> How will the aims and objectives of enhancement / net gain measures be set? Clear need to highlight role of TWG in this process. <input type="checkbox"/> Distinguishing of additional mitigation measures that are required to avoid significant impacts <input type="checkbox"/> Overview of management and monitoring requirements – minimum summary of likely needs, how priorities will be set and means of securing it. <p>It is clear from discussions with all consultees, that the scope and deliverability of enhancement and compensation will provide the most significant challenge with regards biodiversity. There is a clear narrative for going ‘above and beyond’ as alluded to in the Scoping Report. The components of any overarching plan will be complex and require detailed discussions with the TWG. Appropriate engagement should be undertaken with the relevant authorities to agree the proposed mitigation, enhancements and monitoring strategies / programmes.</p>	
	Assessment of Significant Effects		The assessment methodology is very generic and clarity is needed on how	Accepted. Further information is included in the 2022 PEIR . N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Overall conclusion B/C		<p>it deviates from CIEEM guidance. The use of two tiers in defining value / importance is not transparent and not always intuitive. This requires further thought and detail.</p> <p>The identification of impact pathways is not presented with clarity nor is clear consideration of the Proposed Developments phases. Despite the methodology listing a bullet list of factors used to characterise impacts, several of these are not applied to tabulated summaries or the narrative impact assessment.</p> <p>Interrelationships required full consideration. Consultees have highlighted these issues – signposting how they are to be addressed in the Biodiversity chapter is required.</p>	Also refer to response Ref. 4.2 to 2.11	
	Conclusions		No concluding statement is provided with the findings only presented in the residual effects table. A more authoritative overview of the PEIR findings should be presented in parallel with the 'completing the assessment' section.	A concluding statement will be provided within the ES .	N
	Presentation (including Figures and Appendices)		Figures are broadly appropriated and well presented. Study areas need to be clearly defined (and agreed).	Accepted. 2022 PEIR has been reviewed and updated accordingly.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Appendices are comprehensive notwithstanding points about methodologies that require further clarity. Third party reports require close attention as they deviate in style and content.</p> <p>Recommendations/ conclusions made should be thoroughly reviewed to ensure no contradiction with the chapter. While splitting information over the PEIR and appendices is standard practice, the ES chapter on Biodiversity should provide a standalone function and contain the core relevant information to support an impact assessment.</p>		

B14 LVIA review checklist and summary

Note: 'Ref.' is to tables 2-29 and 2-30 of the WSP on behalf of host authorities response.

Table B14.1 Landscape and Visual Impact Assessment

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B/C	The PEIR Vol 1 Section 17.2 refers to legislation, policy and guidance. Consideration should also be given to the European Landscape Convention and Countryside and Rights of Way Act. In addition, it is important that reference is made (where appropriate) to relevant Supplementary Planning Documents (SPDs) as well as Green Infrastructure Strategies which can be used to guide mitigation and address policy aspirations. Given the location of the Chilterns Area of Outstanding Natural Beauty (AONB) in relation to the LTN, the AONB Management Plan and position statement on the setting of the AONB should also be considered. Guidance relating to the local landscape character assessments which are included within the baseline should be referred	<p><u>Legislation, Policy and Guidance</u></p> <p>The legislation, policy and guidance to be considered in the ES has been discussed and agreed with the LVIA Working Group and is described in Chapter 14 in Volume 2 of the 2022 PEIR. Consideration is given to the European Landscape Convention and Countryside and Rights of Way Act; relevant SPDs and Green Infrastructure Strategies; the AONB Management Plan and guidance relating to the local landscape character assessments.</p>	N

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme	
	Aspect being reviewed	WSP code			Comments
			<p>to in section 17.2 as a cross reference.</p> <p>Reference is made in Appendix 17 to Guidelines for Landscape and Visual Impact Assessment, 3rd Edition; specific guidance on airport related development and regulations; and local policies of relevance to the project location and these are considered appropriate. Reference is also made to tranquillity in accordance with Airport NPS and it is stated that this will be subsumed as part of the assessment of effects on landscape and visual receptors. It is expected that the ES will describe how the relevant local policies have informed the chapter.</p> <p>The list of documents forming part of the baseline review should be discussed and agreed by the relevant host LPAs plus the Chilterns Conservation Board.</p>	<p>The ES will describe how the relevant local policies have informed the chapter.</p> <p><u>Tranquillity</u></p> <p>Appendix 17 of the 2019 PEIR did not advise that tranquillity in response to the Airports NPS will be subsumed as part of the assessment on landscape effects. It paraphrased the Airports NPS in stating that '<i>the assessment of) landscape and visual effects (should) also include tranquillity effects</i>' and advised the Applicant's interpretation of Airports NPS Policy to be that tranquillity should not '<i>be assessed as a separate topic area alongside landscape and visual effects, but rather that in determining effects on landscape and visual receptors any effects on tranquillity should be included and given consideration.</i>'</p> <p>The approach to considering tranquillity within the ES has been discussed and agreed</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>with the LVIA Working Group and is included in the methodology provided at Appendix 14.1 in Volume 3 of the 2022 PEIR.</p> <p><u>Stakeholder Engagement</u></p> <p>The list of documents informing the baseline review has been discussed and agreed with the LVIA Working Group and is described in Section 14.7 in Volume 2 of the 2022 PEIR.</p>	
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	B/C	<p>As referred to in the scoping opinion from PINS and LPAs, East of England Typologies need to be considered and the Applicant has confirmed that this will be considered in the ES LVIA.</p> <p>The ES Landscape and Visual Impact Assessment (LVIA) will include a supportive “Non EIA Residential Visual Amenity Appraisal” stopping short of determining significance of visual effects but making judgements informed by desktop and site research on the likely sensitivity and</p>	<p><u>Non-EIA Residential Visual Amenity Appraisal</u></p> <p>A ‘right to a view’ is not an automatic right, even in the case of significant impacts to residents’ outlook. The purpose of the Residential Visual Amenity Appraisal (RVAA) is to determine if the effect of the Proposed Development on Residential Visual Amenity is of such a nature or magnitude that it potentially affects ‘living</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>anticipated magnitude of impact (paragraph 1.17.1). This approach needs to be agreed by the relevant host LPAs plus the Chilterns Conservation Board.</p> <p>PINS / LPAs scoping opinion refers to the need for a Zone of Theoretical Visibility (ZTV). The Applicant's response in the PEIR LVIA Vol 1 as to "how it has been addressed" refers to Figure 17.2 and Appendix 17, though reference to ZTVs is covered in PEIR Vol 1 Section 17.6 and not Appendix 17. Further information is required as to how the ZTV was prepared:</p> <ul style="list-style-type: none"> • What is the assumed viewer eye height? • What was the extent of the ZTV and was this based on the 5 km study area? • What are the assumed heights of the Proposed Development and was the ZTV undertaken on a point basis or did it use a blanket uniform height? • Were planes on the runway considered in any way? 	<p>conditions' or 'Residential Amenity.' This is referred to as the Residential Visual Amenity Threshold. An RVAA will be appended to the ES to support and inform judgements regarding effects on Residential Amenity.</p> <p>The methodology and Study Area for the RVAA has been discussed and agreed with the LVIA Working Group and reflects guidance set out in the Landscape Institute Technical Guidance Note 2/19. It has also been agreed with the LVIA Working Group that the approach does not need to be agreed by the Chilterns Conservation Board.</p> <p><u>Zone of Theoretical Visibility (ZTV)</u></p> <p>The draft scoping responses in the 2019 PEIR stated...</p> <p><i>"The methodology for generating the ZTV is provided in Appendix 17- 1."</i> (Appendix 17-2 ref. 4.13.7).</p>	

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<ul style="list-style-type: none"> • Which phase of works did it concentrate on (Phase 2 / 3)? • Did the ZTV focus on the main application site or extend beyond this to cover road realignments? • Did the ZTV consider any mitigation planting? If so, at what heights/ years? <p>For ease in the ES LVIA it would be beneficial to overlay the ZTV onto a topographical base map and show the location of agreed representative viewpoints. It should be noted that the PEIR LVIA states “Refinement of the ZTV mapping of the Proposed Development as the proposals evolve.”</p> <p>Night time photography, once agreed, should accord with the latest LI guidance issued in September 2019.</p>	<p><i>“The ZTV shown on Figure 17-2 assumes an eye height of 1.6m, is based on bare earth and includes an analysis of multiple points. Further consultation with the host authorities is proposed, and agreement will be sought regarding points of analysis to be used for further iterations of the ZTV.”</i> (Appendix 17-2 ref. 4.140).</p> <p>As noted in the WSP review of the 2019 PEIR, the methodology for generating the ZTV was however omitted from Appendix 17-1.</p> <p>The ZTV included in the 2019 PEIR was created using Ordnance Survey at 5m resolution LIDAR DTM (Digital Terrain Model) data for a minimum radius of 7km centred around the site, therefore providing a topographical model of the bare earth’s surface.</p> <p>Selected points at the proposed roof levels (light</p>

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>source) were chosen, and terrain building software was used to produce the ZTV mapping and is indicated by the blue shade.</p> <p>This works by casting a shadow from the light source/points over the terrain and where visible it registers as a shade (the extent of the visibility from that point). The idea being that the shade identifies views to the surface and vice versa.</p> <p>Cumulatively, this was used to confirm the general extent of the site's visibility. Concerning the draft scoping response included in the 2019 PEIR at ref. 4.140, the eye height assumed in this ZTV was, for the reasons explained above, therefore not at 1.6m but rather ground level.</p> <p>With regards the additional points raised in the review of the Applicant's 2019 PEIR, please note the following:</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<ul style="list-style-type: none"> • The ZTV was undertaken on a point basis using maximum building height parameter information from a range of locations spread across the Main Application Site that were discussed and agreed with the LVIA Working Group ; • Planes on the runway were not considered; • The ZTV focuses on the 32m ppa. phase of development; • The ZTV focuses on the Main Application Site and does not include road realignments; and • The ZTV is based on bare earth only and does not consider the effects of any mitigation planting. <p>The methodology used to generate the ZTV at Figure 14.2 in Volume 4 of the 2022 PEIR differs to that employed</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p>in the 2019 PEIR. The new ZTV methodology is detailed in Appendix 14.1 in Volume 3 of the 2022 PEIR and has been discussed and agreed with the LVIA Working Group.</p> <p><u>Night-time Photography</u></p> <p>The LVIA will not include night-time photography but will draw upon findings set out in the Light Obtrusion Assessment. This approach has been discussed and agreed with the LVIA Working Group.</p> <p>The night-time photography that the lighting advisors have prepared for their Light Obtrusion Assessment is compliant with the LI guidance section on night-time photography issued September 2019. The approach adopted and viewpoint locations considered within the Light Obtrusion Assessment have been discussed and agreed with the LVIA Working Group.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2.2	Do the data collection methods follow relevant guidance?	B/C	<p>Data collection methods appear to follow guidance but more detail is required on how information is collected.</p> <p>The methodology, criteria used, study area (s), data collected and location of verified viewpoints and photomontages should be agreed with the LPAs/Chilterns Conservation Board and actioned by the Applicant in advance of the ES LVIA – it is unclear how much engagement LPAs / AONB have had in commenting on the approach to date.</p> <p>It should be noted that the Landscape Institute guidance on photography and photomontage published in 2011 and referred to in Appendix 17 has now been withdrawn and replaced with TGN 06/09 Visual Representation of development proposals published on 17 September 2019. Accepting that there will be a reasonable grace period the ES LVIA chapter should consider the implications of this new guidance in discussions with the LPAs (discussed further under section 6 below).</p>	<p><u>Engagement with LPAs / AONB</u></p> <p>The methodology, criteria used, study area(s), data collected, verified view locations and photomontage locations have been discussed and agreed with the LVIA Working Group.</p> <p>The methodology, criteria used, initial study area, data collected and location of viewpoints were also discussed with the Chiltern Conservation Board at a pre-scoping meeting.</p> <p><u>LI Guidance on Photography and Photomontage</u></p> <p>The photography and photomontages that supported the 2019 PEIR and that are provided at Appendices 14.5 and 14.6 in Volume 3 of the 2022 PEIR comply with TGN 06/19.</p> <p>TGN 06/19 advises that the viewing distance for the montages from eye to paper</p>	N

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	Aspect being reviewed	WSP code	Comments		
				<p>should be at between 50 and 55cm (Landscape Institute TGN 06/19 para 3.8.3) with a Horizontal Field of View (HFOV) of around 39.6° when printed at A3.</p> <p>Due to the scale of the Proposed Development, it was the Applicant's judgement that a HFOV of 39.6° would show insufficient context and accordingly a larger HFOV (at a viewing distance of 30cm and a HFOV of 72°) was included. From more distant viewpoints including also montages with a viewing distance of 50cm,</p> <p>The HFOV is stated on all baseline viewpoint sheets and the viewing distance is stated for all baseline views and montages.</p> <p>The approach to presenting viewpoint photographs and photomontages has been discussed and agreed with the LVIA Working Group.</p>	

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2.3	Is the study area identified appropriately?	C	<p>Reference is made in PEIR Vol 1 Section 17.6 and Appendix 17.1 to the Study Area which covers 5 km and the entirety of any character areas falling partly within. It is unclear whether there has been any consultation with LPAs over the study area (as referred to in Appendix 17 scoping opinion) and this should be actioned. PINS notes “[T]he Applicant should make effort to agree the study area with the relevant consultation bodies.”</p> <p>Aside from a review of land use, landform and landcover, it would be beneficial to understand why such a Study Area was defined – was it informed by heights of proposed buildings and other similar forms of development – what guidance was used to make this decision?</p> <p>The scoping opinion from Chilterns Conservation Board refers to candidate land for the AONB boundary review and the need to extend the study area. If the study area is to remain at 5 km a clear explanation needs to be included as to why effects on the AONB are</p>	<p><u>Consultation over the Study Area / Study Area Definition</u></p> <p>The size of the Study Area was informed by a baseline survey of the pattern of existing land use, landform and land cover within the landscape surrounding the airport and through field survey activities.</p> <p>The definition of the Study Area followed guidance set out in GLVIA3 Clause 5.2 and is judged to include the site itself plus the full extent of the wider landscape around it which the Proposed Development may influence in a significant manner.</p> <p>The existing airport buildings, notably the control tower, terminal building and hangars surrounding the airfield were used as reference points to confirm the likely visual envelope for development when undertaking the field survey activities.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>deemed insignificant (a further point is covered under future baseline below). Chilterns Conservation Board has stated that, given the topography, Luton Airport might be visible from wider parts of the Chiltern Hills. Rather than just views of the airport, other visual effects like aircraft moving through the sky above the wider AONB creating motion and vapour trails should be addressed also. Candidate land for AONB boundary review is a live application made to Natural England and its extent should be illustrated in the figures (including Figure 17.7). The area to the east of Luton is a potential candidate for extension of the AONB based on criteria published by Natural England relating to landscape quality, scenic quality and relative wildness, relative tranquillity and cultural heritage (Guidance for assessing landscapes for designation as National Park or AONB, 2011). In September 2010, the North Hertfordshire District Council (DC) cabinet passed a resolution to support consideration of the area as AONB. The area has a clear affinity</p>	<p>The LVIA Study Area has been discussed and agreed with the LVIA Working Group and is described at Section 14.3 in Volume 2 of the 2022 PEIR.</p> <p><u>Chiltern Conservation Board (CCB) Scoping Opinion</u></p> <p>A sensitivity test of the potentially expanded AONB based on the 'search area' extents shown in the CCB application has been undertaken at Appendix 14.9 in Volume 3 of the 2022 PEIR.</p> <p>In accordance with guidance set out at Civil Aviation Authority's guidance CAP1616 for considering effects on tranquillity in National Parks and Areas of Outstanding Natural Beauty [AONB], the LVIA Study Area for assessment includes additionally land within the Chilterns AONB where aircraft would be below 7,000 ft. The Study Area has been discussed and agreed with the</p>	

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			<p>with the rest of the Chilterns. It contains clearly recognisable Chilterns features such as chalk streams and associated dry valleys and small settlements, with isolated farms and dwellings with red brick and flint as dominant building materials. The woodland cover is good, with much of it being Ancient Woodland. It is of the same high quality landscape as exists in the AONB. the current boundary is arbitrary, following the A505 road and not natural features (see Appendix 1 for a map and extract from our AONB boundary review application).</p> <p>Based on the scoping opinion comments, should there be different study areas for landscape and visual, which then hone in on a more localised area where appropriate?</p>	<p>LVIA Working Group and is described at Section 14.3 in Volume 2 of the 2022 PEIR.</p> <p>The judgement in the 2019 PEIR that effects on the AONB were insignificant was determined because of the appreciable distance between the AONB and the Main Application Site; the modest change that can be expected from the Off-Site Highway Works; and the pre-existing presence of aircraft overflying the AONB on the flight paths to be used by the expansion proposals. The judgements that informed this assessment remain under review throughout the EIA process and the ES chapter will explain in greater detail how these judgements are reached.</p> <p>Concerning the potential for wider parts of the Chiltern AONB to experience views to the Application Site, CCB's comment is not discounted. However, the purpose of the</p>	

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				<p>assessment was not to assess all effects but to identify the likely significant environmental effects. Professional judgement provides that the effects on wider parts of the AONB are unlikely to be significant.</p> <p>CCB's comment concerning the potential for visual effects on people within the AONB due to aircraft moving across the sky and/or vapour trails being left by aircraft moving across the sky has not been discounted. The effects of these changes have been considered within the assessment work carried out to date and will be going forward as the reports are finalised. The changes that would be brought about by the proposals in this regard are however considered to be relatively insubstantial, given the pre-existing conditions.</p> <p><u>Need for Differing Study Areas</u></p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				The need for differing Study Areas was discussed with the LVIA Working Group and it was agreed that this was not necessary.	
2.4	Have all the resources/receptors been considered?	B/C	<p>This needs to be reviewed and discussed with LPAs and Chilterns Conservation Board. Some points are made below:</p> <p>Landscape receptors: The PEIR LVIA states that there is no agreed methodology for assessing the effects of tranquillity and as outlined in the LI paper on tranquillity, further work needs to be undertaken – could the LVIA define, in agreement with the LPAs, positive / negative factors to tranquillity as defined in the South Downs National Park Tranquillity Study to inform part of the assessment? Appendix 17.1 states that tranquillity will be considered based on Campaign to Protect Rural England (CPRE) Intrusion Map, review of noise assessment mapping and audible /visual observations in the field though elsewhere the Appendix states that that there is no agreed methodology for assessing</p>	<p><u>Tranquillity</u></p> <p>The LVIA will consider the impact of changes to tranquillity when assessing effects on landscape receptors (particularly Landscape Character Areas).</p> <p>Judgements about the baseline tranquillity will be informed by site appraisal, published character documentation and research studies (e.g. CPRE's Tranquillity mapping) where relevant and these judgements will be used to inform further judgements on landscape value.</p> <p>Judgements about changes to tranquillity and the impact this may have on landscape receptors will be informed by</p>	N

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			<p>tranquillity and it is noted that this will be discussed further with PINs. It should also be noted that the CPRE tranquillity mapping (referred to in the PEIR LVIA paragraph 17.6.43) has its limitations and should be caveated on this basis and the assumption that whilst the area surrounding LTN is the “least tranquil of places within the United Kingdom and visual intrusion from the urban edge and airport, alongside disturbance from aircraft noise, certainly impact upon perceptual aspects of landscape character in several locations” this needs to be verified on site. It is likely that there are areas to the east of Luton which are probably more tranquil than other parts of North Herts and such locations need to be reviewed.</p> <p>In addition, vapour trails need to be considered based on the different phases and increase in mppa, and the consequential impact on skyline views, particularly from higher ground including the Chilterns AONB.</p> <p>Registered Parks and Gardens / Area of Great Landscape Value (AGLV) /</p>	<p>assumed noise mapping and flight path data.</p> <p>The LVIA will not include an assessment of tranquillity as this is considered beyond its scope and (as discussed in Landscape Institute TIN 1/17). The LVIA Methodology provided at Appendix 14.1 in Volume 3 of the 2022 PEIR however include a link to Appendix 2 of the South Downs National Park Tranquillity Study.</p> <p>The approach to considering tranquillity within the ES has been discussed and agreed with the LVIA Working Group.</p> <p><u>Vapour Trails</u></p> <p>Vapour trails occur typically at aircraft cruising altitudes (ca. 8,000m). Vapour trails resulting from aircraft originating at LTN are therefore a considerable distance from the Main Application Site. The potential impact of vapour trails on landscape and visual receptors</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
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			<p>Area of Local Landscape Value (ALLV): There appears to be no consideration of the impact of the Proposed Development on the Registered Park and Garden or on Areas of Great Landscape Value / Areas of Local Landscape Value within the Study Area, and in relation to the aesthetic and perceptual impacts of the Proposed Development on them, including inter visibility even though reference is made in the PEIR LVIA Table 17.1 to “[L]ocal areas of landscape that are highly valued locally and/or protected by a local landscape / visual designation”</p> <p>CROW land: CROW land needs to be identified within the study area and considered in the ES LVIA.</p> <p>It should be noted that North Hertfordshire LCA 212 Lilley Bottom has not been assessed as a landscape receptor and should be referred to in PEIR LVIA paragraph 17.8.6.</p> <p>Visual receptors: It does not appear that the selection of representative visual receptors has been agreed and</p>	<p>has been considered in the assessment provided at Section 14.9 in Volume 2 of the 2022 PEIR but is judged unlikely to result in significant environmental effects.</p> <p><u>Impacts on Designations</u></p> <p>The purpose of LVIA with reference to EIA development, is to identify ‘likely significant’ environmental effects on:</p> <ul style="list-style-type: none"> • The constituent elements of the landscape; • The specific aesthetic or perceptual qualities of the landscape; • The character of the landscape; and • People who will be affected by changes in views or visual amenity. <p>The presence or absence of landscape or heritage designations are used in LVIA to help inform judgements about sensitivity, as they inform judgements about</p>	

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			<p>the extent of receptors identified seems to be spread over a much smaller study area than defined in the PEIR LVIA. As outlined above, it is recommended that representative viewpoints are agreed with LPAs/Chilterns Conservation Board and include consideration of additional receptors in the Chilterns AONB. Figure 17.8 includes viewpoints to the west and one to the north, although it is unclear whether all lie within the AONB. The Chilterns Conservation Board recommend that a ZTV is overlain with the Chiltern's AONB boundary to assess other viewpoints needed and that the study area should be reassessed once ZTV work has been undertaken.</p> <p>Impact on receptors' night time views also needs to be considered (in order to identify and address any increase in light pollution from an expanded airport and from aircraft overhead) and relevant viewpoints agreed – this will assist in safeguarding dark night skies and the experience of bright stars from the Chilterns AONB.</p>	<p>landscape value. Designations are not however landscape or visual receptors themselves and accordingly the impact of the Proposed Development on a landscape or heritage designation is considered beyond the scope of this LVIA. This principle has been agreed with the LVIA Working Group.</p> <p><u>CROW Land</u></p> <p>CROW land was considered in the assessment that informed the LVIA chapter of the 2019 PEIR, it was the assessors' judgement however that no users of CROW land within the Study Area would be potentially sensitive to the type of change proposed. This judgement was discussed within the LVIA Working Group and it has been agreed that, whilst CROW land should be identified in the Public Rights of Way figure that supports the LVIA (see also Figure 14.6 in Volume 4 of the 2022 PEIR), users of CROW land did not</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
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			<p>Viewpoints should also be included within the site boundary, for instance, from Wigmore Park and from the Public Right of Way (PROW) (unnamed) running towards Winch Hill to the east. The hillside of fields would be excavated to a lower level with material used to build up the runway, before being converted to car parks. These are significant landscape and visual impacts but are neglected by the current LVIA.</p> <p>Have residents of properties at Dane Street been considered?</p>	<p>need to be considered as a receptor in the LVIA.</p> <p><u>HLCA 212 Lilley Bottom</u></p> <p>The need to assess HLCA 212 Lilley Bottom as a landscape receptor was discussed with the LVIA Working Group and was agreed to be unnecessary.</p> <p><u>Visual Receptors / Viewpoints</u></p> <p>The visual receptors and viewpoints to be considered in the ES have been discussed and agreed with the LVIA Working Group. These discussions considered the AONB boundary and were informed by ZTV mapping. It was agreed with the LVIA Working Group that there was not a need for additional viewpoints or receptors to be considered within the Chilterns AONB.</p> <p><u>Night-time Views</u></p> <p>Please refer to response 2.1 above.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				<p><u>Viewpoints within the Site Boundary</u></p> <p>The viewpoints to be considered in the ES and the winter and summer viewpoint photography provided at Appendix 14.6 in Volume 3 of the 2022 PEIR have been discussed and agreed with the LVIA Working Group. The agreed viewpoints include some locations within the site boundary not included in the 2019 PEIR.</p> <p><u>Residents of Dane Street</u></p> <p>The need to assess residents of properties at Dane Street as a visual receptor was discussed with the LVIA Working Group and was agreed to be unnecessary.</p>	
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	B	<p>Yes, but reference should be made to the European Landscape Convention (ELC) - where every landscape matters - to tie in with Appendix 17 Table 2 Landscape Value.</p> <p>The LPAs consider that all users of Public Rights of Way should be</p>	<p><u>European Landscape Convention (ELC)</u></p> <p>A reference to the ELC is provided at Table 14.1 in Section 14.2 in Volume 2 of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			considered as being of high sensitivity.	<p><u>Sensitivity of Public Rights of Way</u></p> <p>The Applicant disagrees with the LPAs judgement that all users of PRoW should be considered as being of high sensitivity. However, the LVIA Methodology provided at Appendix 14.1 in Volume 3 of the 2022 PEIR has been amended to advise that the susceptibility of users of PRoW should in all cases be high.</p> <p>GLVIA3 advises that the sensitivity of a visual receptors is derived from combining judgements about users' susceptibility to the change proposed (which is mainly a function of the occupation or activity of people experiencing the view at particular locations and the extent to which their attention or interest may be focussed on views and the visual amenity they experience at particular locations) and about the value of the view they experience.</p>	

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				Further to discussions on this matter, the LVIA Working Group agrees that not all users of PRoW should be considered of high sensitivity and the LVIA Methodology for determining sensitivity of visual receptors, provided at Appendix 14.1 in Volume 3 of the 2022 PEIR , has been agreed.	
2.6	Has there been consultation with the relevant statutory bodies?	C	<p>Consultation has been limited with relevant statutory bodies (as evidenced by responses to the PINS / LPAs scoping opinion) and it is critical that further consultation is undertaken to confirm the methodology, criteria, study area, viewpoints and photomontages as well as the mitigation proposed. It should be noted that the NTS section 17.1.2 seems to indicate that representative viewpoints have been discussed with the landscape officers of local authorities and the Chilterns Conservation Board – but have they been agreed?</p> <p>It would also be beneficial to agree with PINS / LPAs the LVIA assessment stages to be used, based</p>	<p><u>Engagement with Statutory Bodies</u></p> <p>Please refer to response 2.2 above.</p> <p><u>Assessment Stages</u></p> <p>The assessment stages considered in Section 14.9 in Volume 2 of the 2022 PEIR have been discussed and agreed with the LVIA Working Group. The LVIA assesses effects at the following project stages:</p> <ul style="list-style-type: none"> • Construction Phase 1 and interim ATM effects (c.2023-2031); 	N

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			<p>on the worst-case scenarios for all 3 phases of development and in the eventuality that the latter phases are not deliverable or economically viable. The PEIR LVIA (paragraph 17.1.4 to 17.1.6) and Appendix 17 describe a baseline in 2020 and assess landscape and visual effects at years 2024, 2027, 2033, 2039 and 2050. However, the scheme development and construction report / PEIR Volume 1 indicate that the following works would take place, which is not fully compatible with the Appendix 17 phases:</p> <ul style="list-style-type: none"> • Year 2020 commencement of phase 1 delivery of interim capacity. • Year 2026 / 27 completion of Phase 1 and commencement of phase 2. • Year 2030/2031 completion of Phase 2 and commencement of Phase 3. • Year 2038 completion of Phase 3. <p>It is also unclear, when the assessment refers to 15 years for planting, why it focuses on year 2024,</p>	<ul style="list-style-type: none"> • Construction Phase 2a and interim ATM effects (c. 2032-2036); • Construction Phase 2b and interim ATM effects (c. 2037-2041); • Operation effects (year of maximum ATM capacity – c.2041); • Operation effects (design year -c.2056). <p>The recommendation that construction and/ or operational effects be considered on commencement of each construction phase and at the end of construction was discussed with the LVIA Working Group but discounted as it was judged not to consider the likely worst-case scenario.</p>	

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			<p>2033 and 2050? Why has year 2033 been judged as per PEIR Vol 1 paragraph 17.1.6 to be “worst-case scenario” regarding the extent that the Proposed Development is visible – is this based on the prominence of the earth bund and height of mitigation planting on and off site prior to maturing?</p> <p>It is recommended that on commencement of each Phase, and on completion of Phase 3, construction and/ or operational effects are considered. If there is a strong justification for retaining the stages assessed then the reasons need to be clearly explained with a clear description of the construction and operation at each of these phases.</p>		
2.7	Is the future baseline scenario adequately described?	B/C	<p>The PEIR Vol 1 Section 17.5 details assumptions associated with future baseline dated 2020. Based on the likely submission date, it is assumed that some areas which have been referred to as “future baseline” will be revised to baseline in the ES LVIA. Elsewhere in Appendix 17 it states that 2020 will be the baseline from</p>	<p><u>Future Baseline</u></p> <p>Some of the developments assumed to have been delivered in the future baseline of the 2019 PEIR were not undertaken following a review of circumstances.</p>	N

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			<p>which effects will be assessed - clarity is required.</p> <p>Reference is made in the scoping opinion to a search area for an extension of the Chilterns AONB and that North Hertfordshire DC cabinet would support consideration of the area. Whilst it is accepted that this should not be considered as part of the existing baseline, consideration should be given to this potential designation extension as part of the future baseline for each of the three phases described.</p> <p>It should also be noted that, based on a national government review of the next steps for National Parks and AONBs, updated 25 September 2019, AONBs may merge with National Parks and become National Landscapes with new shared purposes and voice on proposed developments. An awareness of this potential change needs to be considered in the future baseline.</p> <p>For ease of reading and clarity, it would be beneficial to define the assumptions according to the development phases.</p>	<p>Section 14.7 in Volume 2 of the 2022 PEIR advises the developments that are assumed to be in place by 2023 for the purposes of the preliminary assessment at Section 14.9 in Volume 2 of the 2022 PEIR.</p> <p><u>Chilterns AONB Extension</u></p> <p>A sensitivity test of the potentially expanded AONB based on the 'search area' extents shown in the CCB application has been undertaken at Appendix 14.9 in Volume 3 of the 2022 PEIR.</p> <p><u>National Government Review</u></p> <p>The Glover Report does not have any statutory weight. It is considered accordingly that there isn't a need for this potential change to be considered in the future baseline.</p> <p><u>Assumptions by Development Phase</u></p>

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				<p>Following a review of circumstances, the future baseline now assumes only the continued delivery of projects that are already under construction and that would be completed before or during construction phase 1.</p> <p>Section 14.6 in Volume 2 of the 2022 PEIR identifies the assumptions that have been made in undertaking the LVIA according to the development phases.</p>	
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	B	The PEIR Vol 1 Section 17.5 details assumptions and limitations associated with access, future baseline and growth rates for proposed planting, and further information is provided in Appendix 17 detailing access to publicly accessible viewpoints. For planting, it would be beneficial to understand the source(s) which defined growth rates (influenced by soil quality, condition, other monitoring data, arboricultural information etc) as they appear to be generous for some sizes of trees but	<p><u>Assumptions and Limitations</u></p> <p>The growth rates detailed at Section 14.6 in Volume 2 of the 2022 PEIR have been amended from those set out in the 2019 PEIR. The amended growth rates have been agreed with the LVIA Working Group and reflect advice from the HCC Countryside & Access Officer.</p> <p><u>Explanation of Landscape & Visual Impacts</u></p>	N

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			<p>this may be that they are of a high quality and will be well maintained.</p> <p>The likely landscape and visual impacts associated with each phase and during construction and operation need to be clearly explained.</p> <p>Appendix 17 makes reference to a reliance on professional judgements in terms of undertaking the assessment rather than quantitative information. The use of professional judgement should also be identified in the main body of the ES LVIA.</p>	<p>Section 14.9 in Volume 2 of the 2022 PEIR provides a preliminary assessment of the likely landscape and visual impacts associated with each phase and during construction and operation. Further explanation of the likely landscape and visual impacts will be provided in the ES.</p> <p><u>Professional Judgement</u></p> <p>A reference to the use of professional judgement is included at Section 14.5 in Volume 2 of the 2022 PEIR.</p>	
2.9	Which are the key receptors for the local authorities?	B/C	<p>The identification of key receptors needs to be discussed with LPAs and Chilterns Conservation Board and it is unclear whether this has been undertaken and receptors agreed.</p> <p>From the review, the following points are noted which all need further consideration:</p> <p>Should additional viewpoints be considered from the Chilterns AONB?</p>	<p><u>Receptors</u></p> <p>The receptors assessed at Section 14.9 in Volume 2 of the 2022 PEIR have been discussed and agreed with the LVIA Working Group.</p> <p><u>Viewpoints from the Chilterns AONB</u></p> <p>Please refer to response 2.4 above.</p>	N

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			<p>Should the impact of the airport on the setting of the Chiltern's AONB be considered as well as the AONB which falls within the 5 km study area detailed in Figure 17.7?</p> <p>Have viewpoints from Luton South Conservation Area to west of LLAL been considered in the visual assessment as well as views from Areas of Great Landscape Value and Areas of Local Landscape Value not covered in Figure 17.8?</p> <p>There appears to be no consideration of the impact of the development on the Registered Park and Garden or on Areas of Great Landscape Value / Areas of Local Landscape Value considering the aesthetic and perceptual impacts including inter visibility even through reference is made in the PEIR LVIA Table 17.1 to <i>"[l]ocal areas of landscape that are highly valued locally and/or protected by a local landscape / visual designation"</i></p> <p>Reference to tranquillity should be considered. LBC Greenspaces states that the sites which are particularly vulnerable in Luton include Kidney</p>	<p><u>Setting of the AONB</u></p> <p>It is agreed with the LVIA Working Group that the 'setting of an AONB' does not have a defined geographical extent and that the setting is itself neither a landscape nor a visual receptor and accordingly consideration of the effects of airport expansion on the setting of the AONB falls beyond the scope of the LVIA.</p> <p>It is the assessors' professional judgement that visibility to the Proposed Development from wider parts of the Chiltern Hills is unlikely to be significant.</p> <p>In accordance with guidance set out in the Civil Aviation Authority's guidance CAP1616 for considering effects on tranquillity in National Parks and Areas of Outstanding Natural Beauty [AONB] the Applicant's Study Area for assessment includes additionally land within the</p>	

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			<p>Wood, Stockwood Park, Memorial Park and the Bluebell wood/Roebuck close CWS</p> <p>Local landscape Character Areas covering Wigmore Valley Park seem, based on Figure 17.3, to be a separate character area, but this is not labelled on Figure 17.3. This should be clarified.</p> <p>Should a local landscape character assessment be undertaken looking at quality and condition?</p> <p>The Green Belt lies to the east of LTN. Whilst not a landscape designation, consideration should be given to its five purposes including unrestricted sprawl, preventing coalescence, preserving setting and special character of historic towns, and safeguarding the countryside from encroachment.</p> <p>The Chilterns Conservation Board state that it is not clear why the airport expansion involves the removal of high quality attractive greenfield landscape to east of the airport, in preference re-developing and extracting spoil from beneath the run-down brownfield employment land</p>	<p>Chilterns AONB where aircraft would be below 7,000 ft.</p> <p><u>Viewpoints from Designated Areas</u></p> <p>The potential to include further viewpoints within the Luton South Conservation Area, AGLV and ALLV was discussed with the LVIA Working Group. It was agreed in this meeting that the viewpoint locations included in the PEIR were appropriate but that further viewpoints should be included within the replacement open space on footpath Kings Walden 041, west of the hedgerow on Winch Hill, and to the north of the Thomas Path, within the retained existing part of Wigmore Valley Park. These locations are included in the assessment viewpoint locations mapped in Figure 14.8 in Volume 4 of the 2022 PEIR and in the assessment viewpoint photographs</p>	

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			north of the airport (Percival Way area etc). This alternative should be explored as a reasonable alternative under Schedule 4 of the EIA Regulations. Explaining the different options for the location of the terminal, as consulted on in the non-statutory Future LTN consultation in 2018, is not sufficient.	<p>included at Appendix 14.6 in Volume 3 of the 2022 PEIR.</p> <p><u>Impacts on Designated Areas</u></p> <p>Please refer to response 2.4 above.</p> <p><u>Tranquillity</u></p> <p>The preliminary landscape assessment at Section 14.9 in Volume 2 of the 2022 PEIR considers tranquillity when determining the significance of effect on landscape receptors. The LBC Greenspaces noted are not landscape receptors but do contribute to the landscape value of Landscape Character Areas. The vulnerability of these Greenspaces to changes in tranquillity is also a consideration when determining the susceptibility of a Landscape Character Area to the type of change proposed.</p> <p>Please refer also to response 2.4 above.</p>	

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				<p><u>Wigmore Valley Park Character Area</u></p> <p>The LVIA does not assess the impact of development on Wigmore Valley Park as a character area but as an asset of the landscape that's physical extents would vary associated with the proposed development. The effect of the proposals on the character of the landscape encompassed by Wigmore Valley Park is considered in the Applicant's assessment of effects on landscape receptors LBLCA13, HLCA 200 and HLCA 201 at Section 14.9 in Volume 2 of the 2022 PEIR. This approach has been discussed and agreed with the LVIA Working Group.</p> <p><u>Need for a Local Landscape Character Assessment</u></p> <p>The character assessments published and adopted by the host authorities were reviewed critically to determine their suitability in informing the LVIA</p>	

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				<p>process. This review concluded that the established LCAs were suitable but recognised that they overlapped in some areas (most notably at administrative boundaries). Professional judgement was therefore used to determine the Landscape Character Areas identified in Figure 17.3 of the 2019 PEIR, adjusting the established LCA boundaries where appropriate.</p> <p>The need for a local landscape character assessment looking at quality and condition was discussed with the LVIA Working Group and agreed to be unnecessary, given that the review determined the published and adopted assessments to be suitable.</p> <p><u>Green Belt</u></p> <p>The need for the application for development consent to consider the five purposes of Green Belt was discussed with the LVIA Working Group. It</p>	

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				<p>was agreed however that the LVIA was not the most appropriate place for this matter to be considered.</p> <p><u>CCB Alternative</u></p> <p>Options that considered different locations for the terminal were explored in Sift 1 and 2.</p> <p>The constraints to re-developing and extracting spoil from beneath the brownfield employment land north of the airport however are:</p> <ul style="list-style-type: none"> - Sites north of Percival Way are in use/allocated for development under New Century Park approved application as the location of Century Park Access Road; - The identified area has insufficient material available for the volume of earthworks required; and - Brownfield landfill material is not geotechnically suitable for use beneath the airport apron, 	

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				as it is liable to unpredictable settling/sinking, which would lead to a high cost of repair/maintenance over time. See also Chapter 17: Soils and Geology in Volume 2 of the 2022 PEIR .	
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	B/C	PEIR Vol 1 Section 17.7 and Appendix 17 makes reference to mitigation measures and embedded and additional mitigation measures proposed are covered in Figures 17.9 and 10 respectively. Further detail on the management of existing and proposed vegetation is detailed in Appendix 16-2 Draft Landscape and Biodiversity Management Plan. As outlined above what is unclear is when such mitigation measures would be implemented, during what phase of works and how these then have informed the assessment.	Section 14.6 in Volume 2 of the 2022 PEIR identifies the assumptions that have been made in undertaking the LVIA according to the development phases.	N
3.2	Are the mitigation measures included for significant adverse effects appropriate?	B/C	Embedded and additional mitigation measures are proposed as detailed in Figure 17.9 and Figure 17.10 and PEIR LVIA Vol 1.	The proposed embedded and additional landscape mitigation measures described in Sections 14.8 and 14.10 in	Y

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			<p>Embedded mitigation (described in Section 17.7 of the PEIR LVIA Vol 1) has sought to avoid impacts on ancient woodland, retain mature woodland / hedgerow vegetation along the ridgeline of Winch Hill and introduce replacement open space (which is assumed is to replace Wigmore Valley Park). Material excavated to form the aviation platform would be used to create an earth bund and screening.</p> <p>Additional mitigation proposed in PEIR LVIA Vol 1 Section 17.9 has been incorporated into the Proposed Development's boundary and includes additional mitigation planting for screening and to mitigate for the loss of existing vegetation. Measures cover further hedgerow / hedgerow tree planting to reinstate historic field boundaries, woodland and understorey planting and improvements to PRoW.</p> <p>Reference is also made in Section 16.2 of the NTS to potential enhancement measures which may include contributions to local biodiversity projects and offsite</p>	<p>Volume 2 of the 2022 PEIR and illustrated in Figures 14.9 and 14.10 in Volume 4 of the 2022 PEIR, have been developed subsequent to the 2019 PEIR to reflect changes to the Proposed Development and feedback from discussions with the LVIA Working Group.</p> <p>It is agreed with the LVIA Working Group that the proposed mitigation measures are sufficient to reduce significant adverse effects and that further offsite mitigation measures are not necessary.</p>	

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			<p>enhancement of designated sites within Luton, Bedfordshire and Hertfordshire.</p> <p>Whether these are sufficient to reduce significant adverse effects needs to be considered in consultation with the LPAs. Further exploration of offsite mitigation and enhancement might be necessary.</p>		
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	C	<p>It is unclear from the PEIR LVIA, Appendix 17, or Appendix 16 Draft Outline Landscape and Biodiversity Strategy, how the mitigation measures are to be secured.</p> <p>Clarity needs to be given post aftercare (of 2 years) as to how long the maintenance operations would continue for. Whilst it is assumed that this would be in perpetuity for LLAL land, this needs to be confirmed and also whether new public open space forming part of the remodelled Wigmore Valley Park would be handed over to the host LPA and if so, when.</p> <p>Section 4 of the Scheme Development and Construction Report refers to the replacement of</p>	<p><u>Securing Mitigation Measures</u></p> <p>The Applicant has within its ownership most land holdings necessary to deliver the proposed landscape mitigation measures described in Sections 14.8 and 14.10 in Volume 2 of the 2022 PEIR and is in negotiations with third parties to secure the delivery of proposed mitigation outside their ownership. Whilst the DCO could allow the Applicant rights over third-party land to facilitate the delivery of mitigation the Applicant is seeking to avoid this if possible.</p>	N

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			<p>Wigmore Valley Park as part of preparatory works with a local planning application, but it is unclear whether this has been agreed (paragraph 4.1.1.2) and whether the LVIA has considered this as part of the assessment process.</p> <p>Do specific offsets need to be specified in the Management Plan to avoid damage to existing tree root protection areas, hedgerows, future and potential veteran and ancient woodland? This is partially covered in the NTS under section 16.2 but further clarity is needed.</p> <p>There is a lack of certainty over future management and funding of Wigmore Valley Park. A landscape mitigation fund could be set up as part of the compensation package to enable “oversight of future landscaping and planting mitigation around the site”. There is also a need for further clarity over the scale and duration of mitigation schemes and aftercare – is two years sufficient and added that long term wardening by an ecological competent organisation is required</p>	<p>The implementation of landscape mitigation measures is described in Sections 14.8 and 14.10 in Volume 2 of the 2022 PEIR and detailed in Figures 14.11 to 14.13 in Volume 4 of the 2022 PEIR.</p> <p>All securing mechanisms for mitigation will be confirmed within the ES.</p> <p><u>Maintenance & Management of Mitigation</u></p> <p>A decision is still to be made about the land ownership of the replacement public open space. The Applicant envisages however that maintenance would continue in perpetuity and is investigating the option for the new park to be placed into the control of a new trust that would include members from the local community and other key stakeholders.</p> <p>The aftercare needs of any planting will be closely linked to the type, volume and</p>	

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			not just a general purpose management company / trust.	<p>location of planting. The Applicant will provide indicative designs only in the application for development consent, with detailed design to follow and be agreed with the relevant local authority(ies) under the DCO Requirements.</p> <p>The maintenance and management of landscape mitigation will be undertaken in accordance with the Outline Landscape & Biodiversity Management Plan at Appendix 8.2 in Volume 3 of the 2022 PEIR.</p> <p><u>Preparatory Works</u></p> <p>The assumptions made regarding preparatory works in the LVIA chapter of the 2019 PEIR and the reasoning behind those assumptions have been discussed with the LVIA Working Group.</p> <p>The assumptions associated with enabling works have changed following the mid-term review and the replacement of Wigmore</p>	

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				<p>Valley Park will no longer be undertaken as preparatory works and will instead fall under the DCO.</p> <p><u>Protection of Existing Vegetation</u></p> <p>A Tree Protection Plan that identifies existing trees to be removed and that sets out the necessary measures to avoid damage to existing tree root protection areas is provided in the Arboricultural Impact Assessment provided at Appendix 14.3 in Volume 3 of the PEIR. The Draft CoCP provided at Appendix 4.2 in Volume 3 of the 2022 PEIR and the Outline Landscape & Biodiversity Management Plan at Appendix 8.2 in Volume 3 of the 2022 PEIR requires the contractor to undertake works in accordance with the Tree Protection Plan.</p> <p><u>Future Management of Wigmore Valley Park</u></p> <p>The detailed arrangements for future management of the</p>	

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				public open space are still to be finalised. The Applicant has however committed significant funds within their future budgets to fund the management of the park into the future.	
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	C	<p>Whilst references are made in Section 2.1 and 4, Appendix 16-2 Draft Outline Landscape and Biodiversity Management Plan to ecological monitoring, no reference is made to landscape monitoring requirements apart from a 2-year aftercare period post planting by the landscape contractor.</p> <p>The Management Plan should demonstrate the effectiveness of mitigation measures in reducing the specific adverse landscape and visual effects identified.</p> <p>It would be beneficial if further ZTVs were prepared to test the effectiveness of mitigation measures in screening specific receptors experiencing significant effects.</p>	<p><u>Landscape Monitoring</u></p> <p>Landscape monitoring requirements have been discussed and agreed with the LVIA Working Group. The agreed measures are incorporated into the Outline Landscape & Biodiversity Management Plan at Appendix 8.2 in Volume 3 of the 2022 PEIR.</p> <p><u>Additional ZTVs</u></p> <p>The Applicant considers professional judgement remains the most appropriate means of determining the likely effectiveness of mitigation measures was discussed with the LVIA Working Group. The Applicant has agreed with the LVIA Working Group that</p>	N

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				further ZTVs to test the effectiveness of mitigation measures in screening specific receptors is not required.	
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	B/C	<p>It is unclear whether proposed mitigation measures are sufficient to reduce significant adverse effects and therefore what improvements could be made. This needs to be discussed with LPAs. Key issues are considered to be the delivery, functioning and management of the replacement Wigmore Park; ensuring that mitigation measures don't themselves have an adverse impact; and managing the significant change in the landscape over time (construction & operation).</p> <p>Further engagement and dialogue with the host authorities to discuss the proposed measures is recommended to address some of the reservations / uncertainties as to how successfully the mitigation measures can be delivered.</p> <p>Aspects to consider include but are not limited to:</p>	<p><u>Embedded & Additional Landscape Mitigation</u></p> <p>The layout and relationship between embedded and additional landscape mitigation measures has been discussed with the LVIA Working Group. These discussions led to the design changes evident in Figures 14.9 and 14.10 in Volume 4 of the 2022 PEIR, which were agreed with the LVIA Working Group.</p> <p>Please refer also to response 3.2 above.</p> <p><u>POS</u></p> <p>The layout of the replacement open space has been amended with land east of Winch Hill Lane omitted. This change was discussed with and supported by the LVIA</p>	Y

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			<p>The relationship between the embedded and additional mitigation (in the ownership of the applicant), and how these areas will contribute to the setting and presentation of the POS, and how they will function as a whole is critical.</p> <p>With regards the main body of POS (that comprises neutral meadow grassland, amenity grassland and woodland), there is concern for the appearance of this area, as it is reminiscent of a golf course on plan. It is suggested that the opportunity to create a more traditional Hertfordshire parkland estate character, comprising woodland blocks and tree clumps, and tree avenues, should be explored as an option.</p> <p>The eastern most space (east of Winch Hill lane) appears to have limited access via a route that skirts a short section of its boundary.</p> <p>Another key concern relates to the fragmentation of the POS by the highway network and notably Eaton Green Road/Darley Rd, and the Winch Hill lane. The compartmentalisation of the 3</p>	<p>Working Group and confirmation given that concerns raised about the fragmentation and compartmentalisation were no longer relevant, given the proposed layout changes.</p> <p>Following discussions with the LVIA Working Group. It was agreed that further comments raised on POS would be dealt with under the DCO Requirements.</p>	

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			<p>principle areas of POS raises concerns for how they will function and be managed as a 'whole,' as well as the ease of accessibility and movement between them.</p> <p>There needs to be greater consideration for the creation of multiple sustainable and safe access routes/road crossings into the POS from the existing and potential new communities to the north.</p> <p>There also needs to be an understanding of the likely pressures on the character and quality of the POS expected from the existing and potential new communities, and how these will be effectively mitigated and managed in the long term. Indeed, how are the needs of the local area evidenced and delivered within the scheme?</p> <p>How will the design and layout of the POS enable effective management and grazing regimes, avoiding conflicts between people and animals, and influence the prevailing character of each space?</p> <p>Paragraph 17.7.1 regarding the proposal to use advanced nursery</p>		

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			<p>stock requires further consideration (in addition they do not appear to be mentioned in 17.5.1 assumptions and limitations). Advanced nursery stock can be more challenging to establish, younger stock can provide more vigorous growth that in the long-term results in a more dense and healthy plant. Site specific conditions are likely to dictate the best approach.</p> <p>An interpretation and street furniture strategy is required, to ensure that the location and design of these elements is cohesive, does not result in unnecessary clutter, and is sympathetic to the parkland character.</p>		
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	B	<p>Yes, in Appendix 17.1. We would question whether reference should be made in the assessment methodology Appendix 17 to neutral effects too?</p> <p>As noted above further information is required relating to ZTVs and photomontages, the latter should be</p>	<p><u>Neutral Effects</u></p> <p>It was discussed and agreed with the LVIA Working Group that a change to the LVIA methodology to include neutral effects was not required.</p> <p><u>ZTVs and Photomontages</u></p> <p>Please refer to responses 2.1 and 2.2 above.</p>	N

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	Aspect being reviewed	WSP code	Comments		
			<p>checked against interim and latest guidance.</p> <p>It remains unclear why the LVIA undertook an assessment at the stages specified and detailed under Ref 2.6 above.</p> <p>Whilst Appendix 17,1, paragraph 1.8.3 states that effects of moderate and above will be deemed significant in EIA terms, there is no reference in the PEIR LVIA – for clarity a reference should be included in paragraph 17.4.1.</p>	<p><u>Assessment Stages</u></p> <p>Please refer to response 2.6 above.</p> <p><u>Significant Effects</u></p> <p>A reference stating that effects of moderate and above will be deemed significant in EIA terms is included at Section 14.5 in Volume 2 of the 2022 PEIR.</p>	
4.2	Are the methods for establishing the ‘magnitude’ of effects on the receiving environment clearly defined?	A	Yes, in Appendix 17.1. A qualification is included in the text covering reference to magnitude of impact rather than magnitude of change and for both landscape and visual there are specific 9 point tables: Table 3 Magnitude of Landscape Impact and Table 8 Magnitude of Visual Impact	N/A	N
4.3	Are the methods for evaluating significance clearly defined/?	B	<p>Yes, referred to in Appendix 17.1 Section 1.9 and 1.15.1.</p> <p>It is a little confusing that Section 1.9 refers to “Evaluating the Significance of Impact” and introduces both landscape and visual significant effects, and then just focuses on</p>	Changes to the LVIA Methodology provided at Appendix 14.1 in Volume 3 of the 2022 PEIR to clarify the methods for evaluating significance have been	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			landscape effects, whilst Section 1.15.1 only covers visual – perhaps the two sections could be combined utilising the general introduction covered in section 1.9?	discussed and agreed with the LVIA Working Group.	
4.4	Do the assessment methods used follow relevant guidance?	B/C	<p>Yes, in terms of GVLIA3, though as noted above, consideration needs to be given to recent guidance on photography and photomontage in discussions with the LPAs covered in Ref 2.2. Methodology for the Residential Visual Amenity Appraisal also needs to be outlined and agreed with LPAs.</p> <p>It is important to note that comments from PINS and LPAs refer to the guidance advocating a reduced reliance on matrices and adoption of a more narrative approach. Appendix 17.6 and 17.7 include two tables (Table 12 and 13) summarising landscape and visual effects. If such tables are to be used it is important these are cross checked for consistency with the narrative text and NTS.</p>	<p><u>Photography and Photomontages</u></p> <p>Please refer to response 2.2 above.</p> <p><u>Residential Visual Amenity Appraisal</u></p> <p>Please refer to response 2.1 above.</p> <p><u>Use of Tables</u></p> <p>The use of tables will be cross-checked with narrative text in the ES and NTS.</p> <p>Appendices 14.4 and 14.5 in Volume 3 of the 2022 PEIR summarise the likely landscape and visual effects resulting from the assessment. Further explanation of these effects with greater narrative text will be provided in the ES.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.5	Have potential effects been considered both during construction and operation?	B/C	<p>The assessment does consider effects during construction and operation but there needs to be clarity on why only specific phases have been considered as outlined in section 2.6 above.</p> <p>It is unclear where references are made to plant growth at year 10 and 15 why this does not correlate with the assessment of effect at specific phases unless mitigation measures are introduced in advance – this needs to be clarified by expanding on text in PEIR LVIA Vol 1 Section 17 paragraph 17.8.5 which states “[T]he magnitude of impact and significance of effect on landscape receptors have been considered during the construction period (which includes years 2024, 2027 and 2033) and the operational period (years 2039 and 2050) to understand the effects of proposed planting mitigation measures and changes to land management objectives”.</p> <p>The LVIA should also considered the highway works.</p>	<p><u>Assessment Stages</u></p> <p>Please refer to response 2.6 above.</p> <p><u>Timing of Mitigation</u></p> <p>The assessment of impacts takes into consideration anticipated growth rates associated with the establishment of embedded mitigation to be introduced in advance and advises additional mitigation where it is determined that proposals would lead to significant environmental effects. Further detail about the phasing of proposed mitigation is included at Sections 14.8 and 14.10 in Volume 2 of the 2022 PEIR.</p> <p><u>Highway Works</u></p> <p>The landscape and visual impact of the Off-site Highway Interventions in the Proposed Development have been considered within the preliminary assessment undertaken at Section 14.9 in Volume 2 of the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	B/C	<p>At this stage the assessment is “light touch” - reference to probability is not covered. It is important to note that sequential effects along a series of viewpoints or popular walks like the Chilterns Way need to be considered and not just an appreciation of the view from a specific viewpoint.</p> <p>In terms of significance, the PEIR LVIA Section 17.14 Completing the Assessment states that “a more detailed explanation and justification of magnitude and significance of the likely landscape and visual effects of the Proposed Development” will be included within the ES LVIA.</p>	<p>The judgements in the 2019 PEIR were not “light touch” and take account of probability in judging the susceptibility of a receptor.</p> <p>The LVIA considers the impact of development on visual receptors not viewpoints, appreciation is given to sequential effects experienced by a receptor at various viewpoint locations when determining magnitude of impact and significance of effect and not just an appreciation from a specific viewpoint.</p> <p>The ES LVIA will include a more detailed explanation and justification of magnitude and significance of the likely landscape and visual effects of the Proposed Development.</p>	N
4.7	Are significant adverse and beneficial effects identified and described, with a	B/C	A reasoned justification has been included within PEIR Vol 1 Section 17 for the “significance decision”. PEIR Vol 1 Section 17 should explain in	The ES LVIA will include a more detailed explanation and justification for the significance decision.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	justification for the 'significance' decision?		paragraph 17.8.4 that the level of sensitivity and magnitude of impact is covered in Appendix 17. This is covered under Section 17.14 Completing the Assessment which states <i>"a more detailed explanation and justification of sensitivity of receptors"</i> will be included in the ES LVIA.		
4.8	Are the residual significant effects clearly stated?	B	<p>Yes, though as outlined above it would be beneficial to have a clear understanding of why the specified stages were selected as well as when mitigation is implemented to reduce significant effects – this is not clear.</p> <p>Whilst references are made to embedded mitigation planting detailed in Figure 17.9 Appendix 17.6 and 17.7, is it practicable to implement planting works during construction, and is this for all phases and covering all areas? For instance, the impact on the parkland of Wigmore Valley Park during construction is identified as being a major adverse effect (2024) reducing to moderate adverse (2027 and 2033) and then in operation changing to minor adverse (2039) and then</p>	<p>It is considered practicable to deliver the proposed landscape mitigation during construction. The assessment of impacts takes into consideration anticipated growth rates associated with the establishment of embedded mitigation and advises additional mitigation where it is determined that proposals would lead to significant environmental effects. The principles for delivering proposed landscape mitigation have been discussed and agreed with the LVIA Working Group.</p> <p>Please refer also to response 2.6 above.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			changing to minor beneficial (2030) – when would planting be implemented?		
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	N/A	<p>It is expected that the interaction of effects and cumulative effects would be considered as part of the ES LVIA. LLAL should ensure further engagement and dialogue with Host Authorities to agree methodology in terms of projects to be considered as part of the assessment of cumulative effects.</p> <p>The Chilterns Conservation Board has stated that the zones of influence for the development have been drawn far too closely and much wider zones are required. Assessments must include the area under the flightpaths, protected habitats likely to be affected by air pollution, impacts on the River Ver – an internationally important chalk stream, and the natural beauty, dark skies and public enjoyment of the nationally designated landscape of the Chilterns AONB. The impacts of an expanded Luton Airport go much wider than Luton town and its immediate environs, and so should the EIA.</p>	<p><u>Cumulative Effects</u> A cumulative landscape and visual impact assessment (CLVIA) has been considered within Chapter 21 of the 2022 PEIR. The LVIA methodology has been discussed and agreed with the LVIA Working Group.</p> <p><u>CCB Comment</u> The LVIA Study Area for assessment includes additional land within the Chilterns AONB where aircraft would be below 7,000 ft. The Study Area has been discussed and agreed with the LVIA Working Group.</p> <p>The Applicant has considered the comments raised by the Chiltern Conservation Board but considers that, in landscape and visual terms, these effects are unlikely to be significant and do not therefore need to be considered as</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
				visual receptors within the LVIA. Please refer also to response 2.3 above.	
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	B/C	As outlined in Ref 2.8 the PEIR Vol 1 Section 17.5 details assumptions and limitations associated with access, future baseline and growth rates for proposed planting and further information is covered in Appendix 17 detailing access to publicly accessible viewpoints. It would be beneficial to understand in terms of planting growth rates the origin for basing such judgements on growth (informed by soil quality, condition, other monitoring dates, arb information etc) as they appear to be generous but this may be that they are of a high quality and will be well maintained.	<u>Assumptions and Limitations</u> Please refer to response 2.8 above.	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	B/C	This has been mixed. Some of the comments arising from the scoping opinion have been considered whilst others need further clarification covered in many of the reference points detailed above.	Explanation as to how the scoping opinion has been considered in the LVIA is provided at Table 14.5 in Volume 2 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	B/C	Yes, conclusions are clearly summarised in the PEIR LVIA, though as outlined above further information needs to be provided on specific receptors.	The ES LVIA will include a more detailed explanation and justification for the conclusions for all receptors.	N
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	B/C	Yes, though the summary of effects and associated mitigation for the LVIA are not in the PEIR Vol 1 Table 21 but in Appendix 17.6 and 17.7 Volume 3.	The ES LVIA will present in tabular form the summary of effects and associated mitigation. For the preliminary assessment these summary tables are provided at Appendices 14.4 and 14.5 in Volume 3 of the 2022 PEIR.	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	B	Yes, in terms of landscape and visual – there are some gaps as outlined above which need to be justified covering for instance the assessment phases and mitigation.	Please refer to responses 2.6 and 2.8 above.	N
6.2	Is the PEIR readable to the audience for which it is intended?	B/C	Yes, but lacking in some areas a clear explanation as to why certain approaches have been taken e.g. study area, phases for LVIA assessment, when planting is implemented and what age planting	The assessment refers to the maximum parameters in terms of height and extent of new buildings.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>will be when specific assessments have been undertaken. In addition, it is unclear whether the LVIA considered road alignments outside the main site application area.</p> <p>Key for the ES LVIA is to demonstrate an understanding the Proposed Development in terms of design - the likely range of materials used, mass and heights as well as the nature of the likely surface of the retaining wall. Accepting that the ES is taking a parameter-based approach it is important for the LVIA to refer to the maximum parameters in terms of height and extent of new buildings - Figure 3.11 is unclear.</p>	Please refer also to responses 2.3, 2.6, 4.5 and 4.8 above.	
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	B/C	Yes, generally clear and concise.	N/A	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	B/C	<p>Mixed as outlined below:</p> <p>Whilst paragraph 17.3.1 of the NTS states that the Proposed Development would lead to significant effects, it does not confirm whether they are adverse or beneficial. It needs to be clarified clearly that such effects would be adverse.</p>	The NTS to support the 2022 PEIR clarifies where the Proposed Development is assessed to lead to significant beneficial or adverse effects. The NTS also includes a note advising the AONB to be closer than 5km to the north of the Main Application Site.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Paragraph 17.1.2 of the NTS states that the Chilterns AONB is located approximately 5 km west of LTN, however in Figure 17.7 it is a lot less than this to the north.</p> <p>Paragraph 17.1.2 of the NTS states that panoramic photographs have been taken from “representative viewpoints in the surrounding area, as discussed with landscape officers of local authorities and the Chilterns Conservation Board” though elsewhere, such as the PEIR LVIA Vol 1, it is unclear whether consultation has been completed in terms of discussing and agreeing the methodology, study area, viewpoints and photomontages.</p> <p>Table 17.2 states under pre- scoping meeting and site visit with landscape officers that “feedback was received on potential receptors and viewpoint locations” yet in Appendix 17.1, Table 11 states that data gathering, the identification of receptors, cumulative effects, additional viewpoints, photomontage methodology and the benefit of additional viewpoints will be discussed with relevant consultation</p>	<p>A 10% net gain in biodiversity will be delivered as part of the Proposed Development. This matter is discussed further within Chapter 8: Biodiversity in Volume 2 of the 2022 PEIR.</p> <p>Please refer also to response 2.2 above.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			bodies. creation on and off site to partially mitigate the loss of habitats and contribute to the project's target of achieving a net gain. The ambition is to deliver 10% biodiversity net gain. It would be beneficial to clarify whether an initial assessment has been undertaken to determine whether based on Figure 17.9 and 17.10 this is close to or has been achieved.		
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	B/C	<p>The following comments are relevant to the LVIA figures:</p> <p>Appendix 2 PEIR LVIA figures:</p> <p>Figure 17.2 ZTV – extent of study area is unclear; what data was used, height of buildings – points or area based. Once representative viewpoints are agreed it would be beneficial to overlay the topography and agreed viewpoint locations onto the ZTV.</p> <p>Figure 17.3 Local Landscape Character Areas – key is required and some character areas which lie within the Proposed Development boundary appear to be missing,</p>	<p>Topographic contour data has been overlaid onto the ZTV plan provided at Figure 14.2 in Volume 4 of the 2022 PEIR.</p> <p>A key has been added to the Local Landscape Character Areas plan provided at Figure 14.3 in Volume 4 of the 2022 PEIR. Please refer also to response 2.9 above.</p> <p>Trees which are covered by TPO are included on the Aerial Photograph provided at Figure 14.5 in Volume 4 of the 2022 PEIR.</p> <p>CROW land will is included on the Public Rights of Way plan</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>including the character area of Wigmore Valley Park</p> <p>Figure 17.5 Aerial Photograph – are there any trees which are covered by TPOs?</p> <p>Figure 17.6 Public Rights of Way – CROW land needs to be considered as well as PROWs and the study area extended to reflect a 5 km radius (or wider subject to agreement with the LPAs) and covering the Chilterns AONB. This would demonstrate the location of both the Chiltern Way and the Chilterns Cycleway within the AONB as well as around the LTN which is already illustrated.</p> <p>Figure 17.7 LVIA Constraints - Clarity on the extent of Wigmore Valley Country Park – not all of it is a County Wildlife Site. Reference to Conservation Areas missing. Chilterns Conservation Board has also requested the candidate land for AONB boundary review should be included.</p> <p>Figure 17.8 Assessment Viewpoint Locations - does not marry with the study area of 5 km. Are there other viewpoints within the study area</p>	<p>provided at Figure 14.6 in Volume 4 of the 2022 PEIR. It has however been agreed with the LVIA Working Group that the limits should remain unchanged as extending it in this way would likely make it illegible.</p> <p>ZTV and topographic data is overlaid onto the Assessment Viewpoint Locations plan provided at Figure 14.8 in Volume 4 of the 2022 PEIR.</p> <p>The extent of the County Wildlife Site shown on the LVIA Constraints information included at Figure 17.7 of the 2019 PEIR has been confirmed by the LVIA Working Group as being accurate. Conservation Areas and candidate land for the AONB boundary review has been added to the LVIA Constraints information provided at Figure 14.7 in Volume 4 of the 2022 PEIR.</p> <p>The Assessment Viewpoint Locations plan provided at</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>which need to be considered particularly to the north and north east?</p> <p>Note - Figure 3.11 Parameter Plan: whilst the proposed external AODs are provided there is no indication of existing height AODs on the plan to inform an understanding of levels both in terms of new landform, airport apron and proposed buildings.</p> <p>Appendix 17.4 Viewpoint Photographs and Appendix 17.5 Selected Photomontages:</p> <p>The verified views and photomontages need to be checked against latest guidance (TGN 06/19 Visual Representation of development proposals published on 17 September 2019) in consultation with the LPAs and Chilterns AONB as referred to in Table 11 of Appendix 17.1. It should be explained where there are single and panoramic views and the degree of Horizontal Field of View needs to be clarified against the new guidance. For existing baseline views in Appendix 17.4 the Horizontal Field of View is 75 degrees and</p>	<p>Figure 14.8 in Volume 4 of the 2022 PEIR has been updated to include additional viewpoint locations agreed with the LVIA Working Group.</p> <p>Viewpoint Photographs 49-50 are now included in the information provided at Appendix 14.6 in Volume 4 of the 2022 PEIR.</p> <p>Information concerning camera, field of view, etc. is included alongside viewpoint photography in Appendix 14.6 in Volume 3 of the 2022 PEIR. A note has been added to the selected photomontages provided at Appendix 14.7 in Volume 3 of the 2022 PEIR that directs the reader to the corresponding viewpoint information</p> <p>Section 14.15 in Volume 2 of the 2022 PEIR explains what further work will be undertaken in the preparation of additional verified view photomontages.</p> <p>Please refer also to responses 2.1, 2.2, 2.3 and 2.4 above.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>printing distances set at 300mm – this needs checking.</p> <p>It should be noted that Appendix 17-4 Viewpoint Photograph 49-50 are not viewpoints but referred to as Appendix 18.2 Geophysical survey reports (1 and 2).</p> <p>A selection of photomontages is included within Appendix 17.5. Whilst the viewing distance is referred to as either 300 or 500m for each viewpoint and existing, wireline and block views are provided, no information is provided on the camera, field of view, single frame shot etc</p> <p>It should be noted that the PEIR LVIA states under Section 17.14 “Completing the assessment” that further work will be undertaken in “the preparation of additional verified view photomontages to assist in showing the location and extent of visibility of the Proposed Development from assessment viewpoints”</p>		
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide	B/C	The Appendices require further information to ensure that they reflect comments made above - in agreement with the LPAs and	Please refer to responses 2.1 to 2.6 and 5.1 above.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	further commentary if required.		Chilterns Conservation Board, and that they accord with up to date guidance.		
Conclusion					
	<p>Summary - Legislation, Policy and Guidance</p> <p>Overall conclusion B/C</p>		<p>Further information needs to be provided covering the European Landscape Convention, Chilterns AONB Management Plan and Position Statement as well as (where relevant) Green Infrastructure Strategies.</p> <p>The list of documents forming part of the baseline review should be discussed and agreed by the relevant host LPAs plus the Chilterns Conservation Board.</p> <p>It is important to demonstrate how policies have been considered through the design process and particularly through embedded mitigation measures.</p>	Please refer to response 1.1 above.	N
	<p>Summary - Baseline Information</p> <p>Overall conclusion B/C</p>		Clarity is required on whether the methodology including criteria, study area, representative viewpoints, photomontages and mitigation have been agreed with the LPAs and Chilterns Conservation Board,	Please refer to responses 2.1 to 2.9 above.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>including the ‘Residential Visual Amenity Appraisal’.</p> <p>The ES LVIA needs to be mindful of new LI guidance on photography and photomontage and provide a clearly explanation of how ZTVs were prepared.</p> <p>In terms of baseline information, the ES LVIA should consider East of England Typologies, tranquillity, vapour trails, registered parks and gardens, AGLV / ALLV, Conservation Areas, local landscape character (condition and quality) and Green Belt.</p> <p>In terms of the visual baseline reference is made to the need for night time photography and residential visual amenity appraisal which will be undertaken as part of the ES LVIA.</p> <p>Future baseline needs to be considered carefully in the context of the phases and submission of the ES as well as the potential extension of AONB land / potential merger of National Parks / AONBs.</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	<p>Summary - Mitigation, Enhancement and Monitoring</p> <p>Overall conclusion B/C</p>		<p>Clarity is required on the following:</p> <ul style="list-style-type: none"> • Implementation of mitigation works based on the phases of the proposed development. • Deliverability – how will measures be secured? • The ES LVIA and draft Landscape and Biodiversity Mitigation Plan would need to include further detail on potential enhancement measures – e.g. contributions to local biodiversity projects / offsite enhancement measures including a landscape mitigation fund. • Post aftercare responsibilities need to be clearly stated • Are the mitigation measures sufficient to reduce significant adverse effects and how will this be monitored? • Specific offsets to protect existing landscape features. 	<p>Please refer to responses 3.1 to 3.5 above.</p>	N
	<p>Summary -Assessment of Significant Effects</p> <p>Overall conclusion B/C</p>		<p>The following is required:</p> <ul style="list-style-type: none"> • Clarity over the methodology – evaluating the significance of impacts 	<p>Please refer to responses 4.1 to 4.11 above.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<ul style="list-style-type: none"> • How viewpoints and photomontages are taken and prepared needs to be considered against latest LI guidance • Identification of landscape and visual impacts. • Clarity on assessment phases for both construction / operation to tie in with development phases. • Clarity over the implementation of mitigation planting alongside the assessment phases. • A more detailed explanation / justification of magnitude and significance will need to be covered in the ES LVIA <p>Accepting that a Rochdale envelope has been taken in assessing the effects it would be beneficial to have a clearer understanding of the parameters of the Proposed Development – the maximum heights for different phases; colour; massing; texture; and materials.</p>		
	<p>Summary – Conclusions</p> <p>Overall conclusion B</p>		Further information is required justifying approaches to the study	Please refer to responses 5.1 and 5.2 above.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			area, phases, preparation of ZTVs / viewpoints and photomontages.		
	<p>Summary - Presentation (including Figures and Appendices)</p> <p>Overall conclusion B</p>		<p>Figures need to include keys, and cover all relevant landscape designations. Study areas need to be clearly defined and agreed, and all receptors considered within the agreed study areas.</p> <p>ZTVs need to be prepared with a clear explanation as to how they were prepared, at what phase and height, and the method of taking viewpoints / preparing photomontages reviewed against recent guidance in discussions with the LPAs /Chilterns Conservation Board.</p> <p>Appendices need to reflect the comments made above and the methodology, study area, representative viewpoints / photomontages agreed with LPAs / Chilterns Conservation Board.</p>	Please refer to responses 6.1 to 6.6 above.	N

B15 Cultural heritage review checklist and summary

Note: 'Ref.' is to tables 2-31 and 2-32 of the WSP on behalf of host authorities response.

Table B15.1: Cultural Heritage

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	B	<p>The relevant legislation, policy, guidance and assessment methodology referred to in Section 18.2.2. should be more specific rather than just referring the reader to the Scoping Report for full references.</p> <p>Ideally both PEIR Chapter 18 Section 2 and Scoping Report Section 19.2. should refer to Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) which should be considered in a settings assessment.</p> <p>Section 18.4.1–18.4.3 references guidance that has been used which should really be included in Section 18.2.</p>	<p>Accepted: Details of legislation, policy and guidance relevant to cultural heritage is included in Chapter 10 of the 2022 PEIR.</p> <p>However, reference to Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) is not appropriate for cultural heritage assessment and is not included. Consideration has been given in the PEIR to the conclusions of the Landscape and Visual Impact Assessment (Chapter 14 of the 2022 PEIR).</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Reference should also be made to HE's Conservation Principles (Consultation Draft 2017) and should note that the language in the consultation draft aligns with the NPPF.		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	C	<p>The baseline collation and sources are listed in the Chapter 19 of the Scoping Report. These should however also be set out in PEIR Chapter 18 Methodology Section to confirm whether these sources were actually consulted as this would not appear to be the case. For example, only Ordnance Survey maps are reproduced in Appendix 10.1 Appendix E but no other historic maps are reproduced (e.g. Tithe, enclosure, estate) or referred to in the text, which suggests that they may not have been consulted.</p> <p>A clear statement of sources is required for each authority area.</p>	<p>Accepted: The baseline collation and data sources consulted are listed in the methodology section of Cultural Heritage chapter (Chapter 10 of the 2022 PEIR).</p> <p>An updated Desk-based Assessment (DBA) has been prepared for the 2022 PEIR (Appendix 10.1 of Volume 3 of the 2022 PEIR) and includes reference to historic maps relevant to the assessment.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Sources that should be consulted that are not listed in the Scoping Report Chapter 19 comprise:</p> <p>It should be noted that, there is a national project to integrate the National Record of the Historic Environment (NHRE) data that is not already of the HERs with the local records. HER data should be consulted again and check whether that data is available.</p> <p>Aerial photographs and the National Mapping Programme (where available) – archaeological features visible as cropmarks, parchmarks, earthworks, along with past disturbance;</p> <p>RAF Hendon historic airfield maps - WWII heritage assets extant and non-extant;</p> <p>Defence of Britain Survey data – assets that may not have been not incorporated into the HER</p>	<p>Accepted: Data sources consulted from each local authority are listed in the updated DBA (Appendix 10.1 of Volume 3 of the 2022 PEIR) and set out in Cultural Heritage (Chapter 10 of the 2022 PEIR).</p> <p>NHRE data is included in the data sources used for the updated DBA.</p> <p>Accepted: All of these data sources have been consulted in the preparation of the updated DBA (Appendix 10.1 of Volume 3 of the 2022 PEIR) which accompanies Cultural Heritage, Chapter 10 of the 2022 PEIR.</p>	

Ref.	Consultee comment		Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code		
			<p>LIDAR data, if available - microtopography for identifying potential assets,</p> <p>Geology and geotechnical information - to determine suitability for settlement and likely deposit depth and palaeoenvironmental potential,</p> <p>Topographic data - suitability for settlement and past truncation,</p> <p>Luton airfield drawing archive - services, topography, landscaping, which is important for determining past impacts.</p> <p>The HER data was accessed but it is unclear whether any supplementary reports held by the HER (in particular summaries of fieldwork reports) were collated.</p> <p>In setting out how significance is determined, there should be clear reference to Historic England's Conservation Principles (2008 and consultation draft 2017) and the</p>	<p>Accepted: Fieldwork reports have been consulted, refer to Section 3.2 of the DBA (Appendix 10.1 of Volume 3 of the 2022 PEIR).</p> <p>N/A: Conservation Principles (draft 2017) has not been published. Historic England (HE) has published more appropriate guidance for the assessment of significance of</p>

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			<p>values or interest that define significance set out.</p> <p>The extent of the site walkover inspection of the site or surrounding area is not set out and it is unclear what areas were examined and which areas were inaccessible. The aims and limitations of the site walkover inspection needed to be set out. It should be made clear what limitations (if any) there were and which assets were not included on the site visit. What was the level of inspection for assets visited – i.e. brief visual inspection?</p>	<p>heritage assets, notably Advice Note 12 Statements of Heritage Significance (HE, 2019). These guidance are listed in Table 10.4, Cultural Heritage (Chapter 10 of the 2022 PEIR).</p> <p>Accepted: The aims of the site walkover are set out in Section 3.3 of the DBA (Appendix 10.1 of Volume 3 of the 2022 PEIR).</p>	
2.2	Do the data collection methods follow relevant guidance?	C	Scoping Report Chapter 19 sets out the data collection method. This should also have been set out in the PEIR. Some key data sources do not appear to have been consulted (see above).	Accepted: All data collection methods / sources / techniques are listed in the Methodology section of Chapter 10 of the 2022 PEIR .	N
2.3	Is the study area identified appropriately?	A	The study areas are defined in Chapter 18 Section 18.6. (this might be better placed in Methodology	Noted: Study areas are set out in Chapter 10, Section 10.3 of	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
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			<p>Section 18.2). The study areas appear to be appropriate, although plotting the location of every designated heritage assets within Luton town centre was probably unnecessary. However, consultations would need to take place with relevant LPAs to confirm that the study areas are acceptable.</p> <p>The 2km study area (or agreed study area) should not be inflexible – it should allow for flexibility to include assets beyond the 2km distance. This is noted at para 18.6.23 but more detail would be helpful.</p> <p>The criteria used for the wider study area is noise level alone. More detail is required on why the setting of these assets would be impacted by increased noise levels. This might not be the case as other factors might be present, e.g. urban setting, noise from traffic, trains and aircraft etc. Are there any other ways in which setting</p>	<p>the 2022 PEIR (Scope of assessment).</p> <p>Accepted: Chapter 10 of the 2022 PEIR states that study areas have been identified following consultation with the local authority archaeology officers and comprise a 2km study area for designated heritage assets, a 1km study area for non-designated heritage assets, a 250m study area for designated heritage assets located beyond the 2km study area for the Off-site Highways Interventions and a wider study area beyond the 2km study area that has been informed by noise contour</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
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			<p>might be impacted, e.g. increases in consistency of the noise?</p> <p>In terms of the setting of above ground designated heritage assets, the criteria for including or scoping out assets in Luton town centre should be set out in more detail. As noted above for assets scoped in these factors could include urban setting, noise from traffic, trains and aircraft, relationship of designated heritage assets in the town to each other, relationship to Luton Hoo etc.</p>	<p>data, ZTV and walkover survey/ setting assessment.</p> <p>Accepted: Criteria for scoping out assets from the PEIR is explained in the DBA (Appendix 10.1 of Volume 3 of the 2022 PEIR). A summary of this process is presented in the gazetteer (Appendix 10.2 of Volume 3).</p>	
2.4	Have all the resources/receptors been considered?	C	<p>It is clear from the gazetteer (Appendix 18.1) that the entries are derived entirely from the HER data and National Heritage List of England (NHLE). The HER and NHLE should be seen as a starting point for the assessment and heritage assets will undoubtedly be identified from the broad range of data sources - principally aerial photographs, site walkover, historic maps, geophysical survey and intrusive evaluation.</p>	<p>Accepted: The gazetteer (Appendix 10.2 of Volume 3) includes HER assets and also assets identified from other data sources.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
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			<p>These potential assets should be included in the gazetteer and mapped, and this is where the Consultant can add value in desk-based assessment rather than simply providing the HER/NHLE data back to the curator. The assessment is incomplete in its identification of possible receptors. The baseline in the PEIR should be as detailed as it would be presented in the Environmental Statement (ES), with the exception of incorporating the results of any ongoing site-based surveys. This is to enable the statutory consultees and stakeholders to comment on the likely significant effects ahead of the ES so that any concerns are dealt with mitigation embedded in the design where necessary.</p> <p>In terms of above ground heritage assets, the gazetteer (Appendix 18.1) needs to go into more detail as to why assets have been scoped out of the assessment. Why are there no</p>	<p>Accepted: The DBA (baseline) has been updated for the 2022 PEIR, and includes the results of site surveys undertaken to inform the PEIR.</p> <p>Accepted: A description of the setting of heritage assets is including in the DBA (Appendix 10.1 of Volume 3)</p>	

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			<p>changes to setting? Again, this also stems from the need for more detail on the contribution of setting to the above-ground heritage assets considered in this assessment.</p> <p>Table 18.3 (4.4.15) ‘Luton Hoo and Putteridge Berry Registered Park and Gardens (RPGs) fall partly within the 2km study area however, they have been considered in their entirety’ – this is an unnecessary statement as the assets should be considered in their entirety. For example, in terms of Luton Hoo, what is the relationship between the RPG and the airport, what about the relationship of assets within and in the vicinity of the RPG to each other and to the RPG itself? Fuller analysis required so the impact assessment on Luton Hoo RPG can be understood.</p> <p>PEIR Chapter 18.6 ‘Brief Historic Background’ is indeed brief and not particularly informative, and largely refers to selection of HER entries with</p>	<p>of the 2022 PEIR, along with a rationale for the scoping out of heritage assets from further assessment. A summary is provided in the gazetteer.</p> <p>Noted: Scoping opinion (ref ID 4.14.6) recommended that the RPGs be considered as a whole, so this statement was added to the 2022 PEIR to confirm this has occurred.</p> <p>Accepted: An updated DBA (Appendix 10.1 of Volume 3) has been prepared for the 2022 PEIR which contains a</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>occasional reference to sites further afield but with no indication of distance or direction in most cases. Evidence of prehistoric and Roman archaeology found during the evaluation of part of the site is not mentioned. Medieval manorial settlement, in particular secondary settlement, is not discussed other than the principal settlement of Luton and Someries Castle scheduled monument, for which there is little detail. The WWII background for Luton Airfield is mentioned briefly, but any associated assets should have been mapped from the historic RAF airfield maps. Some of these structures may be significant and some extant.</p> <p>The section on Designated Assets and Non-Designated Assets are just lists of assets but are divorced from any general narrative (e.g. there are several medieval churches indicating settlement centres but no attempt to discuss the pattern of historic</p>	<p>chronological archaeological and historical narrative.</p> <p>Accepted: Heritage assets are discussed as part of the archaeological and historical narrative in the updated DBA of the 2022 PEIR (Appendix 10.1 of Volume 3). Setting of heritage assets and how it contributes to the significance</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>settlement in relation to the site). With respect to the settings of above ground built heritage assets, there is no detailed discussion of why setting contributes to the significance of heritage assets scoped in to the assessment. As examples, more detail is required on the setting of the Luton Hoo Registered Park and garden, the assets contained within the Luton Hoo RPG and the setting of Someries Castle. It is very hard to ascertain the impacts of the scheme on the settings of above ground heritage assets scoped in to the assessment without this more detailed analysis.</p> <p>PEIR paragraphs 18.6.30 – 18.6.45 needs a fuller description of the assets. Again, why are they significant? The assessment appears at times to present just a list of assets.</p> <p>PEIR Volume Appendix 18.4 is a Historic Environment Management</p>	<p>of assets is included in the DBA.</p> <p>Accepted: The DBA (Appendix 10.1 of Volume 3 of the 2022 PEIR) includes detailed descriptions of the settings of Luton Hoo RPG and Someries Castle.</p> <p>Accepted: Section 4 of the DBA (Appendix 10.1 of Volume 3 of the 2022 PEIR) describes assets within the context of an archaeological and historical narrative.</p> <p>Accepted: This information is included as part of the</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Plan (HEMP) and includes a section on geology of the area, which needs to be brought into the baseline narrative. Along with topography and hydrology this assists in building up a picture of the potential for the Application Site to contain remains of a particular chronological period, in addition to paleoenvironmental potential.	baseline conditions narrative in the DBA (Appendix 10.1 of Volume 3) for the 2022 PEIR .	
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	A	The value criteria are set out in Table 18.4. This is derived from the Design Manual of Roads and Bridges and is generally acceptable for EIA. The addition of a very high significance category can be useful though; in moving assets up a category it prevents locally listed buildings from being categorised as 'low' significance, which is not appropriate as they are considered of some significance by the local planning authority.	<p>Comment noted: NPPF defines assets of the highest value as: "assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional".</p> <p>As a result, we have included in the 2022 PEIR all these assets into High value.</p> <p>Non-designated assets that are of regional significance</p>	N

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			World Heritage Sites are considered as assets of very high significance if based on DMRB value criteria.	have been added into the 'medium value' category.	
2.6	Has there been consultation with the relevant statutory bodies?	A	The consultation is appropriate.	Comment noted.	N
2.7	Is the future baseline scenario adequately described?	C	This is missing. Para 18.8.14 talks about future scenarios and potential impacts to Someries Castle. Would be helpful to have these detailed in this section.	Accepted: The future baseline has been included in Chapter 10 of the 2022 PEIR .	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	C	There is no information on the limitations encountered on the site walkover inspection, i.e. areas that were not accessed. There is no statement about the use of professional judgement in the methodology. The reader should be made aware of the current level of understanding of past human activity: have a considerable number of past investigations been carried out and is the area well-understood	Accepted: The baseline conditions have been updated and are set out in the DBA (Appendix 10.1 of Volume 3) of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			archaeologically, or is understanding limited? This is important as it affects how confident we can be in assessment of archaeological potential. The HER alone is unlikely to present an accurate picture of the full extent of past human activity, and this needs to be recognised in this section.		
2.9	Which are the key receptors for the local authorities?	n/a	Potential key receptors should be agreed with all relevant LPAs when preparing the ES.	Noted: Key receptors have been identified through consultation with local authorities as identified in Table 10.6 of Chapter 10 of the 2022 PEIR .	N
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	C	The initial sifting referred to in Section 18.7.1 is optioneering, not embedded mitigation. It is unclear why, how and to what extent the provision of parkland and associated parkland has mitigated potential adverse effects. The details of the embedded mitigation during Construction (18.7.6) and during Operation	Embedded mitigation measures are included in Section 10.8 of the Cultural Heritage chapter (Chapter 10 of the 2022 PEIR). Additional mitigation measures are set out in the draft Cultural Heritage Management Plan (Appendix 10.6 of the 2022 PEIR)	N

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			<p>(18.7.7–18.7.8) are not provided and it is unclear why, how and to what extent these have offset or reduced potential adverse effects.</p> <p>PEIR Chapter 18 presents a general mitigation strategy which is a general standard approach for buried heritage assets. As there is no systematic assessment of impacts to each asset and a list of resulting environmental effects (temporary, permanent, level of effect), specific mitigation measures to reduce or offset significant adverse effects are not presented.</p> <p>In terms of above ground heritage assets, it is noted that the PEIR paragraph 18.8.14 outlines an air quality monitoring point at Someries Castle. Are there any other mitigation measures to be considered for above ground heritage assets?</p>	<p>Accepted: Additional mitigation measures are set out in the draft Cultural Heritage Management Plan (Appendix 10.6 of the 2022 PEIR).</p> <p>Noted: Significant effects are not anticipated for Someries Castle (refer to Section 10.9, Cultural Heritage, Chapter 10 of the 2022 PEIR) and additional mitigation is not proposed.</p>	

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3.2	Are the mitigation measures included for significant adverse effects appropriate?	C	See above comment in 3.1	Noted: Additional mitigation measures are set out in the draft Cultural Heritage Management Plan (Appendix 10.6 of the 2022 PEIR).	N
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	B	The PEIR is supported by Volume 3 Appendix 18.4 Historic Environment Management Plan (HEMP). The HEMP provides a general mitigation approach. It also appears to contain elements of a Written Scheme of Investigation (WSI). A WSI is a scope and method statement for a specific agreed programme of field investigation, rather than a management strategy that one would expect in a HEMP.	Noted: Additional mitigation measures are set out in the draft Cultural Heritage Management Plan (Appendix 10.6 of the 2022 PEIR). This contains methodologies and guiding principles for mitigating impacts to buried archaeological assets. Further strategies for managing impacts to heritage impacts are to be discussed with Historic England and local authority officers and included in the final CHMP which will be submitted with the DCO.	N
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	B	See above comments.	Accepted: This is included in the 2022 PEIR with reference to the CHMP where appropriate.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	C	The mitigation measures need to be specific to each asset potentially affected. The list of known or potential receptors is incomplete.	Accepted: Additional mitigation is detailed in the PEIR for each asset potentially affected. Further measures are set out in the draft Cultural Heritage Management Plan (Appendix 10.6 of the 2022 PEIR).	N
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	C	Whilst the methodology of assessment is made clear, it is unclear how that method has been applied to the assessment.	Accepted: This is included in Section 10.5 of Chapter 10 of the 2022 PEIR .	N
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	C	The level of environmental effects prior to the implementation of an agreed mitigation strategy need to be set out. This is missing.	Accepted: This is included in Section 10.9 of Chapter 10 of the 2022 PEIR .	N
4.3	Are the methods for evaluating significance clearly defined/?	C	See comment in 2.1 regarding Conservation Principles. What is missing from the assessment of the significance of buried heritage assets, which is where the Consultant can add value to a desk-based report, is in considering factors which may have affected archaeological survival.	Noted: Refer to response for comment 2.1. This guidance is no longer applicable and relevant guidance has been used, refer to Section 10.2 of Chapter 10 of the 2022 PEIR .	N

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			<p>This includes geology and the potential depth of remains (as identified from historic British Geology Survey boreholes, geotechnical data, and past investigations), along with past land use for example quarrying, mechanised ploughing, past building development, terracing etc. Whilst remains of high significance may have been identified by the HER, this significance may have been heavily compromised and reduced by former construction activity, for example.</p> <p>Conservation Principles (revised draft) notes this on the setting of heritage assets:</p> <p>Step 1: asset identification. The NPPF requires an approach that is proportional to the significance of the asset, and for this reason only the settings of the most sensitive (i.e. designated) heritage assets are considered in this assessment. A scoping exercise filters out those assets which would be unaffected,</p>		

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			<p>typically where there are no views to/from the site.</p> <p>Step 2: assess the contribution of setting. This stage assesses how setting contributes to the overall significance of a designated asset.</p> <p>Step 3: assess change. This considers the effect of the proposals on asset significance. It is noted however that it can be difficult to quantify such change to the overall significance of a designated heritage asset (for example, significance would rarely be downgraded from 'high' to 'medium' due to changes in setting). For this reason, the impact is reported in this assessment in terms of the extent to which the proposals would change how the asset is understood and experienced (in terms of no harm, less than substantial harm, substantial harm or total loss of significance).</p> <p>Step 4: mitigation. This explores the way to maximise enhancement and</p>		

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			<p>avoid or minimise harm. This is typically considered at the design stage (i.e. embedded design mitigation).</p> <p>Step 5: reporting. Making and documenting decisions and outcomes. This reports the assessment of effects.</p>		
4.4	Do the assessment methods used follow relevant guidance?	C	Whilst the methodology of assessment is made clear, it is unclear how that method has been applied to the assessment.	Accepted: This is included in Section 10.5 of Chapter 10 of the 2022 PEIR .	N
4.5	Have potential effects been considered both during construction and operation?	C	<p>As a PEIR there needs to be a systematic assessment of all heritage assets which may be affected by the proposed development during both construction and operation. This does not appear to have been undertaken. The gazetteer (Appendix 18.1) simply notes whether an asset recorded on the HER has been scoped in or out of the assessment.</p> <p>The numbers of heritage assets which are fully assessed appears to</p>	<p>Comment noted: Only the assets that could experience significant effects (moderate or major) are included in the 2022 PEIR. All assets that may experience effects (significant and not significant) will be included in the ES.</p> <p>A detailed DBA is provided in Appendix 10.1 of Volume 3</p>	N

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			<p>be low. Are the numbers commensurate with the size, scale and extent of the proposed development/use?</p> <p>Table 18-6 set out heritage assets potentially affected, significance, magnitude of change and the resulting environmental effect but this includes only five heritage assets for construction phase and only one for operation phase. In light of the scale of proposed development and the number of HER/NHLE assets within and adjacent to the proposed development as shown on Figures 18.1–18.4, along with any assets identified from historic mapping, site walkover, site-bases surveys and aerial photographs (this is missing), along with the potential of the site for previously unrecorded remains (not presented), there will be considerably more impacts than those identified here.</p>	<p>of the 2022 PEIR and is summarised in the gazetteer.</p> <p>The 2022 PEIR provides an assessment of only those heritage assets that could experience significant effects (moderate or major) as a result of the Proposed Development.</p>	

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			<p>There needs to be a clear statement of the potential for the site to contain previously unrecorded remains for each chronological period (prehistoric, Roman, early medieval, later medieval, post-medieval and modern), along with paleoenvironmental potential. Without site-based investigation (this has been undertaken on part of the site) this constitutes a principal risk for the client and for the proposed development.</p> <p>Noise impacts and visual impacts to the setting of nearby heritage assets.</p>	<p>Noted: A statement of archaeological potential for each chronological period is set out in the DBA Appendix 10.1 of Volume 3 of the 2022 PEIR.</p>	
4.6	Has the magnitude, probability, duration (temporary and permanent), reversibility and significance of impacts been considered?	C	There has been no systematic identification of assets, impacts and effects. The PEIR is incomplete.	Noted: This is included in Section 10.9, Chapter 10 of the 2022 PEIR.	N
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	C	There has been no systematic identification of assets, impacts and effects. The PEIR is incomplete.	Accepted: This is included in Section 10.9, Chapter 10 of the 2022 PEIR.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
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4.8	Are the residual significant effects clearly stated?	C	There has been no systematic identification of assets, impacts and effects. The PEIR is incomplete.	Accepted: Residual effects are included in the 2022 PEIR .	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	C	There has been no systematic identification of assets, impacts and effects. The PEIR is incomplete.	Accepted: Cumulative effects are considered within Chapter 21 of the 2022 PEIR .	N
4.10	Have uncertainties in the design, mitigation or assessment been recognised?	C	They have not been recognised.	Accepted. Assumptions and limitations are included in the PEIR	N
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	C	It has not been considered in the PEIR but it is suggested that concerns will need to be addressed in the ES. The concerns should be addressed in the PEIR so that any significant effects can be designed out by the time the ES is produced.	Accepted: This is included in the 2022 PEIR .	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	C	There has been no systematic identification of assets, impacts and effects. The PEIR is incomplete.	A preliminary assessment of impacts and effects have been reported in Chapter 10 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
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5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	C	There has been no systematic identification of assets, impacts and effects. The PEIR is incomplete.	A preliminary assessment and summary table have been included in Chapter 10 of the 2022 PEIR .	N
6	Reporting				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	C	There has been no systematic identification of assets, impacts and effects. The PEIR is incomplete.	Accepted: A preliminary assessment of impacts and effects have been reported in Chapter 10 of the 2022 PEIR .	N
6.2	Is the PEIR readable to the audience for which it is intended?	B	Information on methodology, sources and baseline is contained in different documents and needs to be brought together in a comprehensive narrative of the development of the site from the prehistoric period onwards. There needs to be a clear statement on the archaeological potential for each chronological period, in particular for the discovery of possible, previously unrecorded archaeological remains. This should include a statement on factors which are likely to have compromised archaeological survival,	Accepted. Methodology and sources are presented in the 2022 PEIR . A comprehensive baseline narrative is presented in the DBA which is presented as Appendix 10.1 of Volume 3 of the 2022 PEIR . A summary of baseline conditions is presented in the PEIR.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			based on geology, potential depth of remains/deposits, past land use and truncation.		
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	C	The NTS reflects what is in the PEIR. However, there has been no systematic identification of assets, impacts and effects: the PEIR is incomplete.	Accepted: An updated NTS has been produced for the 2022 PEIR summarising the preliminary assessment of impacts and effects as reported in Chapter 10 of the 2022 PEIR .	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	C	The NTS reflects what is in the PEIR. However, there has been no systematic identification of assets, impacts and effects: the PEIR is incomplete.	Accepted: An updated NTS has been produced for the 2022 PEIR summarising the preliminary assessment of impacts and effects as reported in Chapter 10 of the 2022 PEIR .	N
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	C	Figures 18.1 – 18.8 are as expected. Photographs from the site walkover inspection and visualisations need to be included Non- Ordnance Survey mapping is not included.	Figures are presented in Volume 4 of the 2022 PEIR . Photographs are included in the DBA, which is presented as Appendix 10.1 of Volume 3 of the 2022 PEIR . Non-ordnance survey mapping has been consulted and extracts included in the DBA.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
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6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	B	The PEIR could be better presented as a high-level summary with the detailed baseline included in a Historic Environment Desk-Based Assessment technical appendix.	Noted: The 2022 PEIR is supported by six appendices in Volume 3 of the 2022 PEIR , including the DBA, gazetteer, draft CHMP and results of fieldwork surveys.	N
Conclusion					
	Legislation, Policy and Guidance Overall conclusion B		The guidance used should be clearer and presented in one section of the report. The Scoping Report text on this should appear in the PEIR, and in one section.	Accepted: This is included in the 2022 PEIR .	N
	Baseline Information Overall conclusion C		The baseline narrative is incomplete and lacks detail. Not all receptors have been identified, in particular likely WWII airfield assets and the potential for possible, previously unrecorded remains dating from the prehistoric period onwards, and paleoenvironmental potential The recommendation is to consult the full range of baseline sources as set out in the Scoping Report, along with additional key sources identified in this review. Enhance the gazetteer, features mapping and assessment with assets within the site as identified from aerial	Accepted: The baseline DBA has been updated for the 2022 PEIR and provided as Appendix 10.1 of Volume 3 of the 2022 PEIR The DBA includes the sources used, comprehensive baseline including geophysical survey and trial trench evaluation results, site walkover results, archaeological potential, a statement of heritage significance and an assessment of setting and how it contributes to the significance of assets.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>photographs, geophysical survey, archaeological evaluation, historic maps and the site walkover inspection.</p> <p>Produce a coherent and comprehensive baseline narrative, ideally in a supporting technical appendix (with a summary in the PEIR). This should include geology, topography, observations from site walkover, with a clear statement of:</p> <ul style="list-style-type: none"> • Factors which may have affected archaeological survival • archaeological potential for each period and the basis for this opinion, • a statement of significance of all assets within the site, both known and potential assets. • An assessment of how setting contributes to the significance of designated above ground assets. <p>Turning to above ground heritage assets, the PEIR requires further detailed analysis of how setting contributes to the significance of the assets.</p> <ul style="list-style-type: none"> • Current photos showing scoped in assets would have been useful. 		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<ul style="list-style-type: none"> • More analysis of assets is required. At times (for example the gazetteer) the reader is presented with a list of assets with no detailed analysis. • A lot more detail is required, for example on the setting of Someries Castle and Luton Hoo registered park and garden. • To take Luton Hoo registered park and garden as an example, what is the relationship between the RPG and the individual heritage assets located within it? What is the relationship with the airport? Does the airport stand on land that is historically part of the Luton Hoo estate? Does the setting of the RPG contribute to its significance? How has the airport detracted from significance? • Further detailed explanation is required in PEIR Chapter 18 as to why assets have been scoped out – the information in the gazetteer is insufficient. <p>The Scoping exercise for considering setting should be a separate section of the PEIR. The results are contained within Appendix 18.1 (the</p>		

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			gazetteer), although the rationale for scoping lacks sufficient detail.		
	<p>Mitigation, Enhancement and Monitoring</p> <p>Overall conclusion C</p>		<p>General mitigation is set out. The list of baseline assets potentially affected is incomplete and the strategy for mitigating the adverse effects on each asset is missing and incomplete.</p> <ul style="list-style-type: none"> The recommendation is to tabulate the full list of known and potential heritage assets affected by the proposed development and include the level of environmental effect prior to the implementation of an agreed mitigation strategy, the mitigation strategy for each asset, and the residual effects following such a strategy. 	<p>Accepted: The 2022 PEIR includes mitigation proposals for those assets with the potential to experience a significant effect as a result of the Proposed Development. The detail of these proposals is set out in the draft CHMP (Appendix 10.6 of the 2022 PEIR).</p> <p>This is included in the 2022 PEIR. A Cultural Heritage Management Plan has been produced that outlines mitigation strategies for heritage assets.</p>	N
	<p>Assessment of Significant Effects</p> <p>Overall conclusion C</p>		The list of baseline receptors and effects is incomplete. Tabulate and describe the full list of known and potential heritage assets affected by the proposed development at construction and operation stages.	Comment noted: Only the assets that could experience significant effects (moderate or major) are included in the 2022 PEIR . All assets that may experience effects (significant and not significant) will be included in the ES .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	<p>Conclusions</p> <p>Overall conclusion C</p>		<p>There is no 'Conclusion' section. In terms of residual effects, this section is incomplete because there has not been as systematic assessment of all the known and potential receptors. The baseline in the PEIR, and the assessment of impacts and effects - based on the preliminary scheme design information at the time - should be as detailed as it would be presented in the ES, except for incorporating the results of any ongoing site-based surveys. This is to enable the statutory consultees and stakeholders to comment on the likely significant effects ahead of the ES so that any concerns are dealt with mitigation embedded in the design where necessary.</p> <p>The baseline in the PEIR, and the assessment of impacts and effects based on scheme Tabulate the full list of known and potential heritage assets affected by the proposed development at construction and operation stages, the proposed mitigation strategy for each asset, and the resulting residual effect.</p>	<p>Accepted: This is included in the 2022 PEIR.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	<p>Presentation (including Figures and Appendices)</p> <p>Overall conclusion C</p>		<p>Figures need to be enhanced with non-HER data. Additional supporting figures need to be included.</p> <p>Enhance figures with additional known and potential assets identified from the additional baseline research. For above ground heritage assets, a useful addition would have been the inclusion of current photographs</p> <p>Reproduce pre- Ordnance Survey 1st edition historic mapping, such as Tithe, enclosure and estate maps.</p> <p>Reproduce photographs from the site walkover inspection along with visualisations for the purposes of presenting how the setting of assets was assessed.</p> <p>Reproduce the report on the geophysical survey of part of the as an Appendix.</p> <p>Produce a Historic Environment Desk-Based Assessment as an appendix.</p> <p>Revise the HEMP appendix so that it does not include text from a WSI.</p>	<p>Accepted. Final figures will be included in the ES once additional fieldwork surveys have been completed.</p> <p>Photographs from site walkover survey are included in the DBA Appendix 10.1 of Volume 3 of the 2022 PEIR.</p> <p>The geophysical survey reports and first phase of trial trench evaluation report included in Volume 3 of the PEIR.</p> <p>The DBA is presented in Appendix 10.1 of Volume 3 of the 2022 PEIR.</p> <p>The draft Cultural Heritage Management Plan has been updated for the 2022 PEIR. The draft CHMP outlines the methodologies and guiding principles for mitigation, including archaeological excavation so the scheme of investigation text is appropriate.</p>	N

B16 Major accidents and disasters checklist and summary

Note: 'Ref.' is to tables 2-33 and 2-34 of the WSP on behalf of host authorities response.

Table B16.1: Major Accidents and Disasters

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	A	<p>Chapter 19 refers to the following:</p> <p>Legislation: H&S, Planning, fire safety and aviation safety.</p> <p>Policy: Airports National Policy Statement, Aviation and local council plans.</p> <p>Guidance: Currently there is no published and agreed guidance for EIA MAD assessments, therefore PIER references analogous HSE's R2P2 and major hazards; DOT & DEFRA; EASA and CAA guidance.</p> <p>Table 19-2: ANPS requirements relevant to MA&D and how addressed in the PEIR</p>	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
2	Baseline Conditions				
2.1	Are the data collection methods/techniques identified and described?	A	Described in paragraphs 19.4.6 and 19.4.7	Accepted.	N
2.2	Do the data collection methods follow relevant guidance?	A	Yes, paragraph 19.4.10 and 19.4.11. Aligns with current developing practice as there is no published guidance.	Accepted.	N
2.3	Is the study area identified appropriately?	A	Yes, paragraphs 19.4.4 and 19.4.5. Also, the study area (or Zone of Influence) of each MA&D hazard scoped into the assessment is listed within Appendix 19-1 Environmental Risk Record.	Accepted.	N
2.4	Have all the resources/receptors been considered?	A	Yes, paragraph 19.4.9., 19.4.12. Section 19.6. Those listed align with requirements of the EIA Regulations and appear appropriate for the proposed development.	Accepted.	N
2.5	Is the value (sensitivity) of the resources/receptors identified using appropriate criteria?	A	A summary of the assessment criteria is provided in Section 19.4 Methodology, with further detail included in Appendix 19-1	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Environmental Risk Record (Volume 3 of the PEIR).		
2.6	Has there been consultation with the relevant statutory bodies?	A	Table 19-3 Stakeholder Engagement relating to MA&D. the range and level of engagement reflects stage of the proposed scheme.	Accepted.	N
2.7	Is the future baseline scenario adequately described?	A	This is set out in Section 19.12: In-combination Climate Change Impacts. This states the ICCIs are already embedded in the wider MA&D process through the review of results of the climate change assessment, therefore will not be considered independently.	Accepted.	N
2.8	Are uncertainties, data limitations, assumptions, difficulties and the use of professional judgment made clear?	A	Set out in Section 19.5 Assumptions and limitations.	Accepted.	N
2.9	Which are the key receptors for the local authorities?	A	Set out in Section 19.4.9 Definition of receptors. Luton Council and Central Bedford Council did not identify any further key receptors during conference call on 21 November 2019.	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
3	Mitigation, Enhancement and Monitoring				
3.1	Does the PEIR describe the measures proposed to avoid, reduce, or offset significant adverse effects of the proposed development?	A	<p>Yes, in Section 19.7 H&S risk during construction and operation is addressed by legal requirements in addition to embedded mitigation measures.</p> <p>Construction phase - construction phasing plan is to be developed which will consider the interaction of the works with airport operations and existing safety, environmental, emergency systems and vice versa; A safe system of work and full safety plan will be established taking into account: aircraft operations, traffic management, critical service, CoCP as well as security plans.</p> <p>Design - 1 in 100 years storm event, accounting for an increase in precipitation of 40% with climate change; engineered slope failure, additional protection over historic landfill site; consultation with the existing LTN fire safety and</p>	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>emergency resilience officers; design of the fuel farm will incorporate measures to mitigate the risk of fire and explosion; developed not to attract birds in order to minimise the risk of bird strike</p> <p>Operations phase - operated under the CAA Aerodrome Certificate in line with the requirements of relevant EASA regulations and CAA guidance; safety arrangements of LTN are set out within the Aerodrome Manual and Emergency Orders; Winter Operations Plan and Terminal Evacuation Orders; fuel farm will be operated under a COMAH; Public Safety Zone to minimise the number of people and properties at risk.</p>		
3.2	Are the mitigation measures included for significant adverse effects appropriate?	A	<p>Yes, set out in Section 19.8, Table 19-6 Construction and Table 19.7 Operation</p> <p>Collaboration with project designers and consultation with stakeholders will be continued to ensure this remains the case as the design of the</p>	Accepted. The MA&D assessment presented within Chapter 15 of the 2022 PEIR has been updated to take into account the updated Public Safety Zone policy and updates to the Proposed Development since the 2019 statutory consultation.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			Proposed Development is progressed. Once the revised Public Safety Zone has been established, the MA&D assessment would be updated accordingly		
3.3	Does the PEIR set out how mitigation measures are to be secured and implemented and with whom the responsibilities for their delivery lies, where possible at this stage?	A	Yes, in Section 19.8. Table 19-8 Column entitled Embedded/Good Practice Mitigation and how secured, e.g. CoCP, compliance with legislation, certified management systems, public safety zone.	Accepted.	N
3.4	Does the PEIR refer to monitoring requirements where it would be considered as being required / appropriate?	N/A		N/A	
3.5	How could the proposed mitigation measures and/or the proposed development be improved?	N/A	Section 19.9, paragraph 19.9.1, states the MA&D in the context of the Proposed Development can be reduced to ALARP levels for all identified risks. Therefore, no additional mitigation is considered to be required.	N/A	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
4	Assessment of Significant Effects				
4.1	Are the assessment methods/techniques used identified and described?	A	These are set out in Section 19.4 Methodology, Paragraphs 19.4.16 and 19.4.17	Accepted.	N
4.2	Are the methods for establishing the 'magnitude' of effects on the receiving environment clearly defined?	A	As set out in Paragraph 19.4.2 by definition all MA&D hazards have the potential to result in serious damage. Table 19-1 includes definition of "serious damage".	Accepted.	N
4.3	Are the methods for evaluating significance clearly defined/?	A	Yes, in Paragraph 19.4.30 and section 19.6	Accepted.	N
4.4	Do the assessment methods used follow relevant guidance?	A	Aligns with current developing practice as there is currently no published agreed guidance.	Accepted.	N
4.5	Have potential effects been considered both during construction and operation?	A	Paragraph 19.4.13 and 19.4.14 Design, construction and operation.	Accepted.	N
4.6	Has the magnitude, probability, duration (temporary and permanent),	A	A summary of the assessment criteria is provided in Section 19.4 Methodology, with further detail included in Appendix 19-1	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	reversibility and significance of impacts been considered?		Environmental Risk Record (Volume 3 of the PEIR). Pre-mitigation - Worse case severity of harm, duration; post mitigation – likelihood, tolerability and significance		
4.7	Are significant adverse and beneficial effects identified and described, with a justification for the 'significance' decision?	A	Beneficial effects are not relevant to MA&D Chapter. A summary of the risks assessed in the Chapter are set out in the Environmental Risk Record.	Accepted.	N
4.8	Are the residual significant effects clearly stated?	N/A	Yes, in Section 19.10 - With the implementation of the mitigation measures identified in Section 19.7, no significant risks associated with MA&D in the context of the Proposed Development have been identified.	N/A	N
4.9	Have the interaction of effects and cumulative effects been considered appropriately?	B	Yes, in Section 19.11 contains a cumulative effects assessment, including a review of cumulative schemes within the context of the MA&D assessment. This will be completed within the ES.	A cumulative effects assessment is presented within Chapter 21 of the 2022 PEIR .	N
4.10	Have uncertainties in the design, mitigation or	A	Collaboration with project designers and consultation with stakeholders will be continued to ensure this	Noted. The MA&D assessment presented within Chapter 15 of the 2022 PEIR has been	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	assessment been recognised?		remains the case as the design of the Proposed Development is progressed. Once the revised Public Safety Zone has been established, the MA&D assessment would be updated accordingly	updated to take into account the updated Public Safety Zone policy and updates to the Proposed Development since the 2019 statutory consultation.	
4.11	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	A	<p>Paragraph 19.1.3 states “<i>This chapter has been prepared in accordance with the scope</i>”.</p> <p>Paragraph 19.3.4 and Table 19-4 summarise the main MA&D Scoping Opinion comments and how addressed in the PEIR.</p> <p>Paragraph 19.4.1 The methodology builds on and develops the methodology provided in Section 20.5 of the EIA Scoping Report (Appendix 1-1, Volume 3 of this PEIR) in response to the comments received in the Inspectorate’s Scoping Opinion.</p>	Accepted.	N
5	Conclusion/Summary				
5.1	Have the conclusions been clearly reported in the PEIR?	A	Section 19.10, paragraph 19.10.1 and Section 19.13. all residual risks	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			associated with MA&D in relation to the Proposed Development are not significant.		
5.2	Is the summary of the significant environmental effects and associated mitigation measures presented in tabular format?	A	Yes, in Section 19.13, Table 19-8	Accepted.	N
6	Reporting Style				
6.1	Is the PEIR unbiased, balanced, comprehensive and transparent in its logic and presentation?	A	Yes	Accepted.	N
6.2	Is the PEIR readable to the audience for which it is intended?	A	Yes	Accepted.	N
6.3	Is the Non-Technical Summary suitably clear and free from technical jargon?	A	Yes, and set out in Section 19	Accepted.	N
6.4	Does the Non-Technical Summary presentation match the findings of the PEIR?	A	Yes, such as Section 19.2 Mitigation Measures, Section 19.3 Likely significant effects, 19.4 Completing the assessment.	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
6.5	Are the Figures generally expected to support this type of document provided either in Volume 2 or Volume 3? – Please provide further commentary if required.	B	No figure showing the extent of the study area for MA&D, as this is different from that shown in Figure 5.1	A figure showing the study area for the MA&D assessment has been included within Volume 4 of the 2022 PEIR .	N
6.6	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	A	Yes, Volume 3, Appendix 19-1 Environmental Risk Record	Accepted.	N
Conclusion					
	Baseline Information	N/A	Adequate provision. Recommend requesting a map of the locality with the boundary of the MA&D study area overlaid on it.	A figure showing the study area for the MA&D assessment has been included within Volume 4 of the 2022 PEIR .	N
	Mitigation, Enhancement and Monitoring	N/A	Full provision	Accepted.	N
	Assessment of Significant Effects Full provision	N/A	Full provision	Accepted.	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
	Conclusions	N/A	Full provision	Accepted.	N
	Presentation (including Figures and Appendices)	N/A	Clear and concise	Accepted.	N

B17 Cumulative effects checklist and summary

Note: 'Ref.' is to tables 2-35 and 2-36 of the WSP on behalf of host authorities response.

Table B17.1: Cumulative Effects

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
1	Legislation and Guidance				
1.1	Does the PEIR refer to latest relevant legislation, policy and guidance including the Airports National Policy Statement?	A	The PEIR Vol 1 Chapter 20 refers to legislation, policy and guidance which has informed the in-combination and cumulative effects assessment.	Noted.	N
2	Assessment of Significant Effects				
2.1	Are the assessment methods/techniques used identified and described?	B/C	The assessment methodology is described within Chapter 20, as well as Chapter 4 and within specific topic chapters (Chapters 5 to 19). The assessment has been undertaken using a staged process, in line with Planning Inspectorate Advice Notes 17.	The Zols of the technical assessments have been reviewed and updated within the 2022 PEIR . Further consultation has also been undertaken with the local planning authorities on the cumulative schemes list. Further information is provided within Chapter 21 of the 2022 PEIR .	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>Section 20.3.21 states that the search criterion is under discussion with LPAs and will be confirmed in the ES. This would be welcomed as some aspects of the methodology require greater clarity. For example, why a distance of 5km has been selected for developments which fall under the Transport and Works Act Order and how the distances link to the topic zones of influences (ZOI).</p> <p>In addition, further justification is required in relation to the ZOI for:</p> <p>Health and community – states that the ZOI is dependent on the spatial distribution of likely impacts identified by other disciplines. Not clear why this is not based on the study area for Health and Community identified in Chapter 14.</p> <p>Major accidents and disasters – as above, states that states that the ZOI is dependent on the spatial</p>	<p>The search criterion remains under discussion and is to be confirmed in the ES. 5km has been set for both Large Scale Major and Transport and Works Act Order based on experience from EIAs of other major infrastructure projects. It was deemed that developments of this scale beyond 5km are unlikely to lead to significant environmental effects in combination with the Proposed Development. The zone of influence (ZOI) has been defined in line with PINS AN17.</p> <p>For Health and community, the ZOI for the CEA is as per the study area for the Health and Community assessment. This is outlined in the Health and Community chapter and has been clarified further in the CEA.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			distribution of likely impacts identified by other disciplines. Not clear why this is not based on the study area identified in Chapter 19.	For the Major Accidents and Disasters topic, the ZOI for cumulative schemes has been updated to reflect the study area within the topic chapter.	
2.2	Has the scoping opinion been considered in the preparation of the PEIR as applicable at this stage?	B/C	<p>Table 20-4 sets out how comments received in the Scoping Opinion have been addressed. Many of the comments have been addressed through the PEIR or will be addressed and reflected in the ES or other DCO documents. Further clarification is required on the following comments:</p> <p>Biodiversity</p> <p>The scoping opinion stated that the ZOI for biodiversity should reflect that used in the assessment i.e. 10km and up to 30km (for statutory designated sites and for those designated for bat and bird species). Table 20-4 states that the study area for the biodiversity assessment considered a 10km radius for statutory designated sites,</p>	<p>Biodiversity</p> <p>Accepted. Clarification is provided in the 2022 PEIR. For the purposes of the cumulative assessment, and in the absence of identified effects upon more distant statutory or non-statutory designated nature conservation sites, a Zoi of 1.5km is considered appropriate as the maximum Zoi for a mobile ecological receptor, in this case barn owl, that could reasonably be considered to be impacted by the Proposed Development.</p> <p>5 year criteria</p> <p>The temporal limit of applications submitted within the last five years from the commencement of the</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>and 2km for non-designated sites from the Main Application Site. However, as no statutory designated sites or non-designated sites were identified a ZOI of 1.5km has been applied.</p> <p>This seems to contradict Section 16.8, which states the nearest statutory designated site is 3.8km away from the site and 30 non-designated are located within 2km of the site.</p> <p>If the justification for selecting a 1.5km ZOI relates to the potential for likely significant effects, this should be explained further within Chapter 20.</p> <p>5-year criteria</p> <p>The Host Authorities (including HCC) expressed a concern that the search included projects/developments submitted within the last five years as this may exclude some very large and</p>	<p>environmental assessment process in 2018 (i.e. applications submitted since 2013) was used as most consented developments typically require commencement within three to five years of receiving permission. This temporal criterion is under discussion with the LPAs and will be confirmed within the ES. Other airports in the south east and large scale developments (such as HS2) have been added and considered in the CEA. These developments have been screened out of the assessment if no cumulative effects are expected or the criteria for assessment is not met. Whether the ZOI of the other airports or large scale developments crosses the ZOI of the Proposed Development has also been considered and the airport included if this is the case.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>complex developments from consideration as part of the CEA. Justification for this approach is not provided in the PEIR, however additional work identified for completing the assessment includes confirmation with stakeholders of their satisfaction with criteria selected for the assessment for example, the 5 years. Further justification should be provided as part of this engagement.</p> <p>Allocations within Local Plans</p> <p>The Host Authorities' scoping report response stated that it was particularly important for the assessment to consider local development plans, policies and programmes. Appendix 20-1 (Long list of other developments) includes local plan allocations from host authorities, however a comprehensive assessment has not been provided within the main PEIR</p>	<p>Allocations within Local Plans</p> <p>Further allocations within local plans have been considered in the CEA at the request of stakeholders. LPAs have also been consulted on the long list and any allocations that met the criteria were added in the assessment. This remains under discussion with the LPAs and will be confirmed within the ES and further information will also be provided in the ES.</p>	

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			chapter. Further information should be provided in the ES.		
2.3	Have the interaction of effects and cumulative effects been considered appropriately?	B	<p>Preliminary in-combination assessments undertaken are set out both in Chapter 20 and topic chapters (Chapters 5 to 19). These effects will be considered further in the ES including details of significance as well as mitigation.</p> <p>Topic comments relating to the cumulative effects assessment are provided under question 4.9 of each topic section within this document.</p>	Noted. An assessment of in-combination effects is now provided within Chapter 21 of the 2022 PEIR .	N
2.4	Are the Appendices generally expected to support this type of document provided in Volume 3? – Please provide further commentary if required.	B/C	<p>Appendix 20-3 - More information should be provided on the Gantt chart, mainly:</p> <ul style="list-style-type: none"> • What the 'x' in each phase represents • Assumptions relating to each project phase and how this links to the other development, for example, would the other development be fully or partially 	<p>The 'x' in each phase have been removed from the Gantt chart to avoid confusion.</p> <p>Further information on known construction phases for other developments has been added to the narrative in the Gantt chart and is also provided within the long list (Appendix 21.1 of the 2022 PEIR).</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>constructed during Phase 2, and if so when?</p> <ul style="list-style-type: none"> • Further clarification required on assumptions which will be applied to developments which do not currently contain programme details e.g. Heathrow or Gatwick. 	<p>The clarification of the assumptions applied to those developments has been provided in the long list (Appendix 21.1 of the 2022 PEIR).</p>	
	<p>Assessment of Significant Effects</p> <p>Coverall conclusion B/C</p>		<p>The following is required:</p> <ul style="list-style-type: none"> • Clarity concerning the methodology for the cumulative and in-combination assessment. For example, justification for the ZOI which will be used for Health and community and Major accidents and disasters and how this links to the assessment study areas. • LLAL to further engage with the Host Authorities to agree methodology in terms of projects to be considered. • Further clarification is required on how comments raised in the Scoping Opinion relating to cumulative and in-combination assessment have been addressed. Primarily those which relate to 	<p>Responses to the comments raised are provided within rows above.</p>	N

Ref.	Consultee comment			Regard had to the consultee comment	Change to the scheme
	Aspect being reviewed	WSP code	Comments		
			<p>biodiversity, comprehensive assessment in relation to local plans and the 5 year criteria.</p> <ul style="list-style-type: none"> • More information should be provided on the Gantt chart presented in Appendix 20-3. For example, what the 'x' in each phase represents. In addition, information relating to the link between the project phase and the other development should be provided. 		

B18 Cole Jarman noise assessment in WSP response on behalf of Host Authorities

Note: 'Ref.' is to paragraph numbers number in Appendix A LLAL PEIR Review Noise Assessment prepared by Cole Jarman on behalf of the host authorities.

Table B18.1 Cole Jarman noise assessment

Ref	Comment	Regard had to the consultee comment	Change to the scheme
2.2	<p>Noise measurements were undertaken at the end of 2018 / beginning of 2019. The majority were outside the 92-day mid-summer period (15/June to 15/September) used for aircraft noise analysis,. They do not necessarily reflect aircraft noise during the busiest time of the year.</p> <p>Noise contour baseline data is provided for 2017, so cannot be correlated with measured data. Is there a reason why 2018 data were not used?</p> <p>It should be noted that the 48 dB $L_{Aeq,8h}$ night time noise contour limit (current planning condition 10) was exceeded in both 2017 and 2018 The daytime and night-time noise contour limit was exceeded in 2019. We therefore query whether this provides a valid description of baseline conditions against which future noise is to be compared.</p>	<p>Baseline noise monitoring was undertaken at community locations to provide context to the assessment. The baseline monitoring results are not used as part of the assessment, which relies on aircraft noise predictions.</p> <p>The baseline year has been updated to 2019 so most noise measurements now correlate with the baseline assessment year. 2019 was the last year of typical operating conditions so is considered the most appropriate year to define as the baseline. It allows future aircraft noise to be tested</p>	N

Ref	Comment	Regard had to the consultee comment	Change to the scheme
		<p>against the requirement of the Airports National Policy Statement requirement to avoid significant impacts on health and quality of life. The aircraft noise EIA <u>compares noise in a future year for 'with development' and 'without development' scenarios. The 'without development' scenario assumes the existing consented cap is retained and fleet transitions to less noisy new generation aircraft, to it is a more onerous method than comparing against the baseline.</u></p>	
2.4	<p>There are 9 schools identified for air noise assessment but no baseline noise measurements are presented for these locations. It is not clear whether measurements have been undertaken at any hospitals or other healthcare facilities.</p>	<p>Five schools in proximity of the airport were contacted to provide STEM sessions and offer to undertake baseline noise monitoring. Schools that accepted the offer of STEM sessions were undertaken were</p>	Y

Ref	Comment	Regard had to the consultee comment	Change to the scheme
		Wenlock Church of England Junior School, Slip End Lower School and Breachwood Green JMI school. Due to either project time constraints or the rejection of the offer of STEM sessions, noise monitoring was not undertaken. The exception to this was at Breachwood Green JMI school, who specifically requested baseline monitoring to be undertaken. This was carried out after the PEIR was published and will be included in the ES .	
2.7	In section 9.5 of the PEIR, it is noted that the runway modal split for baseline conditions is 21/79 (% easterly and westerly) but for future scenarios the adopted split is 30/70. We suggest the adoption of a standard modal split (as used by ERCD in annual contours for designated airports) would allow a like for like comparison.	A runway split of 30/70 has been adopted for all scenarios.	N
3.1	The Noise Envelope is the subject of consultation by the NEDG (Noise Envelope Design Group) which represents the views of the airport operators, local authorities and local interest groups. While the proposals	The NEDG will provide recommendations to the Applicant for inclusion in the Noise Envelope.	Y

Ref	Comment	Regard had to the consultee comment	Change to the scheme
	<p>are hoped to reflect all these interests it is ultimately for the airport to propose the terms of the Noise Envelope.</p> <p>The terms of the revised SIGS scheme are comparable to what has recently been adopted at other airports (London City, Stansted) in terms of daytime noise impacts, However, if night-time noise qualification levels remain as currently, they will fall far short of current UK good practice. Also, if the revised scheme is to align fully with proposals set out in emerging government policy (Aviation 2050), there is a case for the threshold for full noise insulation to be reduced from 63 dB LAeq,16h to 60 dB LAeq,16h. This may then have implications for the lower noise bands for which a maximum financial contribution to insulation is proposed.</p> <p>It should be noted that eligibility under the current sound insulation scheme is effectively determined by night-time noise levels.</p> <p>The revised scheme should include a commitment to ensure that all qualifying properties benefit from appropriate sound mitigation before they are exposed to qualifying noise levels. This should ensure that no property is exposed to a Significant Adverse Effect that is unmitigated.</p>	<p>Revisions to the noise insulation scheme have been undertaken with reference to the Aviation Strategy 2050 document, which proposes: <i>“...to extend the noise insulation policy threshold beyond the current 63dB LAeq 16hr contour to 60dB LAeq 16hr”</i>.</p> <p>There is no equivalent recommendation to alter night-time noise insulation thresholds.</p> <p>The draft noise insulation scheme goes significantly beyond this requirement by introducing a compensation threshold of 54 dB LAeq, 16h.</p> <p>The revised compensation scheme will cover all properties identified as experiencing a significant adverse effect.</p>	

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3.5	<p>Subject to addressing the night-time issue, the proposed mitigation measures strike a fair balance. Better measures could always be proposed, for example, extending eligibility out to the daytime levels set out in the Heathrow DCO, but we do not necessarily advocate that this should be the case at Luton Airport.</p>	<p>The proposed sound insulation scheme improves on what is currently offered and improves on the Planning Requirements set out in the Aviation Strategy 2050 document.</p>	Y
4.3	<p>Table 9-4 set out the receptors that are sensitive to noise. No reference is made to designated quiet areas or other open areas offering high public amenity. Can it be confirmed whether any exist within the extensive noise study area?</p> <p>Table 9-7 sets out the Adverse Effect Level for air noise. No reference is made to the effect of flyover noise levels (defined using the L_{Amax} or SEL metrics) and the risk of additional awakenings arising due to night-time operations. This contrasts with the approach taken in the Heathrow PEIR.</p> <p>The impact criteria set out in Table 9-9 should be justified by reference to supporting evidence, as the proposals lead to potentially anomalous conclusions. For example, is it really the case that a 5dB increase in air noise levels from 58 to 63 is a high impact, whereas a 9dB increase from 53 to 62 is only a medium impact? The resulting noise levels will be barely indistinguishable between the two cases, yet the much higher increase in noise is still rated as a lower impact.</p>	<p>An assessment of the effects of construction and operational noise on private and community amenity spaces will be included in the ES, under health determinant of 'Access to open space, recreation and physical activity'. This will be informed by the noise assessment. No designated quiet areas were identified in the study area.</p> <p>The PEIR identifies likely significant effects as a result of the Proposed Development, which is an appropriate level of detail for the PEIR. The level of detail aligns with that in the</p>	N

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	<p>Given the scale of noise level changes likely to be associated with this application (+3dB at most; based on passenger numbers not quite doubling - 18mppa to 32mppa, therefore aircraft numbers not quite doubling), we query whether the differentiated daytime approach is warranted.</p>	<p>Heathrow PEIR. Consideration of supplementary noise metrics, such as LASmax and risk of additional awakenings, will be covered in the ES.</p> <p>The impact criteria presented has been updated for the 2022 PEIR so it follows current industry best practice.</p>	
4.4	<p>Regarding the assessment method:</p> <p>The PEIR air noise assessment considers only the $L_{Aeq,8h}$ daytime and $L_{Aeq,8h}$ night-time noise levels for average summer mode operations. Commitments to a more detailed study as part of the ES are made in Section 9.14 but the approximate and the preliminary nature of the PEIR findings needs to be emphasised. A considerable amount of technical work needs to be done to ensure that the ES contains an accurate and comprehensive assessment of noise effects.</p>	<p>A requirement for the PEIR is to provide an assessment of the worst-case significant effects. This was undertaken in line with national policy Planning Requirements through assessment of the $L_{Aeq,16h}$ and $L_{Aeq,8h}$ noise metrics. We are committed to providing more detail in the ES by</p>	Y

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	<ul style="list-style-type: none"> • It is emphasised that noise contours are approximate only, as standard AEDT flight profiles and aircraft noise levels have been used. The contours in the PEIR are generally believed to slightly overstate the impacts in terms of area and households contained. It is important that future validation considers departure flight profiles as well as noise levels in order to best reflect the airborne aircraft noise levels around the airport. Note advice of this nature is contained within CAP1736. • Contours are presented for the baseline year 2017, interim year 2029/2030 and the year of full capacity 2039. Analysis of the interim year in terms of contour area and households affected is not included. • The ANPS requires that Heathrow provide an analysis of the highest noise level year, which is forecast to occur earlier (2035) than the year of full capacity (2050). No commentary is provided in the Luton PIER regarding the year of highest forecast noise impact. Para 9.1.4 intimates that 2029/30 might be a highest noise level year but no subsequent analysis is provided to support this. In fact inspection of the noise contours for 2039 DS and 2029 DS suggests the former covers a marginally higher area. Therefore, if it is to be taken that 2039, the year of full capacity, is also the noisiest year, the benefits of new generation, low noise aircraft may be occurring more slowly at Luton Airport than at other comparable airports. The reasons need to be identified. The question also arises whether noise levels would be expected to increase after 2039, raising the concern that benefits arising from new technology are not being shared between the airport and the community, 	<p>providing context through the use of supplementary metrics.</p> <p>A validation exercise has been undertaken, which involved analysis of flight profiles and measured noise data. Details on the validation process are presented in Appendix 16.1 of the 2022 PEIR.</p> <p>The air noise assessment in the 2019 PEIR covered a worst-case assessment, which was identified as 2039. The 2022 PEIR covers three phases of work where 21.5 mppa is forecast to be reached in 2027, 37 mppa in 2039 and 32 mppa in 2043. Results of analysis of changes in aircraft noise at receptor location for the 2027, 2039 and 2043 scenarios are presented in Appendix 16.1 of the 2022 PEIR. The highest noise level year was identified as 2043, which is also the full capacity year. The is due to the</p>	

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	<ul style="list-style-type: none"> • The assessment of future airborne aircraft noise levels does not appear to take fully into account current planning condition 10 which states that by 2028 the daytime 57dB $L_{Aeq,16h}$ contour shall not exceed 15.2km² and the night-time 48dB $L_{Aeq,8h}$ contour shall not exceed 31.6km². The 2039 DN night time 48dB contour is forecast to extend to 38.7km², suggesting that with no development taking place, the condition will be breached. That is not permissible; future DN noise levels must be compliant with planning condition 10. • The 2017 night-time 48dB $L_{Aeq,8h}$ noise contour is 38.7km² (Table 9.15, Annual Monitoring Report), with an average daily movement figure of 63.3 (Table 22). The 2039 DN night-time 48dB $L_{Aeq,8h}$ noise contour is 38.7km² (Table 9.22). with an average daily movement figure of 63.0 (Table 24). This is either indicative of the PEIR noise model significantly over estimating the noise impact, or there being no foreseen benefit arising from the take up of new generation. low noise aircraft between now and then. 	<p>majority of the fleet transitioning to new generation aircraft by 2039 so the increased noise from additional aircraft movements is not offset by less noisy aircraft. Noise predictions account for existing aircraft and do not account for next generation aircraft (i.e. SAF, electric and hydrogen powered). Consequently, it is expected that aircraft noise is likely to reduce in future although this is not captured in the assessment. The Noise Envelope will define a method for sharing benefits of quieter aircraft between the airport and communities.</p> <p>The assessment in the 2022 PEIR identifies worst-case likely significant effects as a result of the proposed expansion. This assessment accounts for the reduction in noise in future if the</p>	

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		<p>current capacity limit was retained. It should be noted that the methodology for calculating noise contours was different to that applied when calculating noise contours that were used to define existing noise limits and hence these values are not directly comparable.</p> <p>Noise modelling for the 2022 PEIR was undertaken using latest noise modelling software (AEDT, which has succeeded INM) and applies the latest methodologies as recommended by the European Civil Aviation Conference, which are not available in INM. Consequently, it is expected that noise contours will cover a larger area than those presented in LLAOLs Annual Monitoring Report.</p>	

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4.5	<p>The construction noise assessment identifies various phases of work between April 2022 and July 2023,, each requiring different activities and equipment and taking place in different areas of the airport. It suggests all works will be undertaken during the daytime only, which must be confirmed given that extensive modification to a working airport is proposed.</p> <p>The ES should include clear statement regarding the days and times at which construction activity will be permitted to take place.</p> <p>The assessment of ground noise is summarised in Appendix 9.7 and reference as made to a Cadna-A noise model used for the analysis. However, in contrast to the approach taken for construction noise, nowhere in the appendix nor in the noise chapter are the results of the modelling given for the designated receptors.</p> <p>The assessment of surface access noise is very broad brush at this stage, providing only very preliminary results and acknowledging that some key aspects of future traffic flows that may lead to significant effects have not yet been taken into account (see para. 9.8.43). The assessment covers the daytime period only.</p>	<p>Proposed construction work hours will be confirmed in the ES.</p> <p>Modelling results were omitted from the 2019 PEIR in error. Detailed results of ground noise modelling are included in the 2022 PEIR.</p> <p>The assessment covers PEIR requirements to identify worst-case significant effects. The assessment will be expanded in the ES to cover night-time traffic noise.</p>	Y
4.6	<p>Table 26 identifies that airborne aircraft noise level changes associated with the development {2039 DS vs 2039 DN) vary from receptor to receptor. This is in spite of the runway modal split end adoption of departure routes remaining entirely the same. We appreciate the number and mix of aircraft are different but can only assume that the changes are not uniform across</p>	<p>As different aircraft have a different noise footprint, variation in fleet proportions affect the shape of the noise contours. Consequently, the</p>	N

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	all departure and arrival routes. Can this be confirmed? Does it explain the noticeably higher daytime and night-time noise levels changes in the area south west of the airport in the vicinity of Slip End?	change in noise for the 2039 DS vs 2039 DN varies from approximately 1.8 to 3.2 dB.	
4.7	Para 9.8.31 identifies 1,800 people experience a Moderate Adverse effect during the daytime and 2,500 during the night-time. These numbers are stated within tables 9-21 and 9-24, respectively, but no information is given on where these people live around the airport. This follows an overall trend in the PEIR that it is difficult to follow effects on individual receptors. There is also no discussion as to whether the 2,500 people affected at night are the same as those counted during the day.	Additional details will be provided in the ES detailing the locations of properties significantly affected by changes in aircraft noise. As noise contour shapes for day and night periods do not differ, the population affected by Moderate Adverse levels of noise at during the day are included in the population affected by Moderate Adverse levels of noise at night.	N
4.12	Some scoping report response issues not addressed in the PEIR:	The baseline year has been updated to 2019, which aligns	N

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	<p>Choice of 2017 as a base year, with noise data only being acquired during 2018;</p> <p>The description of how noise effects, especially significant noise effects will be determined is confusing;</p> <p>Lack of assessment of peak noise year (maximum environmental effects).</p> <p>Table 9.3 identifies how the PEIR responds to various points made in the Scoping Opinion. At point 4.5.15 it reports that there is no formal existing Noise Envelope. Existing planning condition 10 sets limits on the daytime (57dB) and night-time (48dB) noise contours and contains provisions for those to be reduced by 2028. Alongside other planning conditions and provisions within the Section 106 Agreement, the key elements of a 'Noise Envelope' do currently exist.</p>	<p>with data used to validate the noise model.</p> <p>Text will be reviewed in the ES in order to provide additional clarity on how significant noise effects are determined. The 2039 full capacity was identified as the peak noise year in the 2019 PEIR and assessed accordingly. The 2022 PEIR identifies 2043 as the peak noise year. This is because the majority of the fleet has transitioned to new generation aircraft so there are no less noisy aircraft to offset the forecast increase in aircraft movements from 2039 to 2043.</p> <p>This is correct. The existing Planning Requirements are not considered to be a formal Noise Envelope.</p>	