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London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 6 Consultation Report

Consultation Report

6.02 Appendix M 2022 Due Regard Tables Part 2 of 4

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The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

London Luton Airport Expansion Development Consent Order 202x

6.02 CONSULTATION REPORT

APPENDIX M: 2022 DUE REGARD TABLES – PART 2 OF 4

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A8: FLEETMIX

Table A8.1: Regard had to statutory consultation responses on Fleetmix - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
FM.1.1	Experience shows that the predicted noise reduction by introduction of “next generation” quieter aircraft types is highly likely to be over optimistic. A similar argument was used in support of the previous expansion at LLA to 18mppa.		Dacorum Borough Council	1	It is not clear if this comment relates to assumptions about the performance of different types of aircraft or is a reference to possible next generation aircraft that are anticipated over the longer term. The latter have not been modelled but some sensitivity analysis of the assumed performance of new generation aircraft has been undertaken. These are set out in Chapter 5 Approach to the Assessment in the ES [TR020001/APP/5.01] . The reason why the noise reduction has not yet been achieved at 18 mppa relates to the fact that growth has been faster than expected and the rate of introduction of quieter aircraft slightly slower. This is addressed through robust sensitivity analysis and the setting of the Limit, which are discussed further in the GCG Explanatory Note [TR020001/APP/7.07] , submitted	No

Ref	Comment	PC	LA	No PILs	Response	Change
					as part of the application for development consent.	
FM.1.2	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.		Buckingham shire County Council	1	This forms part of the noise envelope/GCG approach, as set out in the GCG Framework [TR020001/APP/7.08] , submitted as part of the application for development consent.	No
FM.1.3	As far as the environmental assessment is concerned, a reference is made to assumptions that have been considered with regards to the timeline of introduction of new generation aircraft types. The assumptions seem to be in line with the targets that have been set by Jet Zero. However, the mentioned sensitivity case is not provided in order to further examine the outputs of the scenarios.		Host Authorities	4	The sensitivity test to examine the potential impact of the next generation of aircraft technologies was not presented in the PEIR but is included in the ES [TR020001/APP/5.01] .	Yes
FM.1.4	A ratio between new aircraft types and existing aircraft types is considered in both the short haul and long-haul fleet. However, it is stated that for the Faster Growth Case this ratio (50%-50%) is different to the ratio used on the Core Planning Case (60%- 40%). It would have been more reliable to use the same ratio for all cases		Host Authorities	4	The growth rate sensitivity tests (i.e. Faster and Slower Growth) have been refined and reflect the timing when projected passenger throughputs will be reached in the two cases. Given that the Faster Growth case is intended to reflect a reasonable worst case for impacts such as noise, the assumption of a slower rate of	No

Ref	Comment	PC	LA	No PILs	Response	Change
	in order for the results to be comparable.				fleet transition remains appropriate.	
FM.1.5	Within the same section of the study, it would be preferable to add the same horizons between the Core Planning and the Faster Growth case. Therefore, Table 7.11 could have mentioned years 2027, 2039 and 2043 (even though the passenger traffic is different as stated) to achieve a complete comparison between the aforementioned years.		Host Authorities	4	This approach has now been adopted in the application for development consent submission documents.	Yes
FM.1.6	It is stated that the existing runway can accommodate Code E aircraft, as LTN is classified as Aerodrome 4E. However, it should be explained if any operational procedures are required or if there are any further limitations to Code E aircraft operations, such as airspace sequencing/separation or limits to the Maximum Take-off Weight (MTOW).		Host Authorities	4	This is fully taken into account in the simulation modelling. Further explanation is included in the Need Case [TR020001/APP/7.04] .	Yes
FM.1.7	Furthermore, it is still not properly explained how LTN can attract long haul operations and how larger Code E aircraft can operate at the airport (see comment 4.5.5). The runway and the apron can accommodate Code E aircraft		Host Authorities	4	Further explanation relating to the market for long haul services is included in the Need Case [TR020001/APP/7.04] .	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	as explained in the current report, but it is not explained if any further operational procedures may need to be applied, as it was commented in 2019, for LTN to offer destinations to USA and Middle East in the long term.					
FM.1.8	Regarding the apron and the aircraft stands, a detailed stand demand forecast has now been provided, examining the annual aircraft fleet mix throughout the Core Planning Case (incl. Without Development Case) and the Faster Growth Case. However, the proposed airfield layout is still not properly described, and it could have been analysed further to provide a clearer picture.		Host Authorities	4	Further explanation is provided in the Need Case [TR020001/APP/7.04] , which should be read in conjunction with the other documentation describing the scheme and the works.	Yes
FM.1.9	It should also be noted, though, that the ONC presented Code E aircraft operations at LTN in 2019, but their purpose was not described. Even though WSP commented that their purpose should be further examined, the Draft Need Case doesn't include any reference to Code E aircraft operations for 2019.		Host Authorities	4	The ONC reported the actual fleet mix in 2017, including a small number of Code E operations. This pattern continued in 2019 and the Code E movements were principally by EI Al and the cargo airlines, with some Code E operations connected with maintenance activities in the TUI hangar.	No
FM.1.10	It is noted that the aircraft fleet is becoming quieter.		Huntingdon shire District Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
FM.1.11	It is already documented that the delivery of new, quieter aircraft has not been as rapid as the airport operator had previously anticipated, and LLAL has no control over the rate of manufacture of the new aircraft or indeed the overall fleet mix. Whilst assumptions have to be made for modelling purposes, Officers are concerned that those made in relation to fleet mix and noise are over optimistic.		St Albans City and District Council		This comment is incorrect. The fleet transition was following the expected timeframe pre-Covid but demand grew more quickly than anticipated. Future uncertainties are addressed through sensitivity tests and are reflected in how the Limit is set.	No
FM.1.12	In the event that the Local Planning Authority (Luton Borough Council) is satisfied as to the need for expansion, then it will need to be fully satisfied that the projected quantum and delivery times for quieter aircraft are realistic and achievable, especially given the delays that have previously occurred and the lack of certainty around the noise performance of some new aircraft.		St Albans City and District Council		The fleet transition was following the expected timeframe pre-Covid but demand grew more quickly than anticipated. Future uncertainties are addressed through sensitivity tests and are reflected in how the Limit is set.	No
FM.1.13	The airport cannot control the modernisation of fleets	Kings Walden Parish Council		1	Reasonable assumptions have been made about the rate of modernisation. Please refer to response to Ref FM.1.11.	No
FM.1.14	Kerosene planes are bad for the environment. No one has yet come up with a greener	Kings Walden		1	This is being addressed at a national level by Government through the Jet Zero strategy.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	alternative that is commercially viable.	Parish Council				
FM.1.15	Airport expansion would have a significant detrimental effect on the environment. Airlines choose their own fleet and even the newer, more fuel-efficient planes have been found to be just as noisy as older versions.	Kings Walden Parish Council		1	This is not correct. There have been some issues in terms of some engine variants on the A321NEO producing more noise than anticipated but it is still quieter than the aircraft that it replaces. Please refer to response to Ref FM.1.11.	No
FM.1.16	On what basis is it assumed the A321 Neo air noise performance would be improved by 2039? As a reasonable worst case assessment we believe this should not be assumed.		Buckingham shire County Council	1	Further sensitivity testing has been undertaken, details of which are included in the ES [TR020001/APP/5.01] .	No
FM.1.17	The airport states that the future use of newer generation aircraft, together with more efficient and electric road vehicles will reduce emissions in the future. The applicants air quality assessment, like the noise assessment, therefore places significant reliance and these assumptions. However, as with the noise forecasting mentioned above, the airport authority is not in a position to guarantee that the uptake of the newer generation aircraft and/or the use of more electric vehicles generally will be		St Albans City and District Council		<p>The assumptions regarding newer generation aircraft underpinning the application for development consent represent a reasonable worst case scenario, with the Limit further ensuring that the impact of expansion is controlled in line with the assumptions assessed in the ES [TR020001/APP/5.01].</p> <p>Encouraging electric vehicles is part of the Applicant's approach to encouraging sustainable travel to/from the airport. However electric vehicles are not included,</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	achieved as forecasted. The air quality/pollution forecasting for the proposal therefore suffers from the same potential inaccuracies as the noise forecast/modelling.				and are in addition to the sustainable mode share targets the Applicant has set. The air quality assessment (as contained in Chapter 7 Air Quality of the ES [TR020001/APP/7.01]) is therefore not optimistic in this respect.	
FM.1.18	A basic premise supporting the expansion proposals is that in the future newer aircraft together with more efficient and electric road vehicles will reduce future emissions. The air quality assessment places great stock on these assumptions. As noted above, however, LLA is not in a position to mandate the uptake and timing of those matters and cannot therefore guarantee that the uptake will be as forecasted. Air quality forecasting therefore suffers from the same potential inaccuracies as for the noise forecasts and modelling. The increase in the volume of traffic is likely to result in further detriment to the locality around LLA.		Dacorum Borough Council	1	Please refer to response to Ref FM.1.11.	No

Table A8.2: Regard had to statutory consultation responses on Fleetmix - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
FM.2.1	Concern that aircraft modernisation only benefits the aviation industry. Some respondents cite that the community derives no benefit from modernised/fuel-efficient aircraft because at Luton they are no less noisy due to short runway length.	3	The comment is incorrect as new generation aircraft are quieter than those they replace and so deliver benefits to the community by reducing the impact of aircraft noise. There is some variation in the degree of noise reduction attained dependent on the engine type used on particular aircraft but this applies at all airports and is not related to the length of runway at London Luton Airport. The noise assessment takes into account the actual noise performance of these aircraft types at London Luton Airport.	No
FM.2.2	Concern that a fuel-efficient fleet mix and/or use of Sustainable Aviation Fuel and new technologies will not help achieve carbon neutrality/net zero targets, with some respondents citing that a more efficient fleet mix will not reduce emissions if there are more flights.	2	The Government is addressing decarbonisation of flying as a national issue. The application for development is consistent with the approach to aviation carbon in the Government's Jet Zero policy.	No
FM.2.3	Concern that the transition to a quieter/fuel-efficient fleet will not occur fast enough and/or the technology does not yet exist. Some respondents felt that the new technology would be ineffective.	14	<p>There has been some slowdown in the delivery of new aircraft during the pandemic but the main airlines using London Luton Airport have secured delivery slots and these have been fully taken into account in the fleet mix projections.</p> <p>The fleet mix projections being used for the EIA do not rely on next generation aircraft using new technology delivering noise benefits, but such technologies are part of the Government's strategy for delivering its net zero carbon target for aviation and this has been assessed.</p>	No

Ref	Comment	No. PILs	Response	Change
FM.2.4	Concern that the Applicant has no control over the transition to a quieter/fuel-efficient fleet mix and/or no measures are being taken to ensure the uptake of quieter/fuel-efficient fleet mix. With some respondents citing that airlines will resist this transition due to economic reasons.	5	The airlines are transitioning to a newer fleet in order to realise savings in operating cost, principally through fuel efficiency. This transition is planned through their fleet acquisition programmes, which have recently been reconfirmed by airline press statements. Fleet transition is further incentivised through the GCG approach, as set out in the GCG Explanatory Note [TR020001/APP/7.07] , submitted as part of the application for development consent. Expansion of the airport will not be able to proceed on the basis the Limit is being exceeded.	No
FM.2.5	Suggest there should be a transition to new, quieter and more sustainable aircraft. With some respondents suggesting electric planes should be used; and/or all aircraft should meet the latest standards for noise and emissions.	3	The transition to new generation aircraft is accounted for in the Proposed Development but this does not rely on electric or other new technologies that are not yet proven (known as “next generation” aircraft). Sensitivity analysis has also been undertaken to consider what further improvement could be achieved through Sustainable Aviation Fuels (SAF) and/or zero emission aircraft might bring.	No
FM.2.6	Suggest that expansion should not take place until new and/or fuel-efficient aircraft technology is available.	1	More fuel efficient new generation aircraft are replacing older aircraft and this transition is expected to be largely complete by the time the main expansion of the Proposed Development is complete in the mid-2030s.	No
FM.2.7	General suggestion that green technology should be used. With some respondents suggesting new propulsion systems (such as hydrogen and electric propulsion) for planes.	2	As little is known about the environmental performance of these aircraft at present, the environmental assessments have proceeded on the basis of known technologies including new generation aircraft. The Applicant is committed to facilitating the transition to new green technologies, including ‘next	No

Ref	Comment	No. PILs	Response	Change
			generation' aircraft, as they develop and sensitivity testing has been undertaken of the potential beneficial effects.	
FM.2.8	Concern that fleet mix is currently and will continue to comprise of noisier, older, larger and/or fuel inefficient aircrafts. With some respondents specifically citing concern that the A321 Neo aircraft is louder than its predecessor.	5	The expected fleet transition is set out in the Need Case [TR020001/APP/7.04] . It is expected that the vast majority of aircraft will be new generation by the time that the main development is undertaken in the mid-2030s. Some variants of the A321Neo are slightly noisier than expected, but not than older generation aircraft. This is taken into account in the noise assessments, which are discussed further in Chapter 16 Noise of the ES [TR020001/APP/5.01] .	No
FM.2.9	Concern that the assumptions about the rate of fleet modernisation and/or replacement are inaccurate.	1	The assumptions about the rate of fleet modernisation are based on detailed consideration of the airline aircraft orders. The assumptions are considered robust.	No
FM.2.10	The Preliminary Environmental Information Report (page 5) talks about "encouraging the operator to update the fleet of ground support equipment that operates on the airport aprons to a low or zero-emission fleet, such as a fleet of electric powered vehicles." I believe a clear target for transitioning to a zero-emission fleet should be set with a break clause in the contract with the operator if they fail to meet it. I appreciate such a change will not happen overnight but a target of 2030, for example, does not seem overly stretching given the growth of electric powered vehicles.	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
FM.2.11	Suggest that rather than increasing number of flights, steps be taken to ensure full capacity on existing flights.	1	The existing flights at London Luton Airport (pre-pandemic) already operate with very high load factors. These are expected to be over 90% on average in busy periods. It is not possible to sustain average load factors materially higher than this as, whilst an outbound flight may be full such as at the start of the holidays, a return flight may necessarily operate with a lower load factor. In the peak period, it is already assumed that load factors will be high but they will tend to be lower in off-peak periods.	No
FM.2.12	Luton Rising's current thinking on noise contours needs to be achievable and in line with manufacturer delivery projections of next gen aircraft.	1	Noted.	No
FM.2.13	LLAOL has worked for many years and will continue to work with its airline customers, to encourage fleet modernisation and use of the quietest types of aircraft practicable for the LLA operation. LLAOL is fully supportive of the needs for measures which assist in the management and mitigation of noise impacts associated with airport operations.	1	Noted.	No
FM.2.14	DHL is committed to investing in the most efficient and quietest aircraft on the market. In addition to the cargo fleet forecast set out in the consultation we expect to be operating the A330-300 model as well as A321 freighters in the future across our global fleet. As part of our fleet renewal programme, DHL has invested in 22 new B777 freighters in recent years, the most efficient and quietest wide-bodied freighter on	1	Options to reconfigure the cargo apron to allow such aircraft have been considered and the new apron proposed as part of the Proposed Development would allow such aircraft to operate.	Yes

Ref	Comment	No. PILs	Response	Change
	the market. While we recognise the runway limitations at LTN, the current stand configuration would not accommodate an A330-300 or a B777F.			

Table A8.3: Regard had to statutory consultation responses on Fleetmix - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
FM.3.1	Concern that aircraft modernisation only benefits the aviation industry. Some respondents cite that the community derives no benefit from modernised/fuel-efficient aircraft because at Luton they are no less noisy due to short runway length.	20	Please refer to response to Ref FM.2.1.	No
FM.3.2	Concern that a fuel-efficient fleet mix and/or use of Sustainable Aviation Fuel and new technologies will not help achieve carbon neutrality/net zero targets, with some respondents citing that a more efficient fleet mix will not reduce emissions if there are more flights.	15	Please refer to the response to Ref FM.2.2.	No
FM.3.3	Concern that global conflict is affecting the supply of aircraft.	1	Please refer to response to Ref FM.2.3. Experience would suggest that the impact of conflicts, such as in Ukraine, tend to have a short term impact on aviation industry and associated demand.	No
FM.3.4	Concern that the transition to a quieter/fuel-efficient fleet will not occur fast enough and/or the technology does not yet exist. Some respondents felt that the new technology would be ineffective.	210	Please refer to response to Ref FM.2.3.	No
FM.3.5	Concern that the Applicant has no control over the transition to a quieter/fuel-efficient fleet mix and/or no measures are being taken to ensure the uptake of quieter/fuel-efficient fleet mix. With some respondents citing that airlines will resist this transition due to economic reasons.	64	Please refer to response to Ref FM.2.4.	No

Ref	Comment	No. CC	Response	Change
FM.3.6	Support the transition to a fuel-efficient fleet. With some respondents citing that a fuel-efficient fleet will reduce noise and emissions.	10	Noted.	No
FM.3.7	Suggest there should be a transition to new, quieter and more sustainable aircraft. With some respondents suggesting electric planes should be used; and/or all aircraft should meet the latest standards for noise and emissions.	90	Please refer to the response to Ref FM.2.5.	No
FM.3.8	Suggest the use of Sustainable Aviation Fuel. With some respondents suggesting the use of hydrogen and biofuels.	33	The development will allow for the use of SAF, which can be blended with existing aviation fuel. The requirements for hydrogen and biofuels are not yet known but the aim is to ensure that the Proposed Development has flexibility to accommodate these requirements when known. Sensitivity analysis has also been undertaken to consider what further improvement could be achieved through Sustainable Aviation Fuels (SAF) and/or zero emission aircraft might bring.	No
FM.3.9	Suggest that expansion should not take place until new and/or fuel-efficient aircraft technology is available.	16	Please refer to response to Ref. FM.2.6.	No
FM.3.10	General suggestion that green technology should be used. With some respondents suggesting new propulsion systems (such as hydrogen and electric propulsion) for planes.	11	Please refer to the response to Ref FM.2.7.	No
FM.3.11	Suggest methods of encouraging airlines to transition to newer, quieter, fuel-efficient aircraft. With some respondents suggesting: the use of differential charges for older and newer aircraft; high charges for the use of private jets; incentivising airlines that use	6	Please refer to response to Ref. FM.2.4.	No

Ref	Comment	No. CC	Response	Change
	fuel-efficient aircraft; and/or specifying environmental requirements for aircraft.			
FM.3.12	Query how the Applicant will support the R&D sector in creating sustainable aircraft.	1	<p>The layout of the Proposed Development 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. The new fuel storage facility will be capable of handling Sustainable Aviation Fuel (SAF). The use of hydrogen as aviation fuel for aircraft is currently in early developmental stages. However, the outline infrastructure design does not preclude its use in the future.</p> <p>Outside of the commitments made as part of the Proposed Development, the Applicant retains a keen interest in progressing sustainability within the aviation sector and will continue to engage with, and work with, others on measures which advance the journey to zero carbon aviation.</p>	No
FM.3.13	Concern that fleet mix is currently and will continue to comprise of noisier, older, larger and/or fuel inefficient aircrafts. With some respondents specifically citing concern that the A321 Neo aircraft is louder than its predecessor.	120	Please refer to response to Ref FM.2.8.	No
FM.3.14	Concern that there is a lack of commitment and/or financial investment in new sustainable aircraft technology. Some respondents cited concern	38	The airlines are incentivised to switch to new generation aircraft to reduce fuel burn and costs. Airlines also replace their fleets as they age due	No

Ref	Comment	No. CC	Response	Change
	that there is no incentive for airlines to use quieter/fuel efficient aircraft.		to increasing maintenance costs for older aircraft. Low cost carriers, that account for the majority of movements at London Luton Airport, typically replace aircraft in their fleets before they reach 14 years old. The projections of the rate of transition to newer generation aircraft are based on analysis of the airlines' aircraft orders and the age of the aircraft in the existing fleet to determine the expected replacement programme.	
FM.3.15	Suggest that rather than increasing number of flights, steps be taken to ensure full capacity on existing flights.	2	Please refer to response to Ref FM.2.11.	No

A9: AIR QUALITY

Table A9.1: Regard had to statutory consultation responses on Air Quality comments - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
Air Quality Impact						
AQ.1.1	In summary, DBC considers that the expansion proposals cannot be achieved without significant impacts from [air] pollution, nor are there measures proposed that will provide suitable control over them, as required by both national and local policy.		Dacorum Borough Council	1	<p>Air quality impacts from all related sources (road vehicles, aircraft and airport sources) have been assessed following best practices in Chapter 7 Air Quality of the ES [TR020001/APP/5.01], which is submitted as part of this application for development consent. The assessment found no significant impacts.</p> <p>The Outline Operational Air Quality Plan in Appendix 7.5 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent, sets out the proposed mitigation for the Proposed Development in order to reduce air quality impacts (whether they are significant or not).</p> <p>The Green Controlled Growth (GCG) document [TR020001/APP/7.08], which is submitted as part of this application for development consent, sets out the mechanism for monitoring air quality (NO₂, PM₁₀ and PM_{2.5}) and the impacts</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>from the Proposed Development, with actions to be taken should thresholds be exceeded.</p> <p>Air quality monitoring data has been used to verify the modelling undertaken as part of the assessment in Chapter 7 of the ES following best practice.</p>	
AQ.1.2	<p>The operation of the proposed development is likely to cause an increase in air pollution through increased road and air traffic over and through the Chilterns Area of Outstanding Natural Beauty (AONB).</p>	<p>Natural England</p>			<p>Air quality impacts from all related sources (road vehicles, aircraft and airport sources) have been assessed following best practices in Chapter 7 Air Quality of the ES [TR020001/APP/5.01], which is submitted as part of this application for development consent. The assessment found no significant impacts, including at the Chilterns AONB.</p> <p>The study area is defined as 200m from the Affected Road Network (ARN). The criteria for determining the ARN is provided in the ES, following Institute for Air Quality Management (IAQM) guidance.</p> <p>It concludes that air quality impacts from increased emissions from road traffic to ecological receptors would be moderate; therefore in addition to the mitigations set out in the Outline Operational Air Quality Plan (submitted in Appendix 7.5</p>	<p>No</p>

Ref	Comment	PC	LA	No PILs	Response	Change
					of the ES [TR020001/APP/5.02]), further mitigation measures for the management of woodland are proposed within the Outline Landscape and Biodiversity Management Plan (LBMP) in Appendix 8.2 of the ES [TR020001/APP/5.02].	
AQ.1.3	In terms of air quality impacts from flights, the Council does not have the in-house expertise to fully assess or make comment on the information provided. However, the Council will not support any proposals that will adversely impact the air quality of Stevenage and expects Luton Rising to promote cleaner aircraft and methods to reduce emissions.		Stevenage Borough Council	1	Please refer to the response to Ref AQ.1.1.	No
AQ.1.4	Residents complain about the smell of aviation fuel, and the air quality in the areas surrounding the airport. This will only worsen with expansion.	Kings Walden Parish Council		1	The jettisoning of fuel from aircraft is only undertaken in emergency scenarios, when an aircraft is required to undertake an emergency landing. Jettisoning of fuel will usually occur over water and at high altitude in order to vaporise the fuel and facilitate dispersion. Due to the infrequency of these events, it is considered that there is no potential	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>significant effect from these activities. In the Scoping Opinion and Scoping Report [TR020001/APP/5.05], the Planning Inspectorate considers that significant effects from increased flight movements are not anticipated in relation to jettisoning of fuel from aircraft and as such it was scoped out from further assessments.</p> <p>The full extent of air quality monitoring is provided in Chapter 7 Air Quality of the ES [TR020001/APP/5.01] and includes monitoring of volatile organic compounds, which are relevant to fugitive emissions of fuel. The monitoring results found no exceedances of environmental limits.</p> <p>Odour impacts from all related sources have been assessed following best practices in Chapter 7 Air Quality of the ES and found no significant impacts.</p>	
AQ.1.5	Overflying aircraft emit carbon dioxide, water vapour, nitrogen oxides or carbon monoxide, which bonds with oxygen to become CO2 upon its release. In addition, the production of	Chilterns Conservation Board			<p>Air quality impacts have been assessed at designated and non-designated ecological sites, following best practices in Chapter 7 Air Quality of the ES [TR020001/APP/5.01].</p> <p>The Habitat Regulation Assessment in Appendix 8.3 of the ES</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	atmospheric particulates such as hydrocarbons, sulphur oxides and black carbon which interact with the atmosphere. Taking nitrogen oxides alone, we know that air pollution on natural habitats is a matter of great concern, and the Chilterns is no exception.				[TR020001/APP/5.02], which is submitted as part of this application for development consent, includes consideration of potential pathways between the Proposed Development and the relevant sites within the National Site Network (previously known as Natura 2000 sites). The Habitat Regulation Assessment concludes that there is no impact pathway on the qualifying features of the designated sites identified within the screening exercise. The study area is defined as 200m from the Affected Road Network (ARN) and within 5km and 2km of the Main Application Site for designated and non-designated ecological sites, respectively. The criteria for determining the ARN is provided in the ES, following IAQM guidance. Beechwoods SAC, Aston Rowant SAC and Chilterns AONB were all included within the study area and are predicted not to experience adverse impacts as a result of the Proposed Development.	
AQ.1.6	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	Chilterns Conservation Board			It concludes that air quality impacts from increased emissions from road traffic to ecological receptors would be moderate; therefore in addition to the mitigations set out in the Outline Operational Air Quality Plan (submitted in Appendix 7.5 of the ES [TR020001/APP/5.02]), further	No

Ref	Comment	PC	LA	No PILs	Response	Change
	have an effect on air quality, noise and habitats. Air pollution and effects on sensitive habitats and protected sites of national and international importance must be carefully addressed through Environmental Impact Assessment and Habitat Regulations Assessment.				mitigation measures for the management of woodland are proposed within the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02] .	
AQ.1.7	All three of the Special Areas of 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.	Chilterns Conservation Board				No
AQ.1.8	Air Quality monitoring in the previous consultation appears to focus on Air Quality Management Areas (monitoring cars in already polluted urban areas) and lacked any consideration of effects of air pollution on natural habitats. For example, if you take Ivinghoe	Chilterns Conservation Board			Please refer to the response to Ref AQ.1.5. The full extent of air quality monitoring is provided in Chapter 7 Air Quality of the ES [TR020001/APP/5.01] , including locations outside of Air Quality Management Areas (AQMAs). Monitoring data has been used to verify the modelling undertaken as part of the assessment in the ES.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Beacon near Tring, this is already overflowed by aircraft upon descent into Luton. Increased air traffic movements will increase emissions. Increased vehicular movements on the motorway network will also impact on the SAC/SSSI habitats of the Chilterns.					
Air Quality and Health						
AQ.1.9	We remain concerned as to the health impacts of increased exposure of urban populations around the airport to increasing particulate matter and harmful levels of other pollutants. In our view, the modelling may not capture all effects that occur in the future, especially from particulate pollution. A detailed monitoring programme as part of the GCG or separately should be put in place to consider health impacts		Host Authorities	4	<p>Health impacts from air emissions have been assessed by modelling every human receptor location within 200m of the ARN, following best practices detailed in Chapter 7 Air Quality of the ES [TR020001/APP/5.01]. The assessment uses current UK Government targets, as required through legislation, to determine significance. The assessment found no significant impacts.</p> <p>Committee on the Medical Effects of Air Pollutants (COMEAP) methodology was used to calculate the health impacts to understand outcomes provided in Chapter 13 Health and Community of the ES [TR020001/APP/5.01], including impacts as a result of particulate matter.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>before development and at each phase, with funding to address measures to address any impacts beyond those presently forecast.</p>				<p>It concludes that both the size of the population exposed to changes in air quality, and the magnitude of change in pollutant concentrations, is likely to be small and well below the level at which effects on respiratory health could be accurately quantified. Therefore, while individuals at affected properties may experience a change in air quality, there would be no detectable impact on respiratory health in the population.</p> <p>Monitoring is carried out across the Luton area by the Applicant, LLAOL (the operator of the airport) and LBC. Discussions to align the monitoring equipment type and management procedures have been held with the long term aim of hosting all results on a single platform available to the public. Additional commitments for on-going air quality monitoring include:.</p> <ul style="list-style-type: none"> a. Commit to construction monitoring as detailed in the Code of Construction Practice (CoCP), Appendix 4.2 of the ES [TR020001/APP/5.02] b. Commit to continue air quality monitoring beyond 2043 and undertake annual air quality monitoring results to be available to the public and the local authority. 	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>The GCG Explanatory Note [TR020001/APP/7.07], sets out the mechanism for monitoring air quality. Appendix D details the monitoring approach which includes the provision of NO₂, PM₁₀ and PM_{2.5} particulate matter monitoring at 15 locations with results reported annually.</p>	
AQ.1.10	<p>The World Health Organisation recommends much more stringent limit values for some key pollutants than those required by law. Growing interest in the health damage from particulate matter in particular suggests that it may be time to look again at the assumption that aircraft emissions at higher altitudes can be disregarded when assessing aviation’s air quality impact. In terms of population exposure, the EU Environment Agency has identified that significant proportions of EU urban populations are exposed to harmful levels of air</p>		North Hertfordshire District Council	1	<p>Please refer to the response to Ref AQ.1.1.</p> <p>The World Health Organisation (WHO) targets are appropriately considered in Chapter 7 Air Quality of the ES [TR020001/APP/5.01]. The assessment uses current UK Government targets, as required through legislation, to determine significance. The assessment found no significant impacts.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	pollutants in relation to WHO guidelines.					
AQ.1.11	The assessment within the PEIR concludes that for Central Bedfordshire any impacts on human health resulting from air quality impacts will be negligible/insignificant. However, the Council reserves judgement and the right to consider this issue further through continued technical meetings and the completion of the Environmental Statement when full assessments and details are available for more in-depth scrutiny		Central Bedfordshire Council	1	Noted.	No
AQ.1.12	[Concerning findings within PIER relating to air quality impacts not being significant] Evidence suggests that health effects can still occur below limit values for air pollutants under regulation. Our position is that pollutants associated with road traffic or	United Kingdom Health Security Agency			Please refer to the response to Ref AQ.1.9.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	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.					
AQ.1.13	<p>Further assessment will be required to assess:</p> <ul style="list-style-type: none"> - 1. Dust and particulate matter (PM10, PM2.5) emissions arising from demolition, earthwork and construction; and - 2. Increased emissions from vehicle journeys as a result of construction activity. <p>- The effects from activities described above could have a detrimental effect on the SRN, posing a potential</p>	National Highways			<p>Please refer to the response to Ref AQ.1.1 and AQ.1.10.</p> <p>A Dust Management Plan is set out in the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02], this follows best practice guidance from the IAQM. The CoCP requires that air quality monitoring be undertaken and compliance with this document will be secured through the Development Consent Order should consent be granted.</p> <p>Construction traffic has been included in all scenarios considered within the air quality assessment as detailed in</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>risk to drivers, from both the northbound off-slip widening and proposed construction of the site compound / storage works. These activities are likely to have significant air quality effects on this area in relation to meeting EIA requirements and/or affect the developers' ability to comply with the Air Quality Directive. Although the impact may be temporary there may be a cause to put in place local air quality monitoring and temporary air quality mitigation measures (dust suppressant, screening etc.) if deemed as a high-risk site and to follow Institute for Air Quality Management (IAQM) guidance for good practice.</p> <p>- Table 7.2 of the PEIR needs to be updated, as the latest World Health Organization (WHO)</p>				<p>Chapter 7 Air Quality of the ES [TR020001/APP/5.01]. The construction traffic has been assessed in combination with operational traffic, as the three assessment phases have both construction and operational traffic occurring. The assessment concludes that with the proposed embedded/good practice mitigation, the air quality impacts from construction traffic would be negligible.</p> <p>The WHO Global Air Quality guidelines are not currently part of UK legislation, so the thresholds used to assess against for schemes remain the same. Until these thresholds are changed, which may or may not reflect the WHO Guidelines, the assessment is undertaken in accordance with current legislation. In order to determine the significance of air quality impacts the methodology detailed in the Air Quality Methodology in Appendix 7.1 of the ES [T020001/APP/5.02] has been used. However, the mitigation provided in the Outline Operational Air Quality Plan Appendix 7.5 of the ES [T020001/APP/5.02], looks to reduce impacts, even at locations where the current legislated standards are not predicted to be exceeded. The GCG Framework [TR020001/APP/7.08] also</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	guidelines were released in September 2021 and cut existing annual PM2.5 guideline values from 10 µg/m ³ to 5 µg/m ³ and PM10 guideline values from 20 µg/m ³ to 15 µg/m ³ . This may change the predictions already stated in the PEIR from negligible to significant.				provides an enforceable and ambitious mechanism for controlling air quality and the mechanism for reviewing the Limit if legal limits change.	
Assessment Methodology						
AQ.1.14	PEIR2 chapter 7 acknowledges the existence of AQMAs in Hitchin, but provides no detail on the modelled impacts of additional traffic generated by the airport expansion. NHC asks LR to: Provide detailed analysis of forecast impacts on air quality in Hitchin, including the two AQMAs.		North Hertfordshire District Council	1	The air quality assessment included dispersion modelling of road traffic emissions in the AQMAs in Hitchin and results are presented in Chapter 7 of the ES [TR020001/APP/5.01] , which found no significant impacts.	No
AQ.1.15	PEIR2 chapter 7 does not cover ultrafine particles (UFPs).		North Hertfordshire District Council	1	Please refer to the response to Ref AQ.1.1.	No

Ref	Comment	PC	LA	No PILs	Response	Change
AQ.1.16	The Air Quality Expert Group (Defra) produced a paper on UFPs in 2018 with a summary provided including current modelling for UFPs is inadequate, UFPs are not addressed in UK or EU Air Quality Regulation, UFPs penetrate deep into respiratory system. The European Airport Regions Conference in 2017 concluded that, “Supporting the reduction of Ultrafine particles (UFPs) to the minimum is crucial to preserve a comfortable and healthy lifestyle for residents living in airport regions.”		North Hertfordshire District Council	1	There is no established modelling methodology for ultrafine particles (UFPs) and there is limited data on the health impacts due to the lack of long term exposure studies. There is also no legislated standard for UFPs. However, PM2.5 is considered to be a good indicator of general risk associated with exposure to particulate matter, which has been quantitatively assessed and results provided in Chapter 7 of the ES [TR020001/APP/5.01] , which found no significant impact.	No
AQ.1.17	Natural England’s key concerns regarding the expansion of London Luton Airport are: 1. The potential impacts to designated sites from air pollution within 15 x 15km grid area used in air quality modelling.	Natural England			Please refer to the response to Ref AQ.1.5.	No

Ref	Comment	PC	LA	No PILs	Response	Change
AQ.1.18	<p>As stated in our previous response, 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. Airports may have air pollution impacts at a greater distance than 5km through effects on the road network, and this needs to be taken into account.</p> <p>We note the ecological receptors that were considered sensitive to air pollutants are outlined in Table 2.2. of PEIR Volume 3: Appendix 7.1 Air Quality Methodology, which are "Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) Ancient Woodland (AW) and Veteran Trees</p>	Natural England			Please refer to the response to Ref AQ.1.5.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>within 200m of the ARN.” We also note that the changes in nitrogen deposition and NOx at Galley and Warden Hills SSSI, Dallow Downs and Winsdon Hill SSSI and Smithcombe, Sharpenhoe and Sundon Hills SSSI were all less than 1% of the lower critical load for each site. However, there are designated sites located within 15km x 15km grid area that were not included in the air quality modelling. Therefore, further information should be provided on the rationale as to why these sites have been screened out.</p>					
AQ.1.19	<p>As outlined by the Chilterns Conservation Board in Table 8.5 of PEIR Volume 2: Chapter 8 Biodiversity, “the Chilterns Beechwoods Special Area of Conservation (SAC) is in close proximity to</p>	Natural England			Please refer to the response to Ref AQ.1.5.	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”, and the interest features of the SAC are sensitive to Nitrogen. However, we note that Volume 3: Appendix 8.3 HRA NSER concludes that “given the separation distance between the Proposed Development and this site and the fact the site does not lie on the ARN for the Proposed Development, no pathways for effect have been identified.”</p> <p>Therefore, further information should be provided on the determination of the ARN.</p>					
AQ.1.20	<p>For Central Bedfordshire, the air quality impact undertaken as part of the PEIR, on initial review, does not appear to be as great as for other authorities given the</p>	<p>Central Bedfordshire Council</p>		<p>1</p>	<p>The study area is defined as 200m from the ARN and within 5km and 2km of the Main Application Site for designated and non-designated ecological sites, respectively.</p>	<p>No</p>

Ref	Comment	PC	LA	No PILs	Response	Change
	nature of the transport system and the proximity and position of the airport.				The criteria for determining the ARN is provided in Chapter 7 Air Quality of the ES [TR020001/APP/5.01] . Following IAQM guidance. Receptors have been assessed in Dunstable within 200m of the ARN which includes receptors in the South Bedfordshire AQMA. Appropriate consideration of the Central Bedfordshire area has been given and no significant impacts were found.	
AQ.1.21	The Council is concerned that an increase in passenger numbers and flights will inevitably increase the amount of air pollution over Stevenage. The Council has reviewed the air quality consultation material and is pleased to see consideration is being given to air pollution created by traffic, the construction phase and future onsite operations.	Stevenage Borough Council			Please refer to the response to Ref AQ.1.20. Appropriate consideration of the Stevenage area has been given and Stevenage is not considered to be significantly impacted.	No
AQ.1.22	We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in	United Kingdom Health Security Agency		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	exposure), maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.					
AQ.1.23	We therefore recommend that the applicant seeks to ensure compliance with, and go beyond, the appropriate air quality objectives and limits values.	United Kingdom Health Security Agency		1	The assessment of compliance uses current UK Government targets, as required through legislation, to determine significance. The assessment found no significant impacts and is not predicted to impact compliance (Chapter 7 Air Quality in the ES [TR020001/APP/5.01]). The Outline Operational Air Quality Plan (Appendix 7.5 of the ES [TR020001/APP/5.01]) proposes mitigation in order to reduce air quality impacts (although impacts are predicted to be insignificant) and the GCG Framework [TR020001/APP/7.08] provides a mechanism for monitoring air quality and the impacts from the airport expansion.	No
Monitoring						
AQ.1.24	NHC asks LR to:		North Hertfordshire	1	Please refer to the response to Refs AQ.1.1 and AQ.1.15.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<ul style="list-style-type: none"> - Identify the locations of all existing air quality monitoring stations. - Agree with NHC the number and locations of new stations to monitor the impact of airport expansion on existing and future settlements (including the Local Plan site allocation EL1, EL2 & EL3 to the east of Luton, identified in Policy SP19). - Provide a mobile monitoring station to identify any new areas of concern. - Agree with NHC an annual review of air quality monitoring. - Undertake to add new monitoring stations if and where air quality problems are identified in new locations (e.g. using the mobile monitoring station). - Provide calibrated baseline air quality metrics for each air quality monitoring site. 		District Council		<p>The full extent of air quality monitoring is provided Chapter 7 Air Quality of the ES [TR020001/APP/5.01], including locations outside of AQMAs. Monitoring data has been used to verify the modelling undertaken as part of the assessment in the ES.</p> <p>The GCG Framework [TR020001/APP/7.08], sets out the mechanism for monitoring air quality and the impacts from the Proposed Development and actions to be taken when limits are breached. The monitoring methodology for GCG includes annual reporting made available to the public and independent bodies in the Environmental Scrutiny Group.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<ul style="list-style-type: none"> - Work with DEFRA to establish a permanent site, monitoring particle number concentration and size distribution (including UFPs) in the vicinity of LLA; and to include UFPs in air quality modelling. - Start monitoring levels and health impacts of UFPs before the project programme commences to provide a reliable baseline. 					
AQ.1.25	The Council would also suggest that an independent body be set up and funded to monitor emissions including air and noise quality. There must also be clear meaningful sanctions for any instances where agreed limits are broken.		Stevenage Borough Council	1	The GCG Framework [TR020001/APP/7.08] , sets out the mechanism for monitoring air quality and the impacts from the Proposed Development and actions to be taken when limits are breached (i.e. airport operator to determine the cause of the exceedance and, if required as stipulated in the Framework, submit a mitigation plan). The monitoring methodology for GCG includes annual reporting made available to the public and independent bodies in the Environmental Scrutiny Group.	No
Mitigation						

Ref	Comment	PC	LA	No PILs	Response	Change
AQ.1.26	NHD asks LR to: Agree with NHC and HCC a mitigation plan for any forecast or observed increase in air pollution in the Hitchin AQMAs		North Hertfordshire District Council	1	The GCG Framework [TR020001/APP/7.08] , sets out the mechanism for monitoring air quality and the impacts from the Proposed Development and actions to be taken when limits are breached. The monitoring methodology for GCG includes monitoring at the Hitchin AQMAs.	No
AQ.1.27	The report and associated documentation set out good practice mitigation measures for a number of aspects in the form of a draft air quality plan and draft code of construction practice, and such measures should be secured via condition or S106.		Central Bedfordshire Council	1	The environmental mitigation measures set out within the ES [TR020001/APP/5.01] will be secured as commitments and controls imposed through the DCO, and the Section 106 agreement. Further information can be found in the Mitigation Route Map [TR020001/APP/5.09] .	No
Engagement						
AQ.1.28	Environmental health team will contact you separately with their views on this matter [air quality]		Stevenage Borough Council	1	Noted.	No

Table A9.2: Regard had to statutory consultation responses on Air Quality comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
General				
AQ.2.1	Concern that the Applicant has ignored the Environment Act 2021 which introduces Local Air Quality Management [LAQM] to “Strengthen the local air quality management (LAQM) framework to enable greater cooperation at local level and broaden the range of organisations that play a role in improving local air quality. Responsibility for tackling local air pollution will now be shared with designated relevant public authorities, all tiers of local government and neighbouring authorities”. The latter point concerning “neighbouring” authorities is strategically key as no neighbouring authorities indicated they are in favour of expansion.	1	Recent changes to relevant legislation have been updated in Chapter 7 Air Quality of the ES [TR020001/APP/5.01] . The Environment Act 2021 has been considered in the air quality assessment. The study area is defined as 200m from the ARN. The criteria for determining the ARN is provided in Chapter 7 of the ES, following IAQM guidance. The study area can be seen to extend across multiple local authority boundaries.	No
AQ.2.2	Suggest that the Proposed Development should not go ahead unless reduction to the current air pollution levels can be achieved.	2	Please refer to the response to Ref AQ.1.1.	No
Impact				
AQ.2.3	Concern that the current operation of London Luton Airport already has negative impacts on air quality, with associated adverse consequences to the health and wellbeing of local communities. Some respondents concluded that the Proposed Development would further worsen air quality and therefore should not be taken forward.	11	Please refer to the response to Ref AQ.1.1.	No

Ref	Comment	No. PILs	Response	Change
AQ.2.4	Concern that the Proposed Development will lead to increased levels of air pollution and an overall degradation of air quality.	61	Please refer to the response to Ref AQ.1.1.	No
AQ.2.5	Concern that the Proposed Development will lead to increased levels of air pollution with adverse impacts on the health and wellbeing of local communities.	36	Please refer to the response to Refs AQ.1.1 and AQ.1.1.9.	No
AQ.2.6	Concern that the Proposed Development will lead to increased levels of air quality which will detrimentally impact local businesses and the local economy more widely.	2	<p>Please refer to the response to Ref AQ.1.1.</p> <p>Chapter 11 Employment and Economics in the ES [TR020001/APP/5.01] includes consideration of environmental factors on businesses and employment. The assessment concludes that whilst there will be some temporary construction and permanent operational air quality impacts, it is unlikely these impacts will result in business displacement, closure or employment loss. There are not predicted to be any residual air quality impacts on employment. Cumulative effects are presented in Chapter 21 In-Combination and Cumulative Effects in the ES [TR020001/APP/5.01].</p>	No
AQ.2.7	Concern that the construction work for the Proposed Development will adversely impact on local air quality from both emissions and creation of dust.	13	Please refer to the response to Ref AQ.1.1 and AQ.1.13.	No

Ref	Comment	No. PILs	Response	Change
AQ.2.8	Concern that the proposed piling works at the former landfill site will release toxic gases including methane, which will have a negative impact on local air quality.	3	<p>Use of gas protection measures to the landfill boundary are part of embedded mitigation and included in Chapter 17 Soils and Geology in the ES [TR020001/APP/5.01]. Within this chapter of the ES it is noted that boundary gas control measures are to be installed prior to major earthworks within the landfill. Gas protection measures are set out in the Outline Remediation Strategy in Appendix 17.5 of the ES [TR020001/APP/5.02] and include boundary gas protection to prevent off-site migration. Both virtual gas barriers and passive barriers are recommended; the final design to be determined by the contractor.</p> <p>Odour impacts from all related sources have been assessed following best practices in Chapter 7 Air Quality of the ES [TR020001/APP/5.01], which found no significant impacts.</p>	No
AQ.2.9	Concern that the current operation of London Luton Airport, including vehicular access to the airport, already has negative impacts on air quality.	7	Please refer to the response to Ref AQ.1.1.	No
AQ.2.10	Concern that the Proposed Development will result in more road traffic accessing the airport and increased congestion in neighbouring towns/villages, which will increase air pollution locally.	19	<p>Please refer to the response to Ref AQ.1.1.</p> <p>The air quality assessment presented in Chapter 7 Air Quality in the ES</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>[TR020001/APP/5.01] concludes that air quality impacts from increased emissions from road traffic to human receptors would be negligible with the proposed embedded/good practice mitigation as set out in the Outline Operational Air Quality Plan in Appendix 7.5 of the ES</p> <p>[TR020001/APP/5.02]. It concludes that air quality impacts from increased emissions from road traffic to ecological receptors would be moderate; therefore in addition to the mitigations set out in the Outline Operational Air Quality Plan, further mitigation measures for the management of woodland are proposed within the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02].</p>	
AQ.2.11	Concern that the Proposed Development will result in more road traffic accessing the airport, which will increase air pollution locally. Respondents specifically highlighted the impact of particulate pollution from rubber tyres.	3	Please refer to the response to Ref AQ.1.1, AQ.1.9, and AQ.1.15.	No
AQ.2.12	Concern that the junction upgrades, which will replace roundabouts with traffic lights, will result in increased congestion and hence an increase in air pollution.	2	<p>Please refer to the response to Refs AQ.1.1 and AQ.2.10.</p> <p>The introduction or removal of a junction near relevant receptors, which causes traffic to significantly change due to vehicle acceleration/deceleration (e.g., traffic lights, or roundabouts), have been</p>	No

Ref	Comment	No. PILs	Response	Change
			included in the air quality assessment presented in Chapter 7 Air Quality in the ES [TR020001/APP/5.01] .	
AQ.2.13	Concern that the air quality assessment is based on under estimates of private vehicle access to the airport (due to people waiting in side streets, in country lanes, in slip roads); and therefore, concern that the air quality impacts from private vehicle access to the airport will be even worse than predicted.	2	<p>Please refer to the response to Refs AQ.1.1 and AQ.2.10.</p> <p>The Applicant is willing to enter discussions with local authorities with regard to the potential for providing assistance with parking management schemes in their local residential areas where there is a clear demonstration that there are problems related to inappropriate airport related parking.</p> <p>In terms of modelling, the Applicant has assessed areas where there have been significant impacts using a detailed methodology of trip generation and distribution of vehicle trips on local roads, so while individuals may wait in these areas, the Applicant has not underestimated them as total vehicle trips would have been assigned to key routes. Please find additional detail in the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] which have been submitted as part of this application for development consent.</p>	No

Ref	Comment	No. PILs	Response	Change
AQ.2.14	Concern that the Proposed Development will result in increased levels of air pollution, which will have a detrimental impact on the health and wellbeing of local communities. Respondents were particularly concerned about the impact on respiratory health from emissions of particulate matter. Some respondents highlighted that air quality is already poor in the local area, and therefore any expansion will inevitably worsen impacts on health.	2	Please refer to the response to Refs AQ.1.1, AQ.1.5 and AQ.1.9.	No
AQ.2.15	Luton has the worst death rate from air pollution in the East of England. Over 6% of all adult deaths in the town are attributed to this cause. 93 people losing their life in just one year. The increase in air pollution from the proposed growth in flights, together with that generated by the additional traffic bringing passengers to the airport, will only radically exacerbate the situation. And Luton rising appears to be completely unable to mitigate for this, as, for instance, St. Albans and City District Council have recognised that: "There does not seem to be any solution to passengers driving to and from the airport from the east and the west through the District's roads and we learned that 97% of the airport's associated carbon emissions are out of their direct control." And whilst neighbouring Councils are raising the hugely negative environmental impact of any potential expansion, Luton Borough Council seems unable to view the proposal with similar consideration for their unfortunate residents, because of the financial conflict of interest it has with the airport.	1	Please refer to the response Refs AQ.1.1, AQ.1.5 and AQ.1.9.	No
AQ.2.16	Concern that the Proposed Development will lead to worsening of exposure to aviation fuel, including	11	Please refer to the response to Ref AQ.1.4.	No

Ref	Comment	No. PILs	Response	Change
	smelling or tasting it across the local area. Respondents highlighted existing issues with smell and taste of aviation fuel, and raised concern that this will be exacerbated by any expansion which leads to increased flights.			
AQ.2.17	Concern that the Proposed Development will lead to worsening of exposure to aviation fuel, including oily film deposits on surfaces in the local area.	2	Please refer to the response to Ref AQ.1.4.	No
AQ.2.18	Concern that the current operation of London Luton Airport already has negative impacts on air quality, and that the Proposed Development would further worsen this.	14	Please refer to the response to Ref AQ.1.1.	No
AQ.2.19	Concern that the negative impacts to air quality from the Proposed Development outweigh the benefits identified.	1	Please refer to the response to Ref AQ.1.1.	No
Mitigation				
AQ.2.20	Concern that the Proposed Development will lead to increased levels of air pollution and an overall degradation of air quality. Respondents highlighted that this would have adverse impacts on the health and wellbeing of local communities near the airport and along the flightpaths, as well as negatively impacting ecology and wildlife. Some respondents were concerned that the proposed mitigation measures are insufficient.	2	Please refer to the response Refs AQ.1.1, AQ.1.5 and AQ.1.9.	No
AQ.2.21	Concern that the proposed mitigation measures are insufficient to address the expected increase in air pollution.	1	Please refer to the response to Ref AQ.1.1.	No

Ref	Comment	No. PILs	Response	Change
AQ.2.22	Concern that the construction work for the Proposed Development will adversely impact on local air quality from the creation of dust. Respondents were concerned that the mitigation measures outlined in the Code of Construction Practice (CoCP) are insufficient. Some respondents highlighted that communities down-wind of the airport will be most affected.	1	Please refer to the response to Refs AQ.1.1 and AQ.1.13.	No
Monitoring				
AQ.2.23	Concern that air quality levels are not being controlled to an acceptable level by the Applicant. Respondents noted that previous air quality monitoring has been flawed and raised concern that this will remain the case with the Proposed Development.	4	Please refer to the response to Ref AQ.1.1. The scheme specific monitoring (detailed in Appendix 7.2 Air Quality Baseline Data of the ES [TR020001/APP/5.02]) has been undertaken in line with Defra technical guidance. Monitoring has demonstrated that the concentration of nitrogen dioxide at the closest residential areas to the airport and also at homes beneath flightpaths, are below the air quality standards set out in legislation.	No
AQ.2.24	Concern that air quality monitoring is not being undertaken to a satisfactory standard covering all areas surrounding the airport.	1	Please refer to the response to Ref AQ.1.1.	No

Table A9.3: Regard had to statutory consultation responses on Air Quality comments - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
General				
AQ.3.1	Concern that the Applicant has ignored the Environment Act 2021 which introduces Local Air Quality Management [LAQM] to “Strengthen the local air quality management (LAQM) framework to enable greater cooperation at local level and broaden the range of organisations that play a role in improving local air quality. Responsibility for tackling local air pollution will now be shared with designated relevant public authorities, all tiers of local government and neighbouring authorities”. The latter point concerning “neighbouring” authorities is strategically key as no neighbouring authorities indicated they are in favour of expansion.	3	Please refer to the response to Ref AQ.2.1.	No
AQ.3.2	Support for the Proposed Development, based on trust in the Applicant focusing on improvements to air quality, as well as assumed adoption of electric vehicle technologies for travel to the airport.	2	Noted.	No
AQ.3.3	Suggest that legally binding air quality limits should be defined with associated penalties for any breaches. Some respondents suggested that the air quality limits should include a continual reduction to air pollutants year-on-year from now onwards.	4	Please refer to the response to Ref AQ.1.1. The GCG Framework [TR020001/APP/7.08] , sets out the mechanism for monitoring air quality and the impacts from the Proposed Development, and actions to be taken when threshold limits are breached. These will be secured as commitments	No

Ref	Comment	No. CC	Response	Change
			and controls imposed through the DCO, and the Section 106 agreement.	
AQ.3.4	Suggest that the Proposed Development should not go ahead unless reduction to the current air pollution levels can be achieved.	14	Please refer to the response to Ref AQ.1.1 and AQ.1.23.	No
AQ.3.5	Suggest that LBC should move away from an overreliance on the aviation industry and invest in measures to improve air quality.	1	This comment is addressed to Luton Council and lies outside the scope of the Applicant's Proposed Development.	No
AQ.3.6	Suggest that the additional wealth generated from the Proposed Development should be focused towards measures to improve air quality.	1	<p>The Applicant has committed to extensive measures to reduce impacts to air quality, such as setting ambitious targets for access to the airport via public transport.</p> <p>The Applicant is also proposing the Community First scheme, which is intended to be an extension of the Applicant's existing policy of giving back to local communities through its Community Funding Programme. This includes directing up to £14m per year into local decarbonisation projects, which will inadvertently have benefits for local air quality. Further information can be found in Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10], submitted as part of the application for development consent.</p>	No

Ref	Comment	No. CC	Response	Change
Impact				
AQ.3.7	Concern that the current operation of London Luton Airport already has negative impacts on air quality, with associated adverse consequences to the health and wellbeing of local communities. Some respondents concluded that the Proposed Development would further worsen air quality and therefore should not be taken forward.	187	Please refer to the response to Ref AQ.1.1 and AQ.1.23.	No
AQ.3.8	Concern that the proposed piling works at the former landfill site will release toxic gases including methane, which will have a negative impact on local air quality.	2	Please refer to the response to Ref AQ.2.8.	No
AQ.3.9	Concern that the Proposed Development will result in more road traffic accessing the airport and increased congestion in neighbouring towns/villages, which will increase air pollution locally.	386	Please refer to the response to Refs AQ.1.1 and AQ.2.10.	No
AQ.3.10	Concern that the Proposed Development will lead to increased air pollution with adverse impacts on local habitats and wildlife.	18	Please refer to the response Refs AQ.1.1, AQ.1.5 and AQ.1.9.	No
AQ.3.11	Concern that the Proposed Development will result in increased levels of air pollution, which will have a detrimental impact on the health and wellbeing of local communities. Respondents were particularly concerned about the impact on respiratory health from emissions of particulate matter. Some respondents highlighted that air quality is already poor in the local area, and therefore any expansion will inevitably worsen impacts on health.	312	Please refer to the response Refs AQ.1.1 and AQ.1.9.	No
AQ.3.12	Concern that the Proposed Development will lead to worsening of exposure to aviation fuel, including smelling or tasting it across the local area. Respondents highlighted existing issues with smell and taste of aviation fuel, and	46	Please refer to the response to Ref AQ.1.4.	No

Ref	Comment	No. CC	Response	Change
	raised concern that this will be exacerbated by any expansion which leads to increased flights.			
AQ.3.13	Concern that the Proposed Development will lead to worsening of exposure to aviation fuel, including oily film deposits on surfaces in the local area.	2	Please refer to the response to Ref AQ.1.4.	No
AQ.3.14	Concern that existing air quality levels are already above the specified limits, and that the Proposed Development would further worsen this.	3	Please refer to the response to Ref AQ.1.1.	No
Mitigation				
AQ.3.15	Concern that the Proposed Development will lead to increased levels of air pollution and an overall degradation of air quality. Respondents highlighted that this would have adverse impacts on the health and wellbeing of local communities near the airport and along the flightpaths, as well as negatively impacting ecology and wildlife. Some respondents were concerned that the proposed mitigation measures are insufficient.	699	Please refer to the response to Refs AQ.1.1, AQ.1.5 and AQ.1.9.	No
AQ.3.16	Concern that the construction work for the Proposed Development will adversely impact on local air quality from emissions. Respondents were concerned that the mitigation measures outlined in the Code of Construction Practice (CoCP) are insufficient, and that they may not be adhered to by contractors on site.	84	Please refer to the response to Refs AQ.1.1 and AQ.1.13.	No
AQ.3.17	Concern that the construction work for the Proposed Development will adversely impact on local air quality from creation of dust. Respondents were concerned that the mitigation measures outlined in the Code of Construction Practice (CoCP) are insufficient. Some respondents	90	Please refer to the response to Refs AQ.1.1 and AQ.1.13. More information can be found in the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] , which includes	No

Ref	Comment	No. CC	Response	Change
	highlighted that communities down-wind of the airport will be most affected.		the consideration of construction impacts.	
AQ.3.18	Suggest that more should be done to mitigate air pollution impacts from the Proposed Development and improve overall air quality. Some respondents suggested reducing road vehicle travel, planting more trees and increasing air flow to buildings.	9	<p>Please refer to the response to Ref AQ.1.1.</p> <p>The Outline Operational Air Quality Plan in Appendix 7.5 of the ES [TR020001/APP/5.02] includes specific measures to mitigate air quality impacts from key sources of pollution, including considerations of surface access emissions (road vehicle emissions), building emissions and aircraft emissions. The plan is considered to include the most effective measures based on best practices. Planting trees and increasing air flow to buildings are not effective mitigation measures and as such are not proposed.</p>	No
Monitoring				
AQ.3.19	Concern that air quality monitoring is not currently being undertaken, or is not being undertaken to a satisfactory standard covering all relevant pollutants across the surrounding residential areas. Respondents were concerned that air quality cannot be controlled to an acceptable level, but noted that monitoring was necessary to establish this and attempt to control it. In addition, some respondents raised concerns that the air quality assessment is over reliant on aircraft operators	38	Please refer to the response to Ref AQ.1.1.	No

Ref	Comment	No. CC	Response	Change
	transitioning to more efficient fleets to manage air quality impacts, which is outside of the Applicant's control.			
AQ.3.20	Concern that greenhouse gases are not being measured as part of air quality monitoring. Luton says that greenhouse gases are "not a pollutant covered by the Local Air Quality Management regime". As Luton is the fastest expanding airport, it is probably the fastest growing UK source of climate change. Regardless of expansion plans, Luton should commit urgently to measuring greenhouse gases, as lack of data makes it harder to act to reduce climate emissions.	1	<p>Green House Gases are assessed in Chapter 12 Greenhouse Gases of the ES [TR020001/APP/5.01]. Chapter 7 Air Quality of the ES assesses human health related pollutants and ecological related pollutants, which have relevant national air quality objectives.</p> <p>The GCG Framework [TR020001/APP/7.08], provides a mechanism for monitoring air quality and GHG emissions, and the impacts from the Proposed Development and the monitoring methodology is provided in the GCG including annual reporting made available to the public and independent bodies in the Environmental Scrutiny Group. The rationale for the choice of locations of air quality monitoring is detailed in the GCG, as there were no significant impacts predicted.</p>	No
AQ.3.21	Suggest that ongoing air quality monitoring should be undertaken and overseen by an independent body; it should be fully transparent with information being made available to the public. Respondents noted that the area for air quality monitoring should be defined by significant impacts arising from the Proposed Development.	17	The full extent of air quality monitoring is provided in Chapter 7 Air Quality of the ES [TR020001/APP/5.01] which includes locations outside of AQMAs. Monitoring data has been used to verify the modelling	No

Ref	Comment	No. CC	Response	Change
			<p>undertaken as part of the assessment in Chapter 7 Air Quality of the ES.</p> <p>The GCG Framework [TR020001/APP/7.08], sets out the mechanism for monitoring air quality and the impacts from the Proposed Development. The GCG Framework also covers the monitoring methodology, including annual reporting made available to the public and independent bodies in the Environmental Scrutiny Group. The rationale for the choice of locations is detailed in the GCG, and there were no significant impacts predicted.</p>	
AQ.3.22	Suggest setting up a factory to supply air pollution monitors.	1	<p>Air quality monitoring is already underway with monitoring systems in place; therefore, there is no need to set up a new factory for this purpose. Monitoring data has been used to verify the modelling undertaken as part of the assessment in Chapter 7 Air Quality of the ES [TR020001/APP/5.01].</p> <p>The GCG Framework [TR020001/APP/7.08], which is submitted as part of this application for development consent, sets out the mechanism for monitoring air quality</p>	No

Ref	Comment	No. CC	Response	Change
			and the impacts from the Proposed Development.	
AQ.3.23	Suggest that air quality monitoring should include sensitivity scenarios, utilising the latest science to determine upper and lower bound impact ranges.	2	Air quality impacts have been assessed following best practices, as presented in Chapter 7 Air Quality of the ES [TR020001/APP/5.01] , and the assessment found no significant impacts. This includes sensitivity scenarios around next generation aircraft. Assumptions have also been included in the assessment and are detailed in the ES.	No

A10: LOCAL ENVIRONMENT

Table A10.1: Regard had to statutory consultation responses on the Local Environment comments - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
Comments on PEIR / ES - General						
LE.1.1	WSP's review has identified that there is still a lack of clarity around the future baseline and an incomplete assessment in some topics of the cumulative effects of development. It is accepted that the PEIR is not the final Environment Statement and LR still clearly have technical work to complete prior to the submission of the application. It is essential that proper analysis of the technical and environmental issues is allowed for prior to the submission of the application.		Host authorities	4	A full Environmental Impact Assessment (EIA) has been undertaken for the Proposed Development, the results of which are presented in the Environmental Statement (ES) [TR020001/APP/5.01] , which is submitted as part of this application for development consent. Chapter 21 In combination and Cumulative Effects of the ES includes an updated assessment of the cumulative effects of the Proposed Development with other development schemes. Consideration of the future baseline in the absence of the Proposed Development is presented within the technical topic chapters of the ES (Chapters 6 - 20).	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.2	The ES topic chapters vary in their commentary on engagement with stakeholders and the outcomes of that engagement. Where discussions have been held with the HAs, we would request that the outcomes of those discussions are identified in each topic chapter in the Environmental Statement. Whilst the Consultation Report will also provide such an analysis the ES should reflect on any changes in the Proposed Development itself, the EIA methodology, or assessment outcomes that have resulted from engagement.		Host authorities	4	The Applicant has continued to engage with statutory stakeholders, including the host authorities throughout the development of the Proposed Development, to discuss the results of the EIA. A summary of topic-specific technical engagement undertaken is provided within each of the technical topic chapters of the ES [TR020001/APP/5.01] (Chapters 6-20), which is submitted as part of this application for development consent.	No
LE.1.3	Compared to the first Statutory Consultation, topic chapters of the PEIR now more comprehensively set out EU Directives, national and local planning policy. There are still certain omissions, however, and this point should be thoroughly reviewed and must include emerging Local Plans, particularly as these will be relevant to the future baseline. It is clearly essential that the Environmental Statement thoroughly identifies all relevant policy and how this is relevant to the assessment process.		Host authorities	4	Noted. The ES [TR020001/APP/5.01] , which is submitted as part of this application for development consent, has been updated accordingly, including with due regard to the comments on the legislation and policy sections of the ES raised by WSP on behalf of the host authorities.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.4	Overall, we consider that this second PEIR consultation has progressed considerably from the first PEIR consultation in late 2019. We appreciate that there has been on-going engagement with the host authorities, and would reiterate that we wish to continue this process and look forward to the opportunity of meeting with Luton Rising to address the points raised by the Council's various internal teams.		Luton Borough Council	1	Noted. The Applicant has continued engagement with the host authorities throughout the project development.	Yes
LE.1.5	Central Bedfordshire Council generally supports the comments and recommendations made by WSP on behalf of the Host Authorities.		Central Bedfordshire Council	1	Noted.	No
LE.1.6	Within the various Chapters of the PEIR, interchangeable references are made between the Central Bedfordshire Pre-submission Local Plan and the adopted Central Bedfordshire Local Plan (2015-2035). For clarification, the Local Plan was adopted in July 2021 and therefore references to the pre-submission local plan are not applicable and should be removed.		Central Bedfordshire Council	1	The ES [TR020001/APP/5.01] has been updated accordingly.	Yes
LE.1.7	Central Bedfordshire Council considers that there are too many issues and shortcomings with the		Central Bedfordshire Council	1	The Applicant has continued to engage with statutory stakeholders, including the host authorities and	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	PEIR that need further discussion and consideration with the Host Authorities before the Environmental Statement is finalised. This should be achieved through ongoing engagement with relevant Officers to inform and shape the forthcoming assessment and outcomes. Therefore, at the current time, Central Bedfordshire Council cannot support the expansion proposals for Luton Airport due to serious concerns regarding the likely impact on the communities that live and work in the local area, which could be adversely affected in terms of highways and local access, air quality, noise and disturbance, visual impact, amongst other aspects.				Central Bedfordshire Council (CBC) throughout the development of the Proposed Development, to discuss the results of the EIA, develop Statements of Common Ground and to agree the mitigation required for the Proposed Development, which will be secured as commitments and controls imposed through the DCO, and the Section 106 agreement. A summary of topic-specific technical engagement undertaken is provided within each of the technical topic chapters of the ES [TR020001/APP/5.01] (Chapters 6-20), which is submitted as part of this application for development consent.	
LE.1.8	A review of LLA's scoping exercise and Preliminary Environmental Information Report (PEIR) which presents the likely environmental and social effects arising from the Project - indicates that impacts on EEAST's operational capacity, staff, vehicle fleet and estate assets have not been baselined or assessed to date. EEAST is therefore keen to ensure that this omission is addressed as part of the updated scoping work required to inform and prepare a robust	East of England Ambulance Service		1	Assessments of relevance to East of England Ambulance Service (EEAST) within the ES [TR020001/APP/5.01] , which is submitted as part of this application for development consent, include the following: <ul style="list-style-type: none"> • Chapter 13 Health and Community – with regards to effects on the health of the population; • Chapter 15 Major Accidents and Disasters (MA&D) – with regards to the risk of a MA&D occurring; 	No

Ref	Comment	PC	LA	No PILS	Response	Change
	Environmental Statement, and related supporting DCO documentation.				<p>• Chapter 18 Traffic and Transport (including Appendix 18.3 Outline Construction Traffic Management Plan (CTMP)) – with regards to impacts on the local transport network and its users.</p> <p>In addition, further information on the transport modelling can be found within the Transport Assessment [TR020001/APP/7.02] and Framework Travel Plan [[TR020001/APP/7.13], which is submitted as part of this application for development consent.</p>	
LE.1.9	<p>"EEAST requests that the EIA and related DCO assessment exercise presents suitable baseline positions, likely effects, mitigation and management measures to address the considerations outlined below:</p> <ul style="list-style-type: none"> • Scoping work to determine a suitable study area, baseline assessment parameters and an approach to identify the likely environmental, social and cumulative effects of the development on EEAST, and its health and blue light partners; • Measures to avoid, reduce, mitigate and compensate for any such effects (focusing on the areas of interest 	East of England Ambulance Service		1	<p>Further engagement with EEAST on the issues raised at the 2022 statutory consultation stage has been undertaken.</p> <p>With regards to point 1, assessments of relevance to EEAST within the ES [TR020001/APP/5.01], which is submitted as part of this application for development consent, include the following:</p> <ul style="list-style-type: none"> • Chapter 13 Health and Community – with regards to effects on the health of the population; • Chapter 15 MA&D – with regards to the risk of a MA&D occurring; 	No

Ref	Comment	PC	LA	No PILS	Response	Change
	<p>outlined above) during the construction phases of the development;</p> <ul style="list-style-type: none"> • Establish suitable mitigation and management measures through Section 106 or Deed of Obligation Heads of Terms of Agreement - to provide funding and new facilities provision, as required, to increase the capacity, response capability and Project Preparedness for EEAST’s staff, vehicle fleet and estate assets; • Establish appropriate Terms of Reference, Membership and a Communications Strategy for a Transport, Community Safety Health and Wellbeing Working Group – with membership to include EEAST and its health and blue light partners; 				<p>• Chapter 18 Traffic and Transport (including Appendix 18.3 Outline Construction Traffic Management Plan (CTMP)) – with regards to impacts on the local transport network and its users.</p> <p>In addition, further information on the transport modelling can be found within the Transport Assessment [TR020001/APP/7.02], which is submitted as part of this application for development consent.</p> <p>With regards to point 2 on measures to avoid, reduce and mitigate effects to EEAST from the Proposed Development, requirements for the provision of occupational healthcare facilities at the construction site are set out within the Code of Construction Practice (CoCP) in Appendix 4.2 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent. This includes the provision of first aid and occupational healthcare service on site. Appropriate health surveillance will also be provided. No regular callouts to the ambulance service</p>	

Ref	Comment	PC	LA	No PIL S	Response	Chan ge
					<p>from the construction site are expected.</p> <p>An assessment of relevant major accident and disaster hazards is provided within Chapter 15 MA&D of the ES [TR020001/APP/5.01]. The assessment concludes that with the controls established through the DCO (e.g. in the form of the CoCP and the Outline Construction Traffic Management Plan), no likely significant risks of MA&Ds remain. As such, no regular callouts to the ambulance service during construction are expected.</p> <p>With regards to point 3 on mitigation and management measures, the Applicant would be pleased to receive information from EEAST on the current number of callouts to the airport in order to better understand the needs of EEAST.</p> <p>With regards to point 4, as part of the non-statutory and statutory consultations undertaken in 2018, 2019 and 2022, and ongoing engagement throughout that time, the Applicant has engaged both jointly</p>	

Ref	Comment	PC	LA	No PILS	Response	Change
					<p>and independently with those involved in the emergency services for the airport. This has allowed issues to be discussed jointly but also focus on detailed elements with each separate organisation. As the Proposed Development has developed and more details have been available, there has been more focus on individual meetings. In addition, at key points in the process, the Applicant has also presented at the relevant local resilience forums.</p> <p>There is a 'Health' technical working group that has met regularly and includes representatives from the public health teams, the local authorities, Clinical Commissioning Group (CCG) representatives, and a representative from the UK Health Security Agency (previously PHE). This working group discusses issues related to physical and mental health and impacts on health service provision.</p>	
LE.1.10	We are aware of the 'Rochdale Envelope' methodology. Following the judgment in Crown v Rochdale MBC, we support the stance of assessing the 'worst case scenario' based upon	Chilterns Conservation Board			Noted. The Applicant agrees with the comments and a Rochdale Envelope approach for the assessment of the Proposed Development has been established for the ES	No

Ref	Comment	PC	LA	No PILs	Response	Change
	'likely significant effects'. Aircraft technology will evolve over the projected period for phases 1,2 and 3 but a baseline must be established, and one based upon a worst case, as is applied by the Rochdale Envelope approach. The PINS Scoping Opinion is clearly a material planning consideration. It helpfully confirms that the Rochdale approach is relevant (2.2.19)				[TR020001/APP/5.01] , which is submitted as part of this application for development consent, as set out within Chapter 4 Proposed Development of the ES. The existing and future baselines are defined within each of the technical chapters of the ES (Chapters 6-20).	
LE.1.1 1	UKHSA expects the Applicant to use best effective practice and best use of technology to ensure that the results from the PEIR and final ES are disseminated in a clear, accessible and meaningful way to all those who may be impacted by the Scheme. Concepts such as "likely significant effect" or "no significant effect" need careful explanation.	United Kingdom Health Security Agency		1	Noted. The EIA approach is described within Chapter 5 Approach to the Assessment of the ES [TR020001/APP/5.01] . Assessment specific significance criteria are further described within each of the technical chapters of the ES (Chapters 6-20), with clear definitions provided on which effects are considered to be significant and not significant within the context of the EIA Regulations.	No
Sustainability Statement						
LE.1.1 2	In summary, the review conducted found the Draft Sustainability Statement to comprehensive, and as detailed as would typically be expected at this early stage in the consenting process. Some areas of clarification		Host Authorities	4	Noted.	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	have been recommended, as well as a slight restructuring of certain sections, but it is otherwise a robust document. Wherever additional detail or granularity can be added, this would certainly improve the strength and accuracy of the content, thus also augmenting the readership's confidence in the commitments made.					
LE.1.1 3	The review provides comments against one of three categories, shown in the final column of Table 7-1; these categories are: Observation: comment relates to a change that should be considered to improve the general content of the Statement, but one that is not critical to the overall success of the document; Advisory: comment is strongly advised, as there is an omission that could lead to misinterpretation or a statement that reduces the technical robustness of the Statement; and Requirement: comment is needed otherwise the Statement is factually or technically incorrect and would leave the document open to justifiable challenge.		Host Authorities	4	Noted.	No
LE.1.1 4	Commitments to industry certifications (BREEAM, CEEQUAL, WELL) would be a welcome addition to the		Host Authorities	4	The Sustainability Statement [TR020001/APP/7.06] , which is submitted as part of this application for development consent, sets out	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	document, as appropriate. (Observatory)				that buildings will be designed to 2013 BREEAM 'Excellent' to be energy efficient with appropriate installations and equipment, together with thermally efficient materials and shading.	
LE.1.1 5	Section 2.4 Local policy. It would be worth considering the influence and requirements of local supplementary planning documents [link] in the preparation of the Draft SS. The Luton Sustainable Design Guide, and Designing for Community Safety in a Quality Environment, may be particularly pertinent (noting that they were originally prepared in 2003, and will be updated in due course). (Advisory)		Host Authorities	4	Noted. The Planning Statement [TR020001/APP/7.01] and the Sustainability Statement [TR020001/APP/7.06] , which are both submitted as part of this application, detail how the local Supplementary Planning Documents have been considered for the Proposed Development.	Yes
LE.1.1 6	Section 4.2.9e Highway improvements. It would add value to give some examples of improvements to be made e.g., central traffic and junctions controls and that respond to weather conditions or peak travel hours. (Observation)		Host Authorities	4	Funding for highways improvements is intended to investigate opportunities for parking controls, traffic management and calming measures, particularly for example within the Wigmore residential area and in rural areas to the east of the airport. This detail is provided within the Sustainability Statement [TR020001/APP/7.06] .	Yes
LE.1.1 7	Section 4.2.14 Construction/Operation. Circular economy is a concept far broader and deeper than reuse or		Host Authorities	4	The Sustainability Statement [TR020001/APP/7.06] outlines commitments to circular economy	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	recycling. The construction measures set out in this section (4.2.14 to 4.2.17) are standard practice, and do not reflect the full capability of circular practice e.g., by applying principles such as design for deconstruction / future recoverability, MMC, modularisation, prefabrication, industrial symbiosis, digitalisation, products as a service etc., More advanced commitments in this context would be welcomed. (Observation)				principles, included in the Proposed Development's outline design. Circular economy principles are included in the broader Design Principles [TR020001/APP/7.09] and the Design and Access Statement (DAS) [TR020001/APP/7.03] , submitted with the application for development consent. These documents will guide detailed design of the Proposed Development, should the application for development consent be granted.	
LE.1.18	Section 4.2.14 Construction Will an MMP be prepared and delivered as part of the scheme?(Observation)		Host Authorities	4	The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent, confirms that materials (made ground and natural soils) outside of the area of historical landfill will be reused in accordance with the materials management plan (MMP). An MMP will be prepared by the lead contractor in line with the CL:AIRE: Definition of Waste Code of Practice (DoW CoP) in order to describe how materials (made ground and natural soils) will be handled and reused on site, during construction works.	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.19	Section 4.2.31 Enhancing local biodiversity. Which biodiversity metric will be used to demonstrate the extent to which net gain is achieved? It would be good to state that, if possible (Advisory).		Host Authorities	4	Biodiversity Net Gain (BNG) will be measured using the DEFRA metric version 3.1, with an Applicant ambition to deliver a 10% biodiversity net gain which is consistent with the ultimate intention of the Environment Act 2021. This is detailed within the BNG report in Appendix 8.5 of the ES [TR020001/APP/5.02] .	No
LE.1.20	Section 4.2.31 Enhancing local biodiversity construction). Referencing an approach to natural capital approach, including the commitment to net gain, would give this statement additional credence / future resilience. (Observation)		Host Authorities	4		No
LE.1.21	Section 4.4 Leading the transition to net zero. Section is generally light on management of Scope 3 emissions across the Luton Rising value chain. Reference to ambitions in this context would be welcomed, as referenced in 3.2.8 c. See also coverage of GHGs in the PEIR, as well as the Green Controlled Growth document, and WSP respective reviews. (Advisory)		Host Authorities	4	Noted. Further information on management of Scope 3 emissions for construction and operation is included in the Sustainability Statement [TR020001/APP/7.06] , which is submitted as part of this application for development consent. This includes details on plans for reducing single occupancy vehicle travel to the airport by employees and passengers, promoting the use of sustainable surface access journeys and steeper runway approaches.	Yes
LE.1.22	Section 4.4.10 Operations Perhaps worth moving this content to Section 4.5, to augment the content on future tech. (Observation)		Host Authorities	4	Section 4.4.10 has been moved to Section 4.5 of the Sustainability Statement [TR020001/APP/7.06] .	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.2 3	Section 4.5 Green technology, finance and innovation This section is limited on specific detail around green tech and innovation. I would suggest responding to comment 8 to help improve this, but also to move information from 4.5.3 to 4.5.12 (inclusive) into Section 6, so that all Employment and Training Strategy (ETS) content is located in one place. (Advisory)		Host Authorities	4	Section 4.53 to 4.5.12 has been moved to Section 6 of the Sustainability Statement [TR020001/APP/7.06] .	Yes
LE.1.2 4	Section 4.6.16 Health and Wellbeing It would add value to confirm whether BREEAM, WELL or similar will be used to help maximise wellbeing and health during operation of new buildings. (Advisory)		Host Authorities	4	Please refer to the response to Ref LE1.14.	Yes
LE.1.2 5	Section 5.1.4 Conclusion Updates to Table 1 Sustainability Appraisal should be made wherever comments set out in this review realise a change to text or content. (Advisory)		Host Authorities	4	Noted.	No
LE.1.2 6	Glossary. Would be worth checking all terms have been used in the Draft SS. "BREEAM" and "CEEQUAL" do not appear except in the glossary, for example. (Advisory)		Host Authorities	4	Noted.	No
Cultural Heritage						

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
LE.1.2 7	We consider the effects on the historic environment - by way of increased noise levels and the introduction of new buildings, are likely to be significant and in need of detailed consideration through the EIA process, including through the development of an ES. Whilst we acknowledge that there are no designated heritage assets within the actual site area that would be directly impacted, there are various heritage assets in relative proximity whose settings may be affected.	Historic England		1	<p>Potential effects to heritage assets as a result of changes in noise level and the presence of new buildings within their settings is assessed in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01], which is submitted as part of this application for development consent.</p> <p>It concludes that the Luton Hoo Registered Park and Gardens (RPG) would experience an increase in noise levels during operation of the Proposed Development, which would slightly change the setting of the RPG and detract from its rural character. All other designated heritage assets assessed are considered not to have any significant adverse impacts from noise.</p> <p>During construction, the building works associated with Car Park P1 and Hangars A and B may be visible from Luton Hoo RPG, resulting in a temporary impact on the setting of this asset but not compromising appreciation of the internal view lines of the garden itself. During operation, these new structures would also be visible from the RPG. Whilst these</p>	No

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					features will not be prominent views from the RPG, this will result in a permanent change to the setting of the designated heritage asset. All other designated heritage assets assessed are considered not to have any significant adverse visual impacts from the introduction of new buildings.	
LE.1.28	Our records indicate that within 2km there are 2 scheduled monuments; 217 listed buildings (including 4 grade I listed and 7 grade II* listed buildings); 4 registered parks and gardens (including 2 x II*, and 1 x I), 8 Conservation Areas.	Historic England		1	Noted. The number of heritage assets within the 1km, 2km and wider study area are documented in the Technical Baseline in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] .	No
LE.1.29	We note the PEIR, and we are encouraged that it describes an integrated multidisciplinary approach to heritage assessment, with a consideration of different environmental factors being used to inform each other where appropriate.	Historic England		1	Noted. An integrated multidisciplinary approach to heritage assessment has also been adopted for the ES [TR020001/APP/5.01] .	No
LE.1.30	The [PEIR] report describes the general approach to assessing the potential for impact upon the historic environment and proposes 3 separate study areas extending to 2km, to capture the effects of the different aspects of the development and supporting infrastructure as well as the wider impact from other environmental	Historic England		1	Agreed. These study areas are also used in the ES [TR020001/APP/5.01] .	No

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	effects. We note the tables at 18.1 which provides details of heritage assets within the 2km to be assessed, and also table 18.2 which shows undesignated heritage assets within 1km study area. We understand that this has been agreed by LPA archaeology staff as appropriate.					
LE.1.3 1	We also refer you to good practice advice notes produced by Historic England on behalf of the Historic Environment Forum in GPA2; Managing Significance in Decision-taking in the historic Environment and GPA 3; The Setting of Heritage Assets. We recommend this guidance is both used and referenced in the full ES.	Historic England		1	Agreed. The Historic England guidance documents referenced have been used to inform the assessments of impacts to cultural heritage from the Proposed Development and are fully referenced in the ES [TR020001/APP/5.01] .	Yes
LE.1.3 2	We are pleased to note that various heritage assets that have been scoped into the ES for further assessment, and we note the preliminary assessment of these. The preliminary assessment is founded on available evidence that is sound and we agree with many of its findings. We would expect the final submission to conduct a more thorough final assessment that examines all aspects of the potential impact in a comprehensive way and	Historic England		1	Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] , provides a thorough assessment of the potential impact of the Proposed Development.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	that clearly demonstrates the effects of the proposal more conclusively.					
LE.1.33	The preliminary assessment has concluded that construction of the proposed scheme would result in adverse impacts on cultural heritage assets. We note however that the PEIR only discusses those assets that would be most significantly affected, and that a more comprehensive assessment will be undertaken of all other affected assets in the ES. We would expect any assessment to include the use of appropriate photomontages/wire frame and rendered images to substantiate the claims of the assessment. We note that some such material is included in the LVIA, but we recommend that images that relate specifically to heritage asset viewpoints and that demonstrate the specific impact upon settings are included. Viewpoints should be agreed with Historic England and the LPA's historic environment advisers to assess the impact of the proposed development on the setting of these assets. If the information is presented in the Landscape and Visual Chapter, this	Historic England		1	Photomontages from heritage assets, are provided in the ES Figures [TR020001/APP/5.03] , which is submitted as part of this application for development consent. Viewpoints were agreed in advance with Historic England.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	should be clearly cross-referenced with the Cultural Heritage Chapter.					
LE.1.34	We note the impacts of the proposed development in levels of noise light, traffic, and landscape assessments have been addressed in the relevant specialist chapters. We would ask that a non-technical summary of these impacts on the designated heritage assets is also provided in the cultural heritage chapter, with cross-referencing. This should be aimed at helping us to interpret the technical data and assess the impact. We advise that all supporting technical heritage information is included as appendices.	Historic England		1	<p>The Environmental Statement Non-technical Summary (ES NTS) [TR020001/APP/5.04], which is submitted as part of this application for development consent, provides overviews of all topic assessments, including noise, light, transport and landscape.</p> <p>Additionally, Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01], submitted with the application for development consent, provides a non-technical summary of these assessments.</p>	No
LE.1.35	The preliminary assessment has concluded that construction and operation of the proposed scheme would result in adverse impacts on cultural heritage assets. We welcome the work that has been undertaken to assess the impact of the scheme on the historic environment, and the ongoing discussion with stakeholders. We acknowledge that the proposed scheme preliminary design is ongoing and will continue to be influenced by environmental factors to avoid or	Historic England		1	<p>The results of archaeological and geoarchaeological surveys are provided in the ES [TR020001/APP/5.01], and the mitigation proposals are set out in the Cultural Heritage Management Plan (CHMP) which forms Appendix 10.6 of the ES [TR020001/APP/5.02]. Engagement has continued with Historic England throughout the design development process and an overview of all relevant stakeholder engagement for this topic is provided</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	reduce effects. In terms of archaeological remains, we welcome the archaeological and geoarchaeological surveys that are being carried out and we look forward to assessing the results of this work. We would advise that the results of these surveys, and the proposals for mitigation, are discussed and agreed in advance of the submission of the Environmental Statement.				in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] .	
LE.1.3 6	We welcome the embedded mitigation relevant to the historic environment, including the provision of parkland and additional planting and draft CoCP to mitigate construction effects. We acknowledge that the proposed scheme preliminary design is ongoing and will continue to be influenced by environmental factors to avoid or reduce effects where feasible.	Historic England		1	Noted.	No
LE.1.3 7	Within the southern part of Central Bedfordshire there are two key heritage assets, Luton Hoo (Grade I listed and Grade II* registered park and gardens) and Someries Castle (Scheduled Monument). Significant concern remains regarding the impact of the proposal on these two heritage assets.		Central Bedfordshire Council	1	Potential impacts to Luton Hoo RPG and Someries Castle are assessed in full in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] . The concerns for these assets derive from potential impacts arising from visual intrusion, noise and vibration, and changes in air quality. Potential impacts arising from these aspects of	No

Ref	Comment	PC	LA	No PILs	Response	Change
					the Proposed Development are included in Chapter 10 of the ES .	
LE.1.38	In respect to Luton Hoo, this is set within a celebrated 'Capability Brown landscape', which beyond its historic significance possesses a tranquillity that is a significant asset. Due to the open and elevated location of the airport there is a highly obtrusive impact of existing buildings and structures upon key views from the hotel and gardens. Views from Luton Hoo have been assessed as part of the LVIA but it is not considered to be adequately covered. It is also considered that any increase in air traffic would inevitably erode the tranquillity in and around Luton Hoo registered park and gardens		Central Bedfordshire Council	1	<p>The setting of Luton Hoo and the heritage significance of its buildings and designed landscape is detailed in the Cultural Heritage Baseline in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01], which is submitted as part of this application for development consent. Impacts to its significance, arising in changes to its setting, which includes aural and visual intrusion, are assessed in the ES. Landscape and Visual Impact Assessment (LVIA) photomontages which demonstrate potential changes to the asset's setting arising from the introduction of new buildings into views from the asset are presented in the ES Figures [TR020001/APP/5.03].</p> <p>An additional assessment of tranquillity on human and heritage receptors has been undertaken in response to responses to the 2022 statutory consultation. The assessment is presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] and has also</p>	No

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					informed other assessments in the ES, namely the impact of the noise change on the setting of heritage assets in Chapter 20 Cultural Heritage and the impact of tranquillity on landscape receptors including the Chilterns AONB in Chapter 14 Landscape and Visual .	
LE.1.39	Central Bedfordshire Councils Conservation Officer has highlighted, throughout the initial stages of the process, the evident crumbling of important brickwork detailing at Someries Castle, which has accelerated in recent years. The reported Planning Inspectorate response (Scoping Opinion) to the Scoping Report set out in Table 10.5 section 4.14.5 on page 10 of PEIR Main Report Chapter 10 (Cultural Heritage) confirms expectation that the Environmental Statement “should acknowledge changes in air quality and vibration which may affect the fabric of the Scheduled Monument, where likely significant effects may occur”, and this acknowledgement of the issues is encouraging		Central Bedfordshire Council	1	Potential impacts to Someries Castle arising from air quality and vibration are assessed in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] .	No
LE.1.40	The Central Bedfordshire Council Conservation Officer has advised that the specific details in Chapter 7 that		Central Bedfordshire Council	1	Air Quality data used to inform the impact assessment for heritage assets comprised modelled data and	No

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	have informed the conclusion [at 10.9.58 of Chapter 10] are not apparent and it would appear that specialist environmental monitoring and assessment have not been carried out on the site as previously requested.				not the results of monitoring. A summary of the methodology for the air quality assessment are included in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] and the detailed results from air quality and noise and vibration surveys, are included in Chapters 7 Air Quality and 16 Noise and Vibration of the ES.	
LE.1.4 1	In terms of vibration impacts, no summary of vibration impacts (construction and operational phases of the proposed development) are provided within Chapter 10 or Chapter 16 (Noise and Vibration), indicating that appropriate monitoring and assessment has not been undertaken. Generally, it is wholly acceptable, and in line with national heritage conservation guidance, to seek and pursue tangible public heritage benefits from the proposed development in respect of: sustaining or enhancing the significance of a heritage asset; and reducing or removing risks to a heritage asset		Central Bedfordshire Council	1	A summary of the noise and vibration assessment and the potential impacts to heritage assets is included in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] . The detailed noise and vibration impact assessment is included in Chapter 16 Noise and Vibration of the ES.	No
LE.1.4 2	The Council considers that it would be appropriate for a dedicated section in Chapter 10 to be provided that covers the impact such as air pollution, noise		Central Bedfordshire Council	1	Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] , includes a separate section on air quality/noise	Yes

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	and vibration on designated heritages assets. This should bring together the results of all the surveys and demonstrate how that information has been used to support any conclusions.				and vibration to make the information more apparent.	
LE.1.4 3	The inclusion of photomontages that show the visual impacts at Luton Hoo and Someries Castle are welcomed but the final images need to be clearer using solid colours.		Central Bedfordshire Council	1	Photomontages have been updated for the ES [TR020001/APP/5.01] , which is submitted as part of this application for development consent.	No
LE.1.4 4	A further concern relates to the proposed fire training ground, which would be relocated within close proximity of Someries Castle. The visual and environmental impacts of the training ground on both Someries Castle and Luton Hoo need to be fully understood, and this is not possible based on the current information in the PEIR.		Central Bedfordshire Council	1	The potential impact of the Fire Training Ground (FTG) on Someries Castle is presented in Section 10.9 of Chapter 10 Culture Heritage of the ES [TR020001/APP/5.01] where a minor adverse effect is predicted.	No
LE.1.4 5	In proximity to M1 J10 are the following sites of cultural heritage interest: <ul style="list-style-type: none"> • The Church of St. Andrew (Grade II, NHLE 1114661) within 250m of M1 J10. • Luton Hoo Registered Park and Gardens (RPG NHLE 1000578), containing 11 listed buildings including the Grade I Luton Hoo house. The 	National Highways		1	Potential effects to heritage assets are assessed in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] . Chapter 10 does not identify any adverse impacts to designated or non-designated heritage assets as a result of the proposed works at Junction 10 of the M1.	No

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	<p>RPG boundary is >250m away from the amendments to M1 J10.</p> <ul style="list-style-type: none"> • Various Grade II listed buildings to the north and south (>250m) of the amendments to M1 J10, although it is unclear from mapping and surveys what the names of these locations are. Regarding the works to M1 J10, the PEIR does not identify any construction or operational impacts to any of the cultural heritage areas of interest defined above. Given the baseline of the surrounding SRN and its day-to-day operation, it is anticipated that no significant operational effects will arise as a result of the amendments to the SRN. However, construction works may temporarily alter views, tranquillity and setting of the cultural heritage areas of interest noted above during the construction phase, the effects of which have not been assessed in the PEIR. 					
Archaeology						
LE.1.4 6	<p>Owing to the nature of the development there would be direct impact on several heritage assets with archaeological interest. The submitted information has been assessed by the</p>		Central Bedfordshire Council	1	<p>The final Written Scheme of Investigation (WSI) for trenches within CBC was issued to CBC's Archaeology Officer on 13 July 2022 and is agreed. The final WSI for</p>	Yes

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	Council's Archaeologist who is generally satisfied that methodology proposed for assessing the impact of the scheme on Cultural Heritage. The Written Scheme of Investigation for additional trial trenching has been reviewed but to date the final document and final trench layout have not been received.				trenches within Hertfordshire County Council (HCC) was issued to HCC's Archaeological Officer and agreed on 1 July 2022. The Archaeological Trial Trench Evaluation Report in Appendix 10.5 of the ES [TR020001/APP/5.02] includes relevant details from the WSI.	
LE.1.47	The inclusion of a draft Cultural Heritage Management Plan (appendix 10.6) is welcomed. However, and despite claims to the contrary, Central Bedfordshire Council Archaeologists have not been involved in the preparation of this document and would strongly request involvement prior to a final document being prepared. We request that future publications make it clear that the PEIR has been prepared without any input from Central Bedfordshire Council Archaeologists and that reference to our involvement in the consultation document, is factually incorrect.		Central Bedfordshire Council	1	Noted. The scope of work in the CHMP in Appendix 10.6 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent, has been agreed with CBC Council and HCC.	No
LE.1.48	The Archaeology Team welcome the commitment made to address the concerns relating to Cultural Heritage raised during scoping stage of this project. Nonetheless, there remain a		Central Bedfordshire Council	1	The issue to resolve comprised the completion of a programme of archaeological trench evaluation. This has now been completed and the results are included in the	Yes

Ref	Comment	PC	LA	No PILS	Response	Change
	<p>number of issues that need to be resolved prior to the completion of the Environmental Statement for this proposal and the submission of an application to PINS. To avoid an objection or delays as a result of requests for further information, we strongly advise the applicant to address these issues in a timely manner.</p>				<p>Archaeological Trial Trench Evaluation Report in Appendix 10.5 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent.</p>	
Water/Drainage/Flood						
LE.1.49	<p>As the Lead Local Flood Authority (LLFA) for the area we request that a suitable treatment train for contaminated surface water would need to be in place for all phases of the development to protect controlled waters.</p>		Luton Borough Council	1	<p>The existing airport infrastructure will be utilised as much as possible. Potentially contaminated runoff from the airport stands will be subject to live monitoring for contaminants prior to discharge to the central soakaway, the location of which can be found on the Scheme Layout Plans [TR020001/APP/4.02].</p> <p>A live monitoring system will be implemented to ensure that any potential contaminants are treated appropriately prior to discharging to soakaway.</p> <p>The drainage design is described in full in the Drainage Design</p>	No

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					Statement (DDS) in Appendix 20.4 of the ES [TR020001/APP/5.02].	
LE.1.50	Details of monitoring of contaminated surface water would also need to be provided.		Luton Borough Council	1	<p>A live monitoring system will be implemented to ensure that any potential contaminants are treated appropriately prior to discharging to soakaway. This will be informed by the outcomes of the Hydrological Risk Assessment in Appendix 20.4 of the ES [TR020001/APP/5.02] to ensure that impacts of discharge to the underlying aquifer is appropriately assessed.</p> <p>The drainage design is described in full in the DDS in Appendix 20.4 of the ES [TR020001/APP/5.02].</p>	No
LE.1.51	Additionally, at source Sustainable Drainage Systems (SuDS) would need to be demonstrated.		Luton Borough Council	1	The airside drainage strategy did consider the use of SuDS, but due to airport wildlife control management policies in relation to the risk of bird strike, the use of SuDS features (such as reed beds) is not possible.	No
LE.1.52	Further engagement is requested to address these detailed points, and it is suggested that a working group is set up of all water and sewerage stakeholders to provide further support and feedback.		Luton Borough Council	1	<p>Ongoing engagement has been undertaken with LBC, CBC and HCC Lead Local Flood Authorities as well as Thames Water, Affinity Water and the Environment Agency.</p> <p>Due to the availability of stakeholders, and variance in scope of meetings,</p>	Yes

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					<p>meetings were generally undertaken with stakeholders on an individual basis. As such a water and sewerage working group was not established. This does however not prohibit the Applicant from establishing a working group at a later time, should the application for development consent be granted.</p> <p>A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01].</p>	
LE.1.5 3	<p>We previously raised concerns in our 2019 response about the possibility that the groundwater supply and principle chalk aquifer would be contaminated by leachate from the former landfill when piling works are carried out. We note the mitigation and avoidance measures outlined in Table 2.3 within PEIR Volume 3: Appendix 17.4 Detailed Quantitative Risk Assessment – Controlled Waters, and we advise that these measures would be appropriate.</p>	Natural Englan d			<p>The Detailed Quantitative Risk Assessment – Controlled Waters is provided in Appendix 17.4 of the ES [TR020001/APP/5.02] and will include the same mitigation and avoidance measures. A HRA would also be produced at detailed design stage for the proposed piling works through the landfill to address the risk to groundwater and identify control measures, the HRA would be agreed with the Environment Agency. A HRA is also required as part of supporting documentation prepared by the Remediation Contractor to obtain the deposit for recovery permit for the excavation and reuse of landfill</p>	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
					materials which will also address the risk proposed to groundwater supply and chalk aquifer from the landfill leachate.	
LE.1.5 4	<p>The main aspect of the proposed development that could influence groundwater quality are:</p> <ul style="list-style-type: none"> • The remediation of the former Eaton Green Landfill – this is dealt with in Chapter 17: Soils and Geology; and, • The proposed infiltration discharges at the airport – these are mainly dealt with in appendices 20.3 and 20.4. <p>Both the Hydrogeological Characterisation Report (Appendix 20.3) and the Drainage Design Statement (20.4) are preliminary and both recognise that additional work and refinement will be required prior to any form of planning consent. The hydrogeological characterisation report concludes that the proposed infiltration drainage approach will work effectively providing that the hydraulic conductivity of the chalk is sufficiently high (subject to confirmatory testing) and that the proposal will not impact on the hydrogeological situation in the vicinity of the site. The Drainage Design Statement (DDS) is discussed further below. The</p>	Environment Agency			<p>A DDS is provided in Appendix 20.4 of the ES and a HRA is provided in Appendix 20.6 of the ES [TR020001/APP/5.02], both of which are submitted as part of this application for development consent. The HRA assesses the impact of the discharge from the Water Treatment Plant to the underlying aquifer. Engagement has been undertaken with Thames Water to agree the flow thresholds for any ongoing discharge to the East Hyde Sewage Treatment Works to ensure this does not adversely affect capacity. A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES TR020001/APP/5.01.</p>	No

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	infiltration drainage proposal is fundamental to the scheme progressing. The proposal to double the passenger numbers through the airport cannot be met by increasing capacity at the nearby East Hyde Sewage treatment Works.					
LE.1.55	<p>Chapter 20: Water Resources & Flood Risk references the proposed off-site highways interceptors (20.9.17) indicating that “only the works associated with the A1081 New Airport Way / M1 Junction 10...may lead to a change in pollutant loading that may need a detailed HEWRAT assessment”. This assessment has been made according to screening which “evaluate[ed] potential change in traffic volumes and potential extent of works”. Further details of the screening are not available.</p> <p>It’s surprising to note that no other assessment of pollutant load is required at other off-site highways interventions given expected passenger numbers and the fact that traffic modelling has indicated the need to upgrade 16 areas of the local highway. A number of these sites are in particularly close proximity to sensitive surface water receptors</p>	Environment Agency			<p>As agreed with the Environment Agency at the scoping stage, the Highways England Water Risk Assessment Tool (HEWRAT) has been used to assess the potential impacts of the off-site highway interventions on local water quality. The first stage in the HEWRAT assessment process is to identify the off-site highway interventions that exceed 10,000 Annual Average Daily Traffic (AADT) and only the off-site highway interventions that exceed the 10,000 AADT threshold are subject to further assessment.</p> <p>As per Design Manual for Roads and Bridges (DMRB) guidance, HEWRAT assessment is only applicable to roads that exceed 10,000 AADT. An additional screening of '>20% Annual Average Daily Traffic (AADT) increase' was also applied. Only a</p>	No

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	(Rivers Lee and Hiz), and those which aren't will likely drain into the surface water drainage systems which will funnel into those local water courses. Given increased traffic movements, the drainage from these sites will have increased pollutant load. Therefore, whilst upgrades are happening to these junctions, it is expected that the current drainage arrangements are enhanced to improve the quality of surface water run-off. These enhancements should follow the SuDS hierarchy, using natural interventions, where possible.				<p>small percentage of intervention locations meet this criteria.</p> <p>The screening and assessment approach is subject to ongoing review and appropriate stakeholder consultation will be sought on final process decisions.</p> <p>Any enhancements to local drainage will be applied in accordance with the SuDS hierarchy.</p>	
LE.1.56	Whilst it's understood that these are considered to be 'minor adverse' effects associated with the operational aspects of [the off-site highway interventions], the River Lee and Hiz are chalk rivers (Table 20.10 should be updated to reflect this for the River Hiz) and therefore particularly sensitive. Both water bodies have transport drainage from roads identified as a 'reason for not achieving good' therefore, it's important to ensure this pressure isn't exacerbated further. Additionally, the Lee (from Luton to Luton Hoo Lakes) water body is classified as at Bad	Environment Agency			The assessment of potential impacts on the River Lee and Hiz has considered their status as chalk streams. A Water Framework Directive (WFD) Compliance Assessment in Appendix 20.2 of the ES [TR020001/APP/5.02] has been completed to assess the potential impacts of the Proposed Development on WFD waterbodies using a methodology that was agreed with the Environment Agency at the scoping stage. With regards to comments concerning Table 20.10, this has now been updated to	No

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	<p>Ecological Potential under the Water Framework Directive (WFD). WFD mandates no deterioration and, where elements are at their worst classification, no further deterioration, including within class, is permitted. Therefore, the ‘minor adverse’ effects identified for the River Lee within Table 20.15 are not acceptable.</p>				<p>accurately reflect River Hiz as a chalk river.</p> <p>Within the WFD Compliance Assessment, the methodology identifies the magnitude of impact on WFD waterbodies from low to high. The low adverse impact (the lowest magnitude from the agreed assessment methodology) in this instance means ‘<i>No measurable adverse impact on status class and/or the future objective at a waterbody scale</i>’. As such there would be no deterioration of the water body. A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01].</p>	
LE.1.57	<p>Water Framework Directive Compliance Assessment. It is important to note how the objectives have been displayed and interpreted for the Lee (from Luton to Luton Hoo Lakes), Mimram (Whitwell to Codicote Bottom), Hiz and Upper Lee Chalk (Pages. 14-19). When reporting the objectives for a water body it is important to include the reasons why either an extension to</p>	Environment Agency			<p>A WFD Compliance Assessment in Appendix 20.2 of the ES [TR020001/APP/5.02] has been completed to assess the potential impacts of the Proposed Development on WFD waterbodies using a methodology that was agreed with the Environment Agency at the scoping stage. This includes consideration of reasons for not achieving a ‘good’ objective and the</p>	No

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	<p>the good by 2021 or a less than good objective has been chosen, these are all available on the catchment data explorer (CDE). It is also worth noting in terms of planning and development a review of objectives should always be challenged and seek to achieve improvements to their corresponding water body, despite their reasons assigned that are potentially hindering a good status objective. The importance of this is demonstrated by how the process of objectives, which are reviewed and if appropriate can change in light of changes in circumstances i.e. reason assigned was no known technical solution, however technological advancements no longer make this a factor. An example of this can be seen in the new River Basin Management draft which is under review. The new draft objectives for all water bodies can be downloaded from the CDE, however reporting on them is not appropriate until the RBMP has been published. To demonstrate the point however, you will see that for all the water bodies covered in this application, most now include Good status objectives.</p>				<p>latest data from a Common Data Environment.</p> <p>The new River Basin Management Plans were not available within the appropriate time to consider in the WFD Compliance Assessment.</p>	

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
LE.1.5 8	<p>The WFD compliance assessment does not include the operational impacts of highway traffic pollution on the receiving water bodies. The PEIR identifies the higher demands on the road networks as traffic increases towards to Luton Airport and have therefore provided infrastructural developments to ease traffic. However, the application as a whole fails to assess water quality impacts from increased traffic loads to neighbouring water bodies. The application needs to include an assessment of the performance of the outfalls where highway improvements are being considered by the Luton Airport expansion.</p> <p>This is especially so in the case of the Lee (from Luton to Luton Hoo Lakes), the water body is at Bad status for dissolved oxygen (DO) and Fish with the reasons assigned including transport drainage. We will need to see CIRIA Simple Index Approach or HEWRAT assessments of all outfalls where highway interventions are proposed for this development, and where mitigation is required following the modelling, adequate treatment trains are developed to mitigate any</p>	Environment Agency			<p>As agreed with the Environment Agency at scoping, the HEWRAT has been used to assess the potential impacts of the off-site highway interventions on local water quality. The first stage in the HEWRAT assessment process is to identify the off-site highway interventions that exceed 10,000 AADT and only the off-site highway interventions that exceed the 10,000 AADT threshold are subject to further assessment.</p> <p>A methodology has been developed to allow an initial assessment to be carried out in the absence of detailed drainage information.</p> <p>Once sufficient drainage design (and outfall) details are stipulated, this assessment will be conducted in full and any mitigation required to ensure adequate protection will be identified and applied to the highway drainage design at this location, in full accordance with the DMRB LA113.</p> <p>On the basis that the drainage design for the Off-site Highway Interventions is developed during detailed design prior to construction in accordance</p>	No

Ref	Comment	PC	LA	No PIL S	Response	Chan ge
	surface water pollution into the water bodies affected.				with contemporary standards of sustainable drainage design and approved pursuant to a DCO Requirement, the design would provide improvements required to mitigate any potential changes to water quality. This would result in <i>'No measurable adverse impact on status class and/or the future objective at a waterbody scale'</i> and as such there would be no deterioration of the water body. Further information is provided in the WFD Compliance Assessment in Appendix 20.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent.	
LE.1.59	The application site is located within Affinity Water's supply area, classified as an area of 'Serious' Water Stress by the Environment Agency. 'Serious' water stress is identified as an area where the current or future demand for household water is, or is likely to be, a high proportion of the effective rainfall which is available to meet that demand. The Environment Agency's document Water Stressed Areas – final classification 2021 can be viewed using the link or by visiting GOV.UK.	Environment Agency			The Proposed Development has been designed in consultation with Affinity Water, Veolia Water, and LLAOL (the airport operator). Therefore, existing infrastructure related to the public and private water supply distribution networks have been identified in relation to the Main Application Site and consideration of the potential impact of the Proposed Development on local water availability has informed the assessment outlined in the Flood Risk Assessment (FRA)	No

Ref	Comment	PC	LA	No PILS	Response	Change
	<p>The availability of water for licensing in this area is detailed within the abstraction licensing strategy for the Upper Lee. Maps 1-4 indicate that “water [is] not available”, with “flows...below the indicative flow requirement to help support a healthy ecology in our rivers” and we are actively looking to reduce abstraction in this catchment. Additionally, as this catchment is “predominantly on unconfined Chalk...the water availability for groundwater is considered the same for surface water”.</p>				<p>[TR020001/APP/5.07] and the Water Cycle Strategy in Appendix 20.5 of the ES [TR020001/APP/5.02], both of which are submitted as part of this application for development consent.</p> <p>A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES TR020001/APP/5.01.</p>	
LE.1.60	<p>Water Consumption – Construction Paragraph 20.9.7 states “the implementation of the water consumption management measures...will ensure there are no significant effects on the local water resources regime”. Additionally, “a more detailed assessment of the potential impacts of construction activities on the local water supply will be provided in the Water Cycle Strategy to be provided as an appendix to the ES” (Page 58). This should be evaluated in the context of the abstraction licensing strategy</p>	Environment Agency			<p>The Water Cycle Strategy in Appendix 20.5 of the ES [TR020001/APP/5.02], has been prepared to take into account water efficiency and rainwater harvesting proposals included in the drainage design to assess the potential impact of the Proposed Development on water supply. The Water Cycle Strategy considers the abstraction licencing strategy.</p>	No

Ref	Comment	PC	LA	No PILS	Response	Change
	above, and our activities to support sustainability reductions in abstraction.					
LE.1.6 1	<p>Water Consumption - Passengers Table 20.15 indicates a potential ‘minor adverse effect on the local supply network’ due to increased passenger numbers across Phases 1, 2a and 2b and associated mitigation. This mitigation is detailed as “water efficiency, rainwater harvesting and reuse from the WTP...to maximise water reuse” (Page 71). Currently, it is noted that the WTP won’t be operational until Phase 2, with an additional 3.5mppa expected in Phase 1. Therefore, there is a need to ensure Terminal 1 is retrofitted with water efficiency and reuse measures to ensure the increase in passengers is balanced against the airports’ target to “reduce the water used per passenger to 6.98 litres by 2023”.</p> <p>There is support for this detailed within the Drainage Design Statement (Paragraph 3.1.16), with options presented. However, there’s been no clear assessment of how this will be delivered or which options, beyond rain water harvesting will be taken forward. Additionally, Table 3-1:</p>	Environment Agency			<p>The delivery of water efficiency measures will be undertaken by the airport operator, where options beyond rainwater harvesting such as water efficient appliances and equipment, will be specified during detailed design. A final decision will then be specified by the airport operator.</p> <p>The 6.98l/passenger target for 2023 was set by the Applicant as part of its 2020-25 Business Strategy, which has been used as a baseline for assessment and outline design purposes. This figure reflects a 10% reduction in water consumption and provides a platform for a more efficient target to be introduced following the detailed design process.</p>	

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	<p>Drainage forecast – 0% Rain Water Harvesting (RWH) Assumed and Table 3-2: Drainage forecast – 7.5% RWH Assumed indicate that from 2024 potable supply from Affinity Water will increase beyond the 6.9l/s in 2023. Given the latest figures suggest an increase of per passenger water consumption from 7.41l in 2019 to 9.63l in 20204, the 6.98l per passenger target may not be a reliable threshold to start the assessment from. Finally, whilst it’s understood this reflects a 10% reduction in water consumption, there’s been no assessment of whether a more efficient target could be introduced. Given the water stressed nature of this location and expected growth in this area, options for increased efficiency should be explored. These options should be scoped into the Water Cycle Strategy and presented as part of the ES. An independent water audit may support in identifying areas where further efficiencies can be introduced. Ultimately, using water efficiently on site will support the airports target to be net zero carbon by 2040, as well as demonstrate compliance with LBC’s Local Plan Policies: LLP25 High</p>					

Ref	Comment	PC	LA	No PILs	Response	Change
	Quality Design and LLP37 Climate change, carbon and waste reduction and sustainable energy. Therefore these opportunities should be maximised.					
LE.1.6 2	<p>Surface Water Quality</p> <p>We would expect the PEIR to set out what monitoring is being undertaken to establish the baseline environmental conditions, and to assess the environmental impacts of the development. The baseline conditions (20.7) is a description of the area affected by the development; there's no mention of any baseline monitoring that is currently being carried out by the operator. There are references to historical groundwater quality monitoring (chapter 17), particularly in relation to the former landfill at Wigmore Valley Park in 2018, but nothing on surface water quality monitoring (rivers or runoff). The report uses water body WFD status as a baseline which is insufficient. Monitoring should be confirmed to establish baseline conditions in receiving surface waters. Including, but not limited to, particular substances of concern associated with airports & highways, such as de-icing chemicals,</p>	Environment Agency			Additional information has now been provided on monitoring undertaken by the operator for the River Lee and this has informed the assessment contained in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01] .	Yes

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	<p>PFAS, hydrocarbons, metals and suspended solids.</p> <p>In the absence of sufficient baseline monitoring, and greater certainty about the mitigation measures being taken, the conclusions reached about construction and operational effects in sections 20.9 & 20.14 are too speculative.</p>					
LE.1.6 3	<p>The discharges referred to in paragraph 20.7.7 are regulated by the Environment Agency, not Thames Water.</p> <p>Paragraph 20.7.38 contradicts paragraph 3.0.2 of the DDS which states that the surface water sewers on site are managed by Luton Airport operations.</p> <p>Paragraph 20.8.7 states that the Thames Water network will increase. It is unclear how much flows will increase by and what assurances Thames Water have given that the network and East Hyde STW will cope with an additional 3.5 mppa in Phase 1 expansion. Paragraph 3.2.3 of the DDS highlights the issue and provides a justification the construction of the on-site water treatment plant in phase 2.</p>	Environment Agency			<p>Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01], has been updated as follows:</p> <ul style="list-style-type: none"> ▪ Corrected paragraph 20.7.7 ▪ Updated paragraph 20.7.38 to be consistent with the DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] ▪ Updated paragraph 20.8.7 to confirm agreed thresholds for discharges to the Thames Water network as agreed directly with Thames Water in stakeholder engagement. <p>The large infiltration tank referred to as Tank 2, is now proposed to function as part infiltration and part attenuation. This will store surface water run off directed to the Water Treatment Plant (WTP), for treatment</p>	Yes

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	<p>Paragraph 20.8.14. recycling of the uncontaminated surface runoff in the large infiltration tank (referred to as tank 2 in the DDS) should also be considered.</p> <p>Paragraph 20.9.11 The scheme should ensure that there is no adverse effect on groundwater quality. Deterioration of the groundwater quality as a result of this discharge will not be acceptable. The compliance point for all hazardous substances will be the water table (no hazardous substances will be allowed to enter groundwater) and to limit the input of non-hazardous pollutants to groundwater so as to ensure that such inputs do not cause pollution (typically determined by DQRA). All compounds that could enter from the terminal building and other effluent streams and operations should be considered and assessed. The on-line monitoring will also need to be sensitive to a wide range of possible contaminants.</p> <p>Paragraph 20.9.17 a HEWRAT assessment will be required to conclude what approach is required to manage potential risks.</p>				<p>to greywater, before being pumped to Terminal 2.</p> <p>The HRA in Appendix 20.6 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent, assesses the impact of the discharge from the Water Treatment Plan to the underlying aquifer.</p> <p>As agreed at scoping, the HEWRAT has been used to assess the potential impacts of the off-site highway interventions on local water quality. The first stage in the HEWRAT assessment process is to identify the off-site highway interventions that exceed 10,000 AADT and only the off-site highway interventions that exceed the 10,000 AADT threshold are subject to further assessment.</p> <p>A methodology is under current development to allow an initial assessment to be carried out in the absence of detailed drainage information - approval will be sought with stakeholders before it is applied in full.</p>	

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
					Once sufficient drainage design (and outfall) details are stipulated, this assessment will be conducted in full and any mitigation required to ensure adequate protection will be identified and applied to the highway drainage design at this location, in full accordance with the DMRB LA113.	
LE.1.6 4	<p>Appendix 20.4 – Drainage Design Statement (DDS)</p> <p>This is a draft document and we do appreciate that additional stakeholder engagement will be required to enable further refinement. We are primarily concerned about the discharge of treated effluent to ground and potential impacts to groundwater quality in the vicinity of the site. The proposal for the new WTP / ETP and Central Soakaway is very ambitious and the treatment and discharge activities will require bespoke Environmental Permits issued by the Environment Agency. At this time, the information provided is not sufficiently detailed for us to assess if the proposals can meet our requirements and be granted Environmental Permits.</p>	Environment Agency			<p>The DDS in Appendix 20.4 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent, has been updated following consultation with stakeholders. A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01].</p> <p>The HRA in Appendix 20.6 of the ES [TR020001/APP/5.02] assesses the impact of the discharge from the Water Treatment Plan to the underlying aquifer.</p> <p>Table 6-5 of the DDS in Appendix 20.4 of the ES [TR020001/APP/5.02], has been compiled using a number of typical final effluent discharge consents in England, including</p>	Yes

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
					<p>watercourse and ground water discharges. The characteristics have been further tightened based on experience and with the knowledge that there are borehole supply installations within the local area. Noting this is an outline design, the parameter stipulated would be refined during detailed design alongside development of the process solution.</p>	
LE.1.6 5	<p>As per the DDS the current surface water drainage arrangement at the airport is predominantly reliant on discharge via the Northern and Central Soakaways. The EA have long standing concerns about this arrangement and it was understood that the proposed scheme would significantly improve the situation, particularly with respect to the discharge of contaminated surface water.</p>	Environment Agency			<p>The DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] has been updated following consultation with stakeholders. A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01].</p> <p>The existing system comprises a combination of discharges to surface water and flood water public sewers and a number of infiltration-based systems. The new drainage design will include a more extensive monitoring regime to identify when surface runoff is polluted and divert to polluted storage tanks or the proposed WTP.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>During initial construction before development of the WTP, any contaminated surface water from the proposed car park shall go through petrol interceptors, before being discharged into the northern soakaway, at an agreed rate of 5 l/s. The central soakaway will not be affected. Once constructed, the WTP will effectively treat contaminated surface water on site.</p>	
LE.1.66	<p>As a general comment – the DDS has treated de-icers as the primary contaminant of concern. Groundwater monitoring data from the airport indicates that hydrocarbons associated with aviation fuels may also be entering the aquifer beneath the airport via the soakaways. We will need confidence that the improved drainage system and associated treatment will be able to deal with all contaminants arising from airport activities. We will also need confidence that any live monitoring systems are sensitive enough to cope with all air side events that could lead to contaminants entering the surface water system not just the use of de-icers during the winter time.</p>	Environment Agency			<p>The DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] has been updated following consultation with stakeholders. A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01].</p> <p>Hydrocarbons will primarily be managed through full retention separators, with contingency measures for larger spills as required.</p> <p>All WTP plants and ancillary systems will be subject to detailed design, where design will be required to</p>	Yes

Ref	Comment	PC	LA	No PIL S	Response	Chan ge
					<p>comply with the current regulations and requirements.</p> <p>Sediments and hydrocarbons spillages would be managed through good practice including silt traps and oil separators. Fuel spillage management includes booms to contain flow and rubber mats to cover gully gratings. In the event of larger fuel spills other mitigation would be deployed, for example temporary bunds and vacuum pumps to cylinders tanks that are then exported from site and recycled.</p> <p>If Total Organic Carbon (TOC) is higher than the trigger level, then the contaminated water will be automatically diverted to the inlet storage tank to be treated in the WTP. It is intended that trigger levels with respect to TOC will be refined during detailed design, with these levels being site dependant. It is anticipated that it would follow a period of site background testing as recommended within the EPA guidance documentation. This above approach is based on current available technology and does not take into</p>	

Ref	Comment	PC	LA	No PILS	Response	Change
					account the potential for future innovation.	
LE.1.67	<p>We note that the Northern Soakaway will be retained and will receive additional discharge from new proposed car park northeast of the airport in Phase 1; this was not apparent during our previous engagement. It is unclear whether the surface water being discharged via the Northern Soakaway will be treated; for the avoidance of doubt we do not consider the current drainage entering the Northern Soakaway to be “clean” and do not consider surface water drainage from carparking areas and road ways to be “clean”. Some form of additional treatment may be required at the Northern Soakaway to ensure that it does not contribute to the pollution of the underlying aquifer. The current discharge via the Northern Soakaway is covered by an Environmental Permit; this may need to be amended to accommodate the proposed additional flows. In addition to the above we question the current proposal not to divert the flows away from the Northern</p>	Environment Agency			<p>The DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] has been updated following consultation with stakeholders. A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01].</p> <p>Any sediments and hydrocarbons are to be managed through well-established techniques such as silt traps and full retention separators.</p> <p>Relevant stakeholders will be consulted in regards to any required amendments to Environmental Permits following detailed design.</p> <p>Any spillage from carparking, such as oils spills, pass through a passive treatment train. This process shall start with the surface run-off through an oil interceptor before entering the attenuation tank prior to discharge.</p>	Yes

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	<p>Soakaway after the development of the WTP as part of Phase 2. Section 3.1.7 states that during the Phase 1 works the new apron southeast of the airport in Zone C will discharge to the existing Central Soakaway and that active monitoring of contaminants is proposed to safeguard the Central Soakaway from the discharge contaminated surface water from this area. Further details regarding the monitoring is required. We note from Section 3.1.15 that any stored contaminated water will be tankered away later; again, further details will be required.</p>				<p>Diverting the current network flows, from the Northern soakaway to the WTP, has never been a part of the strategy as it would primarily add excessive discharge to the WTP's, which they have not been designed for.</p>	
LE.1.68	<p>Paragraph 3.0.2 contradicts paragraph 20.7.38 of Chapter 20 which states that the surface water sewers on site are owned and operated by Veolia Water.</p> <p>Paragraph 3.0.7 refers to chemical removal from surface water runoff. Paragraph 20.7.38 of Chapter 20 suggests that there is a real-time monitoring system detecting the most polluting 'first flush' associated with rainfall and diverting it to foul sewer. However, section 3.0 of the DDS (on the existing drainage network) gives no explanation of how this works.</p>	Environment Agency			<p>Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01] has been updated to clarify ownership and operation of the drainage network at the airport.</p> <p>The DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] has been updated following consultation with stakeholders. A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and</p>	Yes

Ref	Comment	PC	LA	No PILS	Response	Change
	<p>Paragraph 3.1.1. We would expect that information on discharges have been confirmed in time for the PEIR consultation.</p> <p>Page 11. This appears to cast doubt on the feasibility of an attenuation tank under the new car park in zone F proposed in para 3.1.11. Alternative solutions should be identified if the Thames Water network cannot accommodate unattenuated flows from the new car park.</p> <p>Paragraph 3.1.20 It is unclear how feasible the use of tankers is and what impact that may have.</p> <p>Section 3.1.24 – why will only five stands be monitored for the release of contaminated surface water during Phase 1? Inset 3-3 appears to be just five new aircraft stands. What happens to de-icers used on existing stands, aprons and the runway? Paras 3.3.37 & 3.3.38 suggest that de-icers are used widely across the site.</p> <p>Paragraph 3.2.6. It is not clear if this refers to foul sewage or surface water. Surface water runoff entering Thames Water surface water sewers is not treated at East Hyde STW - it either goes to soakaway or is discharged directly to the river Lee. If this</p>				<p>Flood Risk of the ES [TR020001/APP/5.01].</p> <p>The HRA in Appendix 20.6 of the ES [TR020001/APP/5.02] assesses the impact of the discharge to the underlying aquifer.</p> <p>De-icing of aircraft would only be allowed on five of the proposed stands, as the other two stands are restricted to engine testing.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	sentence does refer to surface water, then it also contradicts Inset 3-4, which appears to show drains from T1 and aprons highlighted in yellow being diverted.					
LE.1.69	[DDS] Section 3.3.7 – In line with our previous comments; we do not consider surface water draining from car parks to be "clean" as it will likely contain hydrocarbon contaminant. Specific treatment or some form of passive treatment train may be required to ensure that contaminants associated with normal carparking are not infiltrated to ground via Tank 2. The DDS provides a limited discussion of this in Section 3.3.24 however additional detail will be required; this should be incorporated into the more detailed designs required for the ES.	Environment Agency			Please refer to the response to Ref LE.1.65 and LE.1.67.	Yes
LE.1.70	[DDS] Section 3.3.7 b - Discusses the use of continuous total organic carbon (TOC) monitoring. Given the range of contaminants that could enter surface water flows additional monitoring beyond just TOC may be required. We will also need confidence that the automated monitoring system is reliable and sensitive enough to detect contaminated surface water flows entering the drainage system.	Environment Agency			The DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] has been updated following further consultation with stakeholders. This includes discussions on the live water monitoring system in section 3.4. A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01] .	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.7 1	[DDS] Section 3.3.24 b - The sewage treatment process (STP) will need to be able to treat a very wide range of contaminants (chemical and biological). Given that the system will predominantly receive effluent flows from T2 it will need to be able to effectively treat all contaminants that may be disposed down the drains at the terminal.	Environment Agency			Table 3-7 of the DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] denotes possible influent parameters that may be present within either the Terminal 2 waste water treatment flows or the apron/runway/taxiways runoff water. The majority of these compounds/chemicals will be absorbed and broken down within the treatment processes to their constituent parts to meet the final effluent discharge consents. It is anticipated that this table will be refined following site testing and sampling together with an engagement process throughout the outline and detailed design processes.	No
LE.1.7 2	[DDS] Section 3.3.35 - Discusses the possibility of treating firefighting foams from the fire training ground in the WTP. We would advise caution – we are aware of several “environmentally safe” products that either contain, or degrade into, compounds that are hazardous to groundwater. The Environmental Permit for the WTP will not allow the infiltration of hazardous substances to ground.	Environment Agency			The Firefighting Training Ground (FTG) will be self-contained with surface water run-off during fire training being diverted to a holding tank which will not drain to ground under any circumstance. Any potential future treatment of foams would be dependent on the type of foam utilised at the time and would be agreed in consultation with relevant stakeholders.	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
LE.1.7 3	<p>[DDS] Section 3.4.1 – 3.4.3 – Discuss the chemical composition and hazardous substances in the influent. This information will be essential for any Environmental Permit applications associated with the WTP and the environmental discharge. Based on pre-engagement discussions we understand that the WTP will be designed to effectively treat everything.</p> <p>Section 3.4.4 - Any agreements with Affinity Water with respect to the quality of the discharge from the WTP and infiltrated to ground will be superseded by the Environment Permit issued by the Environment Agency. The permit discharge limits will be developed based on the requirements of the Environmental Permitting Regulations (EPR) and will be designed to prevent the discharge of hazardous substances and limit the discharge of non-hazardous substances into groundwater. It is likely that the requirements of the Environmental Permit will be more stringent than any limits agreed with AW.</p>	Environment Agency			<p>The DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] has been updated following further consultation with stakeholders. This includes discussions on the WTP treatment system, potential consent levels and the live monitoring system.</p> <p>The HRA in Appendix 20.6 of the ES [TR020001/APP/5.02] assesses the impact of the discharge to the underlying aquifer.</p> <p>Relevant stakeholders will be consulted in regards to any required new or amended Environmental Permits following detailed design.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.7 4	[DDS] Section 3.4.8 - This statement is confusing. It is trying to say that the currently proposed combination of treatments can treat effluent to a better quality than typical consented limits for outfalls and to estuaries. Please note, the consented limits for the infiltration to treated effluent to ground are likely to be much more stringent than consented outfalls or discharges to estuaries and will be determined as part of the permitting process for the discharge.	Environment Agency				No
LE.1.7 5	Paragraph 3.4.15. BOD should not be highlighted in green in Table 3-6 as it is a 5-day test done in the lab. Paragraph 3.4.19 Why are glycols, hydrocarbons and PFAS omitted from this list?	Environment Agency			That has now been amended and is included in the updated DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] , submitted with the application for development consent.	Yes
LE.1.7 6	The proposed development and increase in capacity for flights at the airport will require additional fuel storage. The storage of oils fuels and chemicals can pose a risk to groundwater if spillage occurs. Groundwater is particularly sensitive in this location because the proposed development site is on the edge of a source protection zone 3 and on a principal aquifer. The proposals do not indicate what the required new	Environment Agency			The new fuel storage facility would be provided landside to the east of the airport, with a ground level approximately 27m below the proposed apron level. The facility would be designed in accordance with The Dangerous Substances and Explosive Atmospheres Regulations (DSEAR). As part of the planning process, the Applicant commissioned a review of	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	capacity will be or under which legislation the above ground storage will be controlled.				the proposed storage capacity against the requirements of the Control of Major Accident Hazards (COMAH) Regulations 2015. As a result of the assessment mitigations recommended in the design of the new fuel storage facility include high-integrity independent tank overflow protection systems and the installation of Remotely Operated Shut Off Valves (ROSOV) in the fuel transfer pipelines and storage tanks.	
LE.1.7 7	Within Central Bedfordshire Council lies the River Lea County Wildlife Site (CWS) and concerns were previously raised in our response to the 2019 Statutory Consultation, over the potential hydrological impacts to the watercourse and that without appropriate mitigation, pollutants could have a significant effect on the watercourse. Central Bedfordshire Council are pleased that this has been considered and that mitigation has been identified such as oil and sediment separators which will capture pollutants in the surface drainage system. Soakaways at least 1m above the seasonal water table and riverbanks will also protect the River Lea from the input of pollutants from		Central Bedfordshire Council	1	Noted. Details of the proposed measures to mitigate impacts to the River Lea County Wildlife Site are discussed in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01] , submitted with the application for development consent.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the new development. With the appropriate mitigation measures in place, Central Bedfordshire Council is satisfied that no significant impacts are anticipated to the River Lea CWS.					
LE.1.78	Table 20.2 sets out the policy position and should include a list of relevant policies from the Central Bedfordshire Adopted Local Plan, including CC3 Flood Risk Management, CC4 Development Close to Watercourses, CC5 Sustainable Drainage, CC7 Water Supply.		Central Bedfordshire Council	1	Table 20.2 in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01] has been updated to include the list of relevant policies from the Central Bedfordshire Adopted Local Plan, including CC3 Flood Risk Management, CC4 Development Close to Watercourses, CC5 Sustainable Drainage, CC7 Water Supply.	Yes
LE.1.79	The use of infiltration is expected to have limited effect on local water table levels that may contribute to river levels, as such Central Bedfordshire Council has no reason to comment further on the surface water drainage and flood risk strategy.		Central Bedfordshire Council	1	Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01] , together with the associated ES Appendices [TR020001/APP/5.02] , have been updated following further consultation with stakeholders. The updated document details the likely impacts on receptors which may be impacted by the works, together with mitigation measures.	No
LE.1.80	The concept of nutrient neutrality is a matter of increasing importance. Government support for the stance taken by Natural England has been recently confirmed (the March 2022	Chilterns Conservation Board			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	policy paper). We know that such pollution levels are dependent upon local circumstances and that wastewater and agricultural practices are major contributors.					
LE.1.8 1	It is not entirely clear to us from the proposals exactly how surface water run-off is going to be managed with regard to its impact on the Chilterns chalk aquifer and the area's globally distinctive chalk streams. The earthworks necessary to support the new airport infrastructure are also of concern in this regard.	Chilterns Conservation Board			<p>Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01] identifies surface water and groundwater receptors in the study area, with particular cognisance of the high value nature of the Chiltern chalks aquifer underlying the site, and associated groundwater dependent receptors (such as the Lee and Mimram chalk fed streams). This includes a description of baseline water quality, water resources and WFD status.</p> <p>An assessment of the impacts of the Proposed Development on water quality and water resources has been undertaken and is outlined in Section 20.9 of the ES.</p> <p>A WFD Compliance Assessment has been completed, in line with methodology agreed with the Environment Agency and outlined in</p>	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
					<p>the Scoping Opinion and Scoping Report [TR020001/APP/5.05].</p> <p>The approach outlined in the Sustainable Drainage Systems Manual 2015 has been used to inform the drainage design and mitigation measures described in the DDS in Appendix 20.4 of the ES [TR020001/APP/5.02]. The DDS outlines how surface water run-off will be managed.</p> <p>The principles and approach outlined in the Environment Agency Approach to Groundwater Protection 2018 and NC/99/73 2001 have been applied in the completion of the Detailed Quantitative Risk Assessment - Controlled Waters (Appendix 17.4 of the ES [TR020001/APP/5.02].), which documents mitigation and avoidance measures.</p>	
LE.1.8 2	The PEIR highlights that a Highways England Water Risk Assessment Tool (HEWRAT) assessment has not yet been completed as the design provided during the time of its creation was not in sufficient detail to perform this. The screening process identified	Nation al Highw ays		1	An assessment of the impacts of the Proposed Development on water quality and water resources has been undertaken and is outlined in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01] .	No

Ref	Comment	PC	LA	No PILS	Response	Change
	that the works associated with M1 J10 may need a detailed HEWRAT assessment. This could lead to the need for a surface water management system at that location requiring additional water quality treatment measures. At this stage, it is assumed that any effects thereof are minor adverse effect (not significant).				HEWRAT screening is ongoing, and once drainage design is completed to a sufficient level of detail to conduct a full assessment this will be carried out for the M1 J10 location. Should the assessment result in a fail for either sediment or heavy metal contaminants, appropriate mitigation measures will be applied as per the DMRB LA113. This is likely to take the form of a treatment train comprising of either or all: vegetated ditches, swales, vortex grit separators, detention pond. The level of mitigation offered will ensure that, when in place, the assessment passes screening and offers adequate water quality protection.	
Lighting						
LE.1.8 3	With regard to lighting, clarification will be necessary in relation to the cumulative compliance with pre and post curfew limits.		Luton Borough Council	1	The Light Obtrusion Assessment in Appendix 5.2 of the ES [TR020001/APP/5.02] , considers the immediate surroundings and sensitive receptors. The calculations undertaken demonstrate that the design is within the acceptable limits (i.e. less than 10lux and 2lux	No
LE.1.8 4	The effect of the lights at Luton Airport should not be underestimated. It affects people sleep, and that of the wildlife.	Kings Walden Parish		1		No

Ref	Comment	PC	LA	No PILs	Response	Change
		Council			respectively, pre and post curfew), set out for a Zone E3 within the Institute of Lighting Professionals (ILP) Guidance Note 1 (GN01).	
LE.1.85	These bright lights interfere with the viewing of sunsets and the stars in the night sky already. A second terminal closer to the parish would increase the light pollution in the area.	Kings Walden Parish Council		1	Sky glow was observed during the night-time survey (as documented within the Preliminary Light Obtrusion Assessment) above the local area from all viewpoints. It was considered that the magnitude of sky glow observed is typical of any urban and sub-urban location in the region.	No
LE.1.86	Light pollution from the airport is already an issue in our parish, there needs to be more done already to mitigate these issues before making the issue worse.	Kings Walden Parish Council		1		No
LE.1.87	An expanded airport means more light pollution for residents, impacting on quality of life and sleep. The proposed screening plans rely on the co-operation of other land owners for whom the benefit is questionable. Also, any planted screening takes time to grow and will require expensive management.	Kings Walden Parish Council		1	Please refer to the response to Ref LE.1.83 Screening was not included in assessments, but it is anticipated that planting and vegetation will reduce impact from the lighting installation further.	No
Ground Conditions						
LE.1.88	For ground gas there will need to be greater detail in relation to mitigation measures on the boundaries of the landfill to address lateral flow, together		Luton Borough Council	1	Use of gas protection measures to the landfill boundary are part of embedded mitigation, and included in Chapter 17 Soils and Geology in the ES [TR020001/APP/5.01] . Within this	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	with clarity on the monitoring and audit of gas migration.				<p>chapter of the ES it is noted that boundary gas control measures are to be installed prior to major earthworks within the landfill. Gas protection measures are set out in the Outline Remediation Strategy in Appendix 17.5 of the ES [TR020001/APP/5.02] and includes boundary gas protection to prevent off-site migration. Both virtual gas barriers and passive barriers are recommended; the final design to be determined by the contractor. This issue was discussed at the contaminated land technical working group (CL TWG) meeting 3, held on 12 July 2022, at which an LBC representative requested additional information on the boundary gas protection measures to provide confidence they will be effective.</p> <p>A gas, groundwater and leachate monitoring plan was agreed with the Environment Agency and LBC, to obtain further baseline data, at the CL TWG meeting 2, held on 9 February 2022. Prior to construction the appointed contractor will agree the further gas, groundwater and leachate monitoring plan pre, during and post construction into the operational</p>	

Ref	Comment	PC	LA	No PILS	Response	Change
					period of the Proposed Development. An Outline Strategy Report for Groundwater, Ground Gas and Leachate Monitoring is provided at Appendix 17.7 of the ES [TR020001/APP/5.02] . The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] includes the monitoring and control measures which will be in operation during the construction period to monitor and audit gas migration.	
LE.1.89	The focus of the environmental site investigations, risk assessments and remediation strategy presented in the PIER is the former Eaton Green landfill. We are generally comfortable with this approach as the landfill is the main area within the proposed development footprint, where known contaminative historical land use has occurred. We are mindful that additional geo-environmental assessment works may be required elsewhere, for example associated with the DART extension works, the proposed new areas of airport support facilities and carparks (outside of the Eaton Green Landfill) and various highway intervention works. We feel that any consent, that may be granted	Environment Agency			Noted. Table 17.19 in Chapter 17 Soils and Geology of the ES [TR020001/APP/5.01] recommends additional ground investigation (GI) in areas D, E, new FTG and the Airport Access Road. Further to the statutory consultation meeting with the Environment Agency of 12 July 2022 the current FTG has been added to the list of sites requiring further GI should the DCO be granted. This will be secured via a DCO Requirement, these will also to be included in the Design Principles document [TR020001/APP/7.09] , DAS [TR020001/APP/7.03] and the Mitigation Route Map [TR020001/APP/5.09] .	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	for the proposed scheme, will need a form of planning condition ensuring that the potential for land contamination is investigated and that appropriate remediation strategies (where required) are developed for land parcels outside of the former Eaton Green Landfill.					
LE.1.9 0	With respect to the former Eaton Green Landfill; we have reviewed the Preliminary Risk Assessment (Appendix 17.1), the Generic Risk Assessment (Appendix 17.2) and Detailed Quantitative Risk Assessment (DQRA) for controlled waters (Appendix 17.4) alongside the various site investigation reports prepared for the area. We are satisfied, from a groundwater quality perspective, that the area has been adequately characterised and that the risks associated with the former landfill are understood.	Enviro nment Agenc y			Noted. A substantial amount of GI 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, an Outline Remediation Strategy has been developed and is contained in Appendix 17.5 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent. This includes details of measures to be undertaken to prevent contaminants in the former landfill migrating into the groundwater in the underlying chalk, during construction. These measures are also taken forward to the CoCP in Appendix 4.2 of the ES	No

Ref	Comment	PC	LA	No PILS	Response	Change
					<p>[TR020001/APP/5.02], which is submitted as part of this application for development consent. A groundwater monitoring plan has been agreed with the Environment Agency to obtain further baseline data up to DCO (CL TWG 2). The appointed contractor will agree the groundwater monitoring plan pre, during and post construction into the operational period of the Proposed Development. An Outline Strategy Report for Groundwater, Ground Gas and Leachate Monitoring is provided at Appendix 17.7 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent.</p>	
LE.1.9 1	<p>The Remediation Strategy document presented as Appendix 17.5 is logical. The primary remediation associated with the protection of groundwater quality will be the installation of an engineered cap over the former landfill to reduce the infiltration of rainwater through the deposited waste. The remediation strategy also states that the drainage in the former landfill will also be managed to minimise the infiltration of water through this area. A “watching brief” will be adopted during</p>	Environment Agency			<p>Noted. The Outline Remediation Strategy in Appendix 17.5 of the ES [TR020001/APP/5.02] includes detail of the engineered cap with drainage system to collect all infiltration in the area of the landfill and verification procedures. During construction a temporary drainage system and waste water treatment system will be installed. The Outline Remediation Strategy contains some detail of what would be expected in the watching brief, including discovery of</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the remediation of the landfill to identify any pockets of grossly contaminated material that are unlikely to be suitable for treatment and should be removed during the works. A detailed method statement for the watching brief should be developed and provided in subsequent submissions.</p> <p>The landfill will be subject to extensive predevelopment enabling works including excavation, sorting and processing of waste materials. The intention is to redeposit materials that are determined to be suitable for reuse. Given that the material in the landfill was intentionally discarded this will need to be regulated as waste; the enabling works within the landfill will need to be undertaken under an Environmental Permit regulated by the Environment Agency. The Remediation Strategy may need further revision when the requirements of the Environmental Permit are understood.</p>				<p>unexpected contamination. Further to the CL TWG meeting 3 of 12 July 2022 a high-level method statement for the watching brief is provided in the Outline Remediation Strategy in Appendix 17.5 to the ES [TR020001/APP/5.02].</p> <p>The HRA in Appendix 20.6 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent, provides further detail on recovery of landfill waste for redeposition. The HRA also forms part of an Environmental Permit application for approval by the Environment Agency.</p>	
LE.1.9 2	The need for a foundation works risk assessment for piling works in the former landfill area is identified in the DQRA and the Remediation Strategy. Piling in the former landfill area could	Environment Agency			The Foundations Work Risk Assessment (FWRA) in Appendix 17.6 of the ES [TR020001/APP/5.02] has been prepared based on Environment Agency Guidance. The	No

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	potentially push contaminated material to depth in the underlying aquifer or create preferential pathways for contamination migration. Piling methodologies that will allow the safe installation of piles in former landfills do exist and a piling risk assessment considering the conditions in the landfill and appropriate mitigations to be adopted during the piling works is required.				<p>FWRA assesses a very low to low risk from Continuous Flight Auger (CFA) piles or rotary bored piles, assuming a number of appropriate mitigations are adopted. Subsequent to the CL TWG meeting 3 of 12 July 2022, the report was updated based on Environment Agency guidance relevant to drilling into and through landfills.</p> <p>A HRA in Appendix 20.6 of the ES [TR020001/APP/5.01] has also been prepared.</p>	
LE.1.93	Chapter 17 on soils and geology includes a land contamination assessment which characterises the site in terms of contamination risk. Central Bedfordshire Councils Pollution Officer has confirmed that this is satisfactory. However, it is considered that in order to complete the report, further consultation is needed with the Environment Agency and local authorities (including Central Bedfordshire Council) to agree the detail of the Remediation Strategy		Central Bedfordshire Council	1	<p>Noted. Further consultation meetings with the host authorities and the Environment Agency were undertaken in the form of CL TWG meetings on 9 July 2022 and 12 July 2022. CBC's EHO was present at the meeting on 12 July 2022. Additional consultation has also been undertaken with the Environment Agency and LBCs representative to obtain additional input on issues raised in the meeting.</p> <p>A summary of stakeholder engagement completed as part of the EIA is provided in Chapter 20 Water Resources and Flood Risk of the ES [TR020001/APP/5.01].</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
Waste and Minerals						
LE.1.94	<p>[Waste Disposal or Recovery (NLQ I 06, NGW I 02 and NPP P07)]</p> <p>The proposed development is located on the Eaton Green historic landfill which contains mixed controlled waste including but not limited to construction and demolition wastes, cesspool contents and/or sewage sludge, brewers and oil interceptor wastes, household, commercial and industrial wastes. Any disturbance of this landfill will pose an increased risk to the environment.</p> <p>The site's waste authorisation was never formally surrendered but returned to the waste regulation authority in 1993. As no assessment was undertaken at this time, no Certificate of Completion was issued, therefore the land may not be suitable for the potential B111 use. Any redevelopment which takes place on or near to the waste may disturb it and increase the likelihood of pollution or harm.</p>	Environment Agency			<p>Noted. The landfill has been subject to a number of GIs to determine the extent and depth of the landfill and characterise the waste and associated contaminants in soils, landfill leachate, groundwater and landfill gas /ground gas and vapours. A Generic Quantitative Risk Assessment and Detailed Quantitative Risk Assessment - Human Health are provided in Appendices 17.2 and 17.3 respectively of the ES [TR020001/APP/5.02]. The data has indicated the landfill does not currently present a risk to human health, controlled waters or the environment. However the Proposed Development will likely change the conditions within the landfill such as gassing conditions/potential contaminant linkages to groundwater. The Outline Remediation Strategy in Appendix 17.5 of the ES [TR020001/APP/5.02], sets out methods to reduce/remove the risks</p>	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
					identified in the generic and detailed quantitative risk assessments which are associated with the Proposed Development to ensure the land is suitable for the intended use. The assessments have been accepted by the Environment Agency as adequate to characterise the risks to groundwater from the landfill.	
LE.1.95	<p>[Waste Disposal or Recovery (NLQ I 06, NGW I 02 and NPP P07)]</p> <p>The proposed development involves the excavation and redeposit of controlled waste. This will require an environmental permit under the Environmental Permitting (England & Wales) Regulations 2016, from the Environment Agency. As this is already a controlled waste it cannot be reused under other schemes to avoid waste regulation such as CL:AIRE/DoWCoP which is only applicable for material which has never been discarded or become a controlled waste. If the proposals cannot demonstrate this is a legitimate recovery of waste, this will be regarded as a disposal activity and must be undertaken in line with an environmental permit for Landfill.</p>	Environment Agency			Please refer to the response to Ref LE.1.91.	No

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LE.1.96	<p>[Waste Disposal or Recovery (NLQ I 06, NGW I 02 and NPP P07)]</p> <p>The proposed landfill/deposit site for recovery will require a bespoke permit under Schedule Regulation 12 of the Environmental Permitting Regulations (England and Wales) 2016. We do not have enough information to know if the development can meet our requirements to prevent, minimise and/or control pollution to be granted an environmental permit. The applicant is advised to contact the Environment Agency on 03708 506 506 for enhanced permitting pre-application advice and to discuss the issues likely to be raised. You should be aware that there is no guarantee that a permit will be granted, this could bring into question the deliverability of the proposed scheme. Additional 'Environmental Permitting Guidance' can be found at: https://www.gov.uk/environmental-permit-check-if-you-need-one.</p>	Environment Agency			Please refer to the response to Ref LE.1.91.	No
LE.1.97	<p>Waste Treatment (WST I 01)</p> <p>This development involves the excavation and treatment of controlled waste from within a landfill, therefore will require an environmental permit for this treatment activity under the</p>	Environment Agency			<p>Please refer to the response to Ref LE.1.91.</p> <p>Enquiries made on 18 January 2019 to the National Permitting Team confirmed that an enhanced pre-</p>	No

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	Environmental Permitting (England and Wales) Regulations 2016, Regulation 12. Due to the scale of the development and the nature of the waste, this must be a bespoke site-based permit. Mobile plant will not be accepted as the development will not meet the rules and limitations on this type of authorisation. The applicant is advised to find out more information about the permit application process online and to send a pre-application enquiry form via the gov.uk website: https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form				application service would be required prior to submission of the Environmental Permit application. The remediation contractor to be appointed should the application for development consent be granted is expected to engage with the Environment Agency National Permitting Team as they will apply for the bespoke Environmental Permit.	
LE.1.98	Chapter 19 has been assessed by Central Bedfordshire Council's Mineral and Waste Planning Team who have expressed concern with respect to aggregate mineral supply. When demand is considered as a percentage of national demand, the impact is not significant. However, such materials are supplied on a local basis and are subject to both local market capacity and quantity constraints. In order to plan for this, an indication of when these materials might be required should be provided. This is considered to be lacking at this stage.		Central Bedfordshire Council	1	Construction material requirements by quarter are provided in Chapter 19 Waste and Resources of the ES [TR020001/APP/5.01] .	Yes

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Agriculture						
LE.1.99	The proposal to use farmland for the expansion is worrying. Once farmland is taken out of agriculture, it never comes back. There is a global food shortage which will get significantly worse because of the crisis in Ukraine. Moreover, the cost of importing food, further impacts on the environment and increases global warming. Wildlife living in and around the farmland will move on. Villages, and village life, in our parish will be negatively affected.	Kings Walden Parish Council		1	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. Further information on the consideration of alternatives, sifting and design evolution can be found in the DAS [TR020001/APP/7.03] . These identify the appraisal criteria, methodology, outcomes and recommendations, and	No
LE.1.100	The agricultural land that the new park will be built on is not being relocated and this is a huge loss to the area and let us not forget that a loss in agricultural land will also affect employment in farming. Taking land out of agriculture does not make sense either, given the war in Ukraine which produces 40% of Europe's grain.	Kings Walden Parish Council		1	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. Overall, the outcomes of the [final] Sift 3 reinforced the conclusions of Sift 2, that a two terminal solution to the north of the runway was 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	No

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					<p>options were therefore discounted at this stage.</p> <p>Chapter 6 Agricultural Land Quality and Farm Holdings of the ES [TR020001/APP/5.01], includes an assessment of the operational impacts of the Proposed Development on agricultural land quality, soil resources and farm holdings.</p>	
Major Accidents and Disasters						
LE.1.1 01	<p>According to Health and Safety Executive's (HSE) records there are two major accident hazard pipelines within the proposed application boundary of the Expansion of London 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. The major accident hazard pipelines are:</p>	Health and Safety Executive			<p>Noted. The two major accident hazard pipelines operated by Cadent Gas Ltd have been considered within Chapter 15 MA&D of the ES [TR020001/APP/5.01].</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>HSE Reference No. - TRANSCO Index No. - Pipeline Operator - Pipeline/Location Name</p> <p>7527 - 1786 - Cadent Gas Ltd - Vauxhall motors spur (1TOE)</p> <p>7519 - 1778 - Cadent Gas Ltd - Whitwell / Steppingley (1SWA)</p> <p>However, according to Figure 2.2 (Proposed Development layout at 32 mppa 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 land use planning HSE would not advise against the proposal.</p>					
LE.1.102	<p>Explosives sites</p> <p>There 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 significant interaction</p>	Health and Safety Executive			Noted. The existing licensed explosives site has been referenced within Chapter 15 MA&D of the ES [TR020001/APP/5.01] , which is submitted as part of this application for development consent, noting that no interaction with the Proposed Development is considered likely.	No
LE.1.103	<p>Electrical Safety</p> <p>No comment from a planning perspective.</p>	Health and Safety Executive			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.104	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			As referenced within Chapter 15 MA&D of the ES [TR020001/APP/5.01] measures have been embedded within design in line with National Counter Terrorism Security Office's Crowded Places Guidance (2017) and DfT's Aviation Security in Airport Development to minimise threats to the Proposed Development.	No
LE.1.105	The incidence and impact of major accidents (and disasters) on EEAST and its HEMS partner operational capacity, resources and efficiency (including EEAST hazardous area response teams - HART) needs to be presented and assessed, with appropriate mitigation and management measures secured within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.	East of England Ambulance Service		1	<p>As set out within the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] the lead contractor will be responsible for the development of emergency procedures in consultation with the emergency services.</p> <p>An assessment of relevant major accident and disaster hazards is provided within Chapter 15 MA&D of the ES [TR020001/APP/5.01]. The assessment concludes that with the controls established through the DCO (e.g. in the form of the CoCP and the Outline Construction Traffic Management Plan), no likely significant risks of MA&Ds remain. As such, no regular callouts to the</p>	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
					ambulance service during construction are expected.	
LE.1.1 06	In WSP’s review of the PEIR, the quality of the assessment of landscape and visual impact is scored poorly and we would welcome further engagement on the details and overall outcomes of the assessment prior to the submission of the application. We continue to be concerned by the landscape and visual impact of the proposals, both within the vicinity of the airport and further afield.		Host Authorities	4	<p>The assessment of landscape and visual impact provided in the PEIR reflected a methodology and approach to assessment that is in accordance with the third edition of the Guidelines for Landscape & Visual Impact Assessment and that had been discussed and agreed with the LVIA Working Group.</p> <p>The LVIA in Appendices 14.4 and 14.5 of the ES [TR020001/APP/5.02], has been updated from the version available at the 2022 statutory consultation. The LVIA has been revised using updated baseline photography for viewpoints which have experienced change since baseline data was collected in 2018/19.</p> <p>The concerns raised by WSP with reference to the assessment of landscape and visual impact have been further discussed with the LVIA Working Group following the 2022 statutory consultation. The officers in the LVIA Working Group advised</p>	Yes

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					<p>during these discussions that they had not been given sight of WSP’s review ahead of its publication and commented that several of the matters raised in WSP’s review did not reflect their opinions. The officers affirmed also that all LVIA matters stated as having been agreed within the PEIR (including methodology, viewpoint locations, receptors and mitigation) remained so.</p> <p>As was explained within the PEIR, Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] provides further explanation of assessment judgements summarised in the PEIR.</p>	
LE.1.1 07	<p>The visibility of the development from the Chilterns AONB is also a concern. WSP highlight that identification of key receptors should be discussed further with the Chilterns Conservation Board (CCB); concerns are raised about how the AONB and those within it are addressed.</p>		Host Authorities	4	<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 ES [TR020001/APP/5.01]. The visual receptors and viewpoints considered within this assessment were discussed and agreed with the LVIA Working Group. These discussions considered the AONB boundary and were informed by Zone of Theoretical Visibility (ZTV) mapping. It was</p>	No

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					agreed with the LVIA Working Group that there was not a need for additional viewpoints or receptors to be considered within the Chilterns AONB.	
LE.1.1 08	The proposals if implemented will create significant harm to the countryside. A significant part of Dacorum contains both the Chilterns AONB and the Chilterns Beechwoods SAC which are recognised international and national sites of great sensitivity. National planning policy protects the tranquil enjoyment of designated protected areas such as these. These areas are already significantly affected by aircraft movements and impacts in terms of noise and air quality will further increase with these proposals for expansion.		Dacorum Borough Council	1	<p>Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] considers the impact of changes to tranquillity when assessing effects on landscape receptors (particularly Landscape Character Areas). The approach to considering tranquillity within the ES has been discussed and agreed with the LVIA Working Group.</p> <p>An additional assessment of tranquillity on human and heritage receptors has been undertaken in response to feedback from the 2022 statutory consultation. The assessment is presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] and has also informed other assessments in the ES, namely the impact of the noise change on the setting of heritage assets in Chapter 20 Cultural Heritage and the impact of tranquillity on landscape receptors including the Chilterns AONB in Chapter 14 Landscape and Visual. Chapter 14</p>	No

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					<p>considers the tranquillity of the Chilterns AONB with reference to the significance of the landscape effect on 'the aesthetic and perceptual qualities of the Chilterns AONB'. The Chilterns AONB Sensitivity Test can be found in Appendix 14.9 of the ES [TR020001/APP/5.02].</p> <p>As part of the Government's airspace change process, 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>Please also refer to Noise, Flight paths and Fleet Mix, and Air Quality topic responses.</p>	
LE.1.109	<p>Natural England's key concerns regarding the expansion of London Luton Airport are:</p> <p>The potential impacts on the Chilterns Area of Outstanding Natural Beauty in terms of air quality, noise, loss of tranquillity, and the cumulative effect of airport expansions.</p>	Natural England			<p>Please refer to the response to Ref LE.1.108.</p> <p>The extent of the applications and allocations search is based on the Zone of Influence (ZOI) identified by each of the environmental topics. The search area and 'other developments' has been amended throughout the EIA based on Planning Inspectorate and Chilterns Conservation Board</p>	No

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					<p>(CCB) commentary to include airports in the south east. These changes have been detailed in Chapter 21 In-combination and cumulative effects in the ES [TR020001/APP/5.01]. The assessment has included consideration of Stansted, Heathrow, Gatwick and London City airports. The assessment has shown there would be no overlap with the core ZOIs for the Proposed Development (Figure 20.1, Chapter 21 In-combination and cumulative effects in the ES [TR020001/APP/5.01]). Therefore, cumulative effects with other airport expansion in the south east has not been considered further.</p>	
LE.1.1 10	<p>Policy DP14 within the current Chilterns 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</p>	Natural England			<p>Please refer to the response to Ref LE.1.107, LE1.1.108 and LE.1.109.</p>	No

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	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.					
LE.1.111	An extension to an existing AONB is formally designated once a variation Order, made by Natural England, is confirmed by the Defra Secretary of State. Following the issue of the designation order by Natural England, but prior to confirmation by the Secretary of State, any area that is subject to a variation Order would carry great weight in decisions on planning and infrastructure proposals.	Natural England			Noted.	No
LE.1.112	There is concern that the proposed expansion in terms of, for example (but not exclusively) built form, transport and movement, lighting, vapour trails and tranquillity, would have an impact on these sensitive landscape areas. In terms of tranquillity, confirmation of the proposed study area and proposed criteria for assessment is welcomed		Central Bedfordshire Council	1	<p>In this response it is assumed that 'sensitive landscape areas' refers to the Chilterns AONB.</p> <p>Please refer to the response to Ref LE.1.108.</p> <p>The Study Area for considering tranquillity within the LVIA includes the full extent of any character areas</p>	No

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					<p>that may be affected within 5km of the Main Application Site; land in Hitchin within 250m of Work No. 6o, 6p and 6q and land within the Chilterns AONB where aircraft would be below 7,000 ft.</p> <p>With regards to vapour trails, these occur typically at aircraft cruising altitudes (ca. 8,000m). Vapour trails resulting from aircraft originating at the airport are therefore a considerable distance from the Main Application Site. The potential impact of vapour trails on landscape and visual receptors has been considered in the assessment provided at Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] but is judged unlikely to result in significant environmental effects.</p> <p>Sky Glow (light pollution into night sky) was observed during the night-time survey, as documented within the Light Obtrusion Assessment in Appendix 5.2 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent. The assessment demonstrates that Sky</p>	

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					Glow was observed above the local area from all viewpoints. It was considered that the magnitude of sky glow observed is typical of any urban and sub-urban location in the region. The Light Obtrusion Assessment demonstrates that the Proposed Development is substantially below the acceptable limits set out for Upward Flux Ratio (Sky Glow) and nuisance caused by the lighting installation, in line with the recommendations within ILP GN01.	
LE.1.1 13	A significant, and critical, concern is the potential for harmful effects on the designated AONB arising not only from the expansion of activities and the airport and the construction of the required infrastructure itself, but also the significant additional pressure for development in the Luton area that will necessarily follow from the social and economic benefits outlined in the consultation Brochure.	Chilterns Conser- vation Board			Please refer to the response to Ref LE.1.107.	No
LE.1.1 14	The Chilterns Conservation Board recognises that there is a very good case for supporting some expansion of activity at Luton Airport to make provision to address the recognised issues with social and economic	Chilterns Conser- vation Board			Noted.	No

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	deprivation in the area; there are also potential benefits for the AONB in supporting tourism opportunities in the region through the airport's operation and expansion. But expansion needs to be managed with great care to avoid direct and indirect harm to the Chilterns AONB.					
Landscape Assessment						
LE.1.1 15	There is concern in respect of the intervisibility between the proposed development and surrounding area. For clarity, and to assist in the scrutiny of the Landscape and Visual Impact Assessment (LVIA), further information is needed including plans and cross sections that clearly show the relative heights of the existing and proposed built development and features in the landscape. Further details with regards to the approach to visually recessive architectural detailing and materials is also required.		Host Authorities	4	<p>The Location Plan [TR020001/APP/4.01] and General Arrangement Drawings [TR020001/APP/4.09], which are submitted with this application for development consent, demonstrate the relationship between the existing area and the Proposed Development.</p> <p>LVIA photomontages in the ES Figures [TR020001/APP/5.03] help convey the existing and proposed built development and features in the landscape.</p> <p>Details on the design and materiality of buildings within the Proposed Development are set out in the DAS [TR020001/APP/7.03], which is submitted as part of this application for development consent.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 16	HCC and NHC asks LR to: - Provide (or signpost) plans and cross-sections that clearly show the relative heights of the existing and proposed built development and features, and details with regards to the approach to visually recessive architectural detailing and materials. Meet with HCC and NHC to discuss the LVIA in more detail. Provide further information with regards to the options and parameters informing the location, appearance and detailed design of the fuel line and storage tank. This should address any direct impacts, including visual amenity, on the Green Belt as part of any landscape and visual mitigation strategy.		Hertfordshire County Council, North Hertfordshire District Council	2	Please refer to the response to Ref LE.1.106 and LE.1.115.	No
LE.1.1 17	It is noted that Policy EE7 [of Central Bedfordshire Local Plan] is not included in table 14.2 of Chapter 14 and this should be addressed		Central Bedfordshire Council	1	Reference to Policy EE7 has been added to the table referenced in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] .	Yes
LE.1.1 18	The proposed development has been assessed by the Council's Landscape Officer who has confirmed that the methodology and baseline information is appropriate.		Central Bedfordshire Council	1	Noted.	No
LE.1.1 19	It is noted that the Central Bedfordshire Council Landscape Character Assessment has been incorporated with the Hertfordshire		Central Bedfordshire Council	1	Noted. Documentation associated with the application for development consent has been updated since the 2022 statutory consultation.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	Landscape documents and this is deemed fair as they occupy the same geographic area. However, it is important to note that aspects such as the descriptions, sensitivities and guidelines differ between the LPA documents, and this should be recognised in the future assessment. It is also noted that the Central Bedfordshire Council LCA has been incorrectly referenced as CBD LCA within the text and mapping.					
LE.1.1 20	The Council would also query the assessment of the impact on Luton Hoo, a Grade I listed & Grade II* Registered Park and Gardens and seeks the integration of noise assessment/impacts of change/effects on landscape and visual receptors to be considered in greater detail as part of the LVIA process.		Central Bedfordshire Council	1	The LVIA in Appendices 14.4 and 14.5 of the ES [TR020001/APP/5.02] considers landscape effects on Central Bedfordshire Landscape Character Areas 11C, 12C and 12D, across which Luton Hoo extends; and considers visual effects on users of Luton Hoo Hotel and Parkland. The assessment of landscape effects takes into consideration noise mapping and other information advising upon increase in Air Traffic Movements (ATMs). The LVIA provides further explanation of assessment judgements summarised in the PEIR.	No
LE.1.1 21	Appendix 5.2 of the PEIR provides valuable information in terms of light obstruction and identifies proposed		Central Bedfordshire Council	1	The LVIA in Appendices 14.4 and 14.5 of the ES [TR020001/APP/5.02] draws upon findings set out in the	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	landscape viewpoints to be considered within the future lighting impact assessment, numbers of which correlate with proposed viewpoints identified in the LVIA. It would be appropriate to integrate the assessment within the LVIA. For completeness the LVIA should also consider lighting impacts from the AONB.				Light Obtrusion Assessment. This approach has been discussed and agreed with the LVIA Working Group.	
LE.1.1 22	The proposed NSIP is located within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB. Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a relevant matter in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas. An assessment of the landscape and visual impacts of	Natural Englan d			<p>The Applicant has adopted the position taken by North Hertfordshire District Council (NHDC) in its Local Plan process regarding the weight to be given to the application by Chilterns Conservation Board to extend the Chilterns AONB boundary south of the A505.</p> <p>Based on current understanding of the status of the application, Natural England are in the very early stages of undertaking an initial assessment of whether the application could satisfy the designation criteria or to indicate when that may occur. The 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</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the proposal on this area should be undertaken, with opportunities taken to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any infrastructure development should reflect or enhance the intrinsic character and natural beauty of the area and be in line with relevant National Policy Statements and development plan policies.				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	
LE.1.1 23	The Board would like to acknowledge that in June 2021 the Secretary of State for Defra announced that a part of Natural England's ongoing Designations Programme would include an extension to the area covered by the Chilterns AONB. This is in response to a proposal submitted by the Chilterns Conservation Board in 2013. No formal area of search for this extension has yet been published by Natural England, although this is expected in the next few months. It has long been the position of the Chilterns Conservation Board that "a wider area of the Chilterns landscape that merits it "should be designated (Chilterns AONB Management Plan 2019-2024, p.24). The Chilterns landscape, as defined by the Chilterns National Character Area, includes land	Chilterns Conservation Board			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. A Sensitivity Test of the potentially expanded AONB based on the 'search area' extents shown in the Chilterns Conservation Board application has been undertaken in the Chilterns AONB Sensitivity Test in Appendix 14.9 of the ES [TR020001/APP/5.01] . In order to demonstrate that the potential impacts of the range of options were fully considered and appraised, a three-stage option	No

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	to the south and east of the airport, as far as St Albans and the A1(M) respectively.				<p>appraisal process known as the ‘sift process’, was used. Further information on the consideration of alternatives, sifting and design evolution can be found in the DAS [TR020001/APP/7.03], which is submitted as part of this application for development consent. 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>Embedded and additional landscape and visual mitigation measures incorporated into the Proposed Development take into consideration relevant published guidance on landscape character, green infrastructure, and also a position statement ‘Development Affecting the Setting of the Chilterns AONB’ produced by the Chilterns Conservation Board.</p>	
LE.1.124	It is likely that the DCO will be determined more quickly than the extended AONB is designated, but it	Chilterns Conser			Please refer to the response to Ref LE.1.122.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	would still be helpful for the promoters and decision makers if this could be referenced in the proposal going forwards. It is also hoped that a constructive dialogue may be had in order to avoid any unnecessary conflicts between these two national government objectives.	vation Board				
LE.1.1 25	Amendments are required to various figures found in Chapter 21. These involve Figures 21.1 to 21.4 (inclusive). The AONB boundary should be denoted on these figures, for clarity of purpose. At Figure 21.1 (Core Zone of Influence) this is especially relevant because this figure denotes rural landscape character inside the LVIA area but does not show the AONB boundary.	Chilterns Conservation Board			Figures 21.1 - 21.4 in the ES Figures [TR020001/APP/5.03] have been amended to denote the boundary of the Chilterns AONB where relevant.	Yes
LE.1.1 26	The Chilterns Conservation Board is concerned that descriptions of the relationship between the airport's location and the Chilterns AONB are not accurate in the Brochure and supporting documents, including the PEIR, and that there is a confusion between the designated Chilterns AONB and the wider environmental/landscape area of the Chiltern Hills. References to the airport being at the north-east end of the	Chilterns Conservation Board			The airport is located at the north-east end of the Chilterns Hills AONB and is - notwithstanding the Chiltern Hills extending further north and east – 'toward' the north-east of the Chiltern Hills.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Chilterns Hills are not accurate since the Chiltern Hills surround the airport on all sides, and extend several miles further north and further east. Some references to the AONB only mention the area of the AONB to the west of the airport, ignoring the area to the north. Including the boundaries of the AONB in some of the relevant diagrams would be helpful to the reader, could positively influence the proposals, and would demonstrate that the promoters of the scheme are more aware of the AONB than is currently the case. This applies for example to the noise mapping, transport corridors, etc.					
LE.1.1 27	Following the PINS scoping opinion specific AONB assessments should be made with respect of lighting, tranquillity, and dark skies. The AONB boundary review, as now supported by DEFRA must be factored into any landscape assessment work.	Chilterns Conservation Board			Please refer to the response to Refs LE.1.108, LE.1.112 and LE.1.122.	No
LE.1.1 28	The applicants are alert to the need for an assessment of AONB impacts. The Chilterns Conservation Board, as mentioned in our 2019 comments, seeks more information on the impact of greater air traffic movements over the AONB. The PEIR chapter 12	Chilterns Conservation Board			The LVIA in Appendices 14.4 and 14.5 of the ES [TR020001/APP/5.02] identifies significant effects on the aesthetic and perceptual characteristics of the landscape within the Chilterns AONB due to the change associated with overflying	No

Ref	Comment	PC	LA	No PILs	Response	Change
	states, 'the increase in air traffic movements is also assessed to result in a significant adverse effect on the aesthetic and perceptual characteristics of the landscape within the Chilterns AONB'. This point is also made in the non-technical summary at 14.3.2. We could not find any discussion of mitigation.				aircraft. The potential to mitigate these effects through landscape mitigation is limited.	
LE.1.129	(Referencing PIER vol 3 appendix 14.9) We seek a greater discussion of landscape value, impact of air traffic movements on tranquillity and judgement as to magnitude of effect on the AONB. We seek further discussion of mitigation proposals. The current PEIR accepts that there is a problem but then simply sidesteps any discussion of the implications, the extent of greater overflying and how such impacts could be ameliorated.	Chilterns Conservation Board			Please refer to the response to Refs LE.1.108 and LE.1.128. Further detail on judgements concerning landscape value and magnitude of effect are set out in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] .	No
LE.1.130	There is concern for the intervisibility between the proposed development and the Hertfordshire County area. For clarity, and to assist in the scrutiny of the Landscape and Visual Impact Assessment (LVIA), it is requested if it could include (or signpost) a suite of plans and cross sections that clearly show the relative heights of the existing and proposed built		Hertfordshire County Council, North Hertfordshire District Council	2	Please refer to the response to Ref LE.1.115.	No

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	development and features, and details with regards to the approach to visually recessive architectural detailing and materials.					
LE.1.1 31	Further information with regards to the options and parameters informing the location of [fuel line, access track and infiltration basin], their appearance and detailed design, and the landscape and visual mitigation strategy, is requested.		Hertfordshire County Council, North Hertfordshire District Council	2	The location and parameters of the fuel line, access track and infiltration basin are set out in the General Arrangement Drawings [TR020001/APP/4.09] . These form part of the Proposed Development and have been assessed in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] .	No
LE.1.1 32	We note the suggestion outlined in Table 21.8 of PEIR Volume 2: Chapter 21 In-combination and Cumulative Effects that “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, applications for Heathrow, Gatwick and Stansted have been considered outside the cumulative LVIA scope. As stated previously in the 2019 consultation, we advise that this potential impact is factored in to your assessments.	Natural England			Please refer to the response to Ref LE.1.109.	No

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LE.1.1 33	<p>The PEIR identifies no likely significant effects on agricultural land quality, farm holdings and soil resources during the operational life of the proposed development, including the M1 J10 improvements.</p> <p>As a result of the works to M1 J10, a construction compound will be required temporarily upon agricultural land. However, the assessment appears to make reference only to assessing the 'main application site' and areas of 'offsite planting'. Therefore, it is not clear whether the impact upon this agricultural land holding has been assessed.</p>	National Highways		1	The impact on the agricultural land holding to the west of M1 J10 as a result of a temporary compound is assessed in Chapter 6 Agriculture of the ES [TR020001/APP/5.01] .	No
LE.1.1 34	<p>Although the effects on passing vehicle users of New Airport Way have been assessed in the PEIR, no effects of amendments to the SRN (M1 J10) appear to have been assessed on passing vehicle users of the M1.</p> <p>- The portion of land to the south-west of M1 J10 is to be used as a temporary construction compound, which is anticipated to involve some vegetation clearance / land use change, and subsequent siting of a temporary construction compound. The visual and landscape effects thereof could impact:</p>	National Highways		1	Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] includes an assessment of the visual impact of the Proposed Development on users of bridleway Slip End BW1, which borders the temporary construction compound to its west, and on users of Half Moon Lane; and an assessment of the landscape effect on landscape character area 'CBDLCA Area 12C – Slip End Chalk Valley / HLCA 127'. Further to discussions with the landscape officer from CBC, it was agreed that the other visual receptors identified in the	No

Ref	Comment	PC	LA	No PILS	Response	Change
	<ul style="list-style-type: none"> • Receptors within the hamlet of Pepperstock (Half Moon Lane, Pepsal End Road, Front Street); • Users of what appears to be a caravan storage / caravan park compound on Half Moon Lane (determined via satellite imagery); • Passing vehicle users of the M1, M1 slip roads and New Airport Way; • Any users of the bridleway to the west of the temporary construction compound to the south-west of amendments to the M1 J10; • Any users of the PRow to the north-east of the amendments to M1 J10; and • Users of Stockwood Park (containing a County Wildlife Site and Area of Great Landscape Value). <p>Any potential effects to the receptors listed above as a result of the temporary construction compound and works associated with the amendments to M1 J10 appear to have not been covered in the PEIR. This should be provided in the ES.</p>				<p>comment from National Highways would be unlikely to lead to significant environmental effects.</p>	
Landscape - Tranquillity						

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 35	Part of the Chilterns area of outstanding natural beauty (CAONB), which is prized for its relative tranquillity, lies within the Council's administrative area. The Council should resist any changes which have a permanent significant noise effect on the CAONB.		Buckinghamshire County Council	1	Please refer to the response to Ref L1.1.108.	No
LE.1.1 36	[Concerning future development of PIER / Environmental Statement] We draw attention to the work of the International Civil Aviation organisation (ICAO) who promote a balanced approach based upon 4 key principles of (i) reduced aircraft noise, (ii) land use policy, (iii) changes to operational procedures and (iiii) restrictions on the use of the noisiest aircraft. For the Chilterns Conservation Board, land use policy is key in protecting tranquillity and habitat, especially.	Chilterns Conservation Board			Noted. The Applicant is not responsible for land use policy, this is a matter for the local planning authority.	No
LE.1.1 37	[Future development of the PEIR / Environmental Statement] - Any application of the now published work on AONB sensitivity must give weight to tranquillity, which is greatly influenced by air traffic movements. Following the Rochdale Envelope judgment these traffic movements will need to be 'worst case' models, based on existing and projected traffic	Chilterns Conservation Board			Please refer to the response to Ref LE.1.129. Potential changes to flightpaths are subject to the broader airspace change process which is aimed at resolving interface issues between airports. This will be the subject of a separate consultation exercise by the airport operator, LLAOL, following the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>movements. Some attempt must be made to detail and evaluate 'likely significant effects' together with an appropriate discussion of mitigation measures. Evidently matters of airspace change will be dealt with separately and outside the DCO/NSIP process, however, some commentary on this will, no doubt, be possible. It will be needed to inform an assessment as to tranquillity within the AONB and appropriate mitigation. Such mitigation should be all encompassing, for example the switching of a flight path to protect surrounding areas and communities akin to the Heathrow Cranford Agreement, community-based projects, landscape-led enhancement projects and habitat enhancement, including the promotion of habitat connectivity.</p>				<p>CAA airspace change procedure (CAP1616), in due course.</p> <p>The assessments for this application for development consent assume that there are no changes to these interfaces in order to represent a reasonable worst case. Airspace change is intended to reduce noise nuisance and this is expected to deliver some benefits that cannot currently be quantified.</p>	
LE.1.138	<p>[Future development of the PEIR / Environmental Statement] - We seek additional information and an appraisal of tranquillity, which is very much a result of combined effects, notably noise, impacts upon the aesthetic and perceptual characteristics of the landscape and dark skies impacts within a highly valued landscape</p>	Chilterns Conservation Board			<p>Please refer to the response to Refs LE.1.108 and LE.1.112 regarding an appraisal of tranquillity and Ref LE.1.128 in respect of mitigation.</p>	No

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	<p>(values derived from landscape character assessments). In association with this we seek greater commentary on mitigation and its impact. The existing work Appendix 14.9, shies away from this issue, when assessing the impact of air traffic movements. The points made on diminished tranquillity (discussed above), are expressed as almost an inevitability without the need for action. The Chilterns Conservation Board would want to know how this matter can be mitigated. A detailed mitigation strategy for the in-combination effects of overflying aircraft upon landscape and tranquillity is required.</p>					
LE.1.1 39	<p>[Future development of the PEIR / Environmental Statement] Chapters 16 (Noise) and 21 (Cumulative Effects) contain methodologies for the assessment of impact. The Chilterns Conservation Board is especially interested to see how the noise studies impact upon tranquillity within the AONB, notably at elevated recreational site such as at Ivinghoe Beacon within the National Trust’s Ashridge Estate. We seek a focused, tailor made, tranquillity study, combining landscape assessment with noise/overflying</p>	Chilterns Conservation Board			Please refer to the response to Refs LE.1.108 and LE.1.112.	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	<p>studies, to consider tranquillity and inform the DCO / NSIP process. An assessment of dark skies impacts is also required as air traffic movements at dawn and dusk will impact upon people recreating within the AONB. We recommend that the CPRE tranquillity mapping methodology is used (https://www.cpre.org.uk/resources/mapping-tranquillity).</p>					
LE.1.1 40	<p>It is not clear whether the Applicant has conducted or will conduct an assessment of noise impacts on quiet areas and spaces valued for their tranquillity. The scientific evidence suggests that tranquil areas can have a direct and beneficial health effect and can also help restore or compensate for adverse health effects attributed to noise within the residential environment. For example, people living in noisy areas appear to have a greater need for areas offering quiet than people not exposed to noise at home. Soundscapes with certain 'desirable' sounds, such as nature-based sounds, can have a positive effect on subjective wellbeing and reduce physical stress markers.</p>	United Kingdom Health Security Agency		1	Please refer to the response to Refs LE.1.108 and LE.1.112.	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 41	UKHSA recommends that the Applicant liaises with national and local stakeholders (such as Natural England, local authorities and communities) to identify any such areas that are likely to experience an increase in noise as a result of the Scheme, and agree a strategy on how to assess significant effects and design effective mitigation to protect those areas. The Applicant is also encouraged to consider whether there are opportunities to create and designate new quiet/tranquil areas, thereby responding to the third aim of the ANPS and NPSE. Assessments of tranquillity (PIER Section 14.3.15) should be holistic in nature, taking account of cross-modal perception and including both aural and visual elements.	United Kingdom Health Security Agency		1	Noted. The Applicant has engaged with stakeholders such as Natural England and the host authorities since the 2022 statutory consultation. It is not within the scope of the Proposed Development to designate new quiet/tranquil areas.	No
Landscape - Mitigation						
LE.1.1 42	It is advised that a Strategic Landscape Masterplan (SLMP) is required to include a landscape masterplan, and set out the vision, key landscape features, qualities and characteristics that inform the development of a cohesive, beautiful, multifunctional, and resilient place for		Hertfordshire County Council, North Hertfordshire District Council	2	A Strategic Landscape Masterplan Report [TR020001/APP/5.10] has been prepared as part of the application for development consent.	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	people and wildlife. This should be produced in collaboration with all key stakeholders. The proposals to date focus on the delivery of mitigation, however, there also needs to be a focus on placemaking and stewardship to ensure that the open space is successful and ultimately delivers quality over quantity.					
LE.1.1 43	This approach is in line with the more detailed design and specifications for the replacement open space that was shared with the Landscape Stakeholders Group in 2020 and included the evolution of the replacement open space layout and design to reflect local parkland character of Hertfordshire, alongside strategies for mitigation and enhancement, access and circulation, animal management, security, furniture, art, and hard and soft landscape. This information should be compiled within the SLM and should serve to establish the vision and key design principles for the open space and landscape to ensure that the development proposals, and any future incremental change, are fully coordinated and continue to make a		Hertfordshire County Council, North Hertfordshire District Council	2		No

Ref	Comment	PC	LA	No PILs	Response	Change
	positive contribution to the area as a whole.					
LE.1.1 44	The ES needs to provide greater detail on how the various mitigation measures are to be secured, implemented, and maintained. A Strategic Landscape Masterplan (SLMP) is required to set out the vision, key landscape features, qualities and characteristics that inform the development of a cohesive, beautiful, multifunctional, and resilient place for people and wildlife. This should be produced in collaboration with all key stakeholders. Whilst the proposals to date focus on the delivery of mitigation, there also needs to be a focus on placemaking and stewardship to ensure that proposed open space is successful and ultimately delivers quality over quantity. The SLMP also needs to ensure that advanced planting is clearly identified and programmed to maximise its potential as part of the wider strategy		Host Authorities	4	<p>The Applicant has within its ownership most land holdings necessary to deliver the proposed landscape mitigation measures described in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] and is in negotiations with third parties to secure the delivery of proposed mitigation outside their ownership. Whilst the granting of 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> <p>The implementation of landscape mitigation measures is described in Chapter 14 of the ES [TR020001/APP/5.01] and detailed in Figures 14.11 to 14.13 in the ES Figures [TR020001/APP/5.03], which are submitted as part of this application for development consent.</p> <p>The mitigation required for the Proposed Development will be secured as commitments and controls</p>	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
					<p>imposed through the DCO, and the Section 106 agreement.</p> <p>The maintenance and management of landscape mitigation will be undertaken in accordance with the Outline LBMP at Appendix 8.2 of the ES [TR020001/APP/5.02]. Further details are provided in the Strategic Landscape Masterplan Report [TR020001/APP/5.10], submitted with the application for development consent.</p>	
LE.1.1 45	<p>The consultation Brochure and the PEIR recognise at several points the varied harmful impacts of aviation in general, the current operation of the airport, and the proposed expansion on both the wider environment and specifically on the Chilterns AONB. However, there do not appear to be any proposals to redirect the benefits of the expansion into mitigating or compensating for these impacts in the Chiltern Hills AONB.</p>	Chilterns Conser vation Board			<p>The impact of the Proposed Development has been assessed through the EIA process and mitigation has been identified and incorporated as appropriate. Separately, Noise Insulation Schemes are proposed for those properties impacted by the Proposed Development. Further information can be found in Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10], submitted as part of the application for development consent. The Applicant is also proposing the Community First scheme, which is intended to be an extension of the Applicant's existing policy of giving</p>	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
					<p>back to local communities through its Community Funding Programme. As the custodian of a community airport, the Applicant is committed to ensuring that the benefits arising from its ownership of the airport are shared with nearby communities.</p> <p>With regards to benefits generally, the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent identifies the benefits to both the South East and East of England from inbound tourism which is enabled by the airport, stating that the Chilterns AONB is a tourist destination likely to benefit from this.</p>	
LE.1.1 46	<p>The proposals include some lovely pictures of the airport development, but the surrounding area shown is not correct and is therefore misleading. There are miles of hedgerows and wildlife areas shown that are not on land owned by Luton Rising. These do not exist currently, and liaison with the landowners has not happened. It is unlikely that landowners would plant hedging for Luton Airport when there is no benefit to them and the cost of maintaining this planting will also fall to them.</p>	KWPC		1	Please refer to the response to Ref LE.1.144.	No

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Landscape – Management and Maintenance						
LE.1.1 47	It is strongly advised that discussions about the long-term stewardship of the public open space and landscape need to take place at the earliest opportunity, as any decisions could have a fundamental impact upon the strategic landscape masterplan and management strategies. For example, it is proposed to provide areas of calcareous grassland for low intensity grazing, however, there does not appear to be an understanding of the availability of local conservation grazers and how any cattle will be managed. A grazing approach is likely to require some key infrastructure (such as areas of hard standing and fixed cattle handling systems, access for large scale cattle transport, animal shelters, storage of feed, fencing and corrals) that will need to be fully integrated within the landscape layout and design from the outset, to ensure that its landscape and visual impact can be appropriately mitigated.		Hertfordshire County Council	1	Indicative designs only are submitted as part of the application for development consent, however, further information can be found in the DAS [TR020001/APP/7.03] . Detailed design will follow and be agreed with the relevant local authorities under the DCO Requirements. It is the Applicant's intention that the new park be placed into the control of a new Community Trust which would include as Trustees, local community representation and other key stakeholders. Additional detail regarding the assumptions for grazing infrastructure is provided in Chapter 6 Agriculture of the ES [TR020001/APP/5.01] .	No
LE.1.1 48	Any cattle management infrastructure will need to be maintained as part of any stewardship agreement. The impact of cattle management upon the		Hertfordshire County Council	1		No

Ref	Comment	PC	LA	No PILs	Response	Change
	visitor experience will also be a key consideration.					
LE.1.1 49	The Landscape and Biodiversity Management Plan suggests management will be implemented by a Landscape and Maintenance contractor. This will need much more detail in due course, as this does not generate the confidence required to demonstrate appropriate management will be delivered – such as extensive grazing for the ecologically enhanced grasslands to the east. This is supposed to reflect a more traditional, farmland character to provide a high-quality buffer against the expanded built environment and replacement LWS, and as such, simple maintenance works will not be suitable unless it forms part of a farm business tenancy or similar capable of providing the ongoing management needed to achieve this. It is noted that 5.6.25 proposes this approach, which is supported.		Hertfordshire County Council	1	Details of how the habitats will be created and managed are set out in the Outline LBMP at Appendix 8.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent.	No
LE.1.1 50	It is not clear why all areas of neutral grassland creation will not be suitable for sheep grazing (Rf. 5.6.20). Any grassland can be grazed by sheep if it grows palatable grass. If a hay cutting		Hertfordshire County Council	1	Please refer to the response to Ref LE.1.149. Details on the Proposed Development's operational impacts on agricultural land quality, soil	No

Ref	Comment	PC	LA	No PILs	Response	Change
	regime is to be favoured, this does demand mowing and so cannot be grazed by any livestock in the months prior to cutting. If sheep grazing is inappropriate due to public access and dogs, that is a different matter. The issue then is then grazing - which could include cattle - or no grazing and a cutting regime to keep it open grassland. If hay cut due to public pressure, then this will also inhibit use by ground nesting birds due to disturbance. Again, identifying those areas where hay cuts are proposed to promote wildlife and grassland available primarily for open access and informal recreation, is necessary. This issue needs further clarification and recommendations accordingly to reflect the functionality of the grassland areas and their role as mitigation and compensation for loss of the LWS.				resources and farm holdings is included in Chapter 6 Agricultural Land Quality and Farm Holdings of the ES [TR020001/APP/5.01] , submitted with the application for development consent.	
LE.1.1 51	A broader Landscape and Ecology Management Masterplan is needed to establish, from the outset, what functionality the open space / landscape areas will be expected to provide. This will influence how the site is used and managed, as well as influence biodiversity expectations in		Hertfordshire County Council	1	An Outline LBMP at Appendix 8.2 of the ES [TR020001/APP/5.02] sets out the high-level requirements for the establishment, management and monitoring of proposed landscape and biodiversity areas in relation to the Proposed Development.	No

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
	respect of disturbance and management capabilities. Zoning for formal amenity, recreation, informal amenity, limited access, or no access would be helpful, to ensure the intentions are well established and implemented for wider community and LPA understanding of intentions and expectations.					
LE.1.1 52	The Draft Landscape and Biodiversity Management Plan (LBMP) will continue throughout a period of 50 years. There is concern that any benefits accrued by the end of this period should not be lost, it is therefore suggested that there should be a 'trigger point' before then end of the period at which arrangements for the provision of ongoing positive management and maintenance is agreed. It is understood that the responsibility for delivering and maintaining areas will depend on individual land considerations. The SLMP would sit alongside the BMP and would assist in providing individuals an understanding of how their areas contribute to the area as a whole.		Hertfordshire County Council	1	Please refer to the response to Ref LE.1.151.	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 53	HCC and NHC asks LR to: - Engage with HCC and NHC on specifying the Landscape and Maintenance contract. - Set a 'trigger point' before the end of the LBMP period when arrangements will be agreed with HCC and NHC for the provision of ongoing management and maintenance.		Hertfordshire County Council, North Hertfordshire District Council	2	Please refer to the response to Ref LE.1.151 and LE.1.152.	No
LE.1.1 54	A Draft Landscape and Biodiversity Management Plan is provided within the consultation material, and this is welcomed. It is noted that this will be updated with more detailed information during preparation of the Environmental Statement. It would be beneficial for a copy to be shared prior to submission of the DCO application.		Central Bedfordshire Council	1	Noted.	No
Biodiversity - Impact						
LE.1.1 55	We wish to share our concern at the prospective loss of Wigmore Valley Country Wildlife Site. Wigmore Park as well as an important local amenity and resource. It has a developing and varied ecology and has achieved County Wildlife Site status and is listed as an Asset of Community Value. We question whether the offer of replacement land would make up for the loss of that important site. It is difficult to reconcile its loss and also		Dacorum Borough Council	1	The majority of the current Wigmore Valley Park County Wildlife Site (CWS) will be lost as a result of the Proposed Development. After the 2019 statutory consultation the Proposed Development was changed to retain as much of the existing park as possible and the replacement area has been designed so that it offers greater opportunity to support biodiversity. Once established, this area will also mitigate for the loss of	No

Ref	Comment	PC	LA	No PILS	Response	Change
	<p>impacts upon the Chilterns AONB and Chilterns Beechwoods SAC with policy LLP6 in the Luton Borough Council Local Plan to mitigate and reduce over time the noise and amenity impacts of LLA.</p>				<p>habitats within the current CWS currently used for foraging, dispersal, and shelter by a range of wildlife species.</p> <p>Policy Luton Local Plan 6 (LLP6) requires that provision will be made to ensure that the scale and quality of open space and landscaping in the area is maintained and, if feasible increased, that biodiversity will be enhanced and improved, and that long term management is compatible with airport operations. LLP6 also requires that replacement open space is of a high quality with long term security and funding. 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>Whilst it is still not mandatory for Nationally Significant Infrastructure Projects (NSIPs) such as the Proposed Development, the Applicant has set a voluntary ambition of achieving at least 10% BNG which is consistent with the ultimate intention of the Environment Act 2021. This is</p>	

Ref	Comment	PC	LA	No PIL s	Response	Chan ge
					<p>detailed within the BNG report in Appendix 8.5 of the ES [TR020001/APP/5.02]. BNG will be secured through the extensive landscaping and habitat creation proposals incorporated within the Proposed Development, details of how these habitats will be created and managed are set out in the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02]. Version 3.1 of the Defra Biodiversity Metric has been used to calculate the amount of habitat creation that needs to be included within the Proposed Development to mitigate the loss of habitats. The Defra metric takes account of the biodiversity value of those habitats lost to the Proposed Development 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 the ES Figures [TR020001/APP/5.03].</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 56	The Council recently published evidence that the SAC is being impacted by recreational pressure and, following advice from Natural England, the Council is unable to grant planning permission for new homes until a mitigation strategy is in place. This Council recommends that the applicant ensure that it has discharged its functions under the Habitats Regulations as the DCO process develops and ensure that the project will not give rise to adverse impacts on the integrity of the SAC.		Dacorum Borough Council	1	<p>Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] assesses all potential impacts to biodiversity as a result of the Proposed Development. This includes details of the receptors considered appropriate. Where required, mitigation is recommended.</p> <p>The Habitat Regulation Assessment in Appendix 8.3 of the ES [TR020001/APP/5.02] includes consideration of potential pathways between the Proposed Development and the relevant sites within the National Site Network (previously known as Natura 2000 sites). The Habitat Regulation Assessment concludes that there is no impact pathway on the qualifying features of the designated sites identified within the screening exercise (i.e. European Sites within 30km of the Proposed Development), including the Chilterns Breechwood SAC and Wormley Hoddesdonpark Woods SAC.</p>	No
LE.1.1 57	Within Central Bedfordshire there are likely to be limited on the ground impacts in respect of biodiversity arising as a result of the proposals and whilst there are a number of non-statutory nature conservation sites		Central Bedfordshire Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	within the 2km study area, none are within the main application site.					
LE.1.1 58	It is evident from the information contained in Chapter 8 of the PEIR that survey work is still ongoing, and the ecological baseline is to be periodically reviewed and where required, updated surveys will be undertaken. Central Bedfordshire Council would welcome inputting to future methodologies as well as early sight of new survey outcomes as they emerge		Central Bedfordshire Council	1	Noted. Survey data is considered sufficient to inform the assessment of potential impacts to biodiversity presented within Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] . Updated surveys and the age of data has been discussed with stakeholders in the Biodiversity Technical Working Group meetings, with no objections raised regarding the age of survey data. There is a general acknowledgement that the habitats have not changed and sufficient survey data is available to inform the biodiversity assessment.	No
Biodiversity - Assessment						
LE.1.1 59	The [WSP] review of the Biodiversity PIER is a reasonable reflection of the PIER and its supporting information.		Hertfordshire County Council	1	Noted.	No
LE.1.1 60	The challenges and weaknesses are acknowledged but I am not satisfied they would make fundamental differences to our understanding of the site or the approach to development proposed.		Hertfordshire County Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 61	Surveys that have not been repeated would not, in my view, impact on the necessary understanding of the site required to inform the development and can always be updated if necessary.		Hertfordshire County Council	1	Noted.	No
LE.1.1 62	Many surveys have been updated, which in my view have not provided any significantly new information we didn't know previously but are welcome in confirming the biodiversity present and its value.		Hertfordshire County Council	1	Noted.	No
LE.1.1 63	The baseline will always change if you look hard enough; there is more than sufficient data available to inform the proposals and subsequent works, although fine details will still need to be agreed as the scheme progresses.		Hertfordshire County Council	1	Please refer to the response to Ref LE.1.158	No
LE.1.1 64	The [WSP] comment on Table 8.9 seems over critical given local geological sites have always been referred to as regionally important, and as such have always been an anomaly in terms of naming, but their status as local sites is always recognised.		Hertfordshire County Council	1	Noted.	No
LE.1.1 65	The Biodiversity Technical Working Group has met on numerous occasions in the past and I do not recognise the criticisms made. Whilst there has been little contact since the pandemic, I would expect this to		Hertfordshire County Council	1	Noted. The Biodiversity Technical Working Group meetings have been held regularly throughout the preparation of the application for development consent.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	resume now that revised proposals have been worked up.					
LE.1.1 66	Ecological surveys are potentially out of date as soon as they are made as ecology is dynamic and can change for many reasons. A practical proportionate approach must be taken to address this, otherwise surveys may never be acceptable. I have no reason to consider that sufficient, up-to-date surveys have not been undertaken or will be updated accordingly if considered necessary as the scheme develops, to adequately inform the development. This will be the case for mobile species such as badgers and bats and birds. The relative values of the existing farmland for birds and LWS for invertebrates is unlikely to change, although changes in farming practice e.g. if land is set aside, will influence which species may benefit but these will always be temporary phenomena related entirely to management. Whilst this aspect is considered weak, it can be easily addressed if necessary		Hertfordshire County Council	1	Please refer to the response to Ref LE.1.158	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 67	I consider the magnitude issue is adequately addressed in Chapter 5 [Approach to the assessment], as referenced.		Hertfordshire County Council	1	Noted.	No
LE.1.1 68	Consideration of impacts has also been considered weak. For completeness more detail could be provided, but in many respects this detail is perhaps unnecessary. As an example, reversibility for loss of the Wigmore Park LWS is raised, but given the loss is created by the removal of an old landfill site on which the LWS has developed, this reversibility would simply state the obvious – it is essentially unreversible.		Hertfordshire County Council	1	Noted. Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] includes additional detail and clarification on the impacts of the Proposed Development on biodiversity.	No
LE.1.1 69	Cumulative effects appear to be reasonably considered in Table 21.12; it may be difficult to navigate because the potential effects are many given the complexity of ecological receptors and impacts of this and other developments. However, they appear thoroughly dealt with.		Hertfordshire County Council	1	Noted.	No
LE.1.1 70	I do not consider the baseline information is weak; whilst surveys could always be improved, in my view there is now a substantial wealth of data collected over a number of years on the airport site and its surrounds sufficient to inform this development.		Hertfordshire County Council	1	Please refer to the response to Ref LE.1.158	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 71	A clear, written summary conclusion would be helpful.		Hertfordshire County Council	1	The ES NTS [TR020001/APP/5.04] provides a summary for each of the topics covered by the ES.	Yes
LE.1.1 72	The Baseline Ecological Assessment represents a thorough review of the sites and local environment's recognised ecology, as reflected in the PIER report. Already detailed from previous surveys, further surveys have updated these works and provided additional information and confirmation of the ecology. Ecology is dynamic and will change where opportunities allow or are generated. However, the results demonstrate limited changes to the original understanding of the site, and have identified where changes e.g. to badgers have occurred. The ecological surveys provide a comprehensive understanding of the site, identify its most important assets, provide a sound basis for BNG and future site management requirements, opportunities, and considerations.		Hertfordshire County Council	1	Noted.	No
LE.1.1 73	A natural pond lining is preferred to an artificial one; if it is on chalk, ponds wouldn't be natural anyway unless the water table is high enough to maintain a permanent water body.		Hertfordshire County Council	1	This will be taken into consideration during detailed design of the ponds.	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 74	We note the provision of open space and habitat creation areas as mitigation measures outlined within PEIR Volume 2: Chapter 8 Biodiversity. However, we require further information on the intentions for the open space outlined, and whether it is expected to contribute towards biodiversity net gain, as open space has also been proposed for health and community purposes.	Natural England			Please refer to the response to Ref LE.1.155. The replacement open space contributes to both health and community purposes as well as biodiversity.	No
LE.1.1 75	We also advise consideration is given to how biodiversity and wider environmental net gains can be maximised through good design of green infrastructure, including creating links between existing environmental assets.	Natural England			Section 8.8 in Chapter 8 Biodiversity and Section 14.8 in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] set out the embedded and good practice mitigation measures for biodiversity and landscape that are proposed. The Proposed Development has been designed, as far as possible, to avoid effects on biodiversity and existing landscapes through option identification, appraisal, selection and refinement. The design of the Proposed Development and the planned approach to its construction have been developed with an overarching principle of avoidance where possible (e.g. avoid loss of woodland in the first instance above providing replacement	No

Ref	Comment	PC	LA	No PILs	Response	Change
					woodland). The Landscape Planting, Replacement Open Space and Habitat Creation Area includes new areas of habitats that, along with the hedgerow restoration, are designed to increase connectivity to establish a coherent ecological network. In addition, off-site hedgerow restoration and screening to be implemented in the wider arable environment to the north and east of the Proposed Development improves connection between retained and created habitats and the wider area.	
LE.1.1 76	We note the permanent loss of ancient woodland from Winch Hill Wood CWS as outlined in Table 8.16 within PEIR Volume 2: Chapter 8 Biodiversity. As stated above, ancient woodland is irreplaceable habitat and any impacts on ancient woodland should be considered in line with paragraph 175 of the NPPF. Natural England has standing advice on ancient woodland as we only provide bespoke advice where they form part of a SSSI or in exceptional circumstances.	Natural England			The removal of a small number of trees around the edge of the Ancient Woodland is recommended only for arboricultural purposes due to the condition of these trees. The removals would be undertaken for management purposes and be of benefit for the overall condition of the woodland and would not constitute a loss of Ancient Woodland.	No
LE.1.1 77	In Table 8.16 within PEIR Volume 2: Chapter 8 Biodiversity, we note the loss of foraging habitats, commuting routes and roosting sites for bats as a	Natural England			Engagement with Natural England has continued since the 2022 statutory consultation and will continue. The Natural England	No

Ref	Comment	PC	LA	No PILS	Response	Change
	<p>result of the proposed development, while replacement habitats establish, which is a concern. Natural England’s standing advice provides guidance on how protected species should be dealt with in the planning system, and whether a mitigation licence is required. We provide advice and Letters of No Impediment through our licensing team.</p>				<p>standing advice has been taken into consideration in the development of the Proposed Development and associated mitigations. The Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02] sets out the management for existing habitats, as well as the establishment and management of proposed habitats; this includes relevant ecological mitigation measures for protection of habitats and species. Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] identifies the need for licences to be sought from Natural England for various works affecting protected species.</p> <p>Letters of No Impediment will be discussed with Natural England following their review of relevant Mitigation Strategies within Appendices 8.6 to 8.10 of the ES [TR020001/APP/5.02].</p>	
LE.1.1 78	<p>"A number of wildlife sites are affected by the proposed highway interventions, but none are of relevance to National Highways. However, a portion of land to the south-west of M1 J10 circulatory is to be a temporary construction</p>				<p>Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] and the Ecological Baseline Report in Appendix 8.1 of the ES [TR020001/APP/5.02] both include further detail and plans setting out survey information that has informed</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	compound associated with the amendments to the SRN (Work Nos 6r.01 – 6r.03). Aerial imagery shows a mixture of apparent agricultural land and a woodland area which is assumed to require clearance prior to use. The PEIR touches on the requirement for vegetation clearance but doesn't specify what is going to be cleared, or locations (only stating proposed highway intervention works at J10 of M1).				the design of the Proposed Development and mitigation measures. The Ecological Baseline Report concludes that updated surveys would be required prior to the commencement of any vegetation clearance works. Badger surveys have been undertaken; however results of these surveys are confidential and are not submitted publicly as part of this application for development consent.	
Biodiversity – Management and Maintenance						
LE.1.1 79	Long term management of the site should be considered to ensure benefits are not lost.		Hertfordshire County Council	1	The long term management of the replacement open space is covered within the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02] .	No
LE.1.1 80	Advanced planting is fully supported in principle, any early interventions need to be coordinated as part of an overarching strategic landscape masterplan. There does not appear to be any reference to advanced planting within the LVIA.		Hertfordshire County Council	1	As proposed planting will take several years to fully establish, a phased removal of existing vegetation is proposed and the vast majority of proposed landscape mitigation will be delivered at the start of construction.	No

Ref	Comment	PC	LA	No PILS	Response	Change
					The Landscape Mitigation Establishment Schedule in Appendix 14.10 of the ES [TR020001/APP/5.02] supports the overall LVIA and details when all elements of the proposed landscape mitigation planting scheme will be delivered. As detailed in this schedule, there is significant planting and translocation of existing plants in the initial period.	
LE.1.1 81	The time taken to establish the desired grasslands is highlighted. Whilst this is an issue, so is the process of grassland development itself, which can be ecologically beneficial; many old chalk quarries locally have had no remedial works to benefit biodiversity but are now SSSIs. Consequently, whilst appropriate establishment is important, so is the process itself and this does not need to be hurried.		Hertfordshire County Council	1	Details of how these habitats will be created and managed are set out in the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02] .	No
LE.1.1 82	The PEIR identifies that the proposed development will result in the loss of habitats and will impact on species, notably this is outside of Central Bedfordshire. However, it would be beneficial for clarification to be provided on the timeline for delivery of enhancements to off-set this loss.		Central Bedfordshire Council	1	Please refer to the response to Ref LE.1.155.	No

Ref	Comment	PC	LA	No PILs	Response	Change
Biodiversity Net Gain						
LE.1.1 83	Biodiversity Net Gain is rarely mentioned; however use of metric V3 is stated (in Chapter 8), contrary to the report.		Hertfordshire County Council	1	Please refer to the response to Ref LE.1.155.	No
LE.1.1 84	There is limited reference to Biodiversity Net Gain. This will soon be planning law and will undoubtedly be applied to this development. A minimum of 10% is required; there is no reference to any further ambition to exceed this. The proper accounting for existing site value and future compensation and enhancement will, by default, require sufficient supporting evidence although I have no reason to consider this isn't already available. Whether future changes to land management prior to the development commencing would need to be considered as influencing BNG would need to be discussed accordingly by the TWG.		Hertfordshire County Council	1	Please refer to the response to Ref LE.1.155. Details of ongoing and past engagement with the Biodiversity Technical Working Group is provided in Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] . The Biodiversity Technical Working Group meetings have been held regularly throughout the preparation of the application for development consent.	No
LE.1.1 85	There is limited reference to Biodiversity Net Gain in the documentation. This will soon be planning law, which will apply to this development. A minimum of 10% net gain will be required; there is no reference to any further ambition to		North Hertfordshire District Council	1	Please refer to the response to Ref LE.1.155.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	exceed this. NHC asks LR to: Undertake to deliver more than 10% biodiversity net gain, and provide sufficient supporting evidence for how this will be achieved.					
LE.1.1 86	The proper accounting for existing site value and future compensation and enhancement will require sufficient supporting evidence.		North Hertfordshire District Council	1	Please refer to the response to Ref LE.1.155.	No
LE.1.1 87	Natural England's key concerns regarding the expansion of London Luton Airport are: The provision of Biodiversity Net Gain and how it will be delivered is unclear. The intention of open space for habitat mitigation and public use is unclear.	Natural England			Please refer to the response to Ref LE.1.155. The evolution of the design of the Proposed Development has taken into account the mitigation hierarchy and retained and avoided features such as Winch Hill Wood, management of which is incorporated into the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02] . After the 2019 statutory consultation the design of the replacement open space was changed to retain more existing habitats, and habitat creation areas have been designed to enhance existing and create new areas of higher value habitats. All of which will also be managed as per the Outline LBMP.	No

Ref	Comment	PC	LA	No PILs	Response	Change
LE.1.1 88	Natural England supports that the “Biodiversity Net Gain (BNG) calculation is being undertaken using the Defra (Department for Environment, Food and Rural Affairs) metric version 3.0 (Ref. 8.2), with an Applicant commitment to deliver 10% net gain”, as outlined in section 8.1.7. of the PEIR.	Natural England			Noted. Please refer to the response to Ref LE.1.155.	No
LE.1.1 89	We advise that the loss of an area of irreplaceable habitat, such as ancient woodland, should be omitted from the main biodiversity metric calculation for the development. As a result, irreplaceable habitats would need to be treated separately and require bespoke mitigation /compensation in addition to the 10% net gain commitment outlined.	Natural England			There is no loss of ancient woodland as a result of the Proposed Development. This has been clarified within Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] .	No
LE.1.1 90	Central Bedfordshire Council are pleased that Luton Rising are working to achieve the minimum requirement. However, Luton lies within the Oxford-Cambridge Arc and shared environmental principles for protecting, restoring and enhancing the environment within the Arc have been established and agreed by Leaders. One requirement is to deliver 20% biodiversity net gain for developments in the Arc. The proposed development		Central Bedfordshire Council	1	Please refer to the response to Ref LE.1.155. With regards to targets for BNG within the Oxford-Cambridge Arc, it is understood that an aspiration for 20% net gain has been set out in the ‘Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc’ document published in March 2021. However, this document states that for NSIPs a	No

Ref	Comment	PC	LA	No PILs	Response	Change
	should strive to achieve this higher threshold.				minimum of 10% should be delivered. As such, it is considered that the Applicant's ambition of achieving 10% BNG is proportionate.	
LE.1.1 91	A 10% biodiversity net gain will not fully compensate for the irretrievable damage which will be caused to an area of outstanding natural beauty.	KWPC		1	Please refer to the response to Ref LE.1.155.	No
LE.1.1 92	Taking over Wigmore Valley Park will destroy established diverse plants and wildlife. Moving the park into North Hertfordshire and making it 10% bigger, planting wildflower meadows etc does not offset this. Habitats take time to establish, and the detrimental effect on wildlife cannot be undervalued. The wildlife will not simply relocate to the new park which in any case will take time to build and mature enough to accommodate it.	KWPC		1	Please refer to the response to Ref LE.1.155.	No
LE.1.1 93	However, we would like to reiterate that biodiversity net gain will be difficult to achieve considering the likely unavoidable adverse impacts to Wigmore Park County Wildlife Site (CWS) and potential impacts to ancient woodland.	Natural England			Please refer to the response to Ref LE.1.155 and LE.1.189.	No

Table A10.2: Regard had to statutory consultation responses on the Local Environment comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
Assessment				
LE.2.01	Suggest that a full Environmental Impact Assessment needs to be submitted with any application for expansion in order to fully understand the environmental impacts, as the Preliminary Environmental Impact Report (PEIR) is not sufficient.	1	<p>A full EIA has been undertaken for the Proposed Development, the results of which are presented in the ES [TR020001/APP/5.01], which is submitted as part of this application for development consent. This includes assessments with regards to light pollution, water pollution, landscape and visual, and ecology.</p> <p>The Applicant has continued to engage with statutory stakeholders such as the local authorities, Environment Agency and Natural England throughout the development of the Proposed Development, to discuss the results of the EIA and develop Statements of Common Ground to agree the mitigation required for the Proposed Development, which will be secured as commitments and controls imposed through the DCO, and the Section 106 agreement.</p>	Yes
LE.2.02	LLAOL supports the Applicant in seeking to avoid, reduce and mitigate any adverse impacts arising from the proposed development and welcomes the publication of the Preliminary Environmental Information Report (PEIR). As the operator of the airport, LLAOL	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
	recognises the importance of identifying potentially significant adverse effects, alongside the well-recognised positive effects of growth at LLA.			
Cultural Heritage				
LE.2.03	Respondents raised concerned that the Proposed Development would cause harm to designated heritage assets which cannot be mitigated. Stakeholders were particularly concerned that the PEIR does not assess the impact on St Paul's Walden Bury and Luton Hoo.	1	<p>St. Paul's Walden Bury and Luton Hoo house and RPG (which were assessed in the PEIR) are fully assessed in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01], which is submitted as part of this application for development consent.</p> <p>The assessment for St Paul's Walden concludes that there will be no significant effects to this heritage asset. The assessment concludes there would be a moderate adverse (significant) effect to Grade II* Luton Hoo RPG as a result of an increase in aviation noise during operational of the Proposed Development.</p> <p>There are no appropriate measures that would mitigate noise impacts within the setting of a park, therefore the residual effect remains as moderate adverse.</p>	No
Ecology				
LE.2.04	Support for commitments to BNG. Some respondents highlighted specific support that improvements to	2	Noted.	No

Ref	Comment	No. PILs	Response	Change
	biodiversity within landscape proposals coincide with enhanced user experiences.			
LE.2.05	Concern that the Proposed Development will have negative impacts on natural habitats and wildlife.	12	<p>An assessment of potential effects on relevant protected species and habitats has been included within Chapter 8 Biodiversity of the ES [TR020001/APP/5.01] which is submitted as part of this application for development consent. The time taken for the establishment of any mitigation is considered within this assessment.</p> <p>The Proposed Development includes a broad range of habitat creation and enhancement measures delivering benefits for biodiversity. The design of these measures has been informed by the EIA process, seeking to avoid and minimise ecological effects as far as reasonably practical. In addition to the on-site proposals, off-site mitigation is also proposed in the form of ‘green corridors’ created by restoring or planting new hedgerows.</p> <p>Furthermore, the Applicant has set a voluntary ambition of achieving at least 10% BNG (which is consistent with the ultimate intention of the Environment Act 2021), through the extensive landscaping and habitat creation</p>	No

Ref	Comment	No. PILs	Response	Change
			proposals incorporated within the Proposed Development. As a result of all these measures, there are no significant adverse effects forecast on any of the assessed species.	
LE.2.06	Concern that the Proposed Development will result in the loss of green space in the local area, with adverse impacts on natural habitats, species and biodiversity.	11	<p>Landscaping is an important part of the Proposed Development. The proposed landscaping includes creating new areas of broadleaf woodland, meadow and pastoral grassland, a wildlife pond and new hedgerows as part of the replacement open space.</p> <p>The Proposed Development will also deliver public realm landscaping across the airport to create an attractive environment, for example including street trees, native shrub planting and amenity grassland.</p> <p>The ES [TR020001/APP/5.01], which is submitted as part of this application for development consent, provides an assessment of impacts on the natural environment (Chapter 8 Biodiversity and Chapter 14 Landscape and Visual) and sets out mitigation measures to prevent, reduce or offset any significant impacts. Mitigation measures identified in the ES take into</p>	

Ref	Comment	No. PILs	Response	Change
			<p>consideration feedback from stakeholders and the public.</p> <p>The Applicant has set a voluntary ambition of achieving at least 10% BNG, which is consistent with the ultimate intention of the Environment Act 2021. This will be achieved through the extensive landscaping and habitat creation proposals incorporated within the Proposed Development. Further information on the proposals to limit impacts on habitats and the long term management and maintenance can be found in the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent.</p>	
LE.2.07	Suggestion that the RSPB or equivalent wildlife association are given the chance to review these plans and make comments/suggestions on the impact to Wigmore Valley and the surrounding areas' wildlife.	1	Consultation has been undertaken with Natural England, local authorities and Local Wildlife Trusts. The Applicant has continued to keep these organisations updated and allow them to comment on the final plans that are submitted with the ES [TR020001/APP/5.01] , as part of this application for development consent.	No
General				
LE.2.08	Concern that it will not be possible to deliver proposals that will be effective in mitigating environmental impacts	12	The Proposed Development has been informed by the EIA process, and where	No

Ref	Comment	No. PILs	Response	Change
	as the nature of the Proposed Development will result in additional flights and therefore adverse environmental impacts are inevitable.		possible it has been designed to avoid or reduce adverse effects and deliver benefits in accordance with policy and best practice. Where effects cannot be avoided or further reduced, mitigation and compensation proposals have been established in consultation with stakeholders.	
LE.2.09	Concern that the Proposed Development will have overall negative impacts on the environment, regardless of mitigation plans; some respondents therefore concluded that the Proposed Development should not be approved and delivered.	1		No
LE.2.10	Concern that the Proposed Development will have overall negative impacts on the environment, regardless of mitigation plans.	16	The GCG framework established for the Proposed Development is one of the most far-reaching commitments to minimising environmental impact ever put forward by a UK airport and seeks to manage the growth and operation of the airport through the coming decades within definitive environmental limits. Further information on environmental limits committed to can be found within the GCG Framework [TR020001/APP/7.08] , which is submitted as part of this application for development consent.	No
LE.2.11	Concern that the environmental target outlined will never be achieved or complied with.	2	The Proposed Development has been informed by the EIA process and where possible designed to avoid or reduce adverse effects and deliver benefits in accordance with policy and best practice. Where effects cannot be avoided or further reduced, mitigation and compensation proposals have been	No

Ref	Comment	No. PILs	Response	Change
			<p>established in consultation with stakeholders.</p> <p>The Applicant is committed to complying with the policy requirements for mitigation. Mitigation requirements are to be secured through the DCO itself and the Section 106 Agreement. A breach of the DCO would be a criminal offence. In addition, various review groups with the local authorities and relevant stakeholders will be established to ensure that there is visibility on the delivery of mitigation and that enforcement bodies have the information that they need to carry out their function. Monitoring and funding commitments are to be made through the DCO and the Section 106 Agreement.</p>	
Landscape				
LE.2.12	These plans were obviously carried out on a map, not on the ground as a large proportion of these hedges are planned in existing woods and across the middle of arable fields. So not as useful as indicated.	1	The proposed landscape mitigation measures identified in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] , were informed by a review of existing land use and land cover within the landscape surrounding the airport and through field survey activities.	No

Ref	Comment	No. PILs	Response	Change
LE.2.13	Concern that the Proposed Development will lead to adverse visual impacts on the surrounding local area, landscape and countryside.	2	<p>Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01], considers the impact of the Proposed Development on visual amenity experienced by people within the surrounding landscape. The potential for visual effects on people due to aircraft moving across the sky has been assessed in this chapter and conclude that the changes that would be brought about by the Proposed Development in this regard are expected to be relatively insubstantial, given the pre-existing conditions.</p>	No
LE.2.14	Suggestion that existing green spaces should be protected and enhanced.	3	<p>The Applicant is 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. The Proposed Development has been designed to ensure that the replacement open space is not only of a very high quality but is also larger in size. The Proposed Development includes 10% more land 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 ES [TR020001/APP/5.01] and</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>shown in the ES Figures [TR020001/APP/5.03], both of which are submitted as part of this application for development consent.</p> <p>Commitments to deliver landscape and open space mitigation are to be secured via the DCO, compliance with which will be a legal requirement.</p> <p>Proposed planting will take several years to fully establish. The Proposed Development will, however, stage 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>	
LE.2.15	<p>The airport expansion plans include a proposal for the acquisition of permanent rights relating to about 1km of hedgerow on land owned by L&G 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. ...it is understood that the hedgerow is required to provide mitigation in relation to (1) providing habitat creation to secure net biodiversity gain, and (2) mitigate significant environment effects on views and visual amenity</p>	1	<p>The hedgerow and hedgerow tree planting proposed on land owned by L&G to the south of the airport is to mitigate significant effects on views and visual amenity experienced by users of public rights of way in this area.</p> <p>The proposed planting in this area does not contribute to BNG.</p>	No

Ref	Comment	No. PILs	Response	Change
	experienced by people living or using the rights of way in the surrounding area.		Introducing structural planting within the airport's operational area and/or other land within the airport's ownership would not provide an effective screen to views experienced by users of these public rights of way.	
LE.2.16	It is unclear 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.	1		No
LE.2.17	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.	1	The Outline LBMP at Appendix 8.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent, covers a 50-year period from planting commencing.	No
Lighting				
LE.2.18	Concern that the Proposed Development will create more light pollution and that not enough has been done to mitigate this within the current proposals. Some respondents noted that light pollution is already an issue from the existing operation of the airport, and expansion will make the situation worse.	3	Please refer to the response to Ref LE.1.83 and LE.1.112.	No
LE.2.19	Concern that the Proposed Development will create more light pollution.	2		No
LE.2.20	Appendix 5.2 of the PEIR, the Preliminary Light Obtrusion Assessment, is considered thorough and appropriate. LLAOL requests that any changes to this Assessment post-consultation are discussed with the operator, to ensure aviation safety concerns are duly considered	1	Noted.	No
LE.2.21	LLAOL anticipates that the required CAA approvals process with regards lighting proposals is underway by	1	Noted. Aircraft obstacle / warning lighting (i.e. red beacon lights on tall	No

Ref	Comment	No. PILs	Response	Change
	the Applicant, and LLAOL offers support to the Applicant for this process if required.		buildings) has not been commented on in the Preliminary Light Obtrusion Assessment, as this would form part of the CAA approval.	
Mitigation				
LE.2.22	Concern that proposals to protect the environment are inadequate. Some respondents were concerned about long term impacts on the local environment and thought that more should be done to reduce impacts rather than mitigate.	3	Please refer to the response to Ref LE.2.08.	No
LE.2.23	Concern that the proposals to mitigate impacts to the environment will not be properly implemented or managed. Some respondents were concerned about the feasibility of limiting environmental impacts given the proposed scale of growth and nature of airport operations.	1	Please refer to the response to Ref LE.2.11.	No
LE.2.24	Support for the general approach taken to minimising and mitigation impacts to the environment.	1	Noted.	No
LE.2.25	Concern that the proposals to mitigate the impacts of the Proposed Development are insufficient.	9	Please refer to the response to Ref LE.2.08.	No
LE.2.26	Suggest that the mitigation plans should be improved and should be more ambitious overall. Some respondents specifically suggested that minimising environmental impacts and improving on the current situation should be core to the Proposed Development.	4	Please refer to the response to Ref LE.2.08.	No
LE.2.27	Suggest that all proposals to mitigate environmental impacts are carried out as planned and not compromised.	1	Please refer to the response to Ref LE.2.11.	No

Ref	Comment	No. PILs	Response	Change
Water, Drainage and Flood Risk				
LE.2.28	Concern over the potential for contamination of the water network as a result of surface water runoff with pollutants, as well as creation of new pollutant pathways to ground water by disturbance of the former landfill site. Some respondents raised specific concerns on the impacts of potential contamination to the Chiltern chalk streams.	2	<p>The DDS in Appendix 20.4 of the ES [TR020001/APP/5.02], contains a description of the operational drainage design which will be implemented to manage water run-off and pollution risk across the Proposed Development. 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 soakaway. The controls to be in place during construction to manage water run-off and pollution risk are outlined in the Outline Remediation Strategy in Appendix 17.5 and in the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02], both of which are submitted as part of this application for development consent.</p> <p>The WFD Compliance Assessment in Appendix 20.2 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent, details impacts to all groundwater and surface water bodies (including the chalk streams within the study area: River Lee, River</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>Mimram and River Hiz). The WFD concludes that there will be no significant impacts on the chalk streams from the Proposed Development.</p> <p>A substantial amount of GI 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, an Outline Remediation Strategy has been developed and is contained in Appendix 17.5 of the ES [TR020001/APP/5.02]. This includes details of measures to be undertaken to prevent contaminants in the former landfill migrating into the groundwater in the underlying chalk, during construction. These measures are also taken forward to the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02]. The earthworks design has also been amended to reduce the area and volume of landfill to be excavated and therefore associated impacts.</p> <p>A Foundation Works Risk Assessment (FWRA) has been</p>	

Ref	Comment	No. PILs	Response	Change
			<p>prepared and is provided at Appendix 17.6 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent. The FWRA assesses the risks from piling and provides an evaluation of the most appropriate piling technique to be adopted to ensure that contamination present is not mobilised. The assessment has concluded a very low to low risk assuming mitigation measures will be adopted. A groundwater monitoring plan has been agreed with the Environment Agency to obtain further baseline data. The appointed contractor will agree the groundwater monitoring plan pre, during and post construction into the operational period of the Proposed Development. An Outline Strategy Report for Groundwater, Ground Gas and Leachate Monitoring is provided at Appendix 17.7 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent.</p> <p>An Environmental Permit will be obtained prior to the start of construction for the recovery of the landfill wastes as part of the proposed earthworks for which a HRA will be prepared to identify</p>	

Ref	Comment	No. PILs	Response	Change
			any risks to groundwater. 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.	
LE.2.29	Concern that the Proposed Development will increase the risk of flooding in the local area which is already prone to floods. Some respondents raised concern about the increase in impermeable surfaces which may in turn increase surface water flooding.	2	<p>A FRA in Appendix 20.1 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent, addresses fluvial (associated with the River Lee and River Mimram), surface water and groundwater flood risk (including consideration of potential impacts on Kimpton). The outcomes of the FRA have informed the drainage design to ensure that appropriate measures are incorporated to account for any increase in impermeable surfaces required as part of the Proposed Development. The drainage design for the airport has also been designed to a 1 in 100 year plus 40% climate change allowance.</p> <p>At detailed design, the off-site highway interventions will also be designed in line with appropriate drainage design standards and include an appropriate climate change allowance where they are identified to result in any addition in</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>impermeable surface area compared to existing conditions.</p> <p>Engagement has also been completed with the Lead Local Flood Authority to inform the ES to discuss any amendments required to the design and strategy to managing flood risk as part of the Proposed Development.</p>	
LE.2.30	Concern over the potential for contamination of the water network, through the creation of new pollutant pathways to ground water by disturbance of the former landfill site.	2	Please refer to the response to Ref LE.2.28.	No
Agriculture				
LE.2.31	The airport expansion proposals include the provision of a Fire Training Ground (FTG) on land just north of L&G's landholding. The L&G land is in agricultural use, being part of Copt Hall and Someries Farm tenancy. L&G 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. L&G seek assurances that such adverse effects would not occur, or that an appropriate buffer / screening could be provided on LLAL's land. If any such buffer would be required on L&G's land, then such would need to be acquired LLAL on commercial terms. L&G 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 where the	1	Chapter 6 Agricultural Land Quality and Farm Holdings of the ES [TR020001/APP/5.01] , includes an assessment of the operational impacts of the Proposed Development on agricultural land quality, soil resources and farm holdings. The assessment concludes that the L&G agricultural landholding will experience some indirect operational impacts as a result of operational practices following the relocation of the FTG and an increase in noise. These nuisances would not however affect the existing land use or enterprise and are not considered to be significant.	No

Ref	Comment	No. PILs	Response	Change
	DCO interferes with an interest in a property, a 'Section 10 Claim' (under the Compulsory Purchase Act 1965) may apply.		Engagement with L&G has taken place since the 2022 statutory consultation and will continue.	
Biodiversity				
LE.2.32	LLAOL understands that the proposed development will result in a number of significant effects on landscape and biodiversity that are subject to mitigation proposals. These include changes to the landform to the east of the airport and removal of protected habitats requiring the relocation of an area of Wigmore Park. LLAOL considers biodiversity of utmost importance and supports the Applicant's approach within mitigation proposals to move and/or replace any protected habitats.	1	Noted.	No
LE.2.33	LLAOL would welcome further information on the responsibilities for biodiversity management and monitoring, as well as timelines for habitat creation.	1	Please refer to the response to Ref LE.1.179.	No

Table A10.3: Regard had to statutory consultation responses on the Local Environment comments - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
Assessment				
LE.3.01	<p>Suggest that additional ongoing assessments should be undertaken on all the environmental impacts of the Proposed Development, including: light pollution, water pollution, landscape/visual and ecology. Some respondents suggested that assessments should be carried out by an independent body, with outcomes being made publicly available. In addition, some respondents stated that assessments should be cognisant of the commitments and aspirations from COP26.</p>	17	<p>A full EIA has been carried out in accordance with relevant guidelines, with the assessment requirements, methodology and outcomes, explained further in the ES [TR020001/APP/5.01], submitted with the application for development consent. The ES includes assessments concerning light pollution, water pollution, landscape and visual, and ecology.</p> <p>The impacts of the Proposed Development will be considered by the Examining Authority (ExA), who is an independent body and will make a recommendation to the Secretary of State (SoS), who will make a decision in relation to the application for development consent.</p> <p>The application for development consent has been updated to reflect current Government policy on climate change, including any applicable legislative requirements.</p>	No

Ref	Comment	No. CC	Response	Change
LE.3.02	Suggest that a full Environmental Impact Assessment needs to be submitted with any application for expansion in order to fully understand the environmental impacts, as the Preliminary Environmental Impact Report (PEIR) is not sufficient.	6	Please refer to the response to Ref LE.2.01.	No
Ecology				
LE.3.03	Concern that the Proposed Development will have negative impacts on natural habitats and wildlife. Some respondents raised concern about the length of time that it will take for the natural environment to recover from these impacts.	202	Please refer to the response to Ref LE.2.05.	No
LE.3.04	Concern that the environmental target and limits that have been set to mitigate and manage impacts are not ambitious enough, and that not enough clarity has been provided on how these will be set and enforced. Some respondents highlighted specific concern that the Biodiversity Net Gain (BNG) aspirations are not quantified.	12	BNG is measured using the DEFRA metric version 3.1, with the Applicant setting a voluntary ambition of achieving at least 10% BNG, which is consistent with the ultimate intention of the Environment Act 2021. This is detailed within the BNG report in Appendix 8.5 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent. The metric accounts for the time taken for these habitats to establish.	No
LE.3.05	Natural England's Supplementary Advice for the Chiltern Beechwoods SAC, Nov 2018: 'Dry grasslands and scrublands on chalk or limestone' states "The supporting habitat of this feature is considered sensitive to changes in air quality and is currently	1	A Habitat Regulations Assessment Screening Report No Significant Effects Report is included in Appendix 8.3 of the ES [TR020001/APP/5.02] , which is	No

Ref	Comment	No. CC	Response	Change
	<p>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.' 'Beech forests on neutral to rich soils' - For this feature, the critical loads for nitrogen are currently being exceeded (October 2018)". The Trust considers that the impact of the proposal on these designated features should be assessed as part of the EIA.</p>		<p>submitted as part of this application for development consent. This Habitats Regulation Assessment includes consideration of potential pathways between the application site and the relevant sites within the National Site Network (previously known as Natura 2000 sites) and takes account of potential air quality changes. The assessment concludes that Chilterns Beechwoods SAC is 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.</p>	
	<p>Suggest that measures should be put in place to deter birds from near the airport in order to prevent bird strike.</p>	1	<p>With the exception of one pond (or potentially a cluster of three very small ponds) within the Habitat Creation area to the east of the Main Application Site, the Proposed Development does not include the provision of surface waterbodies. The landscape scheme for the Proposed Development has been designed to include management measures to avoid any significant increase in bird strike risk. For further details, please refer to the Bird Strike Risk Assessment in Appendix 8.3 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent.</p>	No

Ref	Comment	No. CC	Response	Change
LE.3.06	Suggest that greater steps should be taken to protect existing habitats and eco-systems, as well as creating additional wildlife areas with a focus on enhancing biodiversity. Some respondents noted the need for appropriate maintenance of these areas to ensure establishment and success; in addition, some respondents suggested that the newly created wildlife sites should be transferred to the Wildlife Trust with commitments for ongoing maintenance and monitoring.	13	The evolution of the design of the Proposed Development has taken into account the mitigation hierarchy and retained and avoided features such as Winch Hill Wood, management of which is incorporated into the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent. Further habitats have been retained within the proposed replacement open space, and habitat creation areas have been designed to enhance existing habitats and create new areas of higher value habitats. All of which will also be managed as per the Outline LBMP.	No
LE.3.07	Suggest that the BNG target should be increased beyond the statutory requirement of 10% to 20/25%, given the scale of the Proposed Development.	4	Please refer to the response to Ref LE.3.04.	No
LE.3.08	Support for commitments to BNG. Some respondents highlighted specific support that improvements to biodiversity within landscape proposals coincide with enhanced user experiences.	7	Noted.	No
LE.3.09	Support for the proposals to protect habitats and wildlife, as well as creating new wildlife sites.	5	Noted.	No
LE.3.10	Suggest that nitrogen deposition levels should be reduced, as they are currently above critical load values. The urgent task in hand is to reduce those load values, in order that woodlands and other habitats can	1	Air quality monitoring has been carried out to inform the Proposed Development and will continue whilst the airport is in operation. The full	No

Ref	Comment	No. CC	Response	Change
	begin to recover their full spectrum of ecological functioning, which includes carbon sequestration.		<p>extent of air quality monitoring is provided in Chapter 7 Air Quality of the ES [TR020001/APP/5.01]. Monitoring data has been used to verify the modelling undertaken as part of the assessment in the air quality assessment.</p> <p>The creation of new grassland areas as part of the Proposed Development will have some benefit in terms of carbon sequestration.</p>	
General				
LE.3.11	Concern that it will not be possible to deliver proposals that will be effective in mitigating environmental impacts as the nature of the Proposed Development will result in additional flights and therefore adverse environmental impacts are inevitable.	327	Please refer to the response to Ref LE.2.08.	No
LE.3.12	Support for the Proposed Development as environmental matters are not a concern.	5	The Applicant takes environmental protection very seriously. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. Please refer to the GCG Framework [TR020001/APP/7.08] for further details.	No

Ref	Comment	No. CC	Response	Change
LE.3.13	Concern that the Proposed Development will have overall negative impacts on the environment, regardless of mitigation plans; some respondents therefore concluded that the Proposed Development should not be approved and delivered.	165	Please refer to the response to Ref LE.2.08.	No
LE.3.14	Suggest that the Proposed Development should not go forward and instead current passenger numbers should be maintained, as this would be the best way to protect the environment from damage.	1	The purpose of the Proposed Development is to enable the airport to meet the projected growth in air travel demand, in line with Government policy. The impacts of the proposed increase in the number of flights are assessed in the ES [TR020001/APP/5.01] . The EIA process takes into account the location of the airport and the impacts on the environment and communities around it.	No
Landscape				
LE.3.15	Concern that the Proposed Development will result in negative impacts on the local landscape, and the Chilterns Area of Outstanding Natural Beauty (AONB) in particular. Some respondents noted concern for the tranquillity of the AONB and villages within it, citing the statutory obligations to protect and conserve the AONB under the Countryside and Rights of Way Act 2000.	56	Effects on the aesthetic and perceptual qualities of the Chilterns AONB are considered in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] . Please also refer to the response to Ref LE.1.108. As part of the Government's airspace change process, which is separate to the Proposed Development, the desirability of avoiding overflying the AONB will be considered, in line with	No

Ref	Comment	No. CC	Response	Change
			<p>the guidance set out in the CAA's CAP1616.</p> <p>Please also refer to Noise, Flight Paths and Fleet Mix, and Air Quality topic responses.</p>	
LE.3.26	<p>Government policy in its guidance to the CAA 2017 states: 'where practicable, it is desirable that airspace routes below 7,000 feet should seek to avoid flying over Areas of Outstanding Natural Beauty (AONB) and National Parks; ...and all changes below 7,000 feet should take into account local circumstances in the development of the airspace design, including the actual height of the ground level being overflown...' The CCG calls for recognition of the status of AONB, the local topography of the Chiltern Hills & reminds LR that as an arm of a statutory authority it bears responsibilities under the CROW Act 2000, as previously described. Whilst this document (above) 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.</p>	1	<p>Decisions as to future flightpaths are subject to a separate airspace change process; this matter is not applicable to this application for development consent. The airspace change process is administered by the CAA and one of the considerations as to any changes to flightpaths is the impact on AONBs.</p>	No
LE.3.27	<p>Concern that the Proposed Development will lead to adverse visual impacts on the surrounding local area, landscape and countryside. Some respondents note particular concern for the visual impact of low flying planes over neighbouring towns and villages, as well as countryside.</p>	90	<p>Please refer to the response to Ref LE.2.13.</p>	No
LE.3.28	<p>Concern that the Proposed Development will result in the loss of green space in the local area, with adverse</p>	190	<p>Please refer to the response to Ref LE.2.14.</p>	No

Ref	Comment	No. CC	Response	Change
	impacts on natural habitats, species and biodiversity. Some respondents raised concern over the length of time to establish sufficient replacement green space.			
LE.3.29	Concern that the Proposed Development will result in the loss of Green Belt land and encroachment into the countryside. Some respondents specifically highlighted the impact of the proposed fuel pipeline on the Green Belt.	29	<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. The location can be seen on the Works Plans [TR020001/APP/4.04].</p> <p>Careful consideration has been given to protecting the Green Belt around Luton and adjacent to the airport. In response to the concerns raised at the 2019 and 2022 statutory consultations, further consideration has been given 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. Further information about the Proposed Development's impact on the Green Belt can be found in the Planning Statement</p>	No

Ref	Comment	No. CC	Response	Change
			[TR020001/APP/7.01] submitted as part of the application for development consent.	
LE.3.30	Suggest that a comprehensive assessment of impacts to the Chilterns Area of Outstanding Natural Beauty (AONB) needs to be undertaken, considering the cumulative impacts of the physical airport expansion as well as the changes to flightpath from Luton and other airports considering expansion. The potential extension of the AONB should be included within this assessment. Some respondents suggested that there should be a commitment to no impacts on the AONB.	3	An assessment of impacts on the Chilterns AONB as a result of the Proposed Development has been undertaken and is presented in Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] . There are no proposed changes to flightpaths as part of the Proposed Development. Changes to flightpaths are assessed through the separate airspace change process, which would include consideration of cumulative impacts with regard to changes to flightpaths at other airports if relevant.	No
LE.3.31	Suggest that existing green spaces should be protected and enhanced, whilst new green spaces should also be created. Some respondents specifically suggested that more trees should be planted for carbon absorption, visual enhancement as well as to provide screening from light pollution.	28	The Proposed Development has been carefully selected following a three stage Sift process. 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 more development in the Green Belt and outside of the Luton Local Plan LLP6 Strategic Allocation boundary and was judged to perform poorly against other criterion,	No

Ref	Comment	No. CC	Response	Change
			<p>notably on the basis of operations, noise impacts, land ownership and landscape and visual impact considerations. Details of the sifting process can be found in the Design and Access Statement [TR020001/APP/7.03].</p> <p>Proposed planting will take several years to fully establish. The Proposed Development will, however, stage 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>Please refer to the response to Ref LE.1.83 for further details on light pollution from the Proposed Development.</p>	
Lighting				
LE.3.32	Concern that the Proposed Development will create more light pollution and that not enough has been done to mitigate this within the current proposals. Some respondents noted that light pollution is already an issue from the existing operation of the airport, and expansion will make the situation worse.	54	Please refer to the response to Ref LE.1.83 and LE.1.112.	No

Ref	Comment	No. CC	Response	Change
Mitigation				
LE.3.33	Concern that proposals to protect the environment are inadequate. Some respondents were concerned about long term impacts on the local environment and thought that more should be done to reduce impacts rather than mitigate.	157	Please refer to the response to Ref LE.2.08.	No
LE.3.34	Concern that the proposals to mitigate impacts to the environment will not be properly implemented or managed. Some respondents were concerned about the feasibility of limiting environmental impacts given the proposed scale of growth and nature of airport operations.	63	Please refer to the response to Ref LE.2.11.	No
LE.3.35	Concern that the proposals to mitigate the impacts of the Proposed Development are insufficient. Some respondents stated that the proposals do not go far enough to fully mitigate the expected environmental impacts, including that there is a lack of consideration on addressing air-side impacts and an overreliance on off-setting measures.	105	Please refer to the response to Ref LE.2.08.	No
LE.3.36	Suggest that the mitigation plans should be improved and should be more ambitious overall, for instance they could include: more screening for light pollution, more living walls, rainwater harvesting across the town (not just at the airport) and greater use of fuel pipelines. Some respondents specifically suggested that minimising environmental impacts and improving on the current situation should be core to the Proposed Development.	37	Please refer to the response to Ref LE.2.08.	No

Ref	Comment	No. CC	Response	Change
LE.3.37	Support for the general approach taken to minimising and mitigation impacts to the environment.	47	Noted.	No
Monitoring				
LE.3.38	Concern that there will not be appropriate monitoring of environmental impacts and that legal limits may not be complied with. Some respondents questioned how environmental limits will be set, how the limits will be enforced and how compliance with these limits will be measured.	32	<p>Mitigation and monitoring requirements are to be secured through the DCO, and subsequent Section 106 Agreement. A breach of the DCO would be a criminal offence.</p> <p>In addition, various review groups with the local authorities and relevant stakeholders will be established to ensure that there is visibility on the delivery of mitigation and that enforcement bodies have the information that they need to carry out their function. Monitoring and funding commitments are to be made through the DCO and the Section 106 Agreement.</p> <p>Further information on environmental limits committed to can also be found within the GCG Explanatory Note [TR020001/APP/7.07]. The environmental limits set out therein have been defined in consultation with statutory stakeholders. The GCG</p>	No

Ref	Comment	No. CC	Response	Change
			Explanatory Note also sets out further information on the mechanisms for enforcement and compliance monitoring.	
LE.3.39	Suggest that environmental impact limits should be clearly defined and agreed in advance of the Proposed Development becoming operational; these should be monitored by an independent body and when a breach occurs, operations should stop until the matter is rectified. Some respondents raised the importance of having clearly defined accountability; in addition, some respondents suggested financial penalties for breaches in limits. Furthermore, some respondents highlighted that the cause of a breach should be inconsequential to enforcement of penalties.	19	<p>The proposed Limit has been developed by the Applicant, having undertaken detailed technical assessments for the different environmental impacts of the Proposed Development, which inform the Limits themselves and would not be available to an independent body. They have been developed in consultation with local authorities and other stakeholders, and any matters of disagreement will be explored during the examination period. Further information can be found in the GCG Explanatory Note [TR020001/APP/7.07].</p> <p>A Mitigation Route Map [TR020001/APP/5.09] has been submitted as part of this application for development consent, setting out how monitoring against the four GCG environmental topics will be carried out, and who is responsible for monitoring. For different topics, different bodies are best placed to undertake this monitoring, which in</p>	No

Ref	Comment	No. CC	Response	Change
			<p>some cases is being led by third parties and in some cases is proposed to be undertaken by the airport operator, as they are the best-placed organisation to be able to suitably monitor the different environmental impacts, and already have processes in place to do so. Monitoring results will still need to be submitted to an independent body (the Environmental Scrutiny Group) who oversee compliance of GCG overall.</p> <p>In the event of breach of the Limit, growth at the airport would be required to stop. The exception to this is air quality, where investigations must first take place while the source of the breach is identified, as this could be unrelated to the airport. This is considered to be a pragmatic approach, because GCG is only intended to apply to airport-related impacts.</p> <p>Financial penalties have been considered, but are not considered to be appropriate, as they represent a less severe sanction that curtailing the future growth of the airport. Financial contributions to mitigation measures could still be required to reduce an</p>	

Ref	Comment	No. CC	Response	Change
			environmental impact back below a Limit if a breach were to occur.	
LE.3.40	Support for independent oversight on environmental impact monitoring, and the inclusion of legally enforceable environmental limits.	9	Noted.	No
Waste and Minerals				
LE.3.41	Concern raised over the waste management measures of the Proposed Development, with queries on where waste material, including excavated materials, will be disposed of.	2	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. Mitigation measures have been integrated 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. In respect of construction good practice mitigation, specific guidance on managing waste in accordance with the relevant regulations is outlined in the CoCP in Appendix 4.2 and the Outline Site Waste Management Plan in Appendix 19.1 of the ES [TR020001/APP/5.02] , which are both submitted as part of this application for development consent. An Outline Operational Waste Management Plan which demonstrates how waste will be managed during the operation	No

Ref	Comment	No. CC	Response	Change
			<p>of the Proposed Development is provided in Appendix 19.2 of the ES [TR020001/APP/5.02].</p> <p>It is anticipated that all excavated material (excluding excavated material from the historic landfill) will be reused on site and incorporated into the landform, thus achieving a cut and fill balance. Therefore, it is anticipated that this material will be managed on site and would not be disposed of. The reuse of this material i.e. soils and demolition waste would be covered by a CL:AIRE DoW CoP Materials Management Plan (MMP).</p> <p>The majority of excavated material from the historic landfill will be reused or recycled on site and incorporated into the landform. Therefore, it is anticipated that this material will be managed onsite and would not be disposed of. The reuse or recycling of this landfill excavated material would be covered by an Environmental Permit. Some hazardous landfill excavated material would be sent offsite to hazardous landfill, soil treatment or incineration.</p>	

Ref	Comment	No. CC	Response	Change
			The exact waste disposal facilities to be used would be decided post consent by the construction contractor. A high-level list of waste management facilities in the relevant study areas are included in the Chapter 19 Waste and Resources Chapter of the ES [TR020001/APP/5.01] .	
Water, Drainage and Flood Risk				
LE.3.42	Concern over the potential for contamination of the water network as a result of surface water runoff with pollutants, as well as creation of new pollutant pathways to ground water by disturbance of the former landfill site. Some respondents raised specific concerns on the impacts of potential contamination to the Chiltern chalk streams.	16	Please refer to the response to Ref LE.2.28.	No
LE.3.43	Concern that the Proposed Development will increase the risk of drought in the local area due to an increased level of water consumption. Some respondents raised specific concern that there are already water supply issues in the local area and this is likely to be exacerbated by the Proposed Development. In addition, some respondents stated that appropriate mitigation has not been identified.	8	Consultation has been undertaken with Affinity Water to ensure the ES focused on how the Proposed Development will mitigate any potential impacts on local water supply and to agree the implementation of water reuse and rainwater harvesting measures to improve the water efficiency of the airport. The DDS in Appendix 20.4 of the ES [TR020001/APP/5.02] , provides a description of the water reuse and rainwater harvesting measures. The Water Cycle Strategy in Appendix	No

Ref	Comment	No. CC	Response	Change
			20.5 of the ES [TR020001/APP/5.02] , provides an assessment of the impact of the Proposed Development on local water supply taking into account the measures outlined in the DDS and has been undertaken in line with relevant guidance provided by LBC.	
LE.3.44	Concern that the Proposed Development will increase the risk of flooding in the local area which is already prone to floods. Some respondents raised concern about the increase in impermeable surfaces which may in turn increase surface water flooding.	12	Please refer to the response to Ref LE.2.29.	No

A11: DESIGN

Table A11.1: Regard had to statutory consultation responses on Design - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
General infrastructure/ancillary services						
D.1.1	As indicated during the Scoping stage, the proposed development has the potential to affect NATS En Route's infrastructure located at Luton Airport and its provision of en-route air traffic services in the London area.	NATS		1	The Applicant has continued, and will continue, to engage with NATS and it has been agreed that any safeguarding issues can be resolved at the detailed design stage.	No

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.2	<p>Local ATC. Luton Rising will need to work with the Airport Operator and the ANSP in the following areas:</p> <ul style="list-style-type: none"> Analyse lines of sight to the new development from the VCR with remediation if required. ATC require full visibility of any new development, either by direct observation or technological means. The development shown in phase one is in an area in which the SMR coverage may be shielded based on current known coverage which could have an impact on movement rates in LVP conditions if not remediated. Electronic surveillance will be required to support this development with full coverage of all manoeuvring areas and aprons with associated masts and equipment at various locations. The ability to re-order the departure sequence once aircraft have left stand is 	NATS		1	<p>The Proposed Development has been updated to bring forward construction of the Surface Movement Radar (SMR) tower to the south of the runway, earlier in construction. The taxiway configuration has been designed, as far as possible, to permit the resequencing of aircraft before departure. There are some areas of the existing infrastructure where this may not be possible. There is potential for some taxiway connections to be required earlier, in order to aid re-ordering of departures. Matters relating to the number of controller positions and reconfiguration of the Virtual Control Room (VCR) will be agreed between NATS and the airport operator should the application for development consent be granted.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>key to attaining peak capacity, new infrastructure should allow this if possible.</p> <ul style="list-style-type: none"> Ensure a sufficient number of ATC controller and support positions are available, orientated correctly to service the new development with its associated increase in complexity and workload. This would likely entail a refit of the current VCR to enable. 					
D.1.3	<p>Detailed Operational Discussions and Analysis will be required to:</p> <ul style="list-style-type: none"> Develop new local procedures. Develop new procedures with Terminal Control. Deploy any new RTF frequencies required. 	NATS		1	Noted. Procedural changes to be drafted and agreed between NATS and the airport operator will be undertaken as required during the implementation stage.	No
D.1.4	<p>Air Traffic Management (ATM) Tools Advanced Air Traffic Control Management Tools may be required for example:</p> <ul style="list-style-type: none"> Arrival and Departure Management ACDM 	NATS		1	These matters relate to IT-based technology. It is assumed that this technology would be housed within existing IT rooms/infrastructure. Detailed matters including IT technology will be dealt with at the implementation stage and are	No

Ref	Comment	PC	LA	No PILs	Response	Change
					not included as part of the application for development consent.	
D.1.5	Technical Safeguarding New development will require technical safeguarding to ensure continued and sufficient performance of ATC Navigation and Communication systems.	NATS		1	Detailed matters such as technical safeguarding will be dealt with at the detailed design stage.	No
D.1.6	It should be noted that the phasing strategy doesn't include any analysis regarding the ancillary systems of the airport. It is not examined if modifications or enhancements will be needed in elements such as <ul style="list-style-type: none"> • Navigational Aids • Fuel Storage • Maintenance facilities • Utilities • Air Rescue and Fire Fighting Facilities (ARFF) Therefore, it is proposed to further examine potential modifications on the above elements and should be included as part of a potential application.		Host Authorities	4	These elements have been considered as part of the Proposed Development and further information can be found within the Design and Access Statement [TR020001/APP/7.03] submitted as part of the application for development consent. Information for each element was provided at the 2022 statutory consultation stage within the Works Description Report. Ongoing stakeholder engagement has also been undertaken with relevant stakeholders as part of the preparation of this application for development consent, including NATS, utility companies and	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>LLAOL. Detailed aspects of the proposed design, including the elements listed and other ancillary facilities, will be dealt with at subsequent stages, should the application for development consent be granted. Detailed design is subject to consultation with relevant stakeholders on matters related to their functions. Further consultation during detailed design is a requirement of the Draft Development Consent Order (DCO) [TR020001/APP/2.01] submitted as part of this application for development consent.</p>	
D.1.7	<p>The Draft Need Case doesn't provide any further analysis regarding the ancillary services at the airport, as it was commented by WSP in 2019. Apart from the terminal facilities (notwithstanding the comment 4.7.4 above) the ancillary services such as navigational aids, maintenance, fuel or utilities are not adequately described, and their characteristics are not presented.</p>		Host Authorities	4	Please refer to the response to Ref D.1.6.	No

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.8	WORK NO. 4P(02) & 4Q(02) Both parking areas are located on the east of the new T2. They both consist of an initial phase of Works no.4p(01) and 4q(01) and then their modification through Works no. 4p(02) and 4q(02). It should be further examined if both parking areas can be constructed directly according to Works no 4p(02) and 4q(02) in order to not be modified again. Additionally, the extra capacity at the initial development phase can serve a number of parking spaces from the temporary parking areas that are distributed across the site.		Host Authorities	4	The proposed car parking arrangement aims to deliver incremental capacity, to meet the growing demand, within the available areas of land. A key element of the Proposed Development is to develop a platform for the airfield. As this will entail significant earthworks, there is limited availability to deliver permanent car parks as early as would be desired.	No
D.1.9	WORK NO. 4U It is stated that the police station will be relocated in an adjacent plot to the existing one. However, there is no further analysis if a dedicated police station will be needed for T2, subject to any operational needs. In that scenario, the plot for the relocation of the existing police station could be potentially reduced and also the response time for any emergencies could be improved as there will be two separate police stations (east and west of the airport site). It should		Host Authorities	4	The spatial requirements, location and ancillary facilities of the Police Station have been discussed at length with Bedfordshire Constabulary and they have confirmed that the proposals are aligned with their operational needs. In addition to the station-specific operational facilities that exist in Terminal 1, similar facilities will be provided in Terminal 2. The detailed design of these facilities will be developed at the detailed design stage, should the application for	No

Ref	Comment	PC	LA	No PILs	Response	Change
	also be noted that the headers of Inets 4.u.3 and 4.u.4 need to be swapped as they don't describe accurately the figures. Additionally, within this section there is a reference to the fact that "this location (of the new police station) is centrally located between the two terminals", which may not be appropriate as the new plot is still located west of the airport site.				development consent be granted. Comments regarding document formatting concern the Works Description Report, which was a 2022 statutory consultation document which is not included in the application for development consent. Regarding the location of the police station, it is between the existing and proposed terminals.	
D.1.10	We recognise that the design of the scheme, in terms of the scale and massing of infrastructure, takes account of a combination of factors, including operational and safety needs, the impact of existing structures within and around the airport, and impacts on nearer neighbours, including residential and commercial uses, as well as impacts on the wider area. The Board is satisfied that an appropriate balance has been taken on these aspects of the design.	Chilterns Conservation Board			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.11	<p>For the avoidance of doubt, while the Chilterns Conservation Board promotes observance of the Chilterns Buildings Design Guide in developments outside of the designated area of the AONB, especially within the associated Chilterns National Character Area, we recognise that this is not always appropriate in the design of large-scale infrastructure, where the outcome can easily fall into a pastiche. Nonetheless, we have found from recent experience, e.g., with buildings associated with HS2, that opportunities to link the palette of materials/colours and overall form of construction with aspects of the local landscape can help with providing a 'sense of place'. In addition, minor details, especially in public spaces, can also help make a link with the local area. We would very much welcome the opportunity to engage with the designers as the project moves forward to see how this might be achieved.</p>	Chilterns Conservation Board			<p>These comments are noted, and the recommendations provided will be considered at the detailed design stage, should the application for development consent be granted.</p> <p>Ongoing engagement with the Chilterns Conversation Board will continue throughout detailed design of the Proposed Development.</p>	No
Runway/airfield						

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.12	The Need Case (8.5.14) states that x2 RETs will be needed for Phase 2a to meet the 27mppa number while the Works Description Report (Inset 2.b.4) only show x1 RET on the west of the runway for the same phase. We query whether phasing of the RETs can be achieved between Phases 2a and 2b		Host Authorities	4	The timing of delivery of the Rapid Exit Taxiways (RETs) has been tested via simulation modelling and are delivered only when needed. In terms of the phasing of the construction, it would not be practicable to construct the two RETs simultaneously as this would cause excess disruption to the operation of the airfield. As the Need Case [TR020001/APP/7.04] , submitted as part of the application for development consent makes clear the RETs are needed by the time the airport is handling 27 million passengers per annum (mppa). The proposal is to stage the construction of the two RETs by the time the airport reaches 27 mppa.	No
D.1.13	Work No.2C Inset 2.c.5 doesn't show the new Taxilane Kilo as the accompanied text states. The section needs to be further explained.		Host Authorities	4	This comment concerns drawings within the Works Description Report, which was a 2022 statutory consultation document. This document is not included in the application for development consent. The Design and Access Statement	No

Ref	Comment	PC	LA	No PILs	Response	Change
					[TR020001/APP/7.03], submitted as part of the application for development consent contains updated drawings showing taxiways.	
D.1.14	Work No.2D. Inset 2.d.1 doesn't show the existing position of the fire training ground.		Host Authorities	4	The existing Fire Training Ground is shown on the Scheme Layout Plans [TR020001/APP/4.02] .	No
D.1.15	Works No.2E, 2F, 2G. According to the report, the ERUB will be relocated twice until the ultimate Phase 2b. It should be explained, though, that the existing location of the ERUB is within the Proposed Development and therefore its relocation is required. However, it should be further researched if the ERUB can be located directly to the proposed location of Phase 2b in order not to be relocated twice. As the ERUB will be used primarily for overnight parking, and it will be only accessible by bus it should be examined what the differences will be between the proposed locations of Phase 2a and 2b.		Host Authorities	4	The platform for the final configuration of the Proposed Development will not exist until part way through construction, therefore there is a requirement to relocate the Engine Run Up Bay (ERUB) twice, as the Proposed Development is constructed overtime. This change took place after the 2019 statutory consultation and before the 2022 statutory consultation. The ERUB is an essential element for aircraft operations, so a facility is needed at all times, and it needs to be accessible for all sizes of aircraft with respect to taxiways for routing purposes. The existing ERUB location needs to be relocated as it is in the path of new taxiways which	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>are needed to ensure efficient circulation of aircraft.</p> <p>Due to construction sequencing of the earthwork's platform and apron, the final location of the ERUB, which needs to be as far from buildings as possible, needs to be relocated twice, as the final location is at the eastern edge of the earth platform which is the final element to be constructed.</p> <p>The ERUB will be used primarily for engine testing but does provide opportunity for buffer stands for aircraft parking, for example if an aircraft is broken down. It is not intended to embark or disembark passengers to or from the ERUB, so the bussing of passengers will not be required (although it may be used for passenger operations in exceptional circumstances, with the need for passenger access dealt with on an equally exceptional basis).</p>	
Terminals						

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.16	We are interested to understand whether the design of the terminals and other infrastructure will take account of non-pharmaceutical interventions required for reducing the spread of COVID19 and other respiratory infections, for example, physical spacing, ventilation and handwashing.		Central Bedfordshire Council	1	Terminal 2 will be designed in accordance with all relevant building regulations as they apply during detailed design. Further detail on the management of Covid and infectious diseases are covered under Chapter 15 Major Accidents and Disasters of the Environmental Statement [TR020001/APP/5.01] .	No
D.1.17	Further studies should be carried out to understand the requirements for the proposed terminal expansions and modifications for Phase 1. There is no reference to standards that are typically used on similar terminal planning exercises such as IATA Level of Service inputs, transaction times, etc.		Host Authorities	4	The design of Terminal 1 has been discussed with the current airport operator, LLAOL. This has resulted in changes to the design of the Proposed Development as presented as part of the 2022 statutory consultation, including additional capacity. In principle, the works are being designed to IATA ADRM 11 Optimum Level of Service, but there are inevitable compromises that need to be made when working within an existing terminal complex. Terminal 2 has been appropriately sized on the basis of specific design criteria established in relation to the growth forecast, in particular the apron capacity and types of	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>carriers which are anticipated and accords with benchmarked international standards.</p> <p>More information is contained within the Need Case [TR020001/APP/7.04] with information concerning how the design of the Proposed Development has met this need, contained within the Design and Access Statement [TR020001/APP/7.03]. Both documents are submitted as part of the application for development consent.</p>	
D.1.18	It is not clear why Inset 8.5 highlights two different areas for terminal works and it is not explained if both areas include terminal expansion/extension or associated works and what their phasing might be.		Host Authorities	4	Works associated with the Proposed Development are shown on the Works Plans [TR020001/APP/4.04] , General Arrangement Drawings [TR020001/APP/4.09] submitted as part of the application for development consent.	No
D.1.19	WORKS NO. 3A(01), 3A(02), 3A(03) The works associated with this section consider terminal expansions/modifications after the implementation of the Project Curium works. The rationale of the proposed terminal development is		Host Authorities	4	<p>Please refer to Ref. D.1.17.</p> <p>More information concerning the rationale behind the Proposed Development is contained within the Need Case [TR020001/APP/7.04] with</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	not adequately explained and there is insufficient information provided. Normally, planning parameters would need to be analysed, which could include IATA Level of Service inputs, dwell time, processing time and/or similar data that can influence the terminal capacity. Additionally, it is not explained if all x3 work parts need to be completed simultaneously or whether there is any need to prioritise any of them.				information concerning how the design of the Proposed Development has met this need, contained within the Design and Access Statement [TR020001/APP/7.03] , both submitted as part of the application for development consent. It should be noted that the level of information that has been submitted as part of the application for development consent is sufficient for an outline application, and further detail will be provided at detailed design stage.	
D.1.20	WORKS NO.3B(01), 3B(02) Similar to the previous comment above, the information about the Terminal 2 seems rather insufficient. The area of the new T2 is indeed analysed, but there are no other references to planning parameters. Additionally, a series of site plans are presented, but the passenger/bags flows could have been included as well to provide a complete overview of T2. Also, the headers of Inset 3.b.1 and Inset 3.b.2 need to be swapped.		Host Authorities	4	The design of Terminal 2 included in the application for Development Consent is based on a detailed set of aviation planning parameters including IATA and national knowledge, specific to the nature of Low Cost Carrier operational requirements. The parameters are underpinned by the traffic forecasts including busy day forecasts. This information was not presented at the 2022 statutory consultation due to the level of detail, but further detail regarding the need for Terminal	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>2 can be found within the Need Case [TR020001/APP/7.04], with information concerning how the design of the Proposed Development has met this need, contained within the Design and Access Statement [TR020001/APP/7.03], both submitted as part of the application for development consent. Comments regarding document formatting concern the Works Description Report, which was a 2022 statutory consultation document which is not included in the application for development consent.</p>	
D.1.21	<p>WORKS NO.3C(01), 3C(02) According to this section, the two new T2 Piers will be constructed during Phase 2b. It is still not clear why the East Pier will be slightly different than the West Pier, instead of having identical piers with mirrored operations.</p>		Host Authorities	4	<p>The piers are virtually a mirror image of each other, but most stands are Code C only (easyjet sized aircraft), whilst some also safeguard options for Code E (jumbo jet size). This has resulted in the link bridges from the piers to the stands being positioned differently.</p> <p>Further details are contained within the Design and Access Statement [TR020001/APP/7.03], submitted as part of the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					application for development consent.	
D.1.22	WORK NO. 3H According to this section, two separate facilities are proposed namely Area A and Area B. Both areas support the terminal operations and can include an Energy Centre, a substation, and a service yard. As those facilities don't have any operational or location requirements, further analysis may be needed in case they can be positioned further away from the terminal to safeguard space for potential expansion of the car parks or the curb zone.		Host Authorities	4	The proposed design seeks to define parameters for development consent on the basis of the Rochdale Envelope. This principle retains flexibility in relation to the potential building requirements, which will only arise in the medium-long term and therefore cannot be predicted at the time of submission.	No
Aircraft stands						

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.23	Within [Phase 1], it is not clear why five new aircraft stands are initially proposed instead of six (as stated in Table 8.2). Further clarification may be needed on how the sixth stand is described, and the whole section needs to be better explained (i.e., it is not clear if those x5 new stands include the additional stand on the ERUB or not). Also, the rationale of the new proposed bus gate facility is not clear, and it should be further explained if it can serve all x5 or x6 remote stands and if further planning parameters need to be considered.		Host Authorities	4	<p>The Need Case [TR020001/APP/7.04] explains the capacity required and the Scheme Layout Plans [TR020001/APP/4.11] illustrates how this is accommodated. Subsequent engagement and design development has resulted in the bus gate facility being omitted from the Proposed Development and replaced with a new pier to provide gate service to 4 new aircraft stands (to be provided under Project Curium and not part of the application for development consent). The pier will also facilitate bussing operations to/from remote stands. The footnote to Table 8.2 of the Draft Need Case made clear that the 6 additional stands included assumed use of the ERUB.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.24	For Phase 2a, from the x18 additional Code C aircraft stands that are referenced, some of them will be constructed during Phase 1 (x4 aircraft stands close to T2 area and the works at ERUB if are included) and they will be modified from remote (during Phase 1) to contact stands (during Phase 2). This should have been properly explained and their location should be presented, as there is no indication of their layout.		Host Authorities	4	Please refer to the response Ref D.1.23.	No
D.1.25	Also, it is stated that x3 Code E MARS stands will be provided through Phase 2a and x3 additional through Phase 2b. However, there is no supporting information about their position or their layout. It is not explained if any planning parameters were taken into consideration in order to optimise the parking arrangement and the taxiway flows.		Host Authorities	4	The provision of the MARS stands and the operation of larger aircraft manoeuvring within the cul-de-sac was taken into account in simulation modelling of airport operations. Further information will be provided about the simulation modelling as part of the Need Case [TR020001/APP/7.04] submitted as part of the application for development consent. The position of Code E stands is indicated on the General Arrangement Drawings [TR020001/APP/4.09] .	No

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.26	Work no.2Afor the apron additions, x4 new Code C aircraft stands are proposed. However, with those additions the total number of aircraft stands at the airport will be 50 (upon competition of Project Curium). It should then be explained that the required number of 52 aircraft stands (according to the forecasts) will be reached by incorporating the existing stand at the Engine Run-up Bay (ERUB) and the introduction of a new stand within the same area. Furthermore, the dimensions of the new Code C aircraft stand at the ERUB are not presented.		Host Authorities	4	<p>This comment is noted, and further explanation is provided in the Design and Access Statement [TR020001/APP/7.03], submitted as part of the application for development consent.</p> <p>Regarding the dimensions of the new Code C aircraft stand at the ERUB, Code C stands are typically 36m wide (this is the maximum wingspan of a Code C aircraft) and 60m long. The length of the Code C stand at the existing ERUB location is lightly shorter due to the constrained nature of this location.</p>	No
D.1.27	Work No.2B. For Phase 2a, a total number of x16 aircraft stands will be constructed. From those x16 stands, x4 of them will have been constructed during Phase 1 (subject to confirmation of the above comment). Also, the rationale for the position of the Code E MARS stands within the development is not explained. It should be more clearly explained		Host Authorities	4	<p>Upon completion, there will be an additional 2 stands available for Code C aircraft to park within the ERUB, which are provided as a buffer only (in accordance with sound airport planning practice) and it is not intended, nor equipped, for regular use or for embarking/dis-embarking of passengers. The rationale for the position of the 3 Code E</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	that during Phase 2a, the total number of aircraft stands at T2 will be x18, which include the x16 new stands and the x2 aircraft stands that are located in the ERUB (but will be used for commercial aircraft operations).				stands is: a) to make best use of the new apron by provision of MARS stands b) accessible from the Pier as servicing remote Code E stands is not practicable.	
D.1.28	Work No.2B. It is stated that provision has been made to serve electric aircraft on stand. Also, it is referenced that individual items will be no higher than circa. 4m, but this fact is not referenced and could be questioned, as technical specifications for electric aircraft are still under development.		Host Authorities	4	As the response notes technical specifications for electric aircraft are still under development and would be considered further during detailed design. The proposed design is outline only and predicated on currently available aircraft data (e.g., Code C, Code E etc). Given the status of the design we have made a spatial allowance for a potential/assumed item of infrastructure (as yet not available) to enable electrical charging of future aircraft within the area at the head of each stand which is in high demand for a multitude of uses.	No
Hydrogen and Electric						
D.1.29	It is stated that provision has been made for potential introduction of electric airliners. However, no further details have been given, even though it is stated that space		Host Authorities	4	The Proposed Development has made some spatial provision for electric aircraft infrastructure. Developments within this area will be reviewed and	No

Ref	Comment	PC	LA	No PILs	Response	Change
	on each stand has been safeguarded along with a separate Energy Centre facility near T2.				incorporated as appropriate at detailed design stage.	
D.1.30	It is stated that the airport would change its fuel storage infrastructure to accommodate potential airliners using hydrogen. These statements are considered too ambitious as the technical specifications of using hydrogen as fuel are yet to be developed.		Host Authorities	4	Within the Proposed Development there are two discreet fuel storage facilities (existing and proposed). With the limited knowledge currently available on hydrogen, a view has been taken that it may be possible to change one of these fuel storage facility sites to become a hydrogen fuel facility in the future if the demand and technology requires it.	No
Sift Back Check Report						
D.1.31	It should be noted that the report presents the summary of the options that were considered previously, their sift process in detail and provides all the required information for the reader to capture a clear picture of the development.		Host Authorities	4	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.32	This section considers the main changes to the Proposed Development since the 2019 Statutory Consultation, with the main one being the inclusion of the Airport Access Road (AAR). The report then states that one of the assumptions that was used to describe the AAR needs to be altered, as the AAR is now completely included in the Proposed Development and therefore it provides its context change. The report could have included estimates regarding the changes on the above areas where possible, to provide a more detailed picture of the numerical differences (i.e., car parking spaces and airfield changes). Alternatively, a map with some high-level pictures or comments could have been provided.		Host Authorities	4	The information requested can be found within the Transport Assessment [TR020001/APP/7.02] and was not reproduced in the Sift Report to avoid duplication.	No
D.1.33	Regarding the surface access, the revised scoring is lower than the original one, as the inclusion of the AAR will require additional highway infrastructure and associated works (i.e., traffic management), which we believe is an appropriate approach.		Host Authorities	4	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
D.1.34	Regarding the estimated cost-benefit criteria, a similar sensible approach was considered, as the inclusion of the AAR includes higher costs, which have not been included previously.		Host Authorities	4	Noted.	No
Forecourt						
D.1.35	With regards to the proposed forecourt at Terminal 2 it is seen as unnecessary by Milton Keynes Council if DART provides a sufficient link between the two terminals.		Milton Keynes District Council		As part of the Proposed Development, the Applicant is seeking to increase the percentage of journeys to the airport by sustainable modes. Substantial progress has already been made towards this aim, including the Luton DART which provides a direct link to Luton Airport Parkway Station. 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 forecourt is required to provide capacity for multiple modes of transport and supporting the targeted 45% modal split, including buses, coaches, and taxis.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>The Surface Access Strategy [TR020001/APP/7.12] provides further information on the proposed surface access network.</p>	

Table A11.2: Regard had to statutory consultation responses on Design comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
Assessment				
D.2.1	Concern that proposals do not address existing negative aspects of passenger experience at the airport, including long queues, overcrowding and lack of seating.	1	The proposed improvements to Terminal 1 and the later construction of Terminal 2 are aimed at addressing passenger experience. Improvements at Terminal 1 include an improved baggage handling system, increased departure lounge seating and critical passenger processes. Upon completion of Terminal 2, the Luton DART will provide a rapid link between the terminals for landside passengers, visitors, and staff.	No
Impact				
D.2.2	Suggest that the direction of the existing runway could be rotated so that residents within Central Bedfordshire and Hertfordshire are no longer affected by noise pollution.	1	Government policy is to make best use of existing runways and re-orientating the runway would not comply with this policy. Runway reorientation would also require substantial expansion of the airport site into Green Belt. Further information on the consideration of alternatives, siting and design evolution can be found in the DAS [TR020001/APP/7.03] .	No
D.2.3	Concern that second taxiway will create further CO2 and noise pollution.	2	The provision of additional taxiway infrastructure will make the operation of the airfield more efficient and so should contribute to reducing delays, CO2 emissions and noise pollution.	No
D.2.4	Concern that increasing fuel storage poses risk of explosion near a residential area. Separately, use of radar to guide flights in poor weather presents risk of aircraft accidents.	1	The proposed fuel storage facility will be distanced from residential areas by several hundred meters. A Control of Major Accident Hazards Regulations (COMAH) assessment will be undertaken with detailed design and the new facility	No

Ref	Comment	No. PILs	Response	Change
			<p>will be constructed in accordance with all legislative and regulatory requirements.</p> <p>Radar does not guide aircraft but monitors their location. The airport is already equipped with a high standard Instrument Landing System which has been employed for many years to guide aircraft at night and in low visibility, as at most other large airports around the world, to reduce risks and improve safety.</p>	
D.2.5	<p>Concern that proposed design is inadequate as it does not mitigate wider environmental and amenity impacts associated with aircraft. Other respondents felt that the design does not include adequate capacity or infrastructure to accommodate an increase in passengers.</p>	5	<p>The Applicant's proposals contained within the Green Controlled Growth Framework [TR020001/APP/7.08] confirm that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. Further information on the GCG approach can be found in the GCG Explanatory Note [TR020001/APP/7.07].</p> <p>To provide adequate capacity for the increase in passengers from 18 to 32mppa the Proposed Development includes localised expansion of the existing Terminal Building (Terminal 1) and an entirely new passenger Terminal (T2) with associated infrastructure including: a new access road, extension of the Luton DART, additional car parking, drop off zone, bus station and hotel; new facilities for aircraft including aircraft parking aprons and taxiways, Engine Run Up Bay; new ancillary facilities including a fuel storage facility, water treatment plant, energy centre and operational/welfare accommodation. The capacity</p>	No

Ref	Comment	No. PILs	Response	Change
			being provided is commensurate to the increased number of flights projected. The ability of the proposed infrastructure to accommodate this number of flights has been thoroughly tested through simulation modelling.	
D.2.6	Concern that the scale of earthworks proposed are significant and present harmful impacts to the local community and environment. Respondents cite that it is difficult to quantify the reduction in the amount of earthworks being proposed.	10	<p>The scale of earthworks has been reduced in response to previous consultation feedback and has been designed to minimise impact beyond the airport site. The CoCP is contained within Appendix 4.2 of the ES [TR020001/APP/5.02] and will be complied with by the organisations undertaking construction works for the Proposed Development. This contains noise and vibration limits, construction working hours and mitigation measures that will need to be followed for the whole construction period. It sets out how Best Practicable Means (as defined in Section 72 of the Control of Pollution Act) (Ref 1) will be adopted to ensure that noise and vibration emissions from earthworks and construction activities are minimised as far as reasonably possible.</p> <p>The Consultation Brochure for the 2022 statutory consultation referred to the reduction of earthworks to build the platform as being equivalent to two Wembley Stadiums, this was included to help consultees understand the scale of reduction.</p>	No
D.2.7	Concern that inadequate capacity at the airport to accommodate increase in flights could harm public safety. Specific concerns included earthworks	3	The delivery approach is aimed at ensuring there is sufficient capacity at each point of the project to accommodate the predicted demand, in accordance with assessment cases. The Proposed	No

Ref	Comment	No. PILs	Response	Change
	disturbing below ground contamination and the new park entrance putting pedestrians at risk.		<p>Development will meet all of the required aerodrome safety requirements. Public safety issues have been addressed through the designation of Public Safety Zones at either end of the runway.</p> <p>Detailed site investigation work has been undertaken to understand the waste material present, landfill gas and groundwater conditions. The proposed work at the landfill site would be for re-engineering that would result in long-term environmental improvements. Further detail can be found within Chapter 17 Soils & Geology of the ES [TR020001/APP/5.01] submitted as part of this application for development consent.</p>	
Local community and environmental impact				
D.2.8	Concern that proposals are insufficient in terms of the quality of the design and addressing environmental and local community impacts.	1	<p>The design is at outline stage and will comply with all relevant best practice design criteria applicable at the time the detailed design is prepared. Impacts of the Proposed Development on the environment and local communities have been carefully considered and are set out in the suite of documents which comprise this application for development consent, most notably the ES [TR020001/APP/5.01], Chapters 7 Air Quality, 9 Climate Change Resilience, Chapter 12 Greenhouse Gases and Chapter 13 Health and Community</p>	No

Ref	Comment	No. PILs	Response	Change
Runway/airfield				
D.2.9	LLAOL supports the rationalisation of the hardstanding areas, an approach which maximises permeable areas, and so which has less environmental impact	1	Noted.	No
D.2.10	In respect of the proposed design, LLAOL suggests flexibility is required in relation to the T1 design and the phasing and split of passengers between T1 and T2, in order to ensure the most efficient solution is achieved and that best use is made of the existing infrastructure to increase capacity and optimise value. This flexibility should be considered and provided for within the DCO application.	1	Flexibility is built into the design of both Terminal 1 modifications and Terminal 2, and this is reflected in the Design and Access Statement [TR020001/APP/7.03] , submitted as part of the application for development consent.	Yes
D.2.11	LLAOL welcomes sustainability design measures and is supportive of the new terminal building being designed as 'Net Zero.' LLAOL supports the efforts made on the Applicant's part to reduce the volume of earthworks required to complete the expansion.	1	Noted.	No
D.2.12	LLAOL endorses the idea of introducing changes to the existing Terminal 1, to support airport growth while the new terminal and developments to the North-East, and East are delivered. LLAOL is also supportive of a phased approach to increase capacity.	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
D.2.13	<p>LLAOL believes that Applicant should revisit and reconsider the design for the expansion of T1 proposed in the “changes to the existing terminal” chapter of the 2019 statutory consultation. LLAOL considers that the design option presented in the 2019 proposal is the design that provides the optimal operational solution and is also the most economically efficient, and therefore would provide the best value for all stakeholders, including the Applicant and the Luton community. The new aircraft apron and additional pier connecting to the existing passenger pier set out in the 2019 proposal would provide a smooth transition to a 2-terminal scheme and allow for more efficient growth aligned with the different passenger forecast scenarios. LLAOL believes the 2019 proposal offers a better solution to the addition of boarding gates, as they were mainly for contact stands. This allows for a reduction in carbon emissions (as the need for buses will be reduced) while providing a much better passenger experience. From an operational point of view, the 2019 proposal also provides an optimised boarding process for simultaneous flights at peak times and allows for an overall better distribution of passengers and seating areas. In LLAOL’s view, the 2019 design is not a material change to the current proposal and would not have any materially different or new environmental impact. LLAOL also expects airlines would be supportive of the 2019 design.</p>	1	<p>The design of Terminal 1 has been discussed with the current airport operator, LLAOL. This has resulted in changes to the design of the Proposed Development previously presented at the 2022 statutory consultation, including additional capacity. In principle, the works are being designed to IATA ADRM 11 Optimum Level of Service, but there are inevitable compromises that need to be made when working within an existing terminal complex.</p> <p>The changes have added three new areas of expansion for Terminal 1 in addition to the two that were publicised in the 2022 statutory consultation. These are a slightly evolved design to that presented in the 2019 statutory consultation, for example the extra Pier is single storey but in 2019 was double storey. These changes have been fully agreed with LLAOL, who have confirmed they are happy with the design of the Proposed Development as submitted in the application for development consent. Details and drawings of these three expansion areas are provided in the General Arrangement Drawings [TR020001/APP/4.09], submitted as part of the application for development consent.</p>	Yes

Ref	Comment	No. PILs	Response	Change
D.2.14	LLAOL has concerns about the option proposed in the current consultation, (such as limited space for buses in the area of the proposed temporary extension; limited space to accommodate the number of passengers and services related to three flights boarded simultaneously; and the location of the additional seating areas). LLAOL believes the 2019 proposal would deliver a materially better operational service and quality of passenger experience	1	Please refer to the response to Ref D.2.13. The concerns raised by LLAOL have been addressed as part of design evolution, with LLAOL having confirmed they are happy with the design of the Proposed Development as submitted in the application for development consent.	Yes
D.2.15	This 2019 proposal is consistent with the alternative option for the Terminal 1 design referred to on page 31 of the Works Description Report (and described on page 32) about options “which provide additional departure gates by extending the terminal building in other locations”. This should be followed as this is the ideal solution for the addition of the 3-4 required boarding gates.	1	Please refer to the response to Ref D.2.13.	Yes
D.2.16	The application should enable flexibility for this design option to be realised.	1	Please refer to the response to Ref D.1.25.	No
D.2.17	In addition, LLAOL suggests there should be flexibility to allow for a different capacity balance between the two terminal buildings and LLAOL would welcome the opportunity to explore the options with the Applicant ahead of their Environmental Statement assessment work. In particular, LLAOL considers the optimal design for T1 would be to potentially accommodate more than 21.5m passengers on a permanent basis, as this would optimise the capacity of T1, make best use of existing infrastructure, and hence represent the best	1	Please refer to the response to Ref D.1.25.	No

Ref	Comment	No. PILs	Response	Change
	value for all stakeholders, including the Applicant and the Luton community. In addition, it may allow the benefits that the DCO will deliver to the community to be realised earlier. Therefore, LLAOL suggests the application should allow for the flexibility for T1 to be developed to enable this.			
Aircraft stands				
D.2.18	DHL is pleased to see the commitment to maintain 2,300 cargo aircraft movements and the higher 2019 tonnage volume (35,700) incorporated into the forecasts. However, the lack of proposals to expand or upgrade the cargo facilities or cargo stands at the airport is a cause for concern. The stand configuration for cargo at LTN is already a limiting factor and we stagger our early morning arrivals as there is not enough space to unload two aircraft simultaneously.	1	As it is not envisaged that there will be growth in cargo activity at the airport, due in part to the need for operations to remain within night movement quotas, it was not considered necessary to upgrade the dedicated cargo handling facilities. The current limitation is noted, and consideration is being given to whether it would be possible to overcome these constraints. There will be opportunities for ongoing engagement with stakeholders throughout detailed design, should the application for development consent be granted.	No
D.2.19	While we understand from the proposals that additional stands across the airport could facilitate cargo operations in the future if needed, this would most likely add time and require more staff and equipment as we would have to transit the freight to and from the cargo centre. The current layout, with the stands adjacent to the cargo centre and a short distance from the runway, enables us to move freight quickly to and from the aircraft to ensure we maintain the express nature of our business.	1	In the event that additional cargo flights can be accommodated within noise limits, the provision of additional cargo handling facilities adjacent to Terminal 2 will be kept under review. It is envisaged that the larger aircraft operating long haul services may carry some belly hold freight and require some transit shed accommodation near to Terminal 2 in any event.	No

Ref	Comment	No. PILs	Response	Change
Renewable Energy				
D.2.20	LLAL has set a number of objectives and targets for reducing its carbon footprint through the use of renewable energy. These targets suggest that the airport is in need of further sources of renewable energy, but the PEIR does not set out how much or what those sources are. L&G'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 L&G's landholding, so the principle of solar energy in this area has been established. L&G would be open to discussions with LLAL on the potential for a solar array on its landholding with direct feed to the airport.	1	Comments regarding the location south of the airport are noted, however, this land is not contained within the Applicant's control and is not included as part of the Proposed Development. Further information regarding energy generated by on-site solar can be found within Appendix 4.3 Energy Statement in the ES [TR020001/APP/5.02] .	
General				
D.2.21	Suggest that use of alternative locations would improve the Proposed Development. Some respondents stated that brownfield land at Provost Way should be considered for this.	2	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. The Applicant has incorporated flexibility into the design to allow incremental growth which responds to passenger demand, for example the second terminal has been adjusted to be modular. The scale of the development has also been designed and benchmarked against other UK airports of similar scale and intended airline users. Further information on the consideration of alternatives,	No

Ref	Comment	No. PILs	Response	Change
			sifting and design evolution can be found in the DAS [TR020001/APP/7.03] .	
D.2.22	Concern that best-use of existing runway is not being made, as additional taxiways are proposed.	3	The additional taxiways are proposed to enable the existing runway to be better used as the lack of taxiways constrains the number of movements currently able to use the runway each hour and requires aircraft to 'back-track' on the runway which is inefficient in terms of time and energy consumption.	No
D.2.23	Suggest facilities that will provide improved amenity and recreation for airport users alongside the local community, including a spectators' area, public shopping, and hospitality.	2	The Proposed Development will increase amenity in Terminal 1. Terminal 2 will be designed to achieve a greater improvement in terms of facilities for airport users. Facilities such as a spectators' area, public shopping and hospitality will be considered at the detailed design stage.	No
D.2.24	Support proposed use of site and location of the Proposed Development.	1	Noted.	No
D.2.25	Support for the sustainability credentials of the Proposed Development. Some respondents expressed particular support for rainwater harvesting and carbon net zero proposals.	1	Noted. Design will incorporate rainwater harvesting to reduce demand on potable water. The airport is targeting net zero by 2040 in accordance with Luton Borough Council targets.	No
D.2.26	Support for the proposed design, with some respondents observing how the design has positively responded to the feedback from previous Consultation.	4	Noted.	No
D.2.27	The Proposed Development should consider ways to facilitate disabled passengers when using the airport without these passengers incurring high costs; for example, a publicised pre-booked system.	1	The specific facilities for disabled access will be finalised at detailed design stage and in full compliance with the Disability Discrimination Act 1995 (Ref 2) and related legislation. Additionally, airports are legally required to provide assistance to persons of Restricted Mobility at any stage of	No

Ref	Comment	No. PILs	Response	Change
			the passenger journey from arrival at the airport to the aircraft seat and the airport will continue to comply with all such obligations.	
D.2.28	Improvements to Terminal 1 including Net Zero measures should come forward now and are not dependent on development of Terminal 2.	1	The net zero measures would be delivered at Terminal 1 in line with other elements of its expansion, within the initial 1-3 years of construction, and in advance of Terminal 2 construction. The Need Case [TR020001/APP/7.04] , submitted with this application for development consent, explains the rationale for the Proposed Development as a whole.	No

Table A11.3: Regard had to statutory consultation responses on Design comments - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
Assessment				
D.3.1	Suggest further consideration of disabled and elderly passengers, which should include additional wheelchair access, lifts and moving walkways.	7	Please refer to the response to Ref. D.2.27.	No
D.3.2	Concern that proposals do not address existing negative aspects of passenger experience at the airport, including long queues, overcrowding and lack of seating.	50	Please refer to the response to Ref D.2.1.	No
D.3.3	Suggest the Applicant should explore further means of achieving sustainability as part of the design of the Proposed Development.	5	The Applicant will continue to explore opportunities to achieve net zero from on-site energy generation and sustainability measures. Green Controlled Growth provides the over-arching tool to drive sustainability, with further information included within the GCG Explanatory Note [TR020001/APP/7.07] .	No
D.3.4	Suggest that the Proposed Development could include greater appreciation of the surrounding landscape. Certain aspects of the proposal including the fuel pipeline may impact the Green Belt and therefore, landscaping and screening should be included within the design to mitigate this.	3	Careful consideration has been given throughout the design process to understand and assess the impact of the Proposed Development on the surrounding landscape, including how to minimise any potential impacts. Further information can be found within Chapter 14 Landscape and Visual of the ES [TR020001/APP/5.01] . The Applicant has set a voluntary ambition of achieving at least 10% BNG, which is consistent with the ultimate	No

Ref	Comment	No. CC	Response	Change
			<p>intention of the Environment Act 2021, with extensive landscaping and habitat creation proposals incorporated into the Proposed Development. This is explained further in the Biodiversity Net Gain Report in Appendix 8.5 of the ES [TR020001/APP/5.02].</p> <p>The proposed new installation at the connection to the fuel pipeline is located on land within the Green Belt and very special circumstances are demonstrated in the Planning Statement [TR020001/APP/7.01], submitted with the application for development consent.</p> <p>The proposed fuel pipeline does not result in built development encroaching on Green Belt boundaries adjacent to the airport.</p>	
Impact				
D.3.5	Suggest that the direction of the existing runway could be rotated so that residents within Central Bedfordshire and Hertfordshire are no longer affected by noise pollution.	6	Please refer to the response to Ref D.2.2.	No
D.3.6	Suggest that airfield platforms, access and taxiways should be monitored to ensure safety. Other respondents suggested that the Public Safety Zone (PSZ) should be extended to the west to avoid debris from possible accidents harming local communities.	5	The operation of aircraft on the airfield is monitored by air traffic control, which ensures safe operations. The size of the Public Safety Zone is determined by Government policy and will remain the same with or without the Proposed Development being approved.	No
D.3.7	Concern that inadequate capacity at the airport to accommodate increase in flights and could harm public safety. Some respondents cited concern that Proposed earthworks could disturb below ground contamination.	17	The capacity being provided is commensurate to the increased number of flights projected. The ability of the proposed infrastructure to accommodate this number of flights has been thoroughly tested through simulation modelling.	No

Ref	Comment	No. CC	Response	Change
			<p>Detailed site investigation work has been undertaken to understand the waste material present, landfill gas and groundwater conditions. The proposed work at the landfill site would be for re-engineering that would result in long-term environmental improvements including:</p> <ul style="list-style-type: none"> a. reducing potential leachate b. materials reused would be treated to remove hazardous components c. processed materials would be treated and placed in a way that avoids risk d. a cover system would be put in place to control any residual gas generation and protect future site users from contact with the landfill material. <p>Further detail can be found within Chapter 17 Soils & Geology of the ES [TR020001/APP/5.01] submitted as part of this application for development consent.</p>	
D.3.8	<p>Concern that best-use of existing runway is not being made as additional taxiways are proposed. Some respondents expressed concern that additional aircraft stands will increase thoroughfare and result in harmful impacts on local environment.</p>	22	<p>The additional taxiways are proposed to enable the existing runway to be better used as the lack of taxiways constrains the number of movements currently able to use the runway each hour and requires aircraft to 'back-track' on the runway which is inefficient in terms of time and energy consumption.</p> <p>An environmental assessment of the additional aircraft movements resulting from the Proposed Development has been undertaken and measures to minimise any potential effects have been established in consultation with stakeholders. Further information can be found specifically within Chapter 7 Air Quality, Chapter 12 Greenhouse Gas Emissions and Chapter 16 Noise</p>	No

Ref	Comment	No. CC	Response	Change
			and Vibration of the ES [TR020001/APP/5.01] submitted as part of this application for development consent.	
D.3.9	Concern that proposed design is inadequate as it does not mitigate wider environmental and amenity impacts associated with aircraft. Other respondents felt that the design does not include adequate capacity or infrastructure to accommodate an increase in passengers.	136	Please refer to the response to Ref D.2.5.	No
D.3.10	Respondents are supportive of Green Controlled Growth being subject to independent monitoring and enforcement to ensure compliance.	5	Noted.	No
D.3.11	Concern that the scale of earthworks proposed are significant and present harmful impacts to the local community and environment. Respondents cite that it is difficult to quantify the reduction in the amount of earthworks being proposed.	93	Please refer to the response to Ref D.2.6.	No
Local community and environmental impact				
D.3.12	Concern that proposals are insufficient in terms of the quality of the design and addressing environmental and local community impacts.	44	Please refer to the response to Ref D.2.8.	No
Mitigation				
D.3.13	Suggest that design could include an acoustic barrier around the airport and near the park, comprising hedging and tree planting.	1	Noise generated on the airport site has been assessed in relation to areas beyond the airport and localised acoustic barriers have been included in the design.	No

Ref	Comment	No. CC	Response	Change
General				
D.3.14	Concern that the design quality of the Proposed Development is at risk due to costs. Some respondents were concerned that the proposal has been poorly designed.	6	The detail of the proposed design is at an outline stage, as is appropriate and proportionate for this application for development consent. The costs have been carefully assessed with respect to affordability and funding, and further information about how the project will be funded can be found in the Funding Statement [TR020001/APP/3.03] submitted as part of this application for development consent.	No
D.3.15	Concern that proposals will necessitate a second runway.	7	Government policy is to make best use of existing runways and constructing a second runway would not comply with this policy. Furthermore, there is no requirement for a second runway to meet demand up to 32 mppa and beyond. A second runway is not part of the Proposed Development.	No
D.3.16	Suggest that existing land within airport site could be used more efficiently and expansion should be accommodated within the existing site.	16	Options for development within the existing site were fully considered at the optioneering stage. 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. Further information on the consideration of alternatives, sifting and design evolution can be found in the DAS [TR020001/APP/7.03] .	No
D.3.17	Suggest that design could be future proofed by including infrastructure that supports green aviation, including gates with airbridges.	4	The design of the Proposed Development is predicated on current aircraft scale/dimensions and in accordance with international standards and recommended practices. The design of green aircraft for use by commercial airlines is currently in early developmental	No

Ref	Comment	No. CC	Response	Change
			stages. However, the Applicant's design does not preclude the use of such aircraft in the future.	
D.3.18	Suggest that use of alternative locations would improve the Proposed Development. Some respondents stated that brownfield land at Provost Way should be considered for this.	21	Please refer to the response to Ref D.2.21.	No
D.3.19	Suggest that more access to turning circles should be provided to improve runway usage at peak times.	1	The Proposed Development provides for additional taxiways to access the runway so additional turning circles are not required.	No
D.3.20	Suggest that Terminal 1 and Hangar 89 should be demolished and rebuilt, rather than following on from previous piecemeal alterations to Terminal 1.	3	This option was considered at the optioneering stage but could not be delivered without major disruption to airport operations and would, in any event, require new terminal facilities on the Terminal 2 site to be constructed as an interim measure to allow any reconstruction works to the existing terminal to take place. Further information on the consideration of alternatives, sifting and design evolution can be found in the DAS [TR020001/APP/7.03] .	No
D.3.21	Suggest that Terminal 2 could be built on the other side of runway, adjacent to the A1081. Other suggestions identify possible location of Terminal 1 at Provost Way and the proposed carpark at Percival Way.	4	The option to develop a new terminal to the south was considered at the optioneering stage but this was ruled out as it would involve major construction in the Green Belt. Further information on the consideration of alternatives, sifting and design evolution can be found in the DAS [TR020001/APP/7.03] .	No
D.3.22	Suggest the Applicant should construct Terminal 2 only and not alter Terminal 1.	1	The design of the Proposed Development includes minor localised expansion of Terminal 1 to improve capacity and operational performance in the short-medium term in advance of the construction of Terminal 2.	No
D.3.23	Suggest Terminal 1 should be improved. This includes expansion to reduce congestion and	6	The Proposed Development includes localised expansion of Terminal 1 to improve capacity and operational performance.	No

Ref	Comment	No. CC	Response	Change
	improve customer experience and increase in sustainability credentials.		The Proposed Development includes installation of solar panels on the roof of Terminal 1, where practicable. Other issues relating to sustainability of the existing Terminal are addressed within Chapter 9 Climate Change Resilience and Chapter 12 Greenhouse Gas Emissions of the ES [TR020001/APP/5.01] .	
D.3.24	Support for the proposed design, with some respondents observing how the design has positively responded to the feedback from previous Consultation.	96	Noted.	No
D.3.25	Concern that best use of existing runway is not being made, as additional taxiways are proposed.	1	Please refer to the response to Ref D.2.22.	No
D.3.26	Suggest that the runway should be extended to allow larger aircraft to connect with long haul destinations.	7	The runway is long enough for new generation aircraft to operate some long-haul routes to the eastern part of America and the Middle East. Government policy is to make best use of existing runways and extending the runway would not comply with this policy. Extending the runway would be very costly and disruptive, given the land form in the vicinity of the airport and further it would encroach into Green Belt. The option was discarded early in the optioneering stage.	No
D.3.27	Suggested that the Proposed Development would benefit from creation of a second runway. This could be a new full-size runway to help meet future demand associated with the expansion, or a shorter runway for small aircraft to free up space on the existing runway.	9	Please refer to the response to Ref D.3.15.	No
D.3.28	Suggest facilities that will provide improved amenity and recreation for airport users	26	Please refer to the response to Ref D.2.23.	No

Ref	Comment	No. CC	Response	Change
	alongside the local community, including a spectators' area, public shopping, and hospitality.			
D.3.29	Certain aspects of the Proposed Development including improvements to Terminal 1, environmental measures, new Engine Run-Up Bay, and other infrastructure upgrades, should come forward irrespective of the expansion of the airport.	29	Noted. Each of these suggested elements is likely to require planning consent, and this application for development consent is a means to achieve this. It does not preclude the airport operator, LLAOL, from developing parts of the airport, subject to consent, in the interim.	No
D.3.30	Support proposed use of site and location of the Proposed Development.	10	Noted.	No
D.3.31	Support for the sustainability credentials of the Proposed Development. Some respondents expressed particular support for rainwater harvesting and carbon net zero proposals.	41	Noted. Design will incorporate rainwater harvesting to reduce demand on potable water. The airport is targeting net zero by 2040 in accordance with Luton Borough Council targets.	No

A12: OPEN SPACE/WIGMORE VALLEY PARK

Table A12.1: Regard had to statutory consultation responses on Open space/Wigmore Valley Park - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
General						
OS.1.01	The proposed development is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. As stated in our previous response in 2019, GI has multi-functional benefits which should be considered including access to nature and educational value for local communities, air quality regulation, water management, water quality, water supply, noise regulation, carbon storage and pollination.	Natural England			Noted. The Applicant is preparing a Green Infrastructure plan which will be published early 2023 and seeks to identify opportunities around the airport (as well as across Luton) to develop additional Green Infrastructure. This could include, for example, identifying incidental spaces within the airport boundary for habitat establishment or food production, improving biodiversity of road verges and roundabouts and designating species corridors around and across the airport. The Green Infrastructure plan will also review the landscape mitigation plans outlined in the ES [TR020001/APP/5.02] and seek to maximise the wider social and environmental benefits that can be delivered through biodiversity enhancement.	No

Ref	Comment	PC	LA	No PILs	Response	Change
Impact						
OS.1.02	Building on Wigmore Valley Park is an unnecessary destruction of established and mature wildlife habitats. It takes many years for an area like that to establish, and at a time where environmental concerns are high on everyone's minds, this isn't an appropriate decision.	Kings Walden Parish Council		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 and was judged to perform poorly against other criterion notably on the basis of operations, noise impacts, land ownership and landscape and visual impact considerations. Details of the sifting process can be found in the Design and Access Statement [TR020001/APP/7.03] .	No
OS.1.03	Destroying valuable agricultural land in order to relocate the park does mean the reduction and destruction of open space.	Kings Walden Parish Council		1	Luton Rising are not destroying valuable agricultural land, and Chapter 6 Agricultural Land Quality and Farm Holdings of the ES [TR020001/APP/5.02] assesses the operational impacts of the Proposed Development and determines that there will not be a significant effect on any agricultural land holdings.	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>The Proposed Development makes available for public access land that is currently identified as farmland. Open space is defined within the Planning Act 2008 as “any land laid out as public garden, or used for the purposes of public recreation, or land which is a disused burial ground”. The Proposed Development provides Replacement Open Space at least 10% greater in size than that existing and further information can be found within the ES [TR020001/APP/5.02].</p>	
OS.1.04	<p>It is unclear why existing brownfield sites around the airport aren't being utilised before destroying an established parkland.</p>	Kings Walden Parish Council		1	<p>Please refer to the response to Ref OS.1.02.</p>	No
OS.1.05	<p>Relocating a Luton park, that is there to serve the Luton residents, into land in North Hertfordshire takes the park further away from the people it is for, meaning most, if not all of them, will have to drive to reach the park. It will involve the destruction of mature vegetation and wildlife habitats. Where will</p>	Kings Walden Parish Council		1	<p>The Replacement Open Space remains in relatively close proximity to the existing park and residential edge of Wigmore. 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 while this means that users will have slightly further to walk to reach the edges of the park, this is</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>the wildlife go? They will not simply relocate to the new park which in any case will take time to build and for the vegetation to mature.</p>				<p>due to the park being 10% larger than the current park. Overall accessibility and 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. In addition, habitat creation and enhancement occurs outside the Replacement Open Space. This links existing mature habitats providing benefit to variety of flora and fauna. Further detail on this can be found within the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02].</p>	
Mitigation						
OS.1.06	<p>It is understood that Luton Rising have already secured planning permission to provide enhanced facilities, including an improved skate park and play facilities, an improved Wigmore Pavilion, and better surfaced footpaths. These early interventions are welcomed, however there needs to be</p>		<p>Hertfordshire CC, North Hertfordshire District Council</p>	2	<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). In response to comments, a Strategic Landscape Masterplan Report [TR020001/APP/5.10] has been prepared, illustrating how the park fits within the wider landscape context.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	consideration for how these proposals knit with the layout and design of the wider strategic landscape masterplan area.					
OS.1.07	Replacement open space is proposed and welcomed although its functionality in respect of public amenity will limit its ecological potential. The extent of the expansion of Wigmore Valley Park is not wholly clear from some of the material. Presumably some of the proposals are also designed to provide ecologically valuable resources subject to less direct human disturbance. Some of the more sensitive or ground nesting birds would not thrive in areas subject to human and animal recreation activities.		Hertfordshire CC	1	Members of the public will be able to travel freely within the Replacement Open Space but will have rights of passage only along public rights of way where land is to be provided as ecological mitigation. More detail can be found at Figures 14.9 to 14.13 of the Landscape and Visual Impact Assessment (LVIA) in Appendix 14.1 of the ES [TR020001/APP/5.02] . Habitat creation areas are created in addition to the Replacement Open Space, these habitats will be less susceptible to public disturbance and have primarily been designed to benefit a variety of wildlife.	No
OS.1.08	HCC and NHC asks LR to: Meet with HCC and NHC at the earliest opportunity to discuss the replacement open space, its functionality in respect of public amenity and potential impacts on its		Hertfordshire CC, North Hertfordshire District Council	2	Regular engagement has taken place with HCC and NHDC on this subject through the LVIA Working Group and Biodiversity Working Group.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	ecological potential and the wider landscape elements.					
Monitoring						
OS.1.09	Generally, we welcome the changes to the layout of the revised Wigmore Valley Park. However, the lack of certainty over future management and funding of future management highlighted at first Statutory Consultation remains. There is a need for further clarity over the scale and duration of mitigation schemes and aftercare. LR need to be able to demonstrate that safeguards are in place to ensure the successful future management of the extended park delivers on the mitigation it is designed to address (including recreational impact and biodiversity enhancement). Whilst the proposals for a general-purpose management company / trust are welcomed, there will be a need for a long-term		Host Authorities	4	It is the Applicant's intention that the new park be placed into the control of a new Community Trust which would include, as Trustees, local community representation and other key stakeholders. The Applicant has committed funds within future budgets to fund the maintenance of the park into the future, see the Funding Statement [TR020001/APP/3.03] for more information. Further detail on the future management of Wigmore Valley Park, along with details of how the habitats will be created and managed, is included within the Outline LBMP in Appendix 8.2 in the ES [TR020001/APP/5.02] . Further engagement on Wigmore Valley Park has been held with the host authorities through the POCG, and LVIA and Biodiversity Working Groups.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>ecological warden to ensure the delivery of biodiversity improvements. Discussions about the long-term stewardship of the public open space and landscape need to take place at the earliest opportunity, as any decisions could have a fundamental impact upon the strategic landscape masterplan and management strategies. We do not believe that sufficient engagement on this matter has yet occurred and request that this is remedied prior to the application being submitted.</p>					
OS.1.10	<p>Of particular concern to North Hertfordshire is the long-term stewardship of the Replacement Open Space which falls within the North Herts boundary and the lack of certainty over future management and funding of future management beyond 50 years as specified in the Draft Landscape and Biodiversity Management Plan. There is a need for</p>		<p>North Hertfordshire District Council</p>	1	<p>Please refer to the response to Ref OS.1.09.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	further clarity over the scale and duration of mitigation schemes and aftercare.					
OS.1.11	The Draft Landscape and Biodiversity Management Plan (LBMP) will continue throughout a period of fifty years. As stated above, there is concern that any benefits accrued by the end of this period should not be lost.		North Hertfordshire District Council	1	Please refer to the response to Ref OS.1.09.	No
OS.1.12	Decisions could have a fundamental impact upon the strategic landscape masterplan and management strategies. LR need to be able to demonstrate that safeguards are in place to ensure the successful future management of the extended park delivers on the mitigation it is designed to address (including recreational impact and biodiversity enhancement). For example, the Landscape and Biodiversity Management Plan suggests management will be implemented by a		North Hertfordshire District Council	1	Please refer to the response to Ref OS.1.09.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Landscape and Maintenance contractor. This will need to demonstrate that appropriate management will be delivered – such as extensive grazing for the ecologically enhanced grasslands to the east within North Hertfordshire.					
OS.1.13	HCC and NHC asks LR to: - Provide more clarity on the future management and funding of future management on the Replacement Open Space, particularly within North Hertfordshire. - Provide more detail on how the proposed structures on Wigmore Valley Park fit with the SLMP		Hertfordshire County Council, North Hertfordshire District Council	2	Please refer to the response to Ref OS.1.09. An illustrative masterplan showing the skate park and other play facilities can be found within the Strategic Landscape Masterplan Report [TR020001/APP/5.10] , however, please note, these are a detailed design matter.	Yes

Table A12.2: Regard had to statutory consultation responses on Open space/Wigmore Valley Park comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
General				
OS.2.01	Suggest improving open space in the local area without expanding the airport.	6	The Wigmore Valley Park proposals are coming forward as part of the Proposed Development and therefore are inherently linked to the airport expansion.	No
OS.2.02	Suggest leaving the existing open spaces including Wigmore Valley Park, alone, which would be more beneficial than any mitigation efforts.	12	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 operations, noise impacts, land ownership and landscape and visual impact considerations. Details of the sifting process can be found in the Design and Access Statement [TR020001/APP/7.03] . Further detail on the future management of Wigmore Valley Park, along with details of how the habitats will be created and managed, is included within the Outline	No

Ref	Comment	No. PILs	Response	Change
			LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02].	
OS.2.03	Suggestions to build the Proposed Development in a way which doesn't result in the loss of open space.	1	Please refer to the response to Ref OS.2.02.	No
OS.2.04	General comments of support regarding the proposals for Wigmore Park.	6	Noted.	No
OS.2.05	LLAOL welcomes the newly outlined plans to preserve the landscape, biodiversity, and heritage in Wigmore Valley Park, recognising the criticality of this open space for the local community.	1	Noted.	
Impact				
OS.2.06	LLAOL supports the suggestion of replacement of all removed open space, to ensure only limited and temporary impact of the proposed development on the local community's access to open space.	1	Noted.	No
OS.2.07	The existing Wigmore Valley Park provides a buffer between residential areas and the airport and proposals will destroy this buffer. Concerns were raised that this will impact the local community through air quality, noise, and pollution.	10	The existing entrance to the Wigmore Valley Park, and a buffer area between the airport and the residential areas, will be retained by the Proposed Development. The uses introduced by the Proposed Development closest to the Wigmore residential area include an access route, car parking areas, terminal supporting buildings and a new hotel. The existing runway, and new taxiways will be shielded from the residential area by the new Terminal 2 and other terminal supporting buildings.	No

Ref	Comment	No. PILs	Response	Change
			<p>An environmental assessment of the impacts of the Proposed Development has been undertaken and measures required to minimise potential effects have been established in consultation with stakeholders. Further information can be found within Chapter 7 Air Quality and Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.02].</p>	
OS.2.08	<p>Concern that the habitats in the new parkland will take years to mature.</p>	6	<p>The design has sought to avoid impacts to valued tree cover where possible, but the Proposed Development will 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. The Proposed Development makes available for public access land that is currently in use as farmland. The Replacement Open Space is at least 10% greater in size than that existing and further information can be found within Chapter 8 Biodiversity of the ES [TR020001/APP/5.02].</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>The Applicant recognises that Wigmore Valley Park is important to the public and has 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.</p> <p>The Proposed Development will 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. Details of the sifting process can be found in the Design and Access Statement [TR020001/APP/7.03].</p> <p>Measures for the establishment and long-term management of habitats is detailed within Chapter 8 Biodiversity of the ES [TR020001/APP/5.02].</p>	

<p>OS.2.09</p>	<p>Concern that the Proposed Development will lead to the destruction of a designated County Wildlife Site which undermines Bedfordshire County Councils emphasis on the importance of ecological sites.</p>	<p>1</p>	<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 ES [TR020001/APP/5.02] sets out the assessment of all potential impacts to biodiversity as a result of the Proposed Development.</p> <p>The Applicant has set a voluntary ambition of achieving at least 10% BNG, which is consistent with the ultimate intention of the Environment Act 2021. This will be achieved 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 Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02]. Version 3.1 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</p>	<p>No</p>
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			<p>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 the ES [TR020001/APP/5.02]. Where translocation of species is proposed these will follow best practice methodologies and will incorporate a period of post-translocation monitoring and remedial actions as appropriate, to ensure the success of the translocations.</p> <p>The Applicant has changed the design to retain as much of the existing Wigmore Valley Park as possible, but the majority of the current Wigmore Park County Wildlife Site will be lost as a result of the Proposed Development. The new open space has been designed 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 County Wildlife Site (CWS) currently used for foraging, dispersal, and shelter by a range of species of wildlife, along with the habitat creation areas.</p>	
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Ref	Comment	No. PILs	Response	Change
OS.2.10	Concern about the impact that the open space and landscaping proposals will have on habitats and wildlife.	22	Please refer to the response to Ref OS.2.09.	No
Mitigation				
OS.2.11	Concerns that the open space and landscaping proposals are greenwashing, with some respondents raising concerns that proposals do not compensate the community for loss of land, that the farmland should be preserved for food production, and that proposals are a distraction to the negative impacts of the Proposed Development.	1	<p>Chapter 6 Agricultural Land Quality and Farm Holdings of the ES [TR020001/APP/5.02] includes an assessment of the operational impacts of the Proposed Development on agricultural land quality, soil resources and farm holdings.</p> <p>The Applicant recognises that Wigmore Valley Park is important to the public and is 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.</p> <p>The Proposed Development will 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, and further detail can be found within Chapter 14 Landscape and Visual of the ES [R020001/APP/5.01]. The replacement of open space proposed by this application is subject to strict planning tests and is only proposed in this</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>instance having exhausted other options. Details of the sifting process can be found in the Design and Access Statement [TR020001/APP/7.03].</p> <p>The Proposed Development makes available for public access land that is currently identified as farmland. The Replacement Open Space is at least 10% greater in size than that existing and additional detail on this can be found in the Environmental Statement [TR020001/APP/5.01]. The Proposed Development has been designed to minimise land required which is not within the Applicant’s existing ownership. LBC and the Applicant own or control the majority of land needed; however, a certain amount of additional land will be required to deliver the Proposed Development. The Order Limits have been designed to incorporate all the land necessary to implement the Proposed Development and no more. A Statement of Reasons [TR020001/APP/3.01] has been submitted as part of the application for development consent explaining why it is necessary for the DCO to contain powers to enable the Applicant 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>	

Ref	Comment	No. PILs	Response	Change
OS.2.12	Suggest that the car parking for the relocated Wigmore Valley Park should be free.	2	The Proposed Development does not propose changes to any parking charges which might apply at the park.	No
OS.2.13	Suggestion to increase the size of the proposed relocated Wigmore Valley Park.	2	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 current provision.	No
OS.2.14	Suggest including bridleways, cycleways and footpaths that provide sufficient accessibility for those using wheelchairs.	1	Overall accessibility and 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. The Replacement Open Space will introduce surfaced paths and improve access for those using wheelchairs. An illustrative masterplan showing the bridleways, cycleways and footpaths can be found within the Strategic Landscape Masterplan Report [TR020001/APP/5.10] .	No
OS.2.15	Suggest incorporating noise reducing design features into the open space and landscaping proposals.	1	Given the distance from the noise source it is considered that these would be largely ineffective and doing so may conflict with local landscape character. Noise barriers are part of the Proposed Development and will be located along the east boundary of Terminal 2 to provide partial screening of ground noise. Further	No

Ref	Comment	No. PILs	Response	Change
			<p>details on this can be found within Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.02].</p>	
OS.2.16	<p>Suggest more car parking at Wigmore Valley Park will be needed if usage increases.</p>	1	<p>It is not envisaged that there will be a need for additional parking, as the park will be for local usage, and therefore should be within walking and cycling distance for most users. Active travel routes are also being provided for users to access the park. Additional detail can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	No
OS.2.17	<p>Suggestion for open space and landscaping proposals to include wetland and dry lawns to replace the wild orchid meadows in Wigmore Valley Park which will be destroyed with the Proposed Development. This will allow for the re-establishment of some of the rare species that will be lost, if carefully planned and considered.</p>	1	<p>The evolution of the design of the Proposed Development has taken into account the mitigation hierarchy and retained and avoided features such as Winch Hill Wood Ancient Woodland, management of which is incorporated into the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02], to improve on its existing condition. Further habitats have been retained within the proposed Replacement Open Space, and habitat creation areas have been designed to enhance existing and create new areas of higher value habitats. All of which will also be managed as per the Outline LBMP, which includes management through grazing, and translocation of orchids.</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>The landscape scheme for the Proposed Development has been designed to include management measures to avoid any significant increase in bird strike risk, and there is additional information in the Bird Strike Risk Assessment in Appendix 8.3 of the ES [TR020001/APP/5.02], and therefore provision of waterbodies such as lakes and wetland areas must be limited. The Applicant has also assessed the loss of orchids and other species of botanical interest within Chapter 8 Biodiversity of the ES [TR020001/APP/5.02].</p>	
OS.2.18	Suggest planting more trees as part of the open space and landscaping proposals to benefit the environment.	3	<p>The Proposed Development includes a broad range of habitat including proposed scrub, woodland, and hedgerow restoration (including trees planted within the hedgerows). The design of these measures has been informed by the EIA process and seeks to avoid and minimise effects on the landscape and biodiversity as far as reasonably practical.</p>	No
OS.2.19	Suggest building another park, in addition to the relocated Wigmore Valley Park	2	<p>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 	No

Ref	Comment	No. PILs	Response	Change
			<p>and within the Replacement Open Space through the upgrading of existing rights of way and new surfaced paths which further improve public accessibility. It is therefore not appropriate to consider additional parks.</p>	
OS.2.20	Suggest including cycleways in open space and landscaping proposals.	1	The Replacement Open Space will introduce surfaced paths and improve access for cyclists.	No
OS.2.21	Concerns that Wigmore Valley Park is located on an old landfill site, which contains contaminated land, and has the potential to be hazardous.	3	<p>An extensive ground investigation has been completed to characterise the material within the former landfill and understand the risk of contamination. Preliminary findings indicate the former landfill contains a variety of contaminants, including heavy metals, chlorinated solvents, and inorganic compounds, and presents a source of landfill gases. At present in its current state, the contamination levels are not to the extent that they would pose a significant pollution risk to human health or the water environment.</p> <p>Construction of the Proposed Development will disturb the landfill and therefore, a range of measures to minimise risks associated with land contamination and ground gases are proposed. Whilst these measures would be implemented during construction, they would also minimise risks</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>during operation. The proposed measures include:</p> <p>a. measures proposed to be implemented by the construction contractors to manage risks associated with contamination and potential Unexploded Ordinance (UXO) are set out within the Code of Construction Practice in Appendix 4.2 of the ES [TR020001/APP/5.01]. These include good construction site practices, site briefings, and compliance with legislation;</p> <p>b. a remediation strategy has been prepared (refer to the Remediation Strategy in Appendix 17.5 of the ES[TR020001/APP/5.01]), setting out details of how remediation would be undertaken and the remediation objectives to be achieved. Prior to the start of construction, the remediation contractor would apply to the Environment Agency for an environmental permit to reuse material from the former landfill;</p> <p>c. a number of measures have been embedded within the design to minimise risks associated with ground contamination, ground gas and settlement during construction on the former landfill which will</p>	

Ref	Comment	No. PILs	Response	Change
			<p>minimise risks during the operational period. For example:</p> <ul style="list-style-type: none"> i. the location, orientation and depth of excavation into the landfill for the development platforms has been designed to reduce the amount of landfill material that will require excavation; ii. all buildings present within the area of the former landfill would have ground gas management measures, to prevent migration of gases into structures; iii. a perimeter ground gas control system would be installed to prevent off-site migration of ground gases to adjacent land uses; iv. the geotechnical design will take into account issues associated with building on the former landfill, including ground stability, settlement, and integrity, to ensure they do not impact the Proposed Development. Measures being considered to address these issues include use of ground improvement techniques, surcharging and flexible pavement; v. service connections would be modified to accommodate the likelihood of future 	

Ref	Comment	No. PILs	Response	Change
			settlement of the landfill and reduce the risk of damage to services; and vi. a material cover system is proposed across the area of the former landfill to prevent contact between people and wildlife and contamination.	
OS.2.22	Concern that open-space and landscaping proposals won't be implemented.	1	Please refer to the response to Ref OS.2.08.	No
OS.2.23	Concern that the open space and landscaping proposals are greenwashing, with some respondents raising concerns that proposals do not compensate the community for loss of land.	2	Please refer to the response to Ref OS.2.11.	No
OS.2.24	Concerns that open space and landscaping proposals are insufficient and are not adequate in mitigating the impacts of the Proposed Development felt by the local community.	11	The applicant recognises that Wigmore Valley Park is important to the public and 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. The Proposed Development will 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. The replacement of open space proposed by this application is subject to strict planning tests and is only proposed in this	No

Ref	Comment	No. PILs	Response	Change
			<p>instance having exhausted other options. Details of the sifting process can be found in the Design and Access Statement [TR020001/APP/7.03].</p> <p>Measures for the establishment and long-term management of habitats is detailed within the Outline LBMP in Appendix 8.2 of the ES [TR020001/APP/5.02]. The design has sought to avoid the loss of 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. 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 identified as farmland. The Replacement Open Space is at least 10% greater in size than that existing and additional detail on this can be found in Chapter 8 Biodiversity of the ES [TR020001/APP/5.02].</p>	
OS.2.25	Concerns that the Proposed Development will result in the loss of the existing park.	26	The Applicant recognises that Wigmore Valley Park is important to the public and	No

Ref	Comment	No. PILs	Response	Change
			<p>has 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.</p> <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 perform poorly against other criterion notably on the basis of operations, noise impacts, land ownership and landscape and visual impact considerations. Details of the sifting process can be found in the Design and Access Statement [TR020001/APP/7.03]. The Applicant has worked hard to ensure that what they offer is not only of a very high quality but is also larger in size. The Proposed Development will result in a loss of some of the existing park, however the total area of replacement open space to be provided is at least 10% greater in size than that existing.</p>	

Ref	Comment	No. PILs	Response	Change
OS.2.26	Concerns around whether the relocated Wigmore Valley Park will be usable space for the local community.	6	<p>The Applicant recognises that Wigmore Valley Park is important to the public and 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. The applicant has worked hard to ensure that what they 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. The Replacement Open Space remains in relatively close proximity to the existing park and residential edge of Wigmore. 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 while this means that users will have slightly further to walk to reach the edges of the park, this is due to the park being 10% larger than the current park. Overall accessibility and 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>Habitat creation areas are created in addition to the Replacement Open Space,</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>these habitats will be less susceptible to public disturbance and have primarily been designed to benefit a variety of wildlife.</p> <p>The applicant has updated the design in response to feedback received to retain as much of the existing park as possible and remodelled 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 Chapter 13 Health and Community of the ES [TR020001/APP/5.02]. User questionnaires have also been undertaken to understand more about the types of users and activities undertaken at the existing park.</p>	
OS.2.27	Wigmore Valley Park should not be relocated to be underneath the flightpath.	2	The Applicant recognises that Wigmore Valley Park is important to the public and has 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. The Applicant has worked hard to ensure that what they 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.	No

Ref	Comment	No. PILs	Response	Change
			<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. Aircraft fly according to the currently approved flightpaths, and any changes to these flightpaths are subject to a separate airspace change process and will be the subject of a separate consultation by the CAA in due course.</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 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>The Applicant updated the design in response to feedback received during the 2019 statutory consultation to retain as much of the existing Park as possible and remodelled the new area so that it is much better connected to the existing area of open space.</p>	

Ref	Comment	No. PILs	Response	Change
			<p>User counts and quality surveys were completed at Wigmore Valley Park. These are reported in Chapter 13 Health and Community of the ES [TR020001/APP/5.02]. User questionnaires have also been undertaken to understand more about the types of users and activities undertaken at the existing park.</p>	
OS.2.28	<p>Concern that the new park is too far from the existing park and therefore doesn't benefit existing users.</p>	11	<p>Please refer to the response to Ref OS.2.27.</p>	No
OS.2.29	<p>Concerns that the proposed relocation of Wigmore park to agricultural land is not adequate compensation, and agricultural land should be preserved for food production due to current pressures on food resources and food security.</p>	7	<p>Chapter 6 Agriculture of the ES [TR020001/APP/5.02] includes an assessment of the operational impacts of the Proposed Development on agricultural land quality, soil resources and farm holdings.</p> <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</p>	No

Ref	Comment	No. PILs	Response	Change
			poorly against other criterion notably on the basis of operations noise impacts land ownership and landscape and visual impact considerations. Details of the sifting process can be found in the Design and Access Statement [TR020001/APP/7.03] .	

Table A12.3: Regard had to statutory consultation responses on Open space/Wigmore Valley Park comments - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
General				
OS.3.01	General comments of support regarding the proposals for Wigmore Valley Park, with specific support for improved landscaping and planting of trees, and the proposed children's play areas.	69	Noted.	No
OS.3.02	Suggest improving open space in the local area without expanding the airport.	30	Please refer to the response to Ref OS.2.01.	No
OS.3.03	Suggest leaving the existing open spaces including Wigmore Valley Park, alone, which would be more beneficial than any mitigation efforts.	94	Please refer to the response to Ref OS.2.02.	No
OS.3.04	Suggest that there should be sufficient and effective engagement with local communities regarding the open space and landscaping proposals.	11	The Applicant agrees that the local community should be involved in the development of Wigmore Valley Park. The additional round of statutory consultation in 2022 provided a further opportunity to comment on the proposals and feedback has been considered. The Applicant will also continue to liaise with local communities and stakeholders in the future.	No
OS.3.05	Suggestions to build the Proposed Development in a way which doesn't result in the loss of open space.	7	Please refer to the response to Ref OS.2.02.	No

Ref	Comment	No. CC	Response	Change
Impact				
OS.3.06	Concern that Wigmore Valley Park is located on an old landfill site, which contains contaminated land. These concerns included that the site could generate gases which may be released, that there may be the potential for explosions, that the site should remain undisturbed, queries around where the toxic waste will be relocated, and the impact of this on residents and wildlife, and that the proposals require a project impact statement.	48	Please refer to the response to Ref OS.2.21.	No
OS.3.07	Concern about the impact that the open space and landscaping proposals will have on habitats and wildlife, including: that the relocation of the park will destroy habitats, mature trees, ancient hedgerows and wild orchids; and that the existing farmland is too sterile to be capable of sustaining ecological balance for years.	331	Please refer to the response to Ref OS.2.09.	No
OS.3.08	Object to the loss of the existing park to development, with some considering it unjustifiable.	280	Please refer to the response to Ref OS.2.02.	No
OS.3.09	The existing Wigmore Valley Park provides a buffer between residential areas and the airport and proposals will destroy this buffer. Concerns were raised that this will impact the local community through air quality, noise, and pollution.	139	Please refer to the response to Ref OS.2.07.	
OS.3.10	Concern that the habitats in the new parkland will take years to mature.	110	Please refer to the response to Ref OS.2.08.	No
OS.3.11	Concern that the Proposed Development will destroy the local landscape, including Wigmore Valley Park which is designated as an Area of Local Landscape Value, and an Asset of Community Value, as well as	38	Please refer to the response to Ref OS.2.11. Stockwood Park is not affected by the Proposed Development.	No

Ref	Comment	No. CC	Response	Change
	<p>concerns that the replacement of existing and planned public open space at Stockwood Park has not been included within proposals.</p>			
OS.3.12	<p>Suggest that construction of open space and landscaping proposals should be delivered as soon as possible to ensure that impacts on local communities is kept to a minimum. Some suggested that these proposals should be delivered sooner than planned.</p>	6	<p>Proposed planting will take several years to fully establish. The Proposed Development will, however, stage 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. 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> <p>The Applicant is committed to delivering works to provide additional open space before any work is undertaken in Wigmore Valley Park. This is an early item on the list for delivery at the soonest opportunity,</p>	No

Ref	Comment	No. CC	Response	Change
			<p>and where possible and practical work on the new park could start in advance of development consent being granted.</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. 	
OS.3.13	Suggestions for how to benefit existing habitats and wildlife and encourage more including: the provision of a lake, wildlife pond and/or wetlands; wild areas dedicated to wildlife and wildflowers; the introduction of	39	Please refer to the response to Ref OS.2.17.	No

Ref	Comment	No. CC	Response	Change
	ecosystem engineers such as longhorn cattle to create a dynamic ecosystem; maximising sustainable trees and natural plants to attract wildlife; and protecting ancient woodlands and wild orchids.			
Mitigation				
OS.3.14	Concerns that the open space and landscaping proposals are greenwashing, with some respondents raising concerns that proposals do not compensate the community for loss of land, that the farmland should be preserved for food production, and that proposals are a distraction to the negative impacts of the Proposed Development.	97	Please refer to the response to Ref OS.2.11.	
OS.3.15	Concern that open-space and landscaping proposals are insufficient, including that the amount of environmental damage occurring as a result of the Proposed Development is so significant that the proposals will not offset the damage, that landscaping proposals are felt to be an afterthought, and that the additional 10% parkland provision is too small. Some respondents also queried how proposals could be an improvement to existing parkland with established wildlife and habitats.	205	Please refer to the response to Ref OS.2.08.	No
OS.3.16	Concerns were raised that the replacement park will not be used due to the noise and pollution caused by the airport.	9	Please refer to the response to Ref OS.2.27.	No
OS.3.17	Concern that the replacement park is not suitable for recreation, including that the topography will make games such as football impossible, that the noise and pollution from the airport will impact users, and that the	14	Please refer to the response to Ref OS.2.27. As part of the Proposed Development the Replacement Open Space would	No

Ref	Comment	No. CC	Response	Change
	lack of established trees will mean there is a lack of shade on hot days.		<p>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. 	
OS.3.18	The open space and landscape proposals will only benefit those who live in the immediate vicinity of the Replacement Open Space.	4	The Replacement Open Space remains in relatively close proximity to the existing park and residential edge of Wigmore. 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	No

Ref	Comment	No. CC	Response	Change
			<p>retained, and while this means that users will have slightly further to walk to reach the edges of the park, this is due to the park being 10% larger than the current park.</p> <p>Overall accessibility and 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>	
OS.3.19	<p>Safety concerns that increased traffic as a result of the Proposed Development will make it unsafe for children to access the park because the children's play area is located to a major new road.</p>	4	<p>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 Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	No
OS.3.20	<p>Wigmore Valley Park should not be relocated underneath the flightpath, with specific concerns relating to the impact of aviation fuel spillages and air and noise pollution on park users.</p>	13	<p>Please refer to the response to Ref OS.2.27.</p>	No

Ref	Comment	No. CC	Response	Change
OS.3.21	The proposed extension of Wigmore Valley Park is too far from the existing park and therefore doesn't benefit existing users. Specific concerns included the inability to walk to the park as a result of its location and topography. Some respondents thought it would be necessary to drive to the park, but no parking was provided.	101	Please refer to the response to Ref OS.2.27.	No
OS.3.22	The proposed relocation of Wigmore Valley Park to agricultural land is not adequate compensation. Specific concerns raised included that farmland is sterile and has been treated with fertilisers and chemicals and will be unable to sustain the same levels of ecology and natural diversity, as well as concerns with pressures on food resources and food security, and that agricultural farmland should be preserved for food production.	55	Please refer to the response to Ref OS.2.11.	No
OS.3.23	Suggestions relating to the design of the new open space including: the children's play area should be located further from the runway; airplane designs should be removed; trees should be used to act as a noise buffer between the skate park and housing; there should be more natural spaces rather than car parking; there should be more trees, hedgerows, and woodlands; and contours, features and mounds should be used to break up the landscape. Some respondents also suggested that open spaces should be accessible for disabled people and others with limited mobility, and that additional provision of sports pitches, golf courses, fishing lakes, and spaces to watch the planes from would be supported.	24	<p>The enhanced children's play and skate park facilities proposed in this area are to be delivered as part of New Century Park application (application ref. 17/02300/EIA). An illustrative masterplan showing these facilities can be found within the Strategic Landscape Masterplan Report [TR020001/APP/5.10].</p> <p>The new open space has been designed so that it offers greater opportunity to support biodiversity. Once established, this area will also mitigate for the loss of habitats within</p>	No

Ref	Comment	No. CC	Response	Change
			the current Wigmore Valley Park CWS currently used for foraging, dispersal, and shelter by a range of species of wildlife, along with the habitat creation areas. Overall accessibility and 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.	
OS.3.24	Suggest that the car parking for the relocated Wigmore Valley Park should be free.	2	Please refer to the response to Ref OS.2.12.	No
OS.3.25	Suggest that the relocated Wigmore Valley Park should include a café.	2	The refurbished Wigmore Pavilion to be delivered by the New Century Park application (application ref. 17/02300/EIA) will include a cafe.	No
OS.3.26	Suggest that the relocated Wigmore Valley Park should include car parking, which should include disabled spaces.	5	The proposed Replacement Open Space retains the main entrance into Wigmore Valley Park from Eaton Green Road, alongside the car park in this location. The New Century Park application proposes to re-surface the existing car park and envisages reinstating this element with clearly demarcated accessible parking spaces.	No

Ref	Comment	No. CC	Response	Change
OS.3.27	Suggest building another park, in addition to expanding Wigmore Valley Park, with suggestions including a water park, additional park to the south of the airport, and a dog park.	7	Please refer to the response to Ref OS.2.19.	No
OS.3.28	Suggestion to increase the size of the proposed relocated Wigmore Valley Park.	13	Please refer to the response to Ref OS.2.13.	No
OS.3.29	Suggest including bridleways, cycleways and footpaths that provide sufficient accessibility for those using wheelchairs.	8	Please refer to the response to Ref OS.2.14.	No
OS.3.30	Concerns that the proposed relocation of Wigmore park to agricultural land is not adequate compensation, and agricultural land should be preserved for food production due to current pressures on food resources and food security.	10	Please refer to the response to Ref OS.2.29.	No
Monitoring				
OS.3.31	Concern that open-space and landscaping proposals will not be implemented. Reference was made to the overall project cost and that landscaping is often first to be scrapped, which was felt to have been the case in the past. There were also concerns about when landscaping would be completed and that these open space proposals should be requirements with effective monitoring.	25	<p>The Applicant recognises that Wigmore Valley Park is important to the public and has 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.</p> <p>The Proposed Development will deliver the vast majority of proposed landscape mitigation at the start of construction, in order to allow it several years to establish before most</p>	No

Ref	Comment	No. CC	Response	Change
			<p>increases in aircraft movements occur from construction of the new terminal.</p> <p>The Replacement Open Space proposed by this application is subject to strict planning tests and is only proposed in this instance having exhausted other options. Details of the sifting process can be found in the Design and Access Statement [TR020001/APP/7.03].</p> <p>Measures for the establishment and long-term management of habitats is detailed within the Chapter 8 Biodiversity of the ES [TR020001/APP/5.02].</p>	
OS.3.32	Concern about how the new park would be managed and maintained, including to ensure that new plants and trees become established, rewilded areas thrive and anti-social behaviour is managed.	11	Please refer to the response to Ref OS.1.09.	No
OS.3.33	Concern about who will be responsible for paying for the upkeep of the park in the long term. Respondents sought more information on the structure and funding of the community trust. Comments were also made about the leasing arrangements for the park, including questioning why the park was being leased now before the DCO is secured and what happens if a third party tried to buy the lease.	8	Please refer to the response to Ref OS.1.09.	No
OS.3.34	Concerns that Luton Council was responsible for managing the park on behalf of residents but licensed	1	Luton Rising currently has a licence over Wigmore Valley Park from LBC,	No

Ref	Comment	No. CC	Response	Change
	the whole park to LLAL in 2015 to draw up development plans without informing the public.		for which they pay an annual fee to LBC. The licence has been renewed regularly.	

A13: IMPACT ON LOCAL COMMUNITIES

Table A13.4: Regard had to statutory consultation responses on Impact on the Local Community comments - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
Health						
LC.1.1	We welcome the inclusion of Health as a discrete topic in the PEIR which deals effectively with in-combination effects of the Proposed Development across topics (particularly noise and air quality) on local communities. The conclusions of this PEIR chapter underline the concerns of the HAs as to the overall impact during construction and operation of the expanded airport on nearby local communities.		Host Authorities	4	Noted. The impact of the Proposed Development has been fully assessed through the EIA process and reported in the ES [TR020001/APP/5.01] , mitigation has been provide as required.	No
LC.1.2	Whilst it is accepted that the positive effects of economic growth and employment will be experienced in the vicinity of the airport, the PEIR identifies significant adverse effects on health and well-being as a result in particular of noise during operation. It notes that physical and mental health outcomes associated		Host Authorities	4	A methodology for quantitative assessment of health effects from noise was outlined in Appendix 13.4 of the PIER (Volume 1: Main Report, October 2019) available during the 2022 statutory consultation, based on the Department for Transport's WebTAG assessment method. The Health Impact Assessment contained within Chapter 13 Health and Community of the ES	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>with aircraft noise include annoyance, sleep disturbance, children's learning, mental health, and cardiovascular health. It further notes that the extent to which different groups within the community will be affected will vary. Noise sensitive individuals, shift workers, socioeconomically disadvantaged individuals, people with existing ill health, children and the elderly are particularly vulnerable to noise and may be disproportionately affected by changes in aircraft noise. As part of the development from the PEIR to the ES we would expect to see quantitative refinement of this assessment and the extent to which the additional mitigation can adequately address these health outcomes.</p>				<p>[TR020001/APP/5.01] provides a narrative of potential disproportionate effects on 'vulnerable groups'. The Equality Impact Assessment (EqIA) [TR020001/APP/7.11] submitted as part of the application for development consent has also highlighted any differential or disproportionate effects as a result of the Proposed Development.</p> <p>Noise mitigation embedded into the Proposed Development includes:</p> <ul style="list-style-type: none"> • Noise control measures as outlined in the Code of Construction Practice (submitted as Appendix 4.2 of the ES [TR020001/APP/5.02]) to mitigate noise impacts during construction. • Mitigation measures in line with the ICAO Balanced Approach to Aircraft Noise Management (Ref 3) and the London Luton Airport Noise Action Plan 2019-2023 (Ref 4) adopted to reduce aircraft noise as far as reasonably practicable. • Measures to reduce ground noise such as screening and quieter power sources. • Noise control measures covered in the Operational Noise Management (Explanatory Note) submitted as 	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Appendix 16.2 of the ES [TR020001/APP/5.01]</p> <ul style="list-style-type: none"> • Noise Insulation Schemes as described in Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] • Establishment of a Noise Envelope to be used in the GCG Framework [TR020001/APP/7.08]. <p>Further information is set out in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01].</p>	
LC.1.3	The Council's Public Health team raise specific comments in relation to a number of areas, including for quality in the mitigation (which would include quality facilities within greenspace).		Luton Borough Council	1	<p>The Applicant is 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. The Applicant has worked hard to ensure that what is offered 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. Please refer to Chapter 14 Landscape of the ES [TR020001/APP/5.01] and the Design and Access Statement [TR020001/APP/7.03] for more information on the open space enhancement.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
LC.1.4	It is also noted that an increase in carbon emissions, such as will be caused by the growth in flights that is implicit to this development, is deleterious to human health on a global scale.		Central Bedfordshire Council	1	<p>Chapter 13 Health and Community of the ES [TR020001/APP/5.01] includes consideration of the in-combination climate change effects (ICCI). The only ICCI identified as relevant to the health and community assessment is the potential for increased heat risk amongst vulnerable members of the population and users of Wigmore Valley Park, which was assessed as negligible.</p> <p>The Government is addressing the issue of carbon emissions at a national and global level through its Net Zero Strategy. Further information on the Proposed Development's approach to climate change and greenhouse gases is contained within Chapter 12 Greenhouse Gases of the ES [TR020001/APP/5.01], along with the Green Controlled Growth Framework [TR020001/APP/7.08].</p>	No
LC.1.5	The Council considers that many residents, particularly in and around Caddington and Slip End, to the southwest of the airport, will be subject to changes in noise as a result of the proposed expansion. The		Central Bedfordshire Council	1	<p>A quantitative assessment of a range of health outcomes likely to occur as a result of changes from aircraft noise has been undertaken and is set out in Chapter 13 Health and Community of the ES [TR020001/APP/5.01]. The health</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>impact on health from noise is a significant issue and it is noted that physical and mental health outcomes associated with aircraft noise include annoyance, sleep disturbance, children’s learning, mental health, and cardiovascular health.</p>				<p>outcomes reported include annoyance, self-reported sleep disturbance, Acute Myocardial Infarction (AMI) and hypertension (stroke and dementia). These outcomes are supplemented by an additional assessment of the likely impacts of the Proposed Development on annoyance, using the exposure-response relationship presented in the 2018 World Health Organisation Environmental Noise Guidelines. An assessment on the likely impact on sleep disturbance, through calculation of additional awakenings, has also been undertaken. With regards to the receptors in the vicinity of Caddington and Slip End, the Proposed Development is predicted to increase noise levels from aircraft noise. However, these increases are not predicted to result in significant effects at these locations.</p>	
<p>LC.1.6</p>	<p>It is noted that COVID-19 in particular, and infectious diseases in general, are not part of the scope of the human health assessment. We suggest that the Environmental Statement addresses this topic and are</p>		<p>Central Bedfordshire Council</p>	<p>1</p>	<p>Covid and infectious diseases are covered under Chapter 15 Major Accidents and Disasters of the ES [TR020001/APP/5.01]. Engagement undertaken with the Health Technical Working Group in July 2022 confirmed that the approach outlined is acceptable and does not require</p>	<p>No</p>

Ref	Comment	PC	LA	No PILs	Response	Change
	interested to understand what steps will be put in place to ensure that the airport expansion, and the subsequent increase in movement of people, will not contribute to a spread of infectious diseases				duplication as part of the health assessment.	
LC.1.7	It is not clear how the economic opportunities afforded by the expansion will contribute to the reduction of health inequalities		Central Bedfordshire Council	1	Chapter 13 Health and Community of the ES [TR020001/APP/5.01] identifies potential positive health effects linked to employment opportunities, including health and wellbeing benefits ranging from increased self-esteem to physical health benefits associated with improved access to healthier lifestyle choices. It also identifies that this may bring disproportionate benefits to those who are currently unemployed. It outlines that the Employment and Training Strategy [TR020001/APP/7.05] will seek to bring about those benefits through a number of objectives and initiatives to maximise operation-related opportunities and upskilling for local people, including hard to reach groups and those currently unemployed in the local and wider study area.	No

Ref	Comment	PC	LA	No PILs	Response	Change
LC.1.8	It is not clear what steps have been taken to include hard to reach groups, community groups and residents from Central Bedfordshire in the engagement and consultation for the human health analysis. We seek assurance that this has been done in a meaningful way and that groups are not simply invited to an event but are not actively engaged with		Central Bedfordshire Council	1	<p>As part of the 2019 and 2022 statutory consultations particular effort was made to engage 'hard to reach' groups. Further details are set out in Chapters 4 and 6 of this report.</p> <p>Specific engagement with 'hard to reach' groups in respect of the health assessment was also undertaken, an interactive community workshop was held on the 9 July 2019 hosted at the Tokko Youth Space in Luton Town Centre. The session was attended by community stakeholders invited by the members of the project team undertaking the health assessment, community assessment and EqIA teams. Representatives from twelve groups attended, whilst a further eleven groups were invited but unable to attend.</p> <p>The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] sets out the requirement to produce a community engagement plan that identifies how local communities and in particular, seldom heard groups, will be engaged with during the construction period of the Proposed Development.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
LC.1.9	It is noted that chapter 13 relates to 'health and community'. At times these are described as one assessment e.g., para 13.1.2 and at other times these are described as separate assessments e.g., para 13.6.2 point c. The distinction between the two is not clear or particularly illuminating in Baseline Conditions (13.7) and subsequent sections. For example, the text for 13.9.16 to 19 (health) and 13.9.29 (community) about the Prospect House Day Nursery is very similar. We also note that all the guidance documents cited for this assessment are health sources (Table 13.4). It would be helpful to understand what public health expertise has been used to produce the document to ensure that a wide view and health & wellbeing has been taken.		Central Bedfordshire Council	1	<p>The assessment of health and community effects is presented as one chapter due to shared commonalities, such as similar baseline profiling requirements, to reduce the level of duplication. Community and health do however have distinct assessment methodologies and in light of this, the assessment findings for the health assessment and the community assessment are presented under separate headings to demonstrate they are distinct and separate assessments.</p> <p>In relation to guidance documents, there are no officially recognised guidance documents relating to community assessments. Industry accepted good practice from other major infrastructure projects and EIAs has been applied in developing the methodology and undertaking the assessment, as described in Chapter 13 Health and Community of the ES [TR020001/APP/5.01].</p>	No
LC.1.10	In para 3.1.2 of Volume 3: Appendix 13.4 the method statement is clear that the health and community		Central Bedfordshire Council	1	Health and community impacts were considered in the optioneering process around design development, where design options were reviewed	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>assessment has been largely based on the significant and residual effects identified by other topics. This suggests that the health and community assessment has taken a reactive and/or passive approach to the assessment. This in turn, suggests that the health and community assessment has no effect upon the design and that it was never in a position to have an effect upon the design. Please clarify whether the health and community assessment has had any effect on the design and please show this effect.</p>				<p>against a set of health and community impact criteria including access to employment, access to green space, impacts on community facilities and residential areas, severance, noise, air emissions and health inequalities.</p> <p>A key part of the health and community assessment is the direct impacts on resources or receptors due to the loss or gain of a resource or the displacement or isolation of resources or receptors. This takes into account the land take required by the Proposed Development.</p> <p>Although the impact on Wigmore Valley Park is not deemed to be a significant effect, given that it is considered to represent an important community resource, the location and functioning of the replacement open space has been an important design consideration and this is described in Chapter 13 Health and Community of the ES [TR020001/APP/5.01].</p> <p>The health and community assessment also considers the loss of Prospect House Day Nursery. Given that discussions are taking</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					place to find a suitable site for relocation and a potential replacement site has been identified, the loss of the nursery has not resulted in any changes to the design of the Proposed Development as mitigation is considered possible.	
LC.1.11	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 on noise contour monitoring. This should be addressed before the Acceptance stage in the DCO process.		St Albans City and District Council		A methodology for quantitative assessment of health effects from noise was outlined in the PEIR and is included as part of the application for development consent in the Methodology for Health and Community Assessment in Appendix 13.2 of the ES [TR020001/APP/5.02] .	No
LC.1.12	The Noise and Vibration chapter states that by 2043 there would be 70% more flights at night (between 11pm and 7am) and 50% more during the day. This would have a significant, negative impact on the health and quality of life of Kings Walden Parish residents.	Kings Walden Parish Council		1	Please refer to the response to Ref LC.1.5. For receptors in Kings Walden Parish, the Proposed Development is predicted to result in a range of effects. A majority of receptors are predicted to experience aircraft noise levels below Significant Observed Adverse Effect Level (SOAEL). However, a small number of properties are predicted to	No

Ref	Comment	PC	LA	No PILs	Response	Change
					experience levels above SOAEL. These properties would be eligible for the Noise Insulation Schemes to mitigate the impacts on their health and quality of life resulting from the Proposed Development. Further information on the Noise Insulation Schemes can be found in the Draft Compensation Policies, Measures and Community First document [TR020001/APP/7.10] .	
LC.1.13	UK Reg (EC) 1107/2006 states 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.” It would be useful for Luton to demonstrate that such matters have been considered.	Civil Aviation Authority			This comment is noted and will be considered at the detailed design stage.	No
LC.1.14	UK airports with more than 150,000 passengers a year should consult with disability	Civil Aviation Authority			This comment is noted and will be considered at the detailed design stage.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	organisations, through setting up an advisory forum. This should include consultation with disability organisations regarding accessibility of infrastructure, including in relation to the new terminal building.					
LC.1.15	LLAL should also demonstrate that Section 5.10 (Airport Design) of ECAC Doc Part 1 has been taken in account.	Civil Aviation Authority			This comment is noted and will be considered at the detailed design stage.	No
LC.1.16	NSIPs should not only limit significant adverse effects, but also explore opportunities to improve the health and quality of life of local communities already adversely affected by noise, and to reduce inequalities.	United Kingdom Health Security Agency		1	A series of recommendations have been included within the EqlA [TR020001/APP/7.11] which will help to promote equality as part of the Proposed Development.	No
LC.1.17	[Health and Community section (pp.122 – 123) of Future LuToN Consultation Brochure] states that “We have assessed effects on health and wellbeing ... as a result of noise...” This statement is incorrect – no assessment of health effects attributable to noise has been reported in the PEIR, although we welcome the Applicant’s	United Kingdom Health Security Agency		1	A qualitative assessment of the effects on health and wellbeing on noise was undertaken as part of the PEIR. It formed part of the assessment of impacts ‘n ‘neighbourhood qual’ty’ which comprised noise, air quality, landscape, visual, light and traffic and transport. Since then, a quantitative assessment of health effects from	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	commitment to carry out such an assessment for the ES.				noise has been undertaken and is described in Chapter 13 Health and Community of the ES [TR020001/APP/5.01] .	
LC.1.18	[PIER section 16.5.20 - assessment methodology] The Applicant should acknowledge that the evidence underpinning BS5228 is based on the Wilson report from 1963. There is at present a paucity of scientific evidence on the health effects due to long-term exposure to construction noise, which the Applicant acknowledges in Section 16.5.20. Given these uncertainties, and the project's plans to carry out construction works spanning approximately 12 years (2025 – 2027, 2033 – 2036, 2037 - 2041) (Section 4.2.4 in Chapter 4), we encourage the Applicant to consider opportunities for monitoring potential health and quality of life impacts on neighbouring communities.	United Kingdom Health Security Agency		1	Noted. However, due to the complexity of obtaining accurate health data for the study population, and of attributing any changes in health outcomes to the Proposed Development, the Applicant does not propose to monitor potential health and quality of life impacts during construction.	No
LC.1.19	The Applicant can use the WHO ENG 2018 evidence to quantify the health impacts of	United Kingdom Health	North Hertfordshire	1	Noted. Additional assessments proposed in Chapter 13 Health and Community of the ES	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Ischaemic Heart Disease (IHD) as well as self-reported sleep disturbance	Security Agency	District Council		[TR020001/APP/5.01] are focussed on those health outcomes on which air noise has the most effect, these being annoyance and sleep.	
LC.1.20	The PEIR suggests that the Applicant will only conduct a quantitative health assessment for aircraft noise. UKHSA would welcome a similar assessment for road-traffic noise, using both TAG and evidence from the WHO ENG 2018.	United Kingdom Health Security Agency		1	Quantification of effects on health focuses on air noise, as set out in Section 13.5 of Chapter 13 Health and Community of the ES [TR020001/APP/5.01] . However, a qualitative assessment of the effects on health resulting from road traffic noise has been undertaken. The Applicant also confirms that the TAG process does not form part of the EIA and therefore monetisation of noise related health impacts are not reported in the ES [TR020001/APP/5.01] .	No
LC.1.21	UKHSA welcomes the commitment to report health impacts in terms of DALYs and changes in incident cases. These numbers may also be reported with respect to the i) local population size, and ii) a standard population size of 10,000 to provide an indication of risk magnitude. Health impacts may also be translated into monetary terms according to the guidance in DEFRA, Environmental noise:	United Kingdom Health Security Agency		1	The assessment of quantitative health impacts has been informed by detailed noise modelling undertaken for air noise, which includes the population located within the Air Noise Study Area. The study area for air noise has been defined based on guidance within Air Navigation Guidance, which states: "Below 4,000 feet, there is a strong likelihood that aircraft could create levels of noise exposure above the Lowest Observed Adverse Effect (LOAELs) identified above, which is reflected in	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>valuing impacts on sleep disturbance, annoyance, hypertension, productivity and quiet. The Applicant should provide greater clarity on the population that will be scoped into the quantitative health assessment, with particular reference to known thresholds for specific health outcomes.</p>				<p>the Altitude Based Priorities”. In addition, the daytime and night-time LOAEL air noise contours for all the assessment scenarios have been referenced to define extents of the air noise study area. The assessment reports the change in noise-related health impacts due to the aircraft noise generated by the Proposed Development for the population within the Air Noise Study Area. As the TAG process does not form part of the EIA, monetisation of noise related health impacts has not been undertaken. Further information can be found in the Methodology for Health and Community Assessment in Appendix 13.2 of the ES [TR020001/APP/5.02].</p>	
<p>LC.1.22</p>	<p>The assessments and findings of the ES and any Equalities Impact Assessment should continue to be cross referenced between the two documents, particularly to ensure the comprehensive assessment of potential impacts for health and inequalities and where resulting mitigation measures are mutually supportive.</p>	<p>United Kingdom Health Security Agency</p>		<p>1</p>	<p>The assessments presented in Chapter 13 Health and Community of the ES [TR020001/APP/5.01] and the EqIA [TR020001/APP/7.11] are consistent and cross referenced as appropriate.</p>	<p>Yes</p>

Ref	Comment	PC	LA	No PILs	Response	Change
	Any variation on the assessment of significance and planned mitigation for each of the identified vulnerable populations should be reported.					
LC.1.23	The ES should address the competencies and roles to be undertaken by community engagement teams in relation to the promotion of public health, including public mental health. The public mental health leadership and workforce development framework published by PHE offers a skills framework for the wider public health workforce. As well as the competences in this framework HEE have published a course content guide entitled Public Mental Health Content Guide For introductory courses or professional development in mental health and wellbeing.	United Kingdom Health Security Agency		1	The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] sets out the requirement to produce a community engagement plan that identifies how local communities and in particular seldom heard groups will be engaged with during the construction period of the Proposed Development.	No
LC.1.24	The significant change in the updated TAG noise impact appraisal is the inclusion of DEFRA's guidance on the		North Hertfordshire District Council	1	The current approach is not to consider monetisation of health effects, as the focus of the Chapter 13 Health and Community and	No

Ref	Comment	PC	LA	No PILs	Response	Change
	valuation of transport-related noise.				Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] is to consider the health effects themselves. It is not appropriate for the EIA to undertake a cost-benefit analysis.	
LC.1.25	This approach to monetizing health impacts has been sanctioned by DEFRA where dose response functions have been created for these specific health impacts. The impacts of environmental noise on sleep disturbance are also already being considered for inclusion in some decision making. For example, in January 2013 the consultation on the night flying restrictions at Heathrow, Gatwick and Stansted proposed an appraisal approach which included the monetised impact of sleep disturbance. This consultation was informed by a Civil Aviation Authority (CAA) review to investigate the adverse effects of night-time aviation noise.		North Hertfordshire District Council	1		No
LC.1.26	Thus there is a strong argument that the PEIR noise assessment should do more than consider annoyance from noise exposures, but conduct		North Hertfordshire District Council	1	Please refer to the response to Ref LC.1.5 and LC.1.24.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the assessment to quantify monetary values for the costs to health.					
LC.1.27	TAG now evaluates noise impacts as health impacts rather than purely as annoyance. In the latest guidance they are now derived from estimates of noise impact on individuals' health, sleep disturbance and annoyance. Monetised outputs are generated for sleep disturbance, Amenity, AMI, Stroke, and Dementia. Non-monetised outputs are based on total number of households with increased or decreased daytime or night time noise.		North Hertfordshire District Council	1	Please refer to the response to Ref LC.1.5 and LC.1.24.	No
LC.1.28	The Council's Public Health team raise specific comments in relation to a number of areas, including providing more detail to demonstrate a clear understanding of the issues and provide appropriate and suitable mitigation.		Luton Borough Council	1	Further detail on these matters can be found within Chapter 13 Health and Community of the ES [TR020001/APP/5.01] . Proposals for mitigation have been outlined within this chapter of the ES, where relevant.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
LC.1.29	The PEIR proposes precursors to health to be monitored, e.g., noise, air quality and employment. Although a community engagement plan will be finalised the intention or approach to monitoring community perceptions has not been considered. The PEIR correctly recognises the plausible link between community anxiety and mental health as a result of the scheme and indeed undertook thematic analysis on previous consultation feedback from the community.	United Kingdom Health Security Agency		1	Chapter 13 Health and Community of the ES [TR020001/APP/5.01] provides further information on the ongoing monitoring of community perceptions.	Yes
LC.1.30	This approach could be continued in order to inform an appreciation of community perceptions, anxiety, and areas of concern. This insight can assist in the targeted communications or mitigation to address these concerns or impacts on the community, including the allocation and use of the Community First funds. Local dialogue with the local authorities, including public health, would be useful	United Kingdom Health Security Agency		1	Feedback from the 2022 statutory consultation (and previous consultations) has been carefully considered and the response is set out in this report. This includes feedback on community perceptions, anxiety, and areas of concern as well as areas such as Community First and Green Controlled Growth. This will also be considered in future engagement on the delivery of the Proposed Development which may be undertaken by the Applicant after	No

Ref	Comment	PC	LA	No PILs	Response	Change
	to finalise an approach to this monitoring and use of the insights. It may also provide useful insights to assist in the Controlled Green Growth commitment.				the application for development consent has been submitted.	
LC.1.31	<p>OHID supports the need for monitoring and the ES should clearly state the principles on which the monitoring strategy has been established, including monitoring in response to unforeseen impacts or effects. It may be appropriate to undertake monitoring where:</p> <ul style="list-style-type: none"> • Critical assumptions have been made in the absence of supporting evidence or data • There is uncertainty about whether significant negative effects are likely to occur, and it would be appropriate to include planned monitoring measures to track their presence, scale and nature. • There is uncertainty about the potential success of mitigation measures • It is necessary to track the nature of the impact or effect and provide useful and timely 	United Kingdom Health Security Agency		1	Further detail on monitoring strategy has been provided in Chapter 13 Health and Community of the ES [TR020001/APP/5.01] .	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>feedback that would allow action to be taken should negative effects occur</p> <p>The monitoring strategy should be published to ensure a transparent, coordinated, and constant approach.</p>					
LC.1.32	<p>The monitoring strategy to set out:</p> <ul style="list-style-type: none"> • Monitoring methodologies • Data sources • Assessment methods • Publication methodology • Reporting frequency • Temporal and geographic scope <p>The monitoring strategy should include the approach to obtaining community insights and perceptions.</p> <p>The monitoring strategy should form part of the embedded mitigation measures within the DCO.</p>	United Kingdom Health Security Agency		1	<p>As noted in the PEIR, monitoring of health outcomes is not proposed due to practical difficulties in obtaining accurate health data for the population in the study area and attributing any changes in observed health outcomes to the Proposed Development. Accurately identifying changes in the health status of a population resulting from a specific intervention requires a large-scale study that is not proportionate in the context of an EIA. However, precursors to health effects will be monitored and the monitoring measures are described within the relevant aspect chapters in the ES, including Chapter 7 Air Quality, Chapter 16 Noise and Vibration and Chapter 11 Employment and Economics. They are not duplicated in Chapter 13 Health and Community of the ES [TR020001/APP/5.01].</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Additional text around the ongoing monitoring of community perceptions has been provided within the ES [TR020001/APP/5.01] .	
LC.1.33	The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or sensitive populations, including those that fall within the list of protected characteristics. In this respect the list of vulnerable populations should be further refined to reflect any differential effects and variation from the overall population level of significance and any resultant variation in planned mitigation measures and monitoring.	United Kingdom Health Security Agency		1	<p>The assessment does include a qualitative statement about any differential effects and variation from the overall population level of significance within the assessment of health effects within Chapter 13 Health and Community of the ES [TR020001/APP/5.01] in Section 13.9 and in Table 13.15.</p> <p>The Health and Equalities teams have engaged with each other during the preparation of the application for development consent to ensure consistency across the assessment of equalities effects and to identify any differential effects on equalities groups.</p>	No
LC.1.34	There should be much better cross-referencing between the Noise and Health and Community chapters in the ES, and summary results should be presented in future consultation documents.	United Kingdom Health Security Agency		1	This comment is noted, and better cross-referencing has been provided in the ES [TR020001/APP/5.01] . No further consultation is planned as part of preparation of the application for development consent.	Yes
LC.1.35	Local health care services are likely to experience additional demand from the influx of non-	United Kingdom Health		1	Chapter 13 Health and Community of the ES [TR020001/APP/5.01] reports the assessment of impacts on	No

Ref	Comment	PC	LA	No PILs	Response	Change
	home-based workers, increased airport employment and the increase in passenger numbers. The PEIR does not consider the impact on local primary health care, acute services, and emergency responders from the significant increase in passenger numbers. The current demands are not quantified to establish a baseline and future demand is also not quantified.	Security Agency			'access to healthcare services', including demand for local primary care and Accident & Emergency (A&E) services during both construction and operation. For construction it concludes a 'minor adverse' residual effect. For operation it concludes 'no impact'. On this basis it was not assessed further. Current demands on A&E services are not quantified as this information is currently unavailable. Luton Airports Fire Service currently is the first responder to initial first aid calls, and that model will continue.	
LC.1.36	Whilst at the wider study area effects may be diluted, the ES must address any localised [healthcare] effects either at a geographic level of specific service provision.	United Kingdom Health Security Agency		1		No
Future Engagement						
LC.1.37	The ES should address opportunities and proposed activity with partner agencies and local Voluntary, Community and Social Enterprise (VCSE) organisations, such as Citizens Advice, to engage and support local communities.	United Kingdom Health Security Agency		1	The Applicant fully agrees that stakeholder engagement is crucial for delivering the Proposed Development in a way that fulfils all of its goals, the future employment needs of the airport and the socio-economic aims of the local authorities. To this end the Applicant has been engaging regularly with all stakeholders in the formulation of the application for	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					development consent and the Employment and Training Strategy [TR020001/APP/7.05] in particular.	
LC.1.38	Given the lack of key data and evidence, and the ongoing development of the final ES, we expect detailed ongoing consultation with stakeholders, including local public health teams, Clinical Commissioning Groups (CCGs) and NHS teams.	United Kingdom Health Security Agency		1	Consultation with the local public health teams and CCGs has been ongoing throughout the development of the Proposed Development through meetings of the 'Health Technical Working Group'. A summary of minutes from these meetings can be found within Table 13.7 in Chapter 13 Health and Community of the ES [TR020001/APP/5.01] .	Yes
Other						
LC.1.39	The PEIR does not identify specific issues related to unaccompanied children arriving at Luton. The Local Authority will have the statutory responsibility where they first present on entry to the UK. When unaccompanied children arrive on inbound flights the Local Authority has a duty to assess such children and provide support. The increase in passenger movements, from 18 MPPA to 32 MPPA, will have a proportionate increase in	United Kingdom Health Security Agency		1	The issue of unaccompanied children arriving at the airport was not covered in the PEIR and is not covered in the ES because it is not a matter over which the Proposed Development would have any control. However, separate to the application for development consent, Luton Rising will continue to work with LBC to understand and address this issue.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>service demand subject to changes in the proportion of international flights and border control procedures. It is disappointing to note this is an outstanding issue from the previous PEIR consultation.</p>					
<p>LC.1.40</p>	<p>Receptors in the Pepperstock area to the southwest of M1 J10 will be impacted by the temporary construction compound. A nearby footpath and bridleway may be impacted by the proposed temporary compound. With regard to the interest of National Highways, impacts to human (residential) receptors (listed above Landscape and Visual Impacts) and any surrounding ‘sensitive’ receptors in proximity of the temporary construction compound sited at J10 of the M1 appear not to have been assessed for combined impacts resulting from any effects arising through all construction phases. No combined effects appear to have been assessed for surrounding commercial /</p>	<p>National Highways</p>		<p>1</p>	<p>The in-combination assessment is based on the assessment, scope, and study area of each of the environmental topics (Chapters 6-20) contained within the ES [TR020001/APP/5.01]. In-combination impacts in proximity to the temporary construction compound located at the M1 J10 have been considered if/where appropriate. This includes potential impacts on users of the M1 and Public Rights of Way.</p>	<p>No</p>

Ref	Comment	PC	LA	No PILs	Response	Change
	business facilities (including farm holdings), and PRowS / bridleways in proximity of M1 J10, its temporary construction compound and passing travelling users of the M1 specifically.					

Table A13.5: Regard had to statutory consultation responses on Impact on the Local Community comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
Health				
LC.2.1	Concern that the Proposed Development will cause harm to the physical and mental health of residents living near to the airport, leading to a reduced quality of life. This has not been considered by the Applicant, and some respondents consider that compensation cannot address this.	37	Chapter 13: Health and Community of the ES [TR020001/APP/5.01] submitted as part of this application for development consent, includes a Health Impact Assessment. This assesses the potential effects of the proposals on people's health, including physical and mental health. Where applicable, mitigation has been provided to address any adverse effects identified.	No
Impact				
LC.2.2	Concern that the local area is untidy due to littering. This should be addressed both now and as part of the Proposed Development.	3	The management of the airport is the responsibility of the airport operator, LLAOL. The local authority, LBC, is responsible for the management of streets surrounding the airport and this includes managing litter. This is therefore not a matter of relevance to the application for development consent.	No
LC.2.3	Concern that the Proposed Development would be at the expense of the local communities living near to the airport. Their quality of life, businesses and enjoyment of the local area will be negatively affected by the proposals, including through noise pollution, construction, and traffic disturbance.	47	The application for development consent includes assessments of a wide range of environmental effects during construction and operation, including air quality, noise, surface access, access to open space as well as economic benefits. The findings of these assessments are reported in the Environmental Statement [TR020001/APP/5.01] submitted as part of	No

Ref	Comment	No. PILs	Response	Change
			<p>this application for development consent. It will 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.</p>	
LC.2.4	<p>Residents living close to the airport are concerned that the Proposed Development will result in a loss of value to their properties, particularly due to noise and disturbance from aircraft.</p>	38	<p>The application for development consent has been prepared with the inclusion of policies to help to alleviate such concerns from residents living closest to the airport. Specific noise mitigation measures are detailed in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] submitted as part of the application for development consent. Separate to the Proposed Development, 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 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</p>	No

Ref	Comment	No. PILs	Response	Change
			during the Proposed Development. Such compensation will be paid in accordance with the 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 the Applicant and the affected property owner.	
LC.2.5	Concern about the loss of the Tidy Tip and lack of information about the location of an alternative facility. Some respondents are concerned about the inconvenience caused by an increase in journey distance when accessing alternative facilities.	3	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.	No
LC.2.6	The economic benefits of the Proposed Development are significantly outweighed by the negative social and environmental impacts that will be caused to the local community.	24	Please refer to the response to Ref LC.2.3.	No
LC.2.7	Concern that the Proposed Development would cause harm to use and enjoyment of nearby community facilities, including the surrounding landscape, outdoor sports facilities, and designated heritage assets.	2	The impact of the Proposed Development on the neighbouring area, including in respect of noise, air quality, heritage, and landscape, has been fully assessed in the ES [TR020001/APP/5.01] and mitigation is provided where possible.	No

Ref	Comment	No. PILs	Response	Change
Mitigation				
LC.2.8	Suggestions to mitigate impact of Proposed Development for the local community include improved street cleaning, employment opportunities and reduced disruption from noise pollution.	1	The impact of the Proposed Development has been carefully assessed and suitable mitigation is proposed. The Proposed Development will create employment opportunities for local communities. Noise pollution has been carefully assessed as part of the application for development consent and mitigation proposed where possible. The Applicant is also proposing Noise Insulation Schemes. The Applicant is not responsible for street cleaning and as such this does not form part of the proposed mitigation.	No

Table A13.6: Regard had to statutory consultation responses on Impact on the Local Community comments - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
Health				
LC.3.1	Concern that the Proposed Development will cause harm to the physical and mental health of residents living near to the airport, leading to a reduced quality of life. This has not been considered by the Applicant, and some respondents consider that compensation cannot address this.	298	Please refer to the response to Ref LC.2.1.	No
Impact				
LC.3.2	Concern that the local area is untidy due to littering. This should be addressed both now and as part of the Proposed Development.	9	Please refer to the response to Ref LC.2.2.	No
LC.3.3	Suggest that it is possible to estimate the reduction in life expectancy in person years occurring as a result of the Proposed Development, and that this figure should be included within proposals to allow people to make a more balanced judgement of the scheme's merits and fully understand the true cost in other than simple monetary terms.	1	Chapter 13: Health and Community of the Environmental Statement [TR020001/APP/5.01] submitted as part of this application for development consent, includes a Health Impact Assessment. This assesses the potential effects of the proposals on people's health. A methodology for a quantitative assessment of health effects from noise is outlined in Appendix 13.2 of the ES. Based on the Department for Transport's WebTAG assessment method, this calculates Disability Affected Life Years (DALYs) arising from increased aircraft noise.	No

Ref	Comment	No. CC	Response	Change
LC.3.4	Concern that the Proposed Development would be at the expense of the local communities living near to the airport. Their quality of life, businesses and enjoyment of the local area will be negatively affected by the proposals, including through noise pollution, construction, and traffic disturbance.	454	Please refer to the response to Ref LC.2.3.	No
LC.3.5	Residents living close to the airport are concerned that the Proposed Development will result in a loss of value to their properties, particularly due to noise and disturbance from aircraft.	92	Please refer to the response to Ref LC.2.4.	No
LC.3.7	Concern about the loss of the Tidy Tip and lack of information about the location of an alternative facility. Some respondents are concerned about the inconvenience caused by an increase in journey distance when accessing alternative facilities.	9	Please refer to the response to Ref LC.2.5.	No
LC.3.8	The economic benefits of the Proposed Development are significantly outweighed by the negative social and environmental impacts that will be caused to the local community.	121	Please refer to the response to Ref LC.2.2.	No
LC.3.9	Concern that the Proposed Development would cause harm to use and enjoyment of nearby community facilities, including the surrounding landscape, outdoor sports facilities, and designated heritage assets.	27	Please refer to the response to Ref LC.2.7.	No
Mitigation				
LC.3.10	Suggestions to mitigate impact of Proposed Development for the local community include improved street cleaning, employment opportunities and reduced disruption from noise pollution.	13	Please refer to the response to Ref LC.2.8.	No

Ref	Comment	No. CC	Response	Change
LC.3.11	Suggestion that the community and social benefits and training opportunities should be provided directly by Luton Council.	1	Luton Council is neither the promoter of the DCO nor a direct beneficiary of growth. The Applicant, as the airport owner and the promoter of the DCO, will be the party responsible for delivering the development to be consented by the DCO, including any mitigation, compensation and planning obligations set out through the process.	No

GLOSSARY AND ABBREVIATIONS

Term	Definition
ACOG	Airspace Change Organising Group
ACP	Airspace Change Proposal
AD6	Airspace change process concerning alterations to the arrival flight path to London Luton Airport
AEDT	Aviation Environmental Design Tool
AMSL	Above Mean Sea Level
ANPS	Airport National Policy Statement
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
ARN	Affected Road Network
ASMGCS	Advanced Surface Movement and Guidance Control System
ATC	Air Traffic Control
ATM	Air Transport Movement
BNG	Biodiversity Net Gain
BPM	Best Practicable Means
BREEAM	Building Research Establishment's Environmental Assessment Method

Term	Definition
C	Change. Used in Appendices L and M to describe whether there has been a change to the project in response to the comment (Y = Yes / N= No).
CAA	Civil Aviation Authority
CAP1616	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
CAP771	CAP 771: Connecting the Continents: Long Haul Passenger Operations from the UK
CBC	Central Bedfordshire Council
CC	Community Consultee - Community Consultees with whom we have a duty to consult as prescribed under Section 47 of the Planning Act 2008
CCB	Chilterns Conservation Board
CCG	Chilterns Countryside Group
CDEW	Construction Demolition and Excavation waste
CHMP	Cultural Heritage Management Plan
CIL	Community Infrastructure Levy
CIRIA	Construction Industry Research and Information Association
CL:AIRE	Independent organisation established to stimulate the regeneration of contaminated land in the UK
CoCP	Code of Construction Practice
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation

Term	Definition
CO2	Carbon dioxide
CPO	Compulsory Purchase Order
CROW	Countryside Right of Way
CTMP	Construction Traffic Management Plan
CWS	County Wildlife Sites
dB	Decibel
DBA	Desk-based Assessment
DBC	Dacorum Borough Council
DCO	Development Consent Order
DfT	Department for Transport
DIV	Document Inspection Venue
DMRB	Design Manual for Roads and Bridges
DN	Do-Nothing
DoWCoP	Definition of Waste: Code of Practice
DS	Do-Something
ECC	Essex County Council
EEAST	East of England Ambulance Service

Term	Definition
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERUB	Engine Run-Up Bay
ES	Environmental Statement
ES NTS	Environmental Statement – Non-technical Summary
ETS	Employment and Training Strategy
EU	European Union
EWR	East West Rail
FASI-S	Modernisation of airspace across the South East of England
FIRST	Future LuToN Impact Reduction Scheme for the Three Counties which was consulted on in 2019. It has since been updated to become Community First.
FTG	Fire Training Ground
FWRA	Foundations Works Risk Assessment
FTP	Framework Travel Plan
GCG	Green Controlled Growth
GDP	Gross Domestic Product
GHG	Greenhouse Gases

Term	Definition
GVA	Gross Value Added
HAWRAT	Highways Agency Water Risk Assessment Tool
HA	Host Authorities
HE	Highways England
HEWART	Highways England Water Risk Assessment Tool
HFOV	Horizontal Field of View
HIA	Health Impact Assessment
HRA	Habitat Regulation Assessment
HRA NSER	Habitat Regulations Assessment No Significant Effects Report
HS2	High Speed 2
HSE	Health and Safety Executive
ICAO	International Civil Aviation Organisation
LA	Local Authority
LAeq	A-weighted, equivalent continuous sound level
LBC	Luton Borough Council
LBMP	Landscape and Biodiversity Management Plan
LCA	Landscape Character Area

Term	Definition
LIR	Local Impact Report
LLAL	London Luton Airport Limited (the airport owner). LLAL has been rebranded as Luton Rising.
LLAOL	London Luton Airport Operations Limited (the airport operator)
LLFA	(Luton, Central Bedfordshire and Hertfordshire) Lead Local Flood Authority
LLP	Luton Local Plan
Lmax	The maximum sound level measured during a single noise event
LOAEL	Lowest Observed Adverse Effect Level
LPA	Local Planning Authority
Luton DART	Luton Direct Air Rail Transport
LVIA	Landscape and Visual Impact Assessment
mppa	Million passengers per annum
MA&D	Major Accidents and Disasters
MSCP	Multi-Storey Car Park
MTOW	Maximum Take-off Weight
NAEI	National Atmospheric Emissions Inventory
NATS	National Air Traffic Services
NEDG	Noise Envelope Design Group

Term	Definition
NHDC	North Hertfordshire District Council
NMP	Noise Mitigation Plan
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
OBR	Office of Budget Responsibility
ONS	Office for National Statistics
OSWMP	Outline Site Waste Management Plan
PC	Prescribed Consultee
PEIR	Preliminary Environmental Information Report
POCG	Planning Officers Coordination Group
POS	Public Open Space
Persons of Restricted Mobility	A physical or mental impairment that has a substantial and long term adverse effect on a person's ability to carry out normal day-to-day activities
PHE	Public Health England
PIL	Persons with Interest in the Land as prescribed under Section 44 of the Planning Act 2008
PINS	The Planning Inspectorate
PPG	Planning Practice Guidance

Term	Definition
PRoW	Public Rights of Way
RICS	The Royal Institute of Chartered Surveyors
RNAV	Area Navigation
ROA	Remediation Options Appraisal
RPG	Registered Park and Garden
RVAA	Residential Visual Amenity Assessment
S106	Section 106
SAC	Special Area of Conservation
SAETS	Getting to and from the Airport - Our Emerging Transport Strategy
SAFs	Sustainable Aviation Fuels
SAS	Surface Access Strategy
SIA	Simple Index Approach
SOAEL	Significant Observed Adverse Effect Level
SoCC	Statement of Community Consultation
SMP	Soil Management Plan
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System

Term	Definition
SWMP	Site Waste Management Plan
The Act	Planning Act 2008
Proposed Development	A new terminal and associated infrastructure to increase the number of flights and passengers the airport can handle, from 18 to 32 million passengers per annum by the mid-2040s.
T1	Terminal 1, the existing terminal
T2	Terminal 2
TA	Transport Assessment
TP	Travel Plan
UK HSA	UK Health Security Agency
UXO	Unexploded Ordnance
WCHs	Walkers, cyclists and horseriders
WDR	Works Description Report
WFD	Water Framework Directive
WHO	World Health Organisation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

¹ Control of Pollution Act 1974 (c. 40). London: Her Majesty's Stationery Office

² Disability Discrimination Act 1995 (c. 50). London: The Stationery Office

³ ICAO, (2001), Balanced Approach to Aircraft Noise Management.

⁴ London Luton Airport, (February 2019) Environmental Noise Directive Noise Action Plan 2019 – 2023.