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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 3 of 4

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

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6.02 CONSULTATION REPORT

APPENDIX M: 2022 DUE REGARD TABLES – PART 3 OF 4

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A14: SURFACE ACCESS

Many of the surface access comments received during the 2022 statutory consultation are very detailed and relate to specific roads or junctions. The **Transport Assessment [TR020001/APP/7.02]** and **Surface Access Strategy [TR020001/APP/7.12]** cover the whole highway network in the vicinity of the airport and include detailed information and plans for the specific locations raised, this information is not replicated here. These documents should therefore be read in conjunction with the tables below.

Table A14.1: Regard had to statutory consultation responses on Surface Access - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
Highways Network – Impact						
SA.1.1	PEIR2 [Preliminary Environmental Impact Report available as part of the 2022 statutory consultation] chapter 18 acknowledges the status of the A505 and A602 described in LTP4. Nevertheless, the PEIR and ETS [Draft Employment and Training Strategy available as part of the 2022 statutory consultation] contain no detail on the impacts of airport expansion on traffic on the A505, A602 and connected roads, in particular in Hitchin. Nor does it make reference to the emerging NHC [North Hertfordshire District Council] Local Plan or Transport Strategy.		North Hertfordshire District Council	1	Analysis of existing passenger numbers suggests that there is a limited volume of airport related traffic travelling to or from the east of the airport via roads such as the A1(M), A505 and A602. Similarly in the future major growth is not predicted from areas to the east of Luton with the majority of airport related traffic forecasted to access the airport from the M1. With this in mind, the Applicant does not currently propose to extend the scope of improvements beyond the measures that are proposed in Hitchin. Please find additional information within the Transport Assessment [TR020001/APP/7.02] and	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Surface Access Strategy [TR020001/APP/7.12].	
SA.1.2	Using the figures within the consultation documents it appears that there would still be an additional 5 million vehicles per year on the local road network (approximately 14,000 per day). Whilst the predicted increase in the proportion of passengers using public transport (from 23% - 45%) is welcomed it is clear that significant congestion of local roads and arterial routes will still result from the proposed expansion.		Dacorum Borough Council	1	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. A new coach station is proposed as part of the Proposed Development, the Applicant also proposes to expand the coach facilities at the existing terminal. 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 Surface Access Strategy [TR020001/APP/7.12] , and the suite of application documents including the Transport Assessment [TR020001/APP/7.02] and the Framework Travel Plan [TR020001/APP/7.13] aim to	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach. Additionally, it is assumed that faced with limited capacity through the terminal in peak periods, additional flights would necessarily be scheduled outside of the peak hours and so minimise additional journeys during peak highway periods. The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate.</p> <p>Detailed assessments of the proposed highway layouts have been undertaken and can be found within the Transport Assessment [TR020001/APP/7.02] to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					Highways and relevant local authorities. A Green Controlled Growth Framework [TR020001/APP/7.08] which will ensure that the airport operates within particular “Limits” is proposed. One of these limits relates to surface access - specifically, mode share. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time. One of the Applicant's GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.	
SA.1.3	CBC has significant concern regarding the traffic and transport impacts of the proposed expansion on the local road network, M1, and rail network and the implications this would have for residents and businesses in Central Bedfordshire.		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.2. The traffic modelling results as included within the Transport Assessment [TR020001/APP/7.02] set out the impact on all roads potentially impacted by the Proposed Development. These have been modelled at strategic and local scales modelled and where necessary, highway	No

Ref	Comment	PC	LA	No PILs	Response	Change
					interventions are proposed as part of the Proposed Development. This includes the local road network in and around Central Bedfordshire and on key junctions onto the M1. The Transport Assessment also considers how the Proposed Development could affect the public transport network including, buses, coaches and rail.	
SA.1.4	The forecasting identifies significant increases in traffic flows through Caddington and this is a concern due to the local level impact that could result.		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.2 and 1.3.	No
SA.1.5	It is evident that a significant level of demolition and construction phase work involving large scale plant, equipment and machinery deployment/ use, engineering operations, waste material arisings/ deposition, import of construction material, HGV traffic generation and related road management measures are envisaged - leading to highway	East of England Ambulance Service (EEAST)		1	The Code of Construction Practice (CoCP) in Appendix 4.2 of Volume 3 of the ES [TR020001/APP/5.02] includes consideration of impacts of construction traffic on the highway network, and includes detail on construction traffic, construction routes and closures and any impact on emergency service vehicles. Most works are off the highway network and	No

Ref	Comment	PC	LA	No PILs	Response	Change
	network impact, delay and route diversions.				where they are on the network, detailed construction management plans would be developed once the DCO is granted. In advance of construction, the Applicant will continue to consult with highway authorities and key stakeholders. It is not common practice to test the impact of construction on delays as they are temporary impacts.	
SA.1.6	Information to determine the effect of increased HGV traffic and transport/ road network management and route diversion measures, and its impact on EEAST's operational capacity, resources and efficiency is currently absent from the PEIR.	EEAST		1	Please refer to the response to Ref. SA.1.2 and 1.3. The application documents including the Transport Assessment [TR020001/APP/7.02] , clearly assess the potential effects and impact of the Proposed Development and how they have been mitigated on the local highway network. The assessments undertaken demonstrate that whilst there are increases in vehicular traffic during peak times as a result of the Proposed Development, interventions are proposed to adequately mitigate this impact. The Transport Assessment lists affected highway links and junctions which may align with	No

Ref	Comment	PC	LA	No PILs	Response	Change
					EEASTs operational routes, there are no significant impacts.	
SA.1.7	The impact of increased HGV traffic, transport/ road network management and route diversions on EEAST's operational capacity, resources and efficiency therefore 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.	EEAST		1	Please refer to the response to Ref. SA.1.2, 1.3 and 1.5. The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] and other management plans are secured through the planning process. The CoCP will be kept under review and updated where necessary as construction proceeds.	No
SA.1.8	The strategy for Articulated Indivisible Loads (AILs) incorporating an assessment of suitable traffic access routes, road closures and diversions for accommodating AIL and related HGV movements, is to be determined by the lead contractors in consultation with the highway authorities. Consequently, information to determine the nature, type/size, frequency, route management	EEAST		1	Please refer to the response to Ref SA.1.5. The strategy for AILs has been dealt with through the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] . The CoCP and other management plans are secured through the planning process. The CoCP will be kept under review and updated where	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>reliance on police escort, and expected time delays associated with AILs, which are likely to directly impact on EEAST's operational capacity, resources and efficiency is currently absent from the PEIR.</p> <p>This impact information therefore 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.</p>				necessary as construction proceeds.	
SA.1.9	<p>Forecasting work carried out by the applicant using CBLTM identifies a significant increase in traffic flows through Caddington, with the difference between the 'do-minimum' and 'do-something' 2043 forecast showing an increase of 219 trips (two way) on Luton Road during the PM peak hour, which then distributes north and west in the centre of the village. As such CBC would be seeking a further assessment of the links and junctions associated with this rerouting traffic. It appears likely</p>		Central Bedfordshire Council	1	<p>Further discussions have been held with Central Bedfordshire Council (CBC) through engagement sessions with Host Authorities and their appointed consultants and further information has been provided that seeks to provide more detail around the specific concerns about traffic routing through villages such as Caddington. Outputs of the transport modelling, including details requested in the comment are provided in the Transport</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	that this re-routing is the result of congestion elsewhere on the network, and as such, mitigation away from Caddington may make alternative routes more attractive and therefore remove this re-routing. Any approach which removes additional through traffic would be the preferred strategy, as this would also reduce the impacts upon local amenity associated with increased traffic levels. However, it is considered unlikely that measures such as traffic calming within Caddington would deliver this in isolation (or necessarily be appropriate), and that positive capacity-based improvements on alternate routes would be required.				Assessment [TR020001/APP/7.02].	
SA.1.10	It is noted that areas of mitigation outside of the DCO redline boundary are identified within the consultation material, for example the plan detailing 'Potential Rural Traffic Management Locations' to the east of the site. As detailed previously, CBC are of the view that impacts to the south and west of the site within the CBC		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.2. The Proposed Development aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, including the mentioned rural traffic	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>network may also require addressing, which would again fall outside of the redline boundary. CBC would therefore be seeking clarity on how any such impacts and associated mitigation would be provided for, and secured through, the DCO process.</p>				<p>management locations, and flight scheduling to minimise additional journeys during peak highway periods. The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken and can be found within the Transport Assessment [TR020001/APP/7.02], to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.</p> <p>In addition, the Applicant will continue to work with local authorities to understand the impacts of the airport through on-going monitoring and seek to investigate the potential implementation of traffic management and/or parking</p>	

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					control measures in rural areas, in order to dissuade vehicles from using these roads to access the airport.	
SA.1.11	It seems likely that there will be some impact locally, most noticeably at Junctions 13 and 14 on the M1. There may also be local impacts at the A5 / A4146 junction (Kelly's Kitchen) due to the A505 / A5 / Junction 11A changes in recent years. The scale of the impact is, in all probability, quite small; however, the ETS makes no attempt to quantify this.		Milton Keynes Council		Please refer to the response to Ref. SA.1.2. The Transport Assessment [TR020001/APP/7.02] , assesses the impact of the Proposed Development across a wide scale and focuses on areas where a significant impact is recorded and where mitigation is required. It will also focus on key junctions in the vicinity of the site as agreed through the modelling scoping exercise.	No
SA.1.12	Highway/Transport – assessments should consider the impact on the Borough from the increase in vehicle movements along key routes and junctions, including but not limited to, the already congested East/West route along the B653 via Wheathampstead.	Welwyn Hatfield Borough Council		1	Please refer to the response to Ref. SA.1.10 and SA1.11.	No
SA.1.13	A big concern of our residents is traffic congestion. Junction 10 of the M1 and the roads around the Airport were already congested	Kings Walden Parish Council		1	Please refer to the response to Ref. SA.1.10.	No

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	in 2019 at almost 19 million passengers.					
SA.1.14	Any expansion will cause more congestion on roads that already cannot cope with the amount of traffic. It is hard to see a benefit to local residents who will struggle to get to where they need to every day with further congestion from an airport expansion.	Kings Walden Parish Council		1	Please refer to the response to Ref. SA.1.10. The Transport Assessment [TR020001/APP/7.02] deals with the impact of the Proposed Development on the highway network which will address residents' concerns through the traffic modelling detailed in Ref. SA.1.10.	No
SA.1.15	Many of the roads close to the airport, that passengers use to access Luton airport, are single track country lanes that are not designed for the levels of traffic that they already get. The expansion proposal doesn't address the increased impact any expansion will have on these country lanes, and the villages that they run through.	Kings Walden Parish Council		1	The Applicant will continue to work with local authorities to understand the impacts of the airport through on-going monitoring. The Applicant will seek 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. The mechanism proposed to deal with any adverse impacts on country	No

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					lanes is included in the Transport Assessment [TR020001/APP/7.02] , and Framework Travel Plan [TR020001/APP/7.13] .	
SA.1.16	Some passengers already park their cars in Breachwood Green free of charge when they fly from Luton. This causes a nuisance for residents and visitors where road parking is the only option for some who do not have a drive. There will no doubt be an increase in the occurrence.	Kings Walden Parish Council		1	As part of the Proposed Development, there will be on-going monitoring of the surface access impacts of the airport. The Applicant will seek 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. It should be noted however, that it is the responsibility of neighbouring authorities to put in place any parking restrictions as appropriate. The mechanism proposed to deal with any adverse impacts through parking on residential streets is included in the Framework Travel Plan [TR020001/APP/7.13] .	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.17	The area around the airport is mostly residential and includes several schools and places of work. The increase in traffic and congestion during the expansion, and after, would be huge. This would also cause extra noise and air pollution.	Kings Walden Parish Council		1	<p>Please refer to the response to Ref. SA.1.2.</p> <p>As a reasonable worst-case, the noise assessment in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] assumes that next-generation aircraft are no quieter than new-generation aircraft. However, the proposed Noise Envelope within the Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] has been updated to include a mechanism for the noise limits (that will be legally binding and enforceable) to be reduced in future years if future technology (next generation aircraft or airspace change) results in noise reduction. This will ensure the benefits of future next-generation technology are shared with the community in line with aviation noise policy.</p> <p>Air quality impacts from all related sources (including road vehicles, aircraft and airport sources) have been assessed following best practices in</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>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>Air and noise impacts from Road Vehicles have been addressed in Appendix 18.1 Traffic and Transportation Methodology of the ES [TR020001/APP/5.01] which is submitted as part of this application for development consent. The assessment found no significant impacts, or a need for additional mitigation further to the embedded mitigation as part of the Proposed Development.</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>	

Ref	Comment	PC	LA	No PILs	Response	Change
Highways Network – Mitigation						
SA.1.18	Whilst specific highway interventions are identified within the Proposed Development, future monitoring of the highway network around the airport will be essential, alongside monitoring of the use of sustainable transport modes. It is indicated that proposed improvements will be delivered over the duration of the access strategy, informed by the rate of passenger growth and local monitoring.		Host Authorities	4	The proposed highway mitigation schemes have been developed based on the results of the future year modelling, which takes into account additional traffic associated with airport growth, together with forecast traffic growth associated with consented developments and general background growth. Further detail on this is included in the Transport Assessment [TR020001/APP/7.02] .	No
SA.1.19	It is noted that throughout the process a number of relatively minor road junction schemes to alleviate congestion have been identified in Hertfordshire, largely around Hitchin and that the nature of these schemes will need to change as transport policy has evolved to respond to wider modal shift aspirations. This flexibility will need to be built into Luton Rising's infrastructure delivery methodology.		Hertfordshire CC	1	The Applicant is willing to work with local authorities post submission of the application for development consent in delivering highway mitigation schemes, through a review mechanism and subject to ongoing monitoring. Further information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.20	<p>There is also no explanation or justification provided for the highway interventions proposed for Hitchin. Nor is there any discussion of the wider impacts of those interventions on active travel, buses, and displacing congestion to other junctions in Hitchin, including Hitchin Hill roundabout, A602-A505 roundabout and A505-B655 mini roundabout. The proposed interventions:</p> <ul style="list-style-type: none"> • Are in locations where provision for cycling is non-existent and provision for walking is minimal. • Take space away that could and, in probably all cases, should be allocated to walking and cycling. • Increase general traffic flows along the A505, which will likely increase congestion in the town centre, notably around the pinch point where the A505 passes under the East Coast Mainline. • Significantly increase the difficulty and danger for people walking and cycling to cross the junction arms that are being 		North Herts DC (NHDC)	1	<p>The proposed mitigation measures at the three junctions within Hitchin are located at the three most congested junctions along the route leading east to the A1(M). It is recognised that these junctions are constrained in nature, with existing congestion and delay at peak periods.</p> <p>The Applicant is supportive of measures to improve active and sustainable travel modes and will work with the authorities to implement any improvements such as to meet their requirements for LTP4 wherever reasonably practicable.</p> <p>The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken and can be found within the Transport</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>widened to accommodate additional filter lanes.</p> <ul style="list-style-type: none"> • Increase traffic speeds on the roundabouts in question, which will increase the risk to life and injury in the event of a collision with a person walking or cycling. These outcomes are inconsistent with LTP4 and NHTS. Any intervention in the urban road network should seek to improve compliance with Manual for Streets and LTN1/20. The proposed interventions would achieve the opposite. 				<p>Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12], to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions will be ongoing with National Highways and relevant local authorities.</p> <p>The design of the proposed junction improvements would be subject to standard safety audits as the design progresses through detailed stage with alignment with LTN 1/20 and Manual for Streets where it is deemed appropriate.</p>	
SA.1.21	<p>Furthermore, to achieve active travel targets in Hitchin, it will be necessary to reduce road capacity in the town in order to create space and signal time for active travel. That is incompatible with increasing vehicle traffic flows into the town centre. In short, the proposed interventions are contrary to local and national policies and guidance.</p>		North Herts DC	1	<p>Please refer to the response to Ref. SA.1.2. Mitigation proposals for the highway network have been proposed where there have been significant effects recorded and solutions have been proposed to mitigate this and ensure there is sufficient highway capacity to deal with the expected additional number of vehicles. This mitigation has been discussed with North Hertfordshire District Council.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					During delivery of the proposed schemes, they will be reviewed to ensure that their design complies with Road Safety Audits and design guidance such as LTN 1/20.	
SA.1.22	<p>NHDC asks Luton Rising to:</p> <ul style="list-style-type: none"> • Share with NHC detailed forecasts of traffic flows in the Do Nothing and Do Something scenarios at each junction of the A505 east of Luton to A1 Junction 9, and of the A602 to A1 Junction 8. • Meet with NHC and HCC to discuss the modelling and rationale for proposed interventions in Hitchin. 		North Herts DC	1	<p>Further discussions have been held with North Hertfordshire District Council, and other highway authorities and further information provided through consultation events and modelling engagement sessions. Detailed outputs of the modelling undertaken and the analysis of such modelling will be contained within the Transport Assessment [TR020001/APP/7.02]. The strategic modelling covers the area within the comment, but will only be analysed in detail if there is deemed a significant impact on the highway network at this point.</p>	Yes
SA.1.23	<p>NHC asks LR to propose interventions that will:</p> <ul style="list-style-type: none"> • Increase transport capacity in terms of people-per-hour (rather than vehicles-per-hour). 		North Herts DC	1	<p>Please refer to the response to Ref. SA.1.2. The Framework Travel Plan [TR020001/APP/7.13] proposes a number of measures that would seek to achieve many of</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<ul style="list-style-type: none"> • Decrease carbon emissions associated with trips to/from LLA. • Improve air quality in Hitchin (see §10.1010.10). <p>This may be achieved in three ways:</p> <ul style="list-style-type: none"> • modal shift from car to bus for medium and longer distance travel, including to and from the airport; • modal shift from car to active travel for short trips within Hitchin, which will release road capacity for longer-distance traffic; and • increased car occupancy rates. 				<p>the outcomes listed out in the response, with the GCG setting limits to growth based on Limits around air quality.</p>	
SA.1.24	<p>Willow Lane Any increase in traffic between LLA and the A1 via the A505 and 602 will increase traffic on Willow Lane. This could have safety implications on the A505 if the queue of traffic waiting to turn right into Willow Lane extends beyond the length of the filter lane. The speed limit at this point is 60mph. The back of the filter lane is only 130m beyond the end of the dual carriageway. It is unclear if Willow Lane has</p>		North Herts DC	1	<p>Please refer to the response to Ref. SA.1.10.</p> <p>Willow Lane forms part of the strategic traffic model. Please find additional information within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>been included in traffic modelling.</p> <p>NHC asks LR to:</p> <ul style="list-style-type: none"> • Check that Willow Lane has been included in traffic modelling. • Propose options for mitigation in case there are safety, air pollution or noise impacts from more traffic trying to use Willow Lane. 					
SA.1.25	<p>Traffic calming on diversionary routes</p> <p>No detail is provided on what options will be offered or considered for potential traffic calming measures within the rural areas to the northeast of the airport. NHC is concerned about making rural routes more attractive. [Route changes] seem not to be reflected fully in the map identifying rural areas of concern, which identifies Tea Green but not King's Walden and Preston. NHC asks LR to:</p> <ul style="list-style-type: none"> • Include King's Walden, Preston and all other villages on forecast diversionary routes in scope for traffic calming measures. • Provide a forecast for net changes to flows for both 		North Herts DC	1	<p>The locations of the indicative traffic calming have been positioned to help dissuade traffic from reaching villages in the first instance, however the Applicant is willing to work with local authorities in delivering highway mitigation and local traffic calming schemes, subject to ongoing monitoring. The Transport Assessment [TR020001/APP/7.02] illustrates locations where there is expected to be increases in vehicular traffic and specific mitigation measures identified where impacts are significant. The locations identified in the comment aren't currently identified as areas that will</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Terminals 1 and 2 combined, so that the full impact can be understood more easily.</p> <ul style="list-style-type: none"> • Provide absolute figures for current and forecast traffic levels through villages that will see a significant (> 5%) increase in traffic volumes (daily or peak) owing to LA expansion. • Provide more detail about what “traffic calming measures” are being considered for the identified villages. • Expand the geographical scope for identifying where traffic calming measures may be required, to include Hitchin and south-east of Hitchin. • Outline how local residents, councillors (parish, district and county), schools and businesses will be proactively engaged (e.g., through workshops) to consider options, locations and designs. 				breach significant impact thresholds.	
SA.1.26	Vauxhall Way Improvements and Century Park Access Road. DfT indicated that it is reviewing all schemes in the current MRN/LLM programme that have not already received approval at the Outline Business Case stage (which neither of the above two		North Herts DC	1	The Applicant understands that LBC remain committed to the delivery of the schemes.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	schemes has). That means there is now some uncertainty about whether the above two schemes will receive central government funding before 2025. This therefore challenges the statement in ETS that this scheme is “committed”. NHC asks LR to: Acknowledge that there is now uncertainty about the delivery of the A505 road interventions in Luton.					
SA.1.27	<p>NHC ask LR to</p> <ul style="list-style-type: none"> • Acknowledge that increasing capacity on this part of the A505 is likely to induce more trips along the A505 to the east of Luton, potentially impacting traffic in Hitchin. • Consider working with LBC to re-specify the Vauxhall Way Improvements schemes to create segregated routes for buses and active travel, rather than increasing road capacity for general traffic. 		North Herts DC	1	<p>The Vauxhall Way scheme is included in the strategic transport modelling and therefore any re-distribution of traffic is addressed through the modelling already undertaken. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p> <p>The Applicant supports the aspiration to improve public transport in the area and will continue to work with relevant authorities moving forward.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.28	Although Barnet falls within one of the airport's key catchment areas, the current transport assessment does not suggest that the predicted increases in capacity and passengers will result in any disruptive impacts to Motorways and Trunk Roads in the Borough. This is inferred from the predicted volumes in the immediate vicinity of the airport including Junction 10 of the M1, which is currently shown as the only motorway junction forecast to require mitigation. If there is any data or analysis available that demonstrates the highway impacts within the LB Barnet catchment area, we would welcome the opportunity to review.		London Borough of Barnet		Please refer to the response to Ref. SA.1.2.	No
SA.1.29	A number of the proposed works appear to fall within the CBC network, and we would therefore be seeking to agree the mitigation works proposed, and the process by which the works would be delivered. These junctions include: New Airport Way / Gypsy Lane; New Airport Way and London Road South.		Central Bedfordshire Council	1	Noted. Discussions on delivery of works will continue between the Applicant and Central Bedfordshire Council.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.30	We would also wish to see Stage 1 Safety Audits undertaken for the proposed works within the CBC network, which could identify the need for amendments to the schemes proposed, and which could have a bearing upon the redline boundaries proposed.		Central Bedfordshire Council	1	Given the long term nature of the project, and considering the outline nature of the proposed mitigation designs, Road Safety Audits have not been commissioned as part of this application for development consent. However, the schemes have been designed to the appropriate highway standards, and comprise relatively standard improvements which would be subject to Road Safety Audits should the application be granted permission and as the design process continues. As such, the Applicant does not anticipate there being any significant issues which could not be mitigated against. It is not the intention of the proposals to affect third party land outside of the highway boundary and this approach would be maintained.	No
SA.1.31	In light of the apparent changes in flows following the development we would also be seeking to see further assessment of the following junctions: <ul style="list-style-type: none"> • Newlands Road / A1081 junction; 		Central Bedfordshire Council	1	Noted. Further assessment information on the impacts at the identified junctions has been provided to CBC. Further information on the modelling assessment can be found within the Transport Assessment [TR020001/APP/7.02] and	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<ul style="list-style-type: none"> • Newlands Road / B4540 Junction; • Newlands Road / Luton Road junction; • Luton Road / Chaul End Road; and • Chaul End Road / Hatters Way. 				Surface Access Strategy [TR020001/APP/7.12].	
SA.1.32	<p>CBC would welcome discussions with the applicant with regards to the phasing of any mitigation works proposed. It is for example noted that the A1081/London Road (S) junction is detailed within Appendix C as having a level of service of 'E' (intolerable delay) in the 2027 'Do-something' scenario, but no mitigation is proposed until the 27mppa forecast assessment, i.e.: by 2039. As such it would be the view of CBC that any scheme agreed for this junction would need to be delivered earlier in the programme than currently proposed.</p>		Central Bedfordshire Council	1	<p>As part of the Proposed Development, there will be on-going monitoring of the surface access impacts of the airport to consider the need to adjust any timing of mitigation measures. Further information on the modelling assessment can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	No
SA.1.33	<p>Highway interventions: Mentions incorporating active travel and landscaping, but no mention of public transport.</p>		Host Authorities	4	<p>Noted. Mitigation proposals are cognisant of all users and in particular opportunities for sustainable transport.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.34	At present, mitigations on the A505 focus on the road within Luton and do not appear to interfere with the emerging proposals for the A505 route strategy, which are generally focussed in Hertfordshire and may affect travel opportunities to the airport in the future. The A505 study, which was not published until after the Luton Rising reports were prepared, should be referred to in future work on the scheme.		Host Authorities	4	Noted. The A505 study is referred to in the Transport Assessment [TR020001/APP/7.02] .	No
SA.1.35	Would recommend early consideration of schemes in 3D. There are currently areas of concern from safety or constructability point of view. Suggest S1 Road Safety Audit should be completed. Swept paths of an appropriate design vehicle should be demonstrated at some locations.		Host Authorities	4	Detailed design of the various off-site mitigation proposals will not be undertaken as part of the application, considering the long-term nature of the development. The proposed improvement schemes would be subject to detailed design and safety audit procedures as part of the ongoing delivery process, should development consent be granted. Details of the proposed mitigation interventions that have been included as part of the assessment are provided in the Transport Assessment [TR020001/APP/7.02] .	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.36	Many of the schemes do not show reinstatement of affected pedestrian/ cycle facilities or provide any infrastructure for them should be LTN1/20 compliant.		Host Authorities	4	All of the proposed mitigation schemes would reinstate pedestrian facilities as appropriate. The design of the proposed junction improvements would be subject to standard safety audits as the design progresses through detailed stage with alignment with LTN 1/20 and Manual for Streets where it is deemed appropriate.	No
SA.1.37	Most drawings do not show reinstatement of affected bus infrastructure and do not show a commitment to ensuring access to the airport is attractive by bus / coach through enhancements to reliability at junctions used by public transport.		Host Authorities	4	There are a limited number of locations where bus infrastructure, such as bus stops, are impacted. In these locations, there is generally scope to either reinstate laybys or provide on-carriageway stops, which is generally the preferred approach for bus operators. As part of the Proposed Development, the Applicant is seeking to increase the percentage of journeys to the airport by sustainable modes. Further information on the modelling assessment can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.38	Many schemes show proposed kerb on top of or within a few hundred millimetres of the existing kerb. Unclear what such minor road widening would actually achieve "on site".		Host Authorities	4	The proposed mitigation schemes have been designed to an outline stage in order to indicate potential schemes which could be delivered to mitigate the impacts of airport related traffic, together with traffic associated with known, consented developments. As the delivery of these schemes progresses, should development consent be granted, detailed design would be undertaken using topographical surveys which may enable the schemes shown to be amended and provide more detailed recordings of existing kerb locations and where improvements will be provided giving great clarity on widths.	No
SA.1.39	Besides the localised highway mitigation drawings there is limited mitigation outside the immediate area.		Host Authorities	4	The proposed mitigation schemes have been located on routes where volumes of predicted traffic associated with airport expansion have been shown to result in significant impacts to delay and congestion.	No
SA.1.40	The A1081; A5183 and the B653 into Luton from within the St Albans City & District area		St Albans City and		Whilst the A1081 and B653 do experience congestion and delay, data suggests that there	No

Ref	Comment	PC	LA	No PILs	Response	Change
	already suffer significant congestion. Whilst some improvements to the A1081 have been identified in the consultation documentation, it is considered that on-going monitoring and assessment of all three routes should be carried out and that a clear process is established to enable local communities to access mitigation funding for any unforeseen highways problems that arise. That process must be articulated clearly at the Acceptance stage of the DCO process and must be open, transparent, and timely so that there is no delay in dealing with any unforeseen problems on local roads.		District Council		are not significant volumes of traffic accessing the airport from these roads, or are outside of typical highway peak periods. However, the Applicant is willing to work with local authorities to monitor usage of these roads. Further information relating to impacts on traffic can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12]	
SA.1.41	Three road junctions in Hitchin are identified for minor improvements in the proposal: A602 Park Way / Upper Tilehouse Street roundabout, A 602 Park Way / Stevenage Road roundabout and A505 Offley Road/ Pirton Road roundabout, all of which fail to cope with the existing levels of traffic at peak times. There is only space for	Kings Walden Parish Council		1	The mitigation schemes at these locations have been proposed to address issues with congestion and delay which already occur, but which may be exacerbated by airport related traffic increases. It is acknowledged that there is limited scope to improve these junctions due to land constraints, and the Applicant would welcome	No

Ref	Comment	PC	LA	No PILs	Response	Change
	very limited improvements to these roundabouts which are unlikely to reduce the adverse impact of increased traffic through Hitchin as a result of airport expansion.				collaboration with Hertfordshire County Council in delivering a scheme. Further information relating to impacts on traffic can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12]	
SA.1.42	<p>National Highways has reviewed the designs for the enhancement of J10 and makes the following observations to aid refinement of the proposals to meet operational needs:</p> <ul style="list-style-type: none"> • The increased capacity and general refining of road markings throughout the circulatory is welcomed. However, the lane widths need further clarification. • The circulatory at J10 is part of the National Highways network, as is the A1081 to the former Kidney Wood Roundabout. Therefore, DMRB standards will need to apply to these sections of road. • Providing improved stacking capacity on the M1 J10 N/B exit slip is welcomed. We would like to discuss the land-take 	National Highways		1	Noted. The Applicant would welcome the opportunity to work collaboratively with National Highways in delivering a scheme which meets their requirements. There has been a comprehensive programme of engagement with National Highways during the project and these discussions will continue for as long as is needed to secure agreement on the items listed within the comment.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>implications with you further and also the markings seem to show that the stop line on the east kerb at the top of the slip is perhaps too close to traffic coming from the A1081.</p> <ul style="list-style-type: none"> • The proposed northbound entry slip will have implications for the Dynamic Hard Shoulder (DHS) Smart Motorway. For the purposes of the DCO application, it will need to be assumed that this form of Smart Motorway operation is retained and that it will not be converted to ALR. Therefore, the changes to the DHS link length and signal positioning will need to be considered. The design will also need to consider whether the extended merge will have a hard shoulder for the majority of its length, as does the current slip road. • CCTV coverage from the current Pan Tilt Zoom (PTZ) camera may not cover the new proposed merge. Hard Shoulder Monitoring cameras (HSM's) only cover DHS links and are not standard for hard shoulder areas (non-dynamic), so cannot be 					

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>considered to provide coverage in the area either.</p> <ul style="list-style-type: none"> The drawings suggest that the proposed scheme is focused more on increasing capacity into J10 rather than out of the junction in the southbound direction. It is acknowledged that minor changes to the southbound exit are proposed, creating a two lane diverge at the top, with some minor lining rework to increase the overall merge length. However, the impact on creating improved southbound exit capacity is limited. This slip road is already known to queue at peak times currently, without the increased traffic expected from the expansion of the airport. As a consequence, there could be an adverse impact on the performance of the slip road, with potential queuing onto the main carriageway, creating a safety hazard. This underlines the importance of validating the modelling work that has been undertaken. Road Safety Audits of the proposed designs will need to be 					

Ref	Comment	PC	LA	No PILs	Response	Change
	undertaken before National Highways can approve them as acceptable. In addition, a GG104 Safety Risk Assessment will need to be undertaken.					
SA.1.43	Chapter 8 [of the SAETS] sets out that the transport assessment work carried out to date has included analysing the impact on the highway network in the vicinity of M1 junction 10, including the section of the motorway north and south of the junction. It indicates that hard shoulder running (ALR) is the most likely scheme to improve motorway capacity should any scheme be considered by National Highways in the future. On this basis it has been assumed that the section of the M1 motorway between junctions 9 and 10 operates with an improved capacity that includes hard shoulder running in the Do-Minimum and Do-Something networks for 32 million airport passengers per annum. The issues in relation the assumption that ALR will be provided in the future are referenced in paragraph 2.3 of this response	National Highways		1	<p>Noted. The assessment approach was developed in discussion with relevant highway authorities including National Highways. The Applicant has been engaging in consultation with National Highways to provide them with additional supporting information.</p> <p>Sensitivity tests have been undertaken using the strategic SATURN highway model for a scenario without the previously assumed motorway widening delivered via ALR. The results of the sensitivity tests have been presented and discussed with National Highways and also with the local highway authorities.</p> <p>Tests have been undertaken for 2043 both without and with the Proposed Development. The results conclude that the impact of the airport traffic on the local road network will be mitigated by</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	and National Highways is keen to see a forecast scenario without the provision of ALR on the M1 between Junctions 9 and 10.				the proposed improvement works at Junction 10. Without the Proposed Development and without the improvements at Junction 10, the forecast traffic flows on the local road network are higher. More detail is set out within the Transport Assessment [TR020001/APP/7.02] .	
SA.1.44	<p>A specific point raised by WSP is that the highways modelling currently assumes hard shoulder running (or Smart motorway) to be present in all future options. If the present government review comes down on the side of no further Smart motorways, a sensitivity test will be needed to demonstrate that the proposals will not cause an unacceptable impact on the Strategic Road Network.</p> <p>There is an assumption in the assessments that an enhancement scheme will be provided at the M1 between junctions 9 and 10 including hard shoulder running (or Smart Motorway) in all forecast options. If the government review concludes no further</p>		Host Authorities	4	<p>The approach to the M1 J10 mitigation and smart motorway scheme whereby hard shoulder running is included as part of the Do Minimum and Do Something modelling scenarios, was agreed with National Highways. Further information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12]</p> <p>Furthermore, a sensitivity test has been undertaken at the request of National Highways to understand the effects of no Smart motorway scheme on M1. This test has demonstrated that without the M1 Smart motorway scheme there is no need for further mitigation, however there was some rerouting on local</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Smart Motorways, an alternative test and/scheme may be required. Recognised that discussions are ongoing with National Highways.				roads. This can be found in Appendix 18.5 Sensitivity Test of the Transport Assessment [TR020001/APP/7.02] .	
SA.1.45	We have significant concerns with reference to the inclusion of a SMART motorway operation between Junction 9 and 10 on the M1. The rationale behind this is explained briefly within the SAETS, however we are concerned about a large infrastructure scheme with no commitment nor funding being included within a core scenario. This could have ramifications for many of the approaches to the site, including those routes in Central Bedfordshire. We would expect a scenario excluding this improvement scheme to be considered within a sensitivity test as a minimum.		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.44. Discussions with National Highways during scoping stage indicated that it would be acceptable to include the SMART motorway/widening as a scheme in the core scenario. Subsequently, the Applicant has undertaken sensitivity tests to understand the impact and effects of this not coming forward. Details of the outcome of the modelling and sensitivity tests are provided in the Transport Assessment [TR020001/APP/7.02] .	No
SA.1.46	CBC also remain concerned that sensitivity testing of options in which the SMART motorways scheme on the M1 is not assumed may show greater levels of traffic on parallel routes such as through Caddington (to		Central Bedfordshire Council	1	The assessment approach has been developed in discussion with relevant highway authorities including National Highways. The Applicant has discussed this issue with highway authorities and provide additional	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	the west) or the A1081 (to the east). As such we would be keen to engage further with the applicant on this particular issue.				supporting information and will continue to discuss with Local Authorities where necessary. For particular reference to SMART motorways, please refer to the response for ref SA.1.45.	
SA.1.47	In the 2039 forecast year without the forecast airport traffic the M1 Jn10 requires additional mitigation on the mainline to accommodate demand. Further work has been carried out to optimise the traffic signals at Junction 10 and improve the operations of the southbound on slip and the merge. This scheme would need to be recognised and funding sought to accommodate background traffic growth without the airport development or it could be seen as a limiting factor for the airport development. Paragraph 8.6.8 states that the inclusion of the enhanced M1 capacity is for 'modelling purposes only' but the modelling work is fundamental to many parts of the PEIR and the emerging transport strategy.		Host Authorities	4	Please refer to the response for Ref. SA.1.45 and SA.1.46. The assessment approach has been developed in discussion with relevant highway authorities including National Highways and including the approach to the additional capacity on the M1 mainline. The results of the modelling assessment and impact on capacity of the M1 Jn10 are included within the Transport Assessment [TR020001/APP/7.02] .	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.48	Reference in paragraph 8.6.1- is made to ongoing discussions with National Highways regarding the capacity improvements and network solutions that will enable their support of the airport expansion. This is welcomed since if this key access route and junction has capacity issues, then there will likely be greater traffic impacts elsewhere in the network due to potential wider network re-routing to access the airport, with knock-on impacts on the PEIR conclusions.		Host Authorities	4	Noted.	No
SA.1.49	There is a requirement to ensure that any mitigations provided at J10, particularly in relation to the north-facing slips, are seamlessly integrated with existing smart motorway technology. Additional technology equipment, for example cameras, may be required to ensure continued coverage, both during construction and following completion of the works.	National Highways		1	Noted. This will be considered at the detailed design stage.	No
Public/Sustainable Transport – Impact						

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.50	There is also concern that increased passenger numbers utilising Luton Airport Parkway station would put pressure on services and facilities at the station as well as the Midland Main Line itself, which could impact Central Bedfordshire residents that rely on these services. This is not exclusive to rail use and would also apply to local bus services and the Luton/Dunstable busway.		Central Bedfordshire Council	1	<p>As part of the Proposed Development the airport is planning an increase in passenger public transport usage from the current 38% to 45% as a minimum. This is considered an achievable target, but it will require improvements in public transport. Encouraging passengers to access the airport by bus and coach is an important part of this and as such a new coach station is proposed. The detailed design for the coach station will be developed at the appropriate time. Further information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p> <p>The Applicant has carried out public transport investigations which included assessing rail capacities and identifying which additional trips could access the airport by public transport. This was then applied to the modelling work to ensure a robust approach.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>There have been significant improvements to rail capacity, and others are proposed including the introduction of Luton DART to improve connectivity to Luton Parkway; the Thameslink/Great Northern timetable enhancements (to a maximum of 24tph per direction travelling through the London core section via St Pancras International); East Midlands Railway future timetable enhancements; Crossrail (Elizabeth line) and East West Rail.</p> <p>Covid-19 has impacted on the rollout of capacity enhancements but has also reduced pressure on some services as user levels remain below pre-Covid-19 levels. More details are provided in the Public Transport Strategy that forms an Appendix to the Transport Assessment [TR020001/APP/7.02].</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.51	It is not completely clear whether there is sufficient capacity to accommodate all of the public transport trips within the proposed networks for rail and bus/coach. The distributional assessment of passenger and employee demand is not clear from the information presented.		Host Authorities	4	Please refer to the response to Ref SA.1.50.	No
SA.1.52	Furthermore, despite 39% of Luton airport passengers having their origin or destination within Greater London, there is very limited consideration of how additional passengers would be accommodated on London's transport network. It is incumbent on Luton airport to show how its expansion plans would impact London's roads and railways, and what this would mean for congestion and air quality in the city.	Transport for London			Please refer to the response to Ref. SA.1.50. The ES [TR020001/APP/5.01] details the effects of the Proposed Development and will focus where there are significant increases in air and noise effects as a result in vehicular trip increases. The Transport Assessment [TR020001/APP/7.02] also demonstrates the results of traffic modelling on the highway network across a wide area, including if there are any significant effects in London.	No
SA.1.53	The effect on mode shift to rail travel from Milton Keynes is likely to be limited, given the current uncertainty of the East-West Rail (EWR) route and proposed service patterns. The		Milton Keynes Council		Noted. All existing rail provision and future changes / improvements have been considered through the development of the future mode shares that have underpinned	No

Ref	Comment	PC	LA	No PILs	Response	Change
	present line has missing links with the lack of both a Bletchley Chord which would enable direct services between Central Milton Keynes and Bedford, as well as a south-west facing chord between EWR and the Midland Mainline towards Luton Airport Parkway station.				the transport modelling approach as set out within the Transport Assessment [TR020001/APP/7.02] .	
SA.1.54	The existing service requires changes at Bletchley (if travelling from Central Milton Keynes or Wolverton), Bedford and Luton Airport Parkway stations making it an inconvenient and time-consuming option. The absence of a direct and fast connection makes travelling by this route from Milton Keynes unattractive and does not improve on the existing service frequency offered by the rail links and interchange via London Euston-St Pancras.		Milton Keynes Council		The Applicant agrees and supports the desire to see development of sustainable transport modes to improve connectivity across the region. As part of the application for development consent, the Applicant see long term improvements in bus and coach connectivity as playing a key role in growing the public transport mode share and complementing the existing rail links. How this approach has informed the development of the mode shares is set out within the Surface Access Strategy [TR020001/APP/7.12] and the Transport Assessment [TR020001/APP/7.02] .	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.55	Given that the majority of the London Luton airport Expansion work takes place within the airport complex and on land to the east of the airport, some distance from the railway, we do not anticipate that there will be significant impact on railway operations or property.	Network Rail Infrastructure Ltd.		1	Noted.	No
SA.1.56	We consider that the surface access proposals still require further development and discussion. Whilst the mode shift targets and monitoring contained in the proposed Travel Plan/GCG proposals are welcomed, the public transport measures continue to focus primarily on public transport (DART) within Luton. Other than by rail and existing public transport, it appears no additional public transport measures are proposed for east-west travel to Luton.		Host Authorities	4	The Applicant is committed to working with the local highway authority and supports measures for further improving sustainable transport within the area. The Framework Travel Plan [TR020001/APP/7.13] sets out a toolbox of measures to enable a flexible approach to adapting and responding to future challenges and uncertainties whilst achieving sustainable mode share targets. The toolbox consists of interventions and measures that can be drawn upon and scaled up or down as and when required, in response to meeting the vision and objectives of the Surface Access Strategy [TR020001/APP/7.12] and changing circumstances which will be recognised through the	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>results of ongoing monitoring and stakeholder feedback. Future Travel Plans that follow the structure and requirements set out in the Framework Travel Plan will have ambitious Targets that are over and above those set out in the GCG Framework [TR020001/APP/7.08], set in consultation with stakeholders. In order to meet these Targets a number of measures will need to be implemented, which could include improvements to local bus services. Ultimately, each one of the future Travel Plans would be subject to approval by the relevant planning authority under the process to discharge the requirements of the DCO, the decision for which would include consideration of the appropriateness of the Targets set out and the corresponding measures proposed to meet them.</p> <p>The approach to future monitoring and undertaking of surveys is set out in the Framework Travel Plan.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.57	<p>Moreover, many of the measures are reliant on third parties such as bus operators. As WSP highlight in their review, there is significant emphasis on increased public transport services but there is no detail as to what these will entail in terms of new or enhanced bus or coach services and whether the capacity will be sufficient to accommodate predicted demand if the modal shift targets are met. It is disappointing that the extent of bus and coach service enhancement is no more defined than at the first statutory consultation. There is also uncertainty as to how maximising the number of rail services calling at Luton Parkway will be achieved.</p>		Host Authorities	4	<p>Please refer to the response to Ref SA.1.56. The granting of development consent would enable the airport to grow and this in turn would increase the potential patronage for bus and coach operators. The toolbox, underpinned by the monitoring and feedback approach enables the Applicant to work with stakeholders and operators to develop measures which are effective in responding to demand. As set out in the toolbox, this can include, for example, subsidies for bus enhancements and therefore the Applicant does not agree that the measures are simply reliant on third parties when the Applicant is able to influence and support measures at the appropriate times. The applicant will work closely with rail and bus service operators through the Travel Plan, which will have measures set out to improve services in order to meet future mode share targets.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.58	We believe that LR should be more ambitious in relation to setting out how the Travel Plan is to be delivered and for providing funding for public transport improvements, particularly local bus services.		Host Authorities	4	Please refer to the response to Ref. SA.1.56.	No
SA.1.59	In achieving real shifts to public transport as well as encouraging cycling and walking, the regular reporting and enforcing of Travel Plan targets is clearly essential and the role of the Has and the proposed airport Transport Forum (ATF) needs to be developed further, including how any ATF is constituted and funded.		Host Authorities	4	Please refer to the response to Ref. SA.1.56. The Green Controlled Growth Framework [TR020001/APP/7.08] , Surface Access Strategy [TR020001/APP/7.12] and Framework Travel Plan [TR020001/APP/7.13] set out the governance structure, including the future role of the existing Airport Transport Forum (including for Local Authorities) and how it will report into the operator and Environmental Scrutiny Group to ensure that the proposed shift to sustainable modes is supported and encouraged.	No
SA.1.60	Luton Rising is keen to believe that the recent naturally occurring increase in the use of bus and coach use for accessing the airport for both employees and passengers is set to		Hertfordshire CC	1	Please refer to the response to Ref. SA.1.56.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	continue. Whilst it is stated that there is already engagement with authorities and bus and coach operators such Luton Borough Council, Central Bedfordshire Council, Hertfordshire County Council, National Express and Arriva, at this stage it is not clear how this growth will be supported. Bearing in mind the weight awarded to this area of transport it is concerning that there are not more advanced proposals available.					
SA.1.61	The ETS makes no mention of bus priority as a means of increasing road capacity (in terms of people moved per hour). The A505 Corridor Study has looked at infrastructure options to support Bus Rapid Transit (BRT) (in reality, that means express bus services) between Luton, Stevenage, Hitchin, Letchworth Garden City, Baldock, Royston. Options included new link roads (town centre bypasses) and junction capacity increases. However, the study concludes that such interventions would be unlikely		North Herts DC	1	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 with the opening of Luton DART which provides a direct link to Luton Airport Parkway Station. Growing the bus and coach mode share is an important part of the Applicant's transport strategy. A new coach station is proposed as part of the Proposed Development, and it is also proposed to expand the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>to guarantee significant advantage to bus services in the long term and would, counterproductively, induce demand to travel in private vehicles.</p>				<p>coach facilities at the existing terminal. There is an opportunity through the rearranging of the coach and bus station and changes to some routes that the proposed development could double the amount of existing coach bays. At T1, there is the potential to add up to 9 bays to the existing 18 bay provision, however this is a maximum provision and will be finalised in discussion between the airport and Coach/Bus operators. The proposed coach station at T2 would have a capacity of 16 bays. Therefore, there is the potential opportunity to provide a maximum provision of 43 bays between both terminals. The Applicant welcomes the authorities support for bus priority measures and is committed to working with stakeholders on ensuring that the potential for travel by sustainable modes is realised. Further information can be found within the Transport Assessment [TR020001/APP/7.02] and</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					Surface Access Strategy [TR020001/APP/7.12].	
SA.1.62	<p>NHC asks LR to fund researching, modelling, consulting on, trialling and implementing any measures that are deemed effective and proportionate to restraining increased demand to travel by car to/from LLA.</p> <p>Potential options to reduce congestion by reducing traffic volumes (in line with LTP4 Policy 4) include:</p> <ul style="list-style-type: none"> • reallocating lanes to bus-only use; • creating new bus lanes and bus gates; • employing smart traffic flow control; • designating some lanes as multi-occupancy vehicle lanes; • reducing road capacity where it could relieve downstream congestion; • building travel hubs; • increasing parking charges; • reducing parking availability; • emission zone charging; • congestion charging; 		North Herts DC	1	<p>The Applicant welcomes the authorities support for bus priority measures and is committed to working with stakeholders on ensuring that the potential for travel by sustainable modes is realised. Further detail regarding sustainable transport targets can be found within the Transport Assessment [TR020001/APP/7.02], Framework Travel Plan [TR020001/APP/7.13] and Surface Access Strategy [TR020001/APP/7.12].</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<ul style="list-style-type: none"> targeted subsidies for public transport; grants or interest-free loans to help people purchase cycles (in particular, e-bikes, cargo-bikes and other relatively expensive models); and personalised travel planning. 					
SA.1.63	Funding to pump-prime and support an expansion of bus services is critical to achieve the sustainable travel targets for LR, and provide benefit to residents in north-west Hertfordshire, who will be most negatively affected by the airport expansion.		North Herts DC	1	Please refer to the response to Ref. SA.1.56. Pump priming, for example identifying and subsidising new routes, in discussions with operators and the local authorities is one of the measures available at the Applicant's disposal for ensuring that sustainable mode share targets are achieved. Further information is available in the Framework Travel Plan [TR020001/APP/7.13] .	No
SA.1.64	The HertsLynx DRT has proven to be successful at gaining patronage where previously there was no or minimal scheduled service provision. Note that demand for runs to/from the airport could be high because DRT would compete on price with taxis. As long as this complements, and does not		North Herts DC	1	Please refer to the response to Ref SA.1.56 and SA1.63. The Applicant will be willing to engage with operators to ensure that sustainable public transport mode share targets are reached and limits set out within the Green Controlled Growth are not breached. This could include support towards HertsLynx if	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>undermine, the service to other destinations, this could, with effective marketing, be a revenue generator, offsetting some or all of the costs of supporting the service across the wider network. With respect to DRT, NHC asks LR to fund:</p> <ul style="list-style-type: none"> - Demand modelling to forecast the required resources (vehicles, drivers, back-office, etc), capital investment and revenue support to expand the HertsLynx service zone west to Luton. • Capital costs of the expansion of HertsLynx. • Any required revenue support for the western expansion of HertsLynx for long enough to minimise the risk of a cliff-edge reduction in services when that funding ceases. 				through monitoring it is determined that this would support increasing public transport mode shares to and from the airport.	
SA.1.65	<p>The Arriva 100 bus service between Stevenage and Luton via Hitchin does not call at Hitchin railway station. The walk between the station and Queen St stops is just over 1km. The journey time for the 100 service is unattractive, taking over an hour at peak times to travel from Stevenage bus station to LLA</p>		North Herts DC	1	<p>Please refer to the response to Ref. SA.1.56, SA.1.63 and 1.64.</p> <p>The particular schemes identified are not considered necessary to mitigate against the impact of the Proposed Development, however these could be included within future bus and coach strategy to facilitate and</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>(and another ten minutes to reach the Luton Station Interchange). Alternative routes and service patterns will be needed if bus services are to compete with driving, for airport workers and passengers. With respect to express bus services, NHC asks LR to fund:</p> <ul style="list-style-type: none"> • Traffic and route modelling to design new express bus service routes between Luton and Stevenage and Luton and Baldock, via Hitchin station and Letchworth. The latter service will cater to people travelling by train from the north and East Anglia, avoiding the delay of travelling to Stevenage to interchange, or walking 1km through central Hitchin. • Demand modelling to determine appropriate service frequencies and operating hours for express bus services. • The development of an Enhanced Partnership Agreement covering the new express bus services. • Pump-priming the new services for long enough to minimise the risk of a cliff-edge 				<p>encourage greater sustainable public transport access to the airport. Alternatively, there is a Community First Fund which the Applicant has committed to paying £1 per additional passenger throughput at the airport and this fund will consider applications for Sustainability and Decarbonisation projects in the future.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
	reduction in services when that funding ceases. • Long-term support for unprofitable service times (e.g., early morning and late night), perhaps drawing from the proposed airport road user charge.					
SA.1.66	Critical to achieving an attractive public transport alternative to driving is integrating services to provide wide coverage and comparable journey times. This cannot be achieved with traditional bus routes, which are designed to provide wide coverage at the expense of journey times. Part of the solution is to design bus services around travel hubs (also referred to as ‘mobility hubs’), where people can interchange between fast longer-distance services (rail or express bus) and first/last mile connections (walking, cycling, local and demand-responsive bus services, taxis, kiss-and-ride and, where appropriate, park-and-ride). With respect to travel hubs, NHC asks LR to fund:		North Herts DC	1	Please refer to the response to Ref SA.1.56 and SA1.65.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<ul style="list-style-type: none"> • Research to identify suitable locations for travel hubs to facilitate access by public transport to LLA. • Scoping, survey, consultation and design work for travel hubs at any locations identified as suitable. • A contribution towards the delivery of any travel hubs adopted in local authority plans, in proportion to the number of public transport trips they will facilitate along the A505/A602 corridor. 					
SA.1.67	<p>There is a concern that the cost of access and parking at LLA will stimulate demand for informal park-and-ride, where a land owner provides parking and a private shuttle bus service. This happens now at Slip End, to the south of Luton. Other sites could pop up elsewhere, including in North Hertfordshire, around the A505. Companies like JustPark broker rental of driveways and other private land close to railway stations and bus routes. This could grow to account for a significant number of trips to the airport.</p>		North Herts DC	1	<p>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 with the opening of Luton DART which provides a direct link to Luton Airport Parkway Station.</p> <p>The number of parking and drop-off spaces has been determined to meet the future demand alongside achievement of the mode share targets.</p>	No

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	<p>With respect to informal park-and-rides, NHC asks LR to:</p> <ul style="list-style-type: none"> • Monitor and work with planning authorities to manage informal park-and-rides. • Make an appropriate correction to the number of DART, bus and taxi passenger arrivals where the main travel mode was by private car. 				<p>The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] set out the monitoring and mitigation measures proposed, as well as the transport impacts in Slip End. As part of the ongoing review process, monitoring programs will be produced to assess any impacts, and work with local authorities to intervene accordingly if any issues persist as appropriate however it is noted that any expansion of off-site car parking is a matter for the relevant planning authorities.</p>	
SA.1.68	<p>NHC asks LR to propose and fund measures to mode-shift trips from car to bus for:</p> <ul style="list-style-type: none"> • Trips to/from LLA (the primary focus of the existing proposals) • Other trips in the Luton–Hitchin–Stevenage area, on the basis that mode-shifting those trips releases road capacity for new car trips that are more difficult to mode-shift. 		North Herts DC	1	Please refer to the response to Ref. SA.1.56.	No
SA.1.69	The region also lacks good public transport from East to West and vice versa, both by		Dacorum Borough Council	1	Please refer to the response to Ref. SA.1.56 and SA1.70 below which demonstrates what work	No

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	road and rail. The proposals do not appear to address this issue. The aspiration to increase travel by rail to LLA is likely to prove very challenging in any event. The existing Midland Mainline already has capacity issues and these may be further exacerbated should the proposals for a rail freight interchange South of Luton be realised.				has been done around demand, capacity assessment and demand distribution for people travelling to and from the airport by rail. This has shown that the rail network will have capacity to deal with the expected increase in passengers and increase in public transport mode share as a result of the Proposed Development, this is summarised in the Transport Assessment [TR020001/APP/7.02] .	
SA.1.70	Significant further improvements will need to be made to the availability of railway and other convenient public transport to LLA.		Dacorum Borough Council	1	The Applicant has carried out public transport investigations which included assessing rail capacities and identifying which additional trips could access the airport by public transport. This was then applied to the modelling work to ensure a robust approach. There have been significant improvements to rail capacity, and more are proposed, including the introduction of Luton DART to improve connectivity to Luton Parkway; the Thameslink/Great Northern timetable enhancements (to a maximum of 24tph per direction	No

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					<p>travelling through the London core section via St Pancras International); East Midlands Railway future timetable enhancements; Crossrail (Elizabeth line) and East West Rail.</p> <p>Covid-19 has impacted on the rollout of capacity enhancements but has also reduced pressure on some services as user levels remain below pre-Covid-19 levels.</p> <p>The Proposed Development will increase the capacity of the airport to handle bus and coach services. Therefore, it offers the opportunity for operators to develop new services improving accessibility for parts of the airport catchment area which are not currently well served by public transport.</p> <p>Discussions have taken place with public transport operators and will continue as part of the Proposed Development to ensure that sufficient emphasis is placed on public transport access to both terminals.</p> <p>Discussions with bus providers aim to increase the coverage</p>	

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					<p>and frequency of services to airport.</p> <p>Despite measures to increase the proportion of journeys to the airport by public transport, there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] aim to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods. The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken and can be found</p>	

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					<p>within the Transport Assessment [TR020001/APP/7.02], to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.</p> <p>A Green Controlled Growth Framework [TR020001/APP/7.08] will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface access – specifically, mode share. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time. One of the GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.</p>	
SA.1.71	DBC believes that the proposals fall well short of what is required by way of investment in a wider network of alternative		Dacorum Borough Council	1	Please refer to the response to Ref. SA.1.70.	No

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	sustainable transport modes if the target aspirations are to be met in reality and even then significant surface access issues arising from expansion will still exist.					
SA.1.72	Greater connectivity with the proposed HERT rapid transit network should be further explored and may assist with some of the East – West connectivity issues.		Dacorum Borough Council	1	Please refer to the response to Ref. SA.1.56. Greater connectivity and capacity being delivered through any public transport improvements including HERT will be welcomed to support the achievement of sustainable public transport mode share targets, however, the Proposed Development is not reliant upon this scheme to satisfy demand.	No
SA.1.73	In principle there are no objections with regards to the proposals and the improvements to the passenger experience, public transport and overall airport accessibility are noted.		London Borough of Barnet		Noted.	No
SA.1.74	We note the comprehensive list of public transport improvements including the DART link from Luton Airport Parkway to the terminal and improvements to Thameslink Services.		London Borough of Barnet		Noted.	No

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SA.1.75	These are all positive improvements and would alleviate pressure on the road network, including within Barnet and surrounding catchment areas in North London.		London Borough of Barnet		Noted.	No
SA.1.76	We would welcome the sharing of any data relating to capacity impacts to public transport networks (including Thameslink services and the Northern Line).		London Borough of Barnet		Noted.	No
SA.1.77	We support the opportunities to promote the use of rail to access the airport in the following ways: <ul style="list-style-type: none"> • Promotion of the DART as the first choice for accessing the airport - promoted through marketing and integrated ticketing. • Support for services running on the Midland Main Line, currently managed by two operators – East Midland Railway and Govia Thameslink Railway. Notwithstanding the improvement in services between London and LLA, BBC notes that for services to destinations north of Bedford (e.g., Leicester, Nottingham and		Bedford Borough Council	1	Noted. Greater connectivity and capacity being delivered through any public transport improvements including East West Rail will be welcomed to support the achievement of sustainable public transport mode share targets, however the Proposed Development is not reliant upon this scheme to satisfy demand. The Applicant is committed to working with public transport operators to seek to deliver improvements to the network to and from the airport.	No

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	<p>Sheffield), passengers have to change at Kettering and Leicester. An international airport served by a main line railway station has significant levels of existing and potential connectivity, and BBC would like to see support from Luton Rising for longer term improvements to the current low level northbound connectivity.</p> <ul style="list-style-type: none"> • Support for East West Rail (EWR) – although EWR is not included in the SAS mode share analysis, we are pleased to see it noted that it is considered to have some beneficial impacts on public transport accessibility including the potential for interchange at Bedford. As such, EWR as a full service between Oxford and Cambridge should continue to be supported by Luton Rising. 					
SA.1.78	<p>The Council would request further information be provided relating to the plans to improve the local public transport networks (e.g., bus networks) that can be used by residents of Central Bedfordshire from more urban settlements such as</p>		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.56. The Applicant is committed to working with public transport operators to seek to deliver improvements to the network to and from the airport, including to places such as Dunstable, Houghton Regis and	No

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	Dunstable and Houghton Regis as well as more rural areas within Central Bedfordshire, to access employment at the airport sustainably.				rural areas within Central Bedfordshire.	
SA.1.79	Whilst it is understood that the detail of new public transport provision (specifically bus and coach services) will be developed in line with demand, we feel that at this stage the proposals would benefit from some detail and a proactive plan rather than a reliance on public transport operators to react to increased demand for journeys to the airport stated in the Public Transport strategy. For example, CBC would be keen to see a firmer commitment to employee only bus services, which is currently detailed as an item to 'explore'.		Central Bedfordshire Council	1	Discussions have taken place between the airport and public transport operators, and as a result of these discussions the Applicant and operators will continue as part of the Proposed Development to ensure that sufficient emphasis is placed on public transport access to both terminals. This will include staff only services to meet shift-based demand. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No
SA.1.80	With a projected mode share of 21%, bus and coach is as critical as rail in contributing to the assumed 45% sustainable mode share, and whilst there is detail on the physical infrastructure that would enable this (e.g., additional bays) there is detail		Central Bedfordshire Council	1	The long-term nature of this project means that it is not generally possible to provide specific details on public transport improvements, other than facilities within the development itself. However, as noted, discussions have been	No

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	lacking of some examples by which the extra demand might be served- for example increasing frequencies of existing services, adding new services to cater for increased demand from particular areas or rerouting existing services to pick up passengers or staff.				held and as a result of these discussions the Applicant and operators will continue to work together on and public transport improvements. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	
SA.1.81	There is a heavy emphasis on increased public transport services, however there is no detail about what these will entail for bus/coach and whether the capacity of any proposals is sufficient to accommodate the predicted demand.		Host Authorities	4	Please refer to the response to Ref. SA.1.80. There are significant improvements proposed for coach and bus terminal facilities as part of the Proposed Development. The Applicant is committed to working with public transport operators to seek to deliver improvements to the coach network to and from the airport where needed. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No
SA.1.82	Overall approach places heavy reliance on the DART connection in 2022 which connects the airport directly with		Host Authorities	4	A train loading capacity assessment has been undertaken for stations along the line between Bedford and St	No

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	<p>the national rail network. The scope of the connection is largely limited to access from the rail network to the south.</p>				<p>Pancras. This has been based on train loading data collected in the Autumn of 2018 by Govia Thameslink Railway (GTR). The analysis shows that with the new Class 700 trains and the Thameslink 20/20 complete timetable, there would be enough capacity to cope with the demand on the line, including London Luton Airport's. In the case of Harpenden it should be noted that with the 20/20 timetable the number of trains in both the AM and PM 3-hr-peak periods would increase by 8 to 10 trains per direction. Furthermore, it should be noted that the Applicant's analysis has conservatively assumed no contribution to capacity on the line by East Midlands Rail (EMR) trains. It is expected in fact that in the future 2tph per direction will be provided by EMR; these will abstract demand for the GTR services with capacity benefits also for stations where EMR trains do not stop. It is however outside the remit or ability of this project to speculate on potential future timetable amendments as</p>	

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					a result of franchise changes. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	
SA.1.83	<p>These services are no more defined than the previous strategy, it is therefore unclear how all of the identified public transport demand is accommodated on public transport. A distributional assessment of the airport passengers and employees should identify locations where additional interventions will be required to support the growth in passenger transport for access to the airport. Linkages to the east and other areas not served by rail will be important. However, the uptake will only be acceptable if the journey times are reliable, and services are available at appropriate times of day. There is no additional provision for bus priority at junctions providing access to the airport in the mitigation drawings. The government has</p>		Host Authorities	4	<p>Please refer to the response to Ref SA.1.56 which sets out how the Proposed Development is seeking to mitigate the effects of additional public transport trips expected to be generated and the approach through future Travel Plans to monitor and improve where necessary and appropriate, public transport provision to and from the airport. This could include future improvements to routes in terms of accessibility and/or frequency. The Public Transport Strategy which forms an Appendix to the Transport Assessment [TR020001/APP/7.02] sets out the expected demand distribution of public transport trips to and from the airport made by both passengers and employees.</p>	No

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	made a firm commitment to improving public transport strategies through the 'Bus Back Better' paper and this will be important for this site.					
SA.1.84	At a macro level, it is considered that Luton Rising should explore measures to improve East-West connections to both serve the airport and support the wider Oxford-Cambridge corridor as part of its expansion proposals.		East Herts District Council	1	Discussions have taken place between the airport and public transport operators, and will continue as part of the Proposed Development to ensure that sufficient emphasis is placed on public transport access to both terminals. It is likely that additional public transport provision in the form of improved rail, bus and coach services will be provided in order to help achieve the ambitious public transport mode share targets. The Applicant and operator are committed, through the Travel Plan to ensure that access to and from the airport by public transport is maximised. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No

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SA.1.85	At a local level, surface access proposals for the airport expansion should ensure that sustainable transport links to key settlements in East Herts are provided as part of the mitigation measures submitted with the application.		East Herts District Council	1	Please refer to the response to Ref. SA.1.84, this includes a commitment to work with operators to look at development and enhancement of routes to East Herts, where necessary.	No
SA.1.86	It is worth noting that while Birmingham Airport is situated 63 miles north of Milton Keynes and has a direct, fast and affordable rail link which makes it an attractive choice for air passengers travelling from Milton Keynes public transport links to Luton Airport, which is located only 20 miles away, require significant improvements. With limited coach services and limited operating, it is challenging to access the Airport by public transport.		Milton Keynes Council		Please refer to the response to Ref. SA.1.84.	No
SA.1.87	There are plans to build a new coach station at Terminal 2 while improving existing facilities at Terminal 1. Given the proximity of the two terminals, it may be reasonable to have one good station instead. From a journey		Milton Keynes Council		The proposed layout of the airport and retention of the existing apron means it is not possible to provide a single bus/coach facility to serve both terminals, without requiring passenger transfer between the	No

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	time point of view, buses will be required to make two stops at Terminal 1 and Terminal 2 which will add an extra travel time for the inter-borough coaches stopping at Luton Airport (National Express services).				coach station and terminals. Discussions with various public transport operators also suggested that they would prefer to retain two facilities in order to enable layover and provide operational flexibility. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	
SA.1.88	As there is a proposal for DART to operate between Terminal 1 and 2 it would be sensible to invest in improving one station and use DART to deliver the last leg of the passenger journey. This will reduce congestion caused by public transport, therefore positively contributing towards environmental targets, freeing up funds to deliver one better-quality bus station, transport integration and invest in better public transport links while maximising the use of DART.		Milton Keynes Council		The proposed terminals are entirely separate, and therefore require two independent Luton DART stations. However, both terminals would be served from the same Luton DART 'service' which connects to Luton Airport Parkway Station. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No
SA.1.89	Consideration should be given to improving sustainable travel		Milton Keynes Council		Please refer to the response to Ref. SA.1.84.	No

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	options, including improving regional coach links for staff.					
SA.1.90	Service 99 requires more frequent services, longer and more operating times (to suit shift workers and early and late flights), better advanced booking system and safe modern coaches. Additionally, Arriva services F70 and F77 require improvements.		Milton Keynes Council		Please refer to the response to Ref. SA.1.80.	No
SA.1.91	Luton Busway provides an excellent link to Luton airport for local travellers. The document does not acknowledge it and it has been noted that there are no proposals to improve, enhance and extend this link to Terminal 2 as part of the proposal.		Milton Keynes Council		As noted, Luton Busway is a valuable service which connects to the airport. Any potential extension of the route to Terminal 2 would be investigated as part of the ongoing discussions with bus operators which will continue through the delivery of the Travel Plan and its regular update and during the monitoring programme for the Green Controlled Growth Framework [TR020001/APP/7.08] .	No
SA.1.92	The existing Midlands Mainline already has capacity and congestion issues and therefore, in addition to the proposals to extend the Luton DART, further		St Albans City and District Council		Please refer to the response to Ref. SA.1.82. The Applicant has produced a number of supporting documents including the Surface Access Strategy	No

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	mitigation measures will be needed on the existing railway, and other public transport infrastructure, to ensure that the predicted increase in public transport trips up to 45% can realistically be achieved. This Council seeks assurances that these measures can be achieved and will be effectively tied to stages of the proposed development. The Planning Inspectorate will be asked to robustly assess the data submitted within the DCO application and independently review the stated projections and assumptions to ensure that they are appropriate, sound and reliable.				[TR020001/APP/7.12] and the Framework Travel Plan [TR020001/APP/7.13] that set out how the Proposed Development will seek to meet the mode share limits and targets. The Green Controlled Growth Framework [TR020001/APP/7.09] sets out the framework that establishes Limits that must not be breached in order for the Proposed Development to airport to expand, which includes the limit that no more than 55% of passenger journeys to the airport should be by non-sustainable modes.	
SA.1.93	The expansion plans say that 45% of passengers will use public transport. Even if this is true, that still leaves more than half the airport's passengers travelling by road. In any case, whilst North and South rail routes are available, these are not an option for those travelling to the airport from the East and West.	Kings Walden Parish Council		1	Please also refer to the response to Refs. SA.1.56 and SA.1.84. The public transport modal shift targets set are felt to be ambitious yet achievable. Despite the public transport targets there will be additional journeys made by car due to the growth targets which have been set. Additional information regarding the sustainable	No

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					transport targets can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	
SA.1.94	The traffic distribution diagram on p.88 of the Brochure highlights the fact that by far the largest proportion of road traffic to the airport is via the M1 from the south, with the next largest being described as “M1 North”. This both reinforces the validity of improving the attraction of rail access (which is also north-south traffic) and highlights the extraordinarily poor opportunities for east-west travel, which is common in the Chilterns.	Chilterns Conservation Board			Please refer to the response to Ref. SA.1.84. It is acknowledged that there are stronger north-south links in terms of both highway and public transport infrastructure to and from the airport. The Applicant is committed to working with public transport operators through the delivery of the Framework Travel Plan [TR020001/APP/7.13] to improve east-west connectivity.	No
SA.1.95	Unfortunately, the diagram [on p.88 of the SAETS] is not helpful with regard to east-west traffic because, while it shows that 9% of road traffic comes from the east via the A505, the amount of traffic coming from the west is entirely obscured within the “M1 North” data. In addition, the percentages given do not reveal the actual volume of traffic. This	Chilterns Conservation Board			The query references a figure on Page 88 within the SAETS, which was included as part of the consultation material during the 2022 statutory consultation, however it is unclear which figure is referred to. Notwithstanding this, the majority of the traffic is based on forecasts of passengers accessing the airport via the M1	No

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	<p>is of importance to the CCB because (a) the A505 forms the southern boundary of part of the existing designated AONB (and traffic on this road is of concern as a result of air quality, groundwater pollution, etc.), and (b) traffic from the west may be drawn through the Chilterns AONB itself, mostly on 'B'classified roads. Increases in traffic on these roads could have significant and disproportionate impacts. This is of concern because the main centres of population in that direction (e.g. Aylesbury and High Wycombe) do not benefit from practicable rail routes to connect with Luton airport, meaning that improved public transport access would need to rely on bus or coach services: these would need to be directed onto major routes (e.g. A418/A505/M1 or M40/M25/M1).</p>				<p>J10. The Surface Access Strategy [TR020001/APP/7.12] aims to mitigate the impact of these airport journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods. The modelling work has identified the locations where highway mitigations are required in response to the Proposed Development. More detail relating to the proposed highway mitigation designs, including type of mitigation and land required, can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12]. This has demonstrated that there are no significant impacts on the road network within the Chilterns AONB that require highway mitigation as a result of potential additional vehicular traffic flows generated by the Proposed Development.</p>	

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					<p>Whilst the modelling has been undertaken to inform the proposed mitigation there is a commitment to on-going monitoring of surface access impacts. Should this identify that additional mitigation is required as a result of the effects of the Proposed Development in centres of Population such as Aylesbury and High Wycombe, then this would be discussed at the appropriate time.</p>	
SA.1.96	<p>It is noted that there are uncertainties concerning the COVID-19 pandemic and whether Public Transport (PT) usage will return to its pre-COVID-19 scenario. National Highways would like to see PT sensitivity modelling to take the anticipated post COVID-19 public transport mode shares and provide evidence that it will not result in the PT mode share being lower than currently anticipated. A strong travel plan will be required in order to ensure that mode share targets are achieved in a post COVID-19 scenario. Furthermore, there are uncertainties concerning rail</p>	National Highways		1	<p>Please refer to the response to Ref. SA.1.50 and SA.1.70. The application is supported by a robust Framework Travel Plan [TR020001/APP/7.13] and a Green Controlled Growth Framework [TR020001/APP/7.08] that will seek to monitor public transport mode share and will control growth of mode share limits are breached.</p>	No

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	timetables and whether these will revert to pre-COVID-19 frequencies. National Highways believes that the 45% public transport mode share is a reasonable assumption. However. Some evidence/confirmation of this will be required in order to provide assurance that the assumed PT mode shares are achievable.					
SA.1.97	We understand that the DART service connection from Luton Airport Parkway on the London Midland Line will come into operation later this year to replace the existing shuttle bus service. However, this will still require an interchange at the Parkway station in the absence of a direct rail service to LLA.		Dacorum Borough Council	1	Interchange between Luton DART and the rail lines takes place within the station itself, with high quality, inclusive facilities to enable a seamless transfer. Additional detail on this can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No
SA.1.98	Through the DART link, the airport will be directly connected to the national rail network for the first time. We share the view that this will make it easier and quicker to access the airport by public transport and provide a solid foundation for increasing the number of passengers and		London Borough of Barnet		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	employees who travel to the airport by non-car modes.					
SA.1.99	Mentions opportunities for maximising the number of services calling at the station (Luton Parkway) but doesn't elaborate on how this could be achieved, integrating ticketing / contactless and joint marketing for rail-based travel will be important for seamless journeys. There needs to be further information on the rail service capacity vs demand for all services calling at Luton, to identify those that may already be close to capacity and could be impacted by the additional demand, this will be important to ensure the mode remains attractive and reliable to achieve the mode share targets.		Host Authorities	4	Please refer to the response to Ref. SA.1.82. The importance of integrating ticketing/contactless and joint marketing for rail-based travel is noted, and all are being developed for the launch of Luton DART services.	No
SA.1.100	[Milton Keynes Council] welcome the extension of DART to the proposed Terminal 2 as it provides seamless access to the Terminal for those travelling by train.		Milton Keynes Council		Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.101	<p>There appears to be no mention in ETS or PEIR2-18 of any park-and-rides or mobility hubs, at Butterfield Business Park or anywhere else. This appears to be a significant disconnect between the LR Transport Strategy and the Luton Local Plan. In any case, the creation of a park-and-ride car park will not necessarily reduce carbon emissions. Analysis of existing and planned park-and-rides elsewhere shows that they increase carbon emissions, concentrate traffic on approach roads to the park-and-ride, and undermine local bus services by abstracting passengers to park-and-ride services.</p> <p>NHC ask LR to:</p> <ul style="list-style-type: none"> • Provide clarity on whether LR has considered park-and-ride to be part of the future transport solution for the airport. • Model the demand for use of a park-and-ride at Butterfield Park (with whatever capacity LBC envisages) and impacts on traffic using the A505. 		North Herts DC	1	<p>The Proposed Development is only able to take into account consented schemes as part of the modelling of future plans. However, any subsequent provision of Park & Ride has the potential to be beneficial for the airport, and as such the Applicant would seek to work together with operators should proposals move forward.</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
Public/Sustainable Transport – Targets						
SA.1.102	It is noted that at the present time the Draft GCG document does not include a proposed target for sustainable travel mode share for staff but indicates that this will be somewhere in the range between 23% to 31% in Phase 1. This reflects the proportions using sustainable transport options in 2016 and 2018 respectively. We consider that LR should show greater ambition, with a goal of ensuring that modal shift to non-car modes allows the number of staff working at the airport to increase as forecast whilst resulting in no net increase in traffic generation, taking into account changes in background traffic levels. We would welcome further discussions on this target.		Host Authorities	4	The GCG Framework [TR020001/APP/7.08] sets out mode share Limits for staff and passengers. The Surface Access Strategy [TR020001/APP/7.12] and the Framework Travel Plan [TR020001/APP/7.13] set out the approach for setting targets, which will be further reaching than the GCG Limits for mode share. Future Travel Plans will set targets for passenger and staff mode share. The Surface Access Strategy [TR020001/APP/7.12] and Framework Travel Plan [TR020001/APP/7.13] are focused on ensuring that the targets are ambitious and aim to directly influence the increase in sustainable surface access modes to and from the airport in the longer term. Therefore, it is proposed that the newly set targets are more ambitious towards sustainable behaviours compared to those achieved in a preceding Travel Plan cycle and	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>the GCG Limits. The level of ambition when setting the percentage change for targets will be informed by (where applicable):</p> <ul style="list-style-type: none"> a. Striving to go beyond the Limits for passenger and staff mode share. b. Responding to modelling forecasts in the Transport Assessment [TR020001/APP/7.02]. c. Due regard for recent five-year CAA / staff surveys and trends over the duration of the previous Airport Surface Access Strategy/Travel Plan. d. A lookahead to delivery of transport infrastructure delivery in the next five year period. e. Engagement with the Airport Transport Forum and other bodies involved in the 	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>governance of the Travel Plans.</p> <p>The airport operator will also set targets for other surface access-related indicators. The diversification of targets will allow for the collection, analysis and ongoing review of more granular data and an improved understanding of how interventions and measures are performing.</p> <p>As shown previously, baseline data for passenger and staff travel has been subject to considerable variation over recent survey years. Therefore, targets will be set with regard to the latest CAA air passenger travel data and once the first staff survey has been completed post approval of the DCO.</p> <p>The Applicant is committed to working with the local highway authorities and supporting measures for further improving sustainable transport within the area.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.103	With regard to surface access, greater clarity is sought in relation to the baseline for passengers travelling by public transport, data sources, and greater ambition for the mode shift target for employees. In order to determine whether a greater modal shift could occur, there are recommendations for feasibility studies such as: bus priority; public transport subsidy; and park and ride, whilst also funding measures that improve public transport journey times, deliver the Council's Local Cycling and Walking Infrastructure Plan and incentivises car sharing for employees.		Luton Borough Council	1	Please refer to the response to Ref. SA.1.102. A comprehensive toolkit of potential measures is set out within the Framework Travel Plan [TR020001/APP/7.13] that would provide the Applicant with tools to ensure that mode shift targets are met, which could include bus priority, public transport subsidies, park and ride, supporting the delivery of the LCWIP and incentivising car sharing for staff.	No
SA.1.104	The existing public transport links to LLA are recognised in the proposals as being inadequate. Of the airports in the London region LLA has the lowest level of public transport use (some 25% of journeys). We welcome the recognition of this inadequacy and the wish to address it, but we do not feel the proposals go far enough to delivering this. We consider that		Dacorum Borough Council	1	Please refer to the response to Ref. SA.1.2.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	there are significant challenges which need to be addressed to achieve that stated modal shift.					
SA.1.105	DBC considers that a much more ambitious target and investment for reduction of road traffic is required.		Dacorum Borough Council	1	<p>As part of the Proposed Development the airport is planning an increase in passenger public transport usage from the current (pre-pandemic) 38% to 45% as a minimum. This has been based on a comparative analysis of other UK airports and it is considered the targets for the Proposed Development are an achievable yet realistic, but will require improvements in public transport, and discussions with operators have been held, and will continue to be held. Please also refer to response to Ref. SA.1.56.</p> <p>Further information on how the target has been set and will be achieved can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
SA.1.106	Whilst the proposal seeks to provide infrastructure to support sustainable transport modes, and this is welcomed, there is concern that the anticipated 45% sustainable transport modal shift may not be fulfilled. There are numerous external factors that underpin the scope to fulfil this such as reliance on third parties i.e. bus and rail operators to provide increased capacity to meet demand.		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.105.	No
SA.1.107	The Council would also seek reassurance that the predicted modal shift is also for people working at the airport, some of whom are likely to be on lower salaries and will be working early and/or late shifts. Reliable and safe public transport to and from a place of work can have benefits in a person's health and well-being.		Central Bedfordshire Council	1	The Surface Access documentation, including the Surface Access Strategy [TR020001/APP/7.12] , the Framework Travel Plan [TR020001/APP/7.13] and the Green Controlled Growth Framework [TR020001/APP/7.08] sets out separate mode share targets for staff and passengers.	No
SA.1.108	The modelling work undertaken is underpinned by assumptions related to the public transport mode share proposed by the applicant team. At present the submitted information does not fully substantiate how this mode		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.70. The Applicant is committed to working with Local Authorities and public transport operators to deliver the Travel Plan and the public transport mode share targets contained	No

Ref	Comment	PC	LA	No PILs	Response	Change
	share will be achieved and appears to be based upon the assumption that the increase in demand, outside of DART, will be met by commercial operators, including providing additional capacity on services. Further clarity on how such services would be secured and promoted, including funding support, would be required. CBC would welcome further discussions with the applicant team on this matter, and in particular with regards to strengthening East-West connectivity by public transport.				within it. Ongoing discussions will be facilitated through the governance process associated with the Travel Plan Forum and Airport Transport Forum. More details are included within the Surface Access Strategy [TR020001/APP/7.12] and Framework Travel Plan [TR020001/APP/7.13] .	

SA.1.109	Table 2-1 Progress with Action Plan for the existing ASAS, shows good progress with targets at a % level, however it is presumed that the 2022 is for the year 2021? And that the total air passenger trips that took place during this time being significantly less compared with pre-pandemic (2019) data, so the sample size will be lower and perhaps not indicative of the full picture post Covid-19. It will		Host Authorities	4	The existing airport Surface Access Strategy (Ref. 1) covered the period from 2018 to 2022. The figure given for 2022 was the target for 2022 rather than the actual level that was achieved. Ongoing monitoring and CAA data review will provide a fuller understanding of the impacts of Covid-19.	No
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	be interesting to see what mode shares the recovery during 2022 shows in terms of public transport.					
SA.1.110	The linkage is with the surface access Co2e emissions monitoring, also mentioned in 2.7.7 as referencing the proposed mode share limits for air passengers and employees. There should be an opportunity to review the future minimum targets if they are exceeded in the early years to ensure there is still a target for continual improvement regarding reducing impacts of private vehicle usage. Having the same target of 45% at 27mppa and 32 mppa implies that there could be a greater impact on the highway network with the further expansion if the 45% target is achieved in the former year. 2.5.5 recognises that absolute growth in public transport continues but not that growth in car traffic would also increase significantly between the years. The targets should therefore perhaps be more ambitious in the final phase.		Host Authorities	4	Noted. The 45% is the minimum acceptable amount of public transport use to be achieved by the time passenger throughput reaches 27mppa, based on the Limit of 55% non-sustainable passenger mode share set out in the GCG Framework. This has been set as a Limit through GCG to align with the modelling assumptions used in the Transport Assessment [TR020001/APP/7.02] . Notwithstanding this, the public transport work has shown that there is potential to grow passenger modal share beyond 45%. The Framework Travel Plan [TR020001/APP/7.13] sets out the approach and structure for future TPs, to establish more ambitious Targets for future years.	No
SA.1.111	7.6.2 recognises that further increases in mode share beyond 45% are limited without		Host Authorities	4	Please refer to the response to Ref. SA.1.110.	No

	impacting other rail users and until more capacity becomes available. Surely providing this additional capacity should form part of the airport proposals or be able to be captured at this time. At the moment the suggestion is that the public transport capacity and mode share is capped at 45% which is forecast to be achieved in 2039. As above this implies the relative increase in absolute car traffic could be significant beyond 2039.					
SA.1.112	Mode shift targets are only applied to new staff over and above the existing employees, unclear how this can be measured and monitored, any additional measures provided through the travel plan will also clearly benefit existing employees.		Host Authorities	4	The approach to monitoring is set out the in the Framework Travel Plan [TR020001/APP/7.13] . The operator and the CAA already undertake monitoring and it is proposed to build upon this existing approach. The Framework Travel Plan explicitly sets out what surveys are planned in order to monitor staff and passenger travel and will also include measures that are likely to benefit existing staff as well as those new staff that are required to support the Proposed Development.	No
SA.1.113	Targets for increasing the proportion of journeys made by passengers and workers set in the Consultation brochure are unambitious and should be revised in line with national,		Milton Keynes Council		Please refer to the response to Ref. SA.1.105.	No

	regional and local transport and decarbonisation policies.					
SA.1.114	It is proposed to increase modal share of people travelling by bus/coach from 16.86% (18mppa) to 18.20% (32 mppa); rail from 20.72% to 26.80%; and walking and cycling 0.17% to 0.20%; while taxi travel should decrease from 17.94% to 15.50%. It is unclear how these targets have been developed and what are the timeframes for delivering these numbers.		Milton Keynes Council		Please refer to the response to Ref. SA.1.50. The future mode split scenarios have been developed by applying a series of assumptions that have considered the impacts of changes in the transport network (e.g. Luton DART, Crossrail) and changes in travel generalised costs (e.g. through increased congestion, or changes in parking charges). The changes attributable to each individual demand driver were found to be relatively modest. However, in combination these factors are anticipated to have a significant impact on mode share. The expected impacts from the implementation of the Thameslink 20/20 timetable in conjunction with the opening of the Luton DART and the benefits of the provision of much improved bus/coach facilities when the new terminal is opened support the future mode share limits and targets.	No
SA.1.115	These are extremely unambitious targets given the national strategy to decarbonise transport by 2040. With car travel proportion proposed to decrease by less than 3%, these estimations are based on a		Milton Keynes Council		Please refer to the response to Ref. SA.1.105.	No

	<p>“business as usual” scenario almost ignoring the massive growth in passenger numbers and these targets do not acknowledge, despite the car travel modal share decrease, the increase in overall car journeys and therefore negative impact on environment and congestion within Bedfordshire, Buckinghamshire and other areas. Compared to private cars, taxis, especially if zero emission, are more sustainable. Milton Keynes council recommends that these targets are revised in line with the relevant transport policy documents.</p>				
SA.1.116	<p>Main concerns remain around transport and potential impact on traffic levels and congestion. It is therefore advised to review the public transport modal shift targets and to come up with a more robust Transport Strategy to deliver these targets as part of the local, regional and national strategies.</p>		Milton Keynes Council		<p>Please refer to the response to Ref. SA.1.2.</p> <p>No</p>
SA.1.117	<p>The predicted increase in the use of public transport (from 23% to 45%) is, of course, welcomed but that increase will depend upon significant improvements being made to the</p>		St Albans City and District Council		<p>Please refer to the response to Ref. SA.1.105.</p> <p>No</p>

	availability of appropriate and convenient public transport access to the airport.				
SA.1.118	Delivering sustainable mode shift in airport surface access is also an essential part of decarbonisation as well as in reducing air pollution. The lack of ambition shown by Luton airport in this regard is deeply disappointing, with a public transport mode share target of just 45% by 2039 – a tiny increase compared to the 43.5% mode share in 2019, according to Civil Aviation Authority (CAA) data. I am especially surprised that you have assumed a mode share target in 2027 of 40%, effectively below pre-pandemic levels. This is all despite the transformational rail improvements in the coming months, including opening of the DART light rail link from the airport to the nearby railway station and the onward connectivity to be offered by the new Elizabeth line, via interchange at Farringdon. The forecast 39% increase in vehicle trips is completely incompatible with sustainable mode shift, as	Transport for London		<p>Please refer to the response to Ref. SA.1.105.</p> <p>The modelling mode shift reflects the worst case, in order to assess the impacts on the highway network. The 45% public transport mode share quoted is a limit, rather than a target. Since the Consultation this has been reviewed and the Green Controlled Growth Framework [TR020001/APP/7.08] now aims to limit the unsustainable mode share. The Surface Access Strategy [TR020001/APP/7.12] and Framework Travel Plan [TR020001/APP/7.13] set out the approach that will be undertaken in order to establish sustainable modal share targets, that will be more ambitious than the unsustainable mode share limits set out at the time of the Statutory Consultation. The Transport Assessment [TR020001/APP/7.02] sets out the rationale and methodology that underpins the selection of mode share assumptions for transport modelling, limits and targets. It aims to balance the ambition to encourage and promote sustainable travel with the uncertainty of future travel behaviour to</p>	No

	is your proposal to increase passenger car parking by 62%.				and from airports, and seeks to robustly assess the potential impacts of vehicular movements associated with the Proposed Development.	
SA.1.119	Your 'Green Controlled Growth' targets for surface access-related carbon and air quality appear to take such growth in vehicle trips as a given rather than seeking to reflect the need to contribute to net zero carbon and tackling illegal levels of air pollution. As a minimum, there should be no increase in vehicle trips.	Transport for London			Please refer to the response to Ref. SA.1.93 an SA 1.118.	No
SA.1.120	Sustainable mode share. The public transport targets are inadequate and in the first phase actually constitutes a decrease in sustainable mode share compared to pre-pandemic levels, from 43.5 per cent in 2019 to just 40 per cent in 2027. This increases marginally, to just 45 per cent, by 2039. This is wholly unacceptable. If Luton airport is committed to supporting London and UK targets for securing net zero carbon emissions, it needs to demonstrate how the scheme can be delivered, at a minimum, without any increase in highway trips over base (2019 pre-	Transport for London			Supporting sustainable travel is a key requirement in helping to manage surface access impacts. The surface access mode share targets have been set based on the historical levels that the airport has achieved and also based on bench marking against other airports and should therefore been seen as challenging but also achievable. Whilst it is acknowledged that there are external factors that can influence the take up of sustainable modes, it is also important for the Applicant and the Operator to be able to demonstrate that reasonable measures within their control are being taken. Monitoring will be important and the Framework Travel Plan	No

	<p>pandemic) levels. This should be reflected in a mode share target that would not result in any further growth in highway trips. It is of deep concern that vehicle trips are forecast to increase by 1,200 in the AM peak with the scheme in 2043, a 39% uplift compared with the 18mppa do-minimum. Moreover, the provision of an extra 6,100 passenger car parking spaces (up from 9,900 to 16,000) – a 62% increase, appears to be wholly at odds with any aspiration to increase the airport’s sustainable transport mode share.</p> <p>It is also not credible to assume so little sustainable mode shift given the transformation in rail connectivity that the airport is experiencing, starting this year. The opening of the DART will soon finally end Luton’s status as the last London airport without a direct rail connection. This will greatly improve access (and perceptions of access) from central London and along the Thameslink corridor. Meanwhile the Elizabeth Line, also opening this year, will create a wide range of convenient onward</p>			<p>[TR020001/APP/7.13] and Surface Access Strategy [TR020001/APP/7.12] proposes the establishment of a forum, such as the Airport Transport Forum, to ensure that Local Authorities are part of the on-going process and aware of issues beyond the control of the operator.</p> <p>The modelling mode shift reflects the worst case, to assess the impacts on the highway network. The 45% is a limit, rather than a target. The Surface Access Strategy sets out targets that provide additional ambition on top of the limits.</p>	
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	<p>connections via Farringdon, improving access to the airport from across London and the south east.</p> <p>On this basis, the proposed 2043 passenger rail mode share of 27% – compared to 21% in 2019 – is extremely unambitious. Indeed, this would be lower than the passenger rail mode share achieved by each of the other five London airports in 2019, and should be revised accordingly to truly reflect the airport’s future rail connectivity. Bus and coach will also have a part to play in driving mode shift from locations away from the rail corridor and look forward to hearing about the concrete steps that Luton airport will take to strengthen existing and develop new services, beyond any enhancements of bus and coach facilities on site.</p> <p>Recognising the density of the airport’s London catchment – and the planned rail improvements which will disproportionately benefit access to London – we recommend supplementing the general sustainable mode share targets with the development and</p>					
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	<p>adoption of mode share targets which are specific to trips to/from London.</p> <p>One question that arises is on exactly what basis the 40 and 45% sustainable mode share targets have been derived. “Technical evidence” is cited but not provided. Luton Airport needs to clearly set this out and how the targets align with its proposals for Green Controlled Growth.</p> <p>In determining future mode share targets for staff trips, Luton Airport should likewise take account of surface access improvements delivered since 2018, when the airport achieved a sustainable mode share of 31% for staff. The Luton DART as well as potential bus, cycling and walking enhancements to be fleshed out as part of airport expansion should increase the attractiveness for staff of public transport and active travel.</p> <p>Previously observed usage of sustainable modes by staff should form the starting point for future targets, rather than an upper limit.</p>					
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<p>SA.1.121</p>	<p>Interventions. We believe that Luton Airport’s growth aspirations are missing the adequate package of measures required to secure sufficient sustainable mode shift. The proposal to extend the DART to the new Terminal 2 will maintain the airport’s new rail connectivity as it expands. Beyond this however, the focus of proposed measures is to expand the airport’s highway network and increase car parking provision, both of which will only serve to promote use of private vehicles to the airport. This is entirely counterproductive if seeking to drive sustainable mode shift. The tentative proposal for introduction of road user charging is welcomed. One of the most important aspects of mode choice is the differential cost in travelling to the airport by car compared to that by public transport. Road user charging would increase the cost differential between the two, facilitating a shift from car/taxi to public transport. Aligning road user charging with other measures to promote</p>	<p>Transport for London</p>		<p>The airport operator already has powers to implement car parking and access charges, and as such it is not necessary to seek further powers through the application for development consent. The approach to managing the potential surface access impacts of the Proposed Development do not assume the use of additional road user charging.</p>	<p>No</p>
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	sustainable transport would maximise its effectiveness in stimulating mode shift. Indeed, hypothecation of road user charging should be used to fund sustainable surface access improvements. However, limited information has been provided as to how a road user charging scheme would operate, alongside existing car parking and forecourt charges, nor have the impacts been modelled.					
SA.1.122	An adequate assessment of rail flows, and based on acceptable public transport mode share, will help identify public transport interventions required, for example at key Thameslink interchanges. A particular focus should be made on trips from inner and outer London locations without easy access to the Thameslink corridor. Most such trips are currently likely to be made by car/taxi but consideration should be given to more sustainable alternatives, such as by bus/coach to a Thameslink station or, indeed, direct to the airport.	Transport for London			Please refer to the response to Ref. SA.1.82. The Transport Assessment [TR020001/APP/7.02] and incorporated public transport strategy sets out the methodology for determining public transport mode shares, an assessment of impact on Thameslink services and seeks to understand the demand distribution from different spatial areas of future passengers.	No
SA.1.123	In developing a coherent strategy for managing road access, targets also should be	Transport for London			Noted. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy	No

	<p>set for passenger and staff trips by zero-emission vehicles. There should also be greatly increased provision of rapid electric charging points in existing car parks for staff, passengers and taxis.</p>				<p>[TR020001/APP/7.12] submitted as part of this application for development consent includes extensive provision to support the move towards lower emissions vehicles.</p>	
SA.1.124	<p>The method for efficient use of taxi and private hire trips needs further detailing. Significant 3rd party buy-in, possibly from small/lone operators, will they be able to keep up with the clean/efficient ambition? Incentives will be needed. How can fleet composition be influenced? Even if local taxis electrify quickly, hire could be from a long way outside Luton. For achieving more efficient two-way trips, may need a taxi-passenger matching system and sufficient and organised waiting will be needed.</p>		Host Authorities	4	<p>Ongoing work and collaboration will be required with local operators in a proactive manner to deliver the aims of the Framework Travel Plan [TR020001/APP/7.13], the Green Controlled Growth Framework [TR020001/APP/7.08] and meet the mode share targets, in conjunction with monitoring of mode share patterns. The Applicant welcomes the transition of taxis to electric vehicles; however it has limited ability to influence the types of vehicles used. Through the delivery of Travel Plan measures there will be a need to engage with taxi and private hire operators, with surface access restrictions at the disposal of the operators to encourage a shift towards electric vehicles.</p>	No
SA.1.125	<p>Cars parked for long stay but will need charging. They won't always need to occupy a charger, details of management/logistics for EV need developing.</p>		Host Authorities	4	<p>The number and type of EV charging points within the car parks is subject to ongoing discussion. Clearly, with developing technologies there are likely to be changes in how vehicles are charged and how often they are required to be charged, however it is noted that the provision of charging</p>	No

					points at all parking spaces is likely to be unnecessary.	
Active Travel						
SA.1.126	North Herts' LCWIP focuses on the towns and one inter-urban route, between Stevenage and Hitchin. Luton's LCWIP will necessarily end at the borough border. As a result, there is little in the way of evidence or policy to support investment in cycling and walking infrastructure in north-west Hertfordshire.		North Herts DC	1	Whilst the Applicant is dedicated to meeting the mode share targets specified within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] , the number of employees who would cycle to the airport from Stevenage or Hitchin are anticipated to be low. As such the cost of providing such a route – including third party land requirements – would likely be prohibitive in comparison to the net benefit to the airport and its employees. However, improvements are proposed to cycle connectivity to the immediate east of the airport, increasing connectivity to Breachwood Green and linking with existing routes.	No
SA.1.127	If there were safe and attractive cycling infrastructure available to residents of villages between Luton and Stevenage and Hitchin, it would remove some vehicles from the A505 and A602 that are making local trips. This would free up capacity for longer-distance trips, which are the vast majority of those to LLA.		North Herts DC	1	The Proposed Development includes improvements to cycle connectivity between the airport and villages such as Breachwood Green, via the replacement parkland, details of which will be included in the Transport Assessment [TR020001/APP/7.02] . However, the constrained nature of the existing roads outside of these areas means it is difficult to provide dedicated	No

					infrastructure on the narrower country lanes.	
SA.1.128	<p>If there were cycling highways between Luton and Hitchin, and between Luton and Stevenage, these would:</p> <ul style="list-style-type: none"> • Support a small volume of inter-urban cycle trips (the 8-mile distance is manageable on an e-bike). • Enable residents of villages between Luton, Hitchin and Stevenage to cycle into their nearest town. • Enable those residents to cycle between villages to access local amenities and make social visits. • Enable residents of the towns to access the villages and countryside. This would bring money into rural pubs, tea rooms, B&Bs, farm shops, etc. There would be a large net benefit to the rural area most affected by the airport expansion. 		North Herts DC	1	Please refer to the response to Ref. SA.1.126.	No
SA.1.129	<p>NHC asks LR to fund:</p> <ul style="list-style-type: none"> - Scoping, survey, consultation and design work to develop plans for two cycling highways, one between Luton and Hitchin, and one between Luton and Stevenage. 		North Herts DC	1	Please refer to the response to Ref. SA.1.126. Through the delivery of the Framework Travel Plan [TR020001/APP/7.13] ambitions and measures to meet the targets contained within it, the Applicant will seek to support the delivery of new	No

	- A contribution towards delivery of any cycling highways adopted in local authority plans, in proportion to the number of trips they will remove from the A505 and A602.				walking and cycling infrastructure and schemes that will benefit staff travel to and from the airport.	
SA.1.130	<p>Acceptable that this will focus on employees. It is notable that the access junction improvements do not provide additional infrastructure for pedestrians and cyclists. There should be a requirement for any improvements to be compliant with LTN 1/20 guidance and safe access at appropriate routes provided for. Existing local cycle network seem to lack continuity, could improvements be made for employees?</p> <p>Doesn't feel like cycling and walking for employees is fully supported through the development proposals. Enhancements to existing route networks could be beneficial in providing an alternative mode of travel over driving from the localised area. E-bikes and scooters and other emerging micro- -bikes could enhance the opportunity and catchment for cycling by employees, but only if the infrastructure provides</p>		Host Authorities	4	<p>The majority of mitigation schemes proposed comprise conversion of junctions to signalised control, which inherently allow improvements to pedestrian/cycle crossings. The Applicant is willing to work with local authorities in assessing the requirement for cycle facilities which may help to achieve the airport's modal shift targets. Through the delivery of the Framework Travel Plan [TR020001/APP/7.13] ambitions and measures to meet the targets contained within it, the Applicant will seek to support the delivery of new walking and cycling infrastructure and schemes that will benefit staff travel to and from the airport.</p>	No

	acceptable and well-designed connections from the airport.					
SA.1.131	In 9.3.6 it is implied that new jobs / employees are sourced locally through the assumptions that additional employees who gain jobs through the expansion of the airport would have a higher use of public transport (40% by 2043) and commuting by walking and cycling (increasing to 14% by 2043). Is this realistic based on the current employee catchment? And also based on the fact that there are very few measures proposed to promote and encourage access to the airport for walking and cycling?		Host Authorities	4	The modal split forecasts used in developing the future year surface access forecasts assume that the rate of transfer from car use to adoption of more sustainable modes would continue over the forecasting period (as has been the general trend at the airport). The Applicant believes that as the airport grows and the opportunity exists to further influence mode share through the package of measures that have been set out in the Framework Travel Plan [TR020001/APP/7.13] , which are submitted as part of this application for development consent.	No
Car Parks						
SA.1.132	The CCB is concerned that the proposed phasing focuses on the works to the airport itself and the provision of new car parking. The latter clearly contradicts the objective to shift traffic from private vehicles to more sustainable modes. We consider that the phasing of construction	Chilterns Conservation Board			Additional parking is required despite the modal shift targets, in order to meet the resultant demand but also to accommodate existing parking which is displaced by the proposals. The type and location of the parking areas have been subject to a detailed decision-making process, which has informed the proposals as they currently stand.	No

	needs to be dependent on the provision of capacity on public transport to meet sustainable travel objectives being in place to support the intended passenger numbers before those passenger numbers can be achieved through the development. This should apply for all phases of the development.				Reasons behind using surface level parking include operational requirements and environmental considerations, however multi-storey parking is used where required. Further information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	
SA.1.133	An additional 7,750 car parking spaces are proposed. This would result in greater car usage, road congestion and greater GHG emissions.		Dacorum Borough Council	1	Please refer to the response to Ref. SA.1.132.	No
SA.1.134	Parking is a concern as inappropriate and inconsiderate parking in residential roads in Central Bedfordshire is already an issue, most notably within the settlements of Caddington and Slip End, where there have been frequent examples of airport passengers parking on residential roads for significant lengths of time, having taken a taxi to the airport. Mitigation in the form of parking controls would therefore be necessary as part of any future expansion proposals.		Central Bedfordshire Council	1	The Applicant is willing to enter discussions with local authorities with regard to the potential for providing assistance with supporting the delivery of parking management schemes in their local residential areas where there is a clear demonstration that there are problems related to inappropriate airport related parking. However, it should be noted that it is entirely within the gift of neighbouring local authorities to put planning policies in place as appropriate to ensure that inappropriate parking is managed.	No

SA.1.135	<p>Whilst the assessment work assumes increases in demand for other modes, car travel assumptions seem to be constrained by the forecast availability of 'on-site' car parking. CBC is concerned that parking demands above those predicted could be realised if the mode share targets are not achieved, and that the additional parking demand would be generated at off-site locations, which would likely impact on the CBC network. Additionally, due to land constraints within the Borough of Luton it could place pressure for long term parking provision in the southern areas of Central Bedfordshire which are designated Green Belt and the implications of this need to be considered as part of the DCO process.</p>		Central Bedfordshire Council	1	<p>The modal shift aspirations are preferable to the inclusion of significant amounts of long term parking from both an environmental and highway capacity perspective. The ratio of parking spaces per passenger as the airport expands is planned to decrease, although it is acknowledged that the overall number of parking spaces will increase. The potential impact of the increase in passenger numbers all arriving by car would be significant, as such there are Limits and measures in place to maximise access to the airport by public transport. Any future third-party proposals for off-site car parking would require a separate planning application to the relevant local planning authority if and when they come forward, and it would be for the local planning authority to consider the potential implications of such proposals through their decision-making processes.</p>	No
SA.1.136	<p>CBC have concerns that the proposed expansion, in combination with proposed parking restraint and pricing policies may result in increased demand for off-site parking (both formalised and opportunistic). As such there may be a need to implement parking control areas</p>		Central Bedfordshire Council	1	<p>Please refer to the response to Ref. SA.1.135. 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 inappropriate airport related parking is occurring. However, it should be noted that it is</p>	No

	in Slip End, and possibly elsewhere within CB.				entirely within the gift of neighbouring local authorities to put planning policies in place to ensure that inappropriate parking is managed.	
SA.1.137	It is noted that there has been a reduction in the car parking footprint since the previous 2019 consultation. It was not however possible to correlate the overall existing and proposed parking provision with the existing and target ratios per 1mppa.		Central Bedfordshire Council	1	Noted. The Applicant can confirm that there has been a reduction in the footprint in terms of the ratio car parking provided per number of passengers expected to use the airport and this will continue to reduce over time as the airport expands.	No
SA.1.138	CBC is of the view that there is a risk that parking demands above those predicted could be realised in the event that the mode share targets are not achieved, and that the additional parking demand would be generated at off-site locations, which would impact upon the CBC network.		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.135.	No
SA.1.139	This could be exacerbated by the requested powers under the DCO to impose and vary access and parking charges, which may encourage a shift to sustainable modes, but which may also increase the relative attractiveness of 'off-site' parking provision, not subject to the same charging regime/s.		Central Bedfordshire Council	1	Any expansion of existing car parks or new parking developments would be subject to planning applications, which the relevant local authority would be required to consider in terms of the potential for increased traffic volumes on their local networks. The Applicant has no control over this process and approval of off-site car parking and can only consider consented developments as part of the strategic and local modelling.	No

					<p>The Applicant would be willing to support local authorities in a number of ways to minimise this risk:</p> <ol style="list-style-type: none"> 1. Support the local authorities to include policies in newly adopted plans that would prevent the development of any off- airport car parking on the basis that it would be damaging to the sustainability of the airport’s surface access strategy; and 2. Not allow any space for off-site car park-related shuttles to use the coach or bus parking areas. <p>Further detail on the parking strategy can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	
SA.1.140	<p>It is noted that the off-site provision within 3.3 miles of the airport is significant at 6,800 spaces, compared to the on-site provision of 10,550 spaces. Of the 6,800 offsite spaces, 4,400 are located at Slip End, within CBC.</p>		Central Bedfordshire Council	1	<p>Noted. The historical location of off-site parking provision is not within the control of the Applicant.</p>	No
SA.1.141	<p>Whilst the assessment work assumes increases in demand for other modes, car travel assumptions appear to have been constrained by the forecast availability of ‘on-site’ carparking. This appears to be further clarified within the PEIR,</p>		Central Bedfordshire Council	1	<p>Please refer to the response to Ref. SA.1.139.</p>	No

	which confirms 0% mode share for off-site car parking was modelled. As such CBC are of the view that this approach may also underestimate the actual number of additional cars on the strategic and local networks in the forecast scenarios, as it would be realistic to expect an associated increase in 'off-site' provision, as a reaction to the expansion.					
SA.1.142	There is no obvious reference to parking provision for scooters or motorbikes. With the staff survey reporting 3% of staff travelling by either motorcycle or taxi there could be a reasonable level of demand to cater for. Whist CBC are sure that this will have been accounted for within the proposals, some further clarification would be appreciated.		Central Bedfordshire Council	1	The proposed designs of the car parking facilities have inherent flexibility to accommodate motorcycle parking to meet demand. Demand for such spaces will be recorded through the staff surveys linked to the Framework Travel Plan [TR020001/APP/7.13] and can easily be converted if there is sufficient demand.	No
SA.1.143	Phases in table 2-4 do not replicate the phase 1/2/2a provided earlier in the document. Impacts on third-party operated car park would need to be monitored and managed through the local authorities. Adverse impacts on localised areas would also need careful monitoring and management.		Host Authorities	4	Table 2-4 within the SAETS prepared for the 2022 statutory consultation, identified the parking provision and ratios at different levels of passenger demand as the airport grows. The analysis carried out and the car parking requirements that have been established are based on the future modal share targets and as such have enough spaces to meet that demand at	No

					<p>the public transport levels targeted. This is in line with the sustainable approach to transport. The Applicant cannot comment on car parks off site as that is a matter for the relevant local authority to address.</p> <p>Please refer to the response to Ref SA.1.139. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] set out the monitoring and mitigation measures proposed. As part of the ongoing review process, the Applicant intends to produce monitoring programs, assess any impacts, and then intervene accordingly if any issues persist as appropriate.</p>	
SA.1.144	<p>It is noted that the costs of travel by PT to Luton in comparison to Stansted are, on average higher, whilst the cost of car parking is lower. National Highways would like to see this imbalance addressed. The parking costs at Stanstead airport are considerably higher in comparison to Luton and this is likely to affect the mode share.</p>	National Highways		1	<p>Noted. Drop off/parking charges will be/are set by the operator.</p>	No
<p>General/Other – Framework Travel Plan</p>						

SA.1.145	The current biennial survey would likely need to be updated to annual if it is to help inform a more robust review and monitoring process.		Central Bedfordshire Council	1	Noted. It is proposed through the Surface Access Strategy [TR020001/APP/7.12], Framework Travel Plan [TR020001/APP/7.14] to update the survey frequency so that the staff survey is undertaken on an annual basis.	Yes
SA.1.146	It is noted that the metrics for assessment are split between those related to Green Controlled Growth and those related to the Travel Plan. In particular CBC note that metrics related to parking fall within the Travel Plan, rather than Green Controlled Growth, and are therefore not within the criteria proposed to control or manage development. It is the view of CBC that a wider range of metrics should sit under the Green Controlled Growth heading, even if gathered within the Travel Plan process. If the Green Controlled Growth approach is to be followed, CBC consider it essential that a robust and comprehensive monitoring, management, governance, and funding process is fully identified. We would also be seeking confirmation as to how any such		Central Bedfordshire Council	1	<p>The DCO contains three key control documents in regard to surface access at the expanded airport; the Surface Access Strategy (SAS) [TR020001/APP/7.12], Framework Travel Plan [TR020001/APP/7.14] and Green Controlled Growth Framework [TR020001/APP/7.08].</p> <p>All three of these documents set out the passenger and staff mode share targets.</p> <p>The SAS sets out the overarching vision and targets for airport surface access across the 20-year lifespan of the expansion project. The FTP also forms a key part of the monitoring and evaluation for the SAS. Travel Plans produced in accordance with the FTP will be updated every five years, showing how the principles and targets set out in the SAS will be delivered. The FTP includes other items to survey such as Electric Vehicle usage, to provide a richer evidence base to strengthen the airport's understanding</p>	No

	<p>approach would be secured through the DCO process.</p>				<p>of surface access trends over time. The key focus, however, is to monitor the mode share at the airport to understand whether the airport is operating is within the Limits established through Green Controlled Growth.</p> <p>The intention of the GCG framework is to directly link growth to the extent of ongoing impacts at the airport. It is not felt that car parking is an impact of this nature, as this will be controlled through the DCO itself which will establish the total amount of parking permitted on the airport site.</p> <p>The Transport Assessment [TR020001/APP/7.02] assesses the impact of the expansion proposals and identifies mitigation measures where appropriate and necessary but does not form part of the suite of control documents.</p>	
SA.1.147	<p>With regards to monitoring, CBC would also be seeking further clarity on how journey types would be defined and recorded. For example, would shuttle bus arrivals from 'off-site' car parks be recorded as car journeys or public transport journeys.</p>		Central Bedfordshire Council	1	<p>Further information can now be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] which have been submitted as part of the application for development consent. The Framework Travel Plan [TR020001/APP/7.13] provides a narrative as to how various measures</p>	Yes

					will be funded, to what level and what the appropriate trigger points based on the airports trajectory to meet mode share targets.	
SA.1.148	It is not clear how the 'toolbox of travel plan measures' would be funded and who takes responsibility for them. There is a heavy reliance on third-party schemes / interventions coming forward and third-party buy-in to measures. Cost and funding of these measures is not clear.		Host Authorities	4	The mode share Limits included in GCG will ensure that the operator delivers any sustainable travel measures from the Framework Travel Plan toolbox that are necessary to stay within the Limits. Failure to stay within the GCG Limits would result in limitations being placed on airport growth; therefore, the GCG Limits provide sufficient incentive to the operator to stay within the mode share Limits to ensure that the toolbox of measures will be utilised appropriately.	Yes
SA.1.149	Technology: Will be difficult to influence type of vehicle that can use the airport. There is rapid development in this area and the development should capitalise on the possibilities for incorporating into the DCO application and Travel Plans.		Host Authorities	4	The Framework Travel Plan [TR020001/APP/7.13] is a framework to enable flexibility in the implementation of the toolbox, or other, measures.	No
SA.1.150	Travel Plan: 9.3.23. Understood that this is work in progress with the local authorities and National Highways to develop a long list of potential schemes and measures and monitoring. Some mid-development targets mentioned as interim and non-binding. Risk that if the targets		Host Authorities	4	Please refer to the response to Ref. SA.1.147. The Green Controlled Growth Framework [TR020001/APP/7.08] would control growth of the airport in line with binding limits on public transport mode share, with threshold levels, whereby if reached will trigger separate processes to be followed by the airport operator.	Yes

	are not binding it could be impossible in the future to achieve the final target as the gap could be too late, whereas action could be taken in the interim. Monitoring and review timeline needs further detail.			This is a proactive approach with the aim of ensuring as far as possible that as the airport grows, environmental Limits will be respected.	
SA.1.151	<p>While some measures to improve modal shift are welcome, it is noted that Luton Rising does not take ownership for delivering these interventions:</p> <ul style="list-style-type: none"> • Engaging with bus operators to create new and extended routes, better connecting the airport to more places in particular urban areas and transport hubs • Explore employee-only buses to poorly connected residential areas • Explore bus enhancements, including subsidies for east west routes to improve service provision and passenger experience 		Milton Keynes Council	Please refer to the response to Ref. SA.1.149.	No
SA.1.152	Luton Rising commits to delivering some interventions by placing a green tick against them, but not the three interventions mentioned above aimed at improving bus and coach travel. Given the future		Milton Keynes Council	Please refer to the response to Ref. SA.1.149 and SA.1.150. The Toolbox of measures within the Framework Travel Plan [TR020001/APP/7.13] sets out the type of interventions that could be implemented to encourage greater uptake of public transport,	No

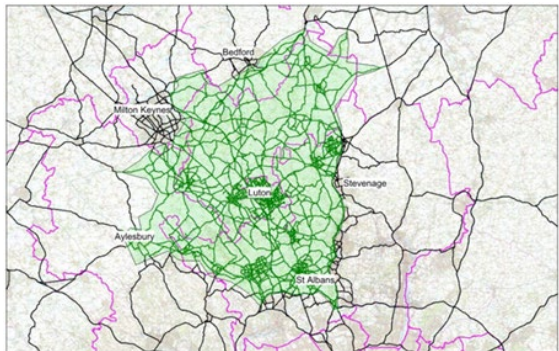
	increase in traffic and additional pressure on an already congested town, it is essential that Luton Rising commits to alleviate some of the negative impact on the transport system locally and regionally by taking the ownership and by making a clear action plan outlining commitments to invest in public transport as part of the growth agenda.				including supporting improvements to bus and coach routes, services and facilities.	
SA.1.153	For Milton Keynes public transport links, it is essential that this plan includes delivering improvements to the Stagecoach Service 99, that currently provides the only direct link from Milton Keynes Central to Luton airport. Due to limited service operating time with first coach arriving to the airport at 7:42am and last service leaving Luton at 21:20pm and an hourly service, it does not offer a reliable sustainable transport option.		Milton Keynes Council		Please refer to the response to Ref. SA.1.149. The Framework Travel Plan [TR020001/APP/7.13] sets out measures that will be taken to improve public transport access to and from the airport, this will need to take a strategic, network-wide approach to delivering improvements rather than responding directly at this stage to individual services such as route 99 mentioned in the comment.	No
SA.1.154	NHC asks LR to confirm how it will fund, incentivise, market and monitor lift-sharing programmes for airport staff and passengers long-term to maximise the take-up of ride sharing.		North Herts DC	1	The Framework Travel Plan [TR020001/APP/7.13] submitted as part of the application for development consent sets out a toolbox of measures toolbox to enable a flexible approach in adapting and responding to future challenges and uncertainties. It also	Yes

					includes a commitment to on-going approach to monitoring which will be important in the success of the Travel Plan. It also sets out the governance structure to support delivery of these programmes and measures, and the GCG mode share Limits provide the necessary incentive to ensure that the operator will deliver measures necessary to stay within the GCG Limits. Please also refer to response to Ref. SA.1.148.	
Getting to and from the Airport – our Emerging Transport Strategy (2022 statutory consultation document) (SAETS)						
SA.1.155	It is assumed that the SAETS will be applied to the whole airport rather than just the new development as it will be difficult to decipher the two for target setting, monitoring and evaluation purposes.		Host Authorities	4	The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] sets out the approach to targets and monitoring with regard to the existing and extended airport.	No
SA.1.156	The SAETS covers passengers, visitors, employees and goods travel to and from the airport. This includes all modes of transport: public transport, taxis, cars, lorries, walking and cycling. Linkages with air quality and carbon emissions are referenced, no linkage with noise impacts appears to be made.		Host Authorities	4	The transport data is used to inform the noise assessment which is set out in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No

SA.1.157	The SAS will cover a 20 year period with Travel Plans produced every 4-5 years, informed by data and monitoring against targets, with linkages to stakeholders via the Airport Transport Forum (ATF). The emerging SAS will be live from 2022, it is not clear how this is implemented ahead of the DCO being granted (2.1.9).		Host Authorities	4	The airport already has a SAS in place the emerging SAS builds upon the existing SAS and therefore should not be seen as standalone rather an evolution of the objectives of the SAS to reflect the updated position with regard to policy and practice and a growing airport.	No
SA.1.158	East West Rail is mentioned in the ETS but is not deemed significant in terms of travel to the airport. Some mention is made of interchange at Bedford but there is no mention of Bletchley as an interchange point (P.68). Along with only a passing reference to EWR, it could be suggested that the scope of the ETS is slightly narrow. The ETS does include a catchment diagram based on data supplied by the CAA, which clearly shows that MK is in the area generating the highest levels of passenger numbers. Highway mitigation is limited to a few key junctions in Luton. Other measures include the rail link, the local guided bus system, and the Travel Plan.		Milton Keynes Council		Please refer to the response to Ref. SA.1.2. The Transport Assessment [TR020001/APP/7.02] highlights areas where significant impacts have been recorded resulting from the Proposed Development. This demonstrates that transport modelling indicates that there are no areas within Milton Keynes that would suffer significant effects that require mitigation. The Framework Travel Plan [TR020001/APP/7.13] establishes governance and ongoing monitoring so that in future if adverse impacts are recorded there are forums to discuss potential mitigation, if required.	No

SA.1.159	<p>Within the Aviation Policy Framework, DfT also recommend that ATFs produce ASASs to set out:</p> <ol style="list-style-type: none"> 1. targets for increasing the proportion of journeys made to the airport by public transport for both airport workers and passengers; 2. the strategy to achieve those targets; and 3. a system whereby the forum can oversee implementation of the strategy. 		Milton Keynes Council		<p>Noted. As part of the application for development consent a Surface Access Strategy [TR020001/APP/7.12] is submitted which sets out the long-term 20 year strategy for the airport. This reflects the Green Controlled Growth Limits that will control growth unless specific public transport mode share targets are achieved. The Surface Access Strategy supported by a Framework Travel Plan [TR020001/APP/7.13] that sets out the strategy for achieving those targets and set out the governance and toolkit of measures whereby this strategy will be implemented and delivered.</p>	No
SA.1.160	<p>At present only 14% of passengers travel to the airport by public transport. Without an East West rail link only passengers travelling North South are able to travel by rail. Further expansion will therefore result in additional traffic into an already congested local road network, which will also increase pollutants and decrease air quality.</p>	Kings Walden Parish Council		1	<p>Please refer to the response to Ref. SA.1.2.</p>	No
SA.1.161	<p>We have reviewed the document “Getting to and from the airport- Our emerging Transport Strategy” in some detail, given its importance to</p>	National Highways		1	<p>Noted.</p>	No

	the impact of the proposals on the SRN. It is a comprehensive report, which provides appropriate information concerning all relevant facets of the transport strategy.					
SA.1.162	The assumption that an All Lane Running scheme will have been implemented in advance of the final phase scheme opening is not secure. There is currently no commitment to implement such a scheme and this will be dependent on the content of future Road Investment Strategies, which are set by government. We will therefore need to understand the implications of a scenario of the airport operating with 32 million passengers per annum without ALR south of M1 J10. In addition, we need to confirm the modelling outputs that the SRN will not be affected by the proposals at any locations other than J10 the mainline to its south.	National Highways		1	Noted. The assessment approach has been developed in discussion with relevant highway authorities including National Highways. The applicant will continue to work with National Highways to provide the additional supporting information. Subsequently a scenario test has been performed to test the effects of not implementing All Lane Running in the 2043/32 mppa scenario. This test has shown that there is strong evidence that whilst there is rerouting onto local roads, no further mitigation is required to allow the Proposed Development. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	Yes
SA.1.163	In addition, we have a number of specific observations, queries and comments on some of the detailed information provided in Chapter 10 and Appendix B of the report:	National Highways		1	The responses to specific comments raised by National Highways are dealt with below and this detail is provided in the Transport Assessment [TR020001/APP/7.02] .	

	<ul style="list-style-type: none"> • 10.4.1 – It would be helpful to mention the software modelling platforms used for assessing different modes of transport. • 10.4.2 – Has there been any use of strategic models for operational assessment of junctions? • 10.6.1 – Is there a Detailed Model Area (DMA) within FMA? • 10.8.2 – It is not clear as to how NTEM data was used as a starting point and growth was added, based on the committed major residential and employment developments? It would be helpful if this could be explained in more detail. • 10.8.4 – It is stated that, in highway terms, the central and LTP scenarios produce similar results. Is this because traffic generation from zones classed as ‘foreseeable’ been included in the NTEM constraint or have they been excluded? • 10.12.1 – What are the sources of growth factors of 0.25% and 0.5% as mentioned in a. and b. and have these factors been applied to all vehicle types? • Table B1-4 in Appendix B – Is there an explanation for the level 			<p>10.4.1 – The strategic modelling software used included SATURN for highway modelling and EMME for public transport modelling.</p> <p>10.4.2 – The SATURN strategic modelling has incorporated a detailed simulation area and less detailed buffer area, surrounding the simulation area. The simulation area included detailed junction modelling.</p> <p>10.6.1 – The detailed simulation area of the SATURN model is shown in green below:</p>  <p>Map contains Ordnance Survey data © Crown copyright and database right 2020</p> <p>10.8.2 – Base year (2016) planning data have been used in the development of the highway and public transport models. These base year planning data have primarily been derived from Census data and information contained within Trip End</p>	
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	<p>of traffic at 28.4m is higher in 2016 base year than all other forecasting years?</p>			<p>Model Presentation Program (TEMPro).</p> <p>Using these base year planning data as a starting point, growth has been added based on the residential and employment developments identified within the Uncertainty Log, supplemented by information from TEMPro forecasts.</p> <p>The forecast planning data for a given scenario are entered into the trip-end model. This is a variant of the DfT CtripEnd software associated with the TEMPro forecasts, which has been adapted to represent the zone system implemented within CBLTM-LTN. The trip-end model provides 'reference' trip-ends for forecasting. These exclude the direct effects of changing costs of travel, which are applied by the demand model, but include forecast changes in land-uses. Trip-end changes are applied to the base year demand matrices through a matrix-balancing procedure (Furnessing). This involves factoring matrix rows to match given production targets, then factoring matrix columns to match attraction targets, and repeating this process until convergence is achieved. Convergence is measured where both</p>	
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				<p>production and attraction totals match the target trip-ends within a specified tolerance for error.</p> <p>For most zones, a growth factor is applied to the base year validated demand matrices based on the percentage change from the base year to a given future year forecast by the trip-end model. This approach retains the trip rates observed within the development of the base year highway and public transport assignment models for the majority of zones.</p> <p>The outputs from this process are 'reference' demand matrices for a given scenario. These 'reference' demand matrices provide the starting point for the demand model, with these matrices being adjusted based on the costs of travel forecast by the assignment models.</p> <p>10.8.4 – The TAG-based forecasts include only those residential and employment developments classified as 'complete', 'near certain' or 'more than likely', with growth controlled to that forecast within TEMPro 7.2.</p> <p>An alternative scenario has been produced for 2027, 2039 and 2043 which takes the development</p>	
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				<p>assumptions from the TAG-based forecasts and adds those developments classified as ‘reasonably foreseeable’. This planning scenario therefore represents the growth assumed within the current Local Plans for Luton Borough, Central Bedfordshire, North Hertfordshire, St Albans District and Dacorum. Within this alternative scenario, the constraint to TEMPro forecasts is retained, resulting in the overall growth within each district being the same as that assumed for the TAG-based forecasts. This alternative scenario therefore results in a redistribution of growth across the model zones within each district.</p> <p>10.12.1 – The growth factors were applied in the VISSIM model only. The growth factors were applied over and above the inclusion of all known committed developments and based on professional judgement. The approach was discussed with LBC and National Highways with the derived factors agreed.</p> <p>Table B1-4 in Appendix B – This query appears to relate to the traffic flow on the A5228 Hitchin Road and flows derived from the SATURN model which were then converted to AADT flows. In</p>	
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					all future years and scenarios (i.e. without and with airport expansion), an improvement scheme has been assumed for the junction of Hitchin Road/Ramridge Road involving the conversion of the roundabout to a signalised junction with partial pedestrian crossing facilities. The change from a priority roundabout to signals has resulted in a small amount of traffic re-assignment onto alternative routes due to the change in capacity and delay at this location.	
SA.1.164	It is noted that, for the purposes of road traffic forecasting, in the Do-Minimum and Do-Something scenarios, HGV movements to and from the airport were assumed to grow in line with air passenger numbers. This is considered to be a cautious approach. National Highways requests further information regarding this cautious approach and potentially a sensitivity test to determine the impact on the highways network with a higher number of HGV's.	National Highways		1	Please refer to the response to Ref. SA.1.162. Engagement will be ongoing with National Highways on these matters; however, it is assumed that this is a robust approach to modelling HGVs and if anything the likely proportion of HGVs to passengers would reduce over time. The Transport Assessment [TR020001/APP/7.02] sets out the assumptions included within the transport modelling.	No
SA.1.165	Where the 'period of the forecasts' is referred to, it would be helpful to understand the time horizon of the forecasts. National Highways would like to see further information regarding	National Highways		1	Please refer to the response to Ref. SA.1.162, which establishes where the assumptions used within the traffic modelling can be found. This includes the Strategic Modelling: Forecasting Report as an appendix to the	No

	the assumptions made in the forecast about fleet mix, economic drivers and conditions over the lifetime of the forecast.				Transport Assessment [TR020001/APP/7.02] which details the assumptions used in the modelling.	
PEIR transport chapter						
SA.1.166	The transport chapter considers the need to include junctions and / or links for assessment under Rules 1 and 2 of the IMEA guidance and determines that no wider links within CBC or HDCC [sic HCC] fall within the assessment criteria (assuming that Rule 1 applies to these routes). However, the justification for considering these routes as not 'sensitive' and therefore subject to Rule 2 is not clear. I.e.: factors such as accident history, use by pedestrians, location of sensitive receptors etc would also be expected to feed into the decision-making process.		Central Bedfordshire Council	1	In paragraph 18.5.31 of the PEIR it was explained that with the CBLTM-LTN model covering a study area of over 1,000 sq. km. it was necessary to screen the road links for those that might be associated with an environmental effect. This screening was based on information provided by the model for the routing of airport related traffic and also local knowledge of the operation of the highway network. The roads that have been assessed include all roads where there is predicted to be an increase in traffic flows in excess of 10%. Further information, including details of the sensitivity adopted for the four categories of receptor, these are driver, pedestrian, other road users, and occupants, on each link is set out in Appendix 18.1 Traffic and Transportation Methodology of the ES [TR020001/APP/5.01] .	No
SA.1.167	Table 18.9 of Chapter 18 of the PEIR (Assumed mode shares used in CBLTM-LTN) details a combined car / taxi mode share of 63.0% reducing to 60.4% in		Central Bedfordshire Council	1	The mode shares are included in the Transport Assessment [TR020001/APP/7.02] . These mode shares have been used across all of the Applicant's assessments, modelling	Yes

	<p>the 'With Development 2039' and 57.1% in the 'With Development 2043'. It is unclear how this relates to the proposed minimum public transport mode share of 45% assumed within the Surface Access Strategy. It is also noted that in all scenarios there is an assumed 0.0% mode share for Private Car (off site car parking). As detailed previously, Private Off-Site already represents a significant proportion of the airports current parking provision, so it is not clear why the baseline modelling, which should reflect the current operation, assumes a 0% provision.</p>				<p>and reporting for the application for development consent. The figures quoted in the PIER and Table 18.9 were incorrect and as soon as the Applicant became aware of this, CBC, National Highways, LBC, and HCC were informed during the post consultation engagement meetings that were held during April and May 2022.</p>	
SA.1.168	<p>Para. 18.4.32 of Chapter 18 of the PEIR refers to flows for the AM peak hour (1 hr) and the AM peak period (3 hr), being taken directly from the CBLTM-LTN, however no reference is made to the derivation of PM peak hour or peak period flows. Could the applicant confirm if the reference to bullet 'c' is a typo, that should read 'e' related to the PM peak hour</p>		Central Bedfordshire Council	1	<p>Flows for the PM peak hour (1 hr) and the PM peak period (3 hr) have also been taken directly from the CBLTM-LTN. The reference to 'a' and 'c' is correct in the context of the AM peak. For the PM peak, flows would relate to 'b' and 'e'.</p>	No
SA.1.169	<p>There are several areas of detail, on which engagement has been deferred until the SRN</p>	National Highways		1	Noted.	No

	mitigation proposals are agreed by National Highways. These include technology interfaces in respect of the smart motorway to the north of J10, impacts during construction and mitigation required, and commercial agreements					
SA.1.170	To enable National Highways to be able to validate the findings of the modelling assessment and determine the appropriateness of mitigation solutions, we request that the Saturn model is provided to us for review.	National Highways		1	As part of the on-going dialogue with National Highways further modelling information has been provided.	Yes
SA.1.171	'National Highways' response on the Traffic and Transport chapter of the PEIR focuses predominantly on the contents relating to the provision of All Lane Running (ALR) on the M1 and the construction phase. National Highways is comfortable with the general conclusions of this chapter but requests further information, particularly in respect of the modelling, to confirm our preliminary view. - With respect to the existing ALR arrangements to the north of Junction 10, the M1 is a Smart Motorway with three lanes	National Highways		1	As part of the on-going dialogue with National Highways further modelling information has been provided.	Yes

	<p>in each direction, incorporating hard shoulder running when additional capacity is needed.</p> <ul style="list-style-type: none"> - National Highways has identified that any assessment should consider the operation of the SRN, which in this case is the M1 particularly J10, but also any wider impacts on J9 and J11. - No mitigation of environmental impacts is proposed during construction or operation on the SRN other than a CTMP and Travel Plan. 					
SA.1.172	<p>[Referring to paragraph 18.10.1, National Highways states that] to date, National Highways has seen no information relating to the construction proposals, beyond what has been presented in the PEIR. Therefore, National Highways is not able confirm the statement that there will be no impact on the SRN.</p>	National Highways		1	<p>The Code of Construction Practice (CoCP) in Appendix 4.2 of Volume 3 of the ES [TR020001/APP/5.02] includes consideration of the expected level of construction traffic and concludes that the impacts would not be significant. In the context of traffic flows on the Strategic Road Network (SRN) the impacts will be small. With respect to traffic management measures required to implement any improvements to the SRN, detailed plans will be developed as the Proposed Development moves forward particularly as the impacts and mitigations on the SRN occur in the later phases of the development. These plans will be developed at the</p>	No

					appropriate time and in consultation with National Highways.	
SA.1.173	Furthermore, whilst overall the permanent mitigation proposals appear to identify limited impacts on the SRN, this is yet to be confirmed through National Highways reviewing the details of the modelling	National Highways		1	Noted. Engagement with National Highways will continue post-submission of the Transport Assessment [TR020001/APP/7.02] and seek acceptance on the results of the modelling following National Highways' review.	No
SA.1.174	A surface water management plan should be developed for the M1 J10 improvement works for the control of runoff and to prevent pollution from the construction site until permanent drainage has been established. This will need to be confirmed during the detailed design stages.	National Highways		1	Engagement with Lead Local Flood Authorities (LLFA), sewerage providers and the Environment Agency is ongoing and when detailed design of off-site highway interventions is confirmed, the requirement for a Site Waste Management Plan (SWMP) at this location will be considered further along with any requirements to deal with preventing pollution run-off. This would be developed in tandem with detailed design, in consultation with all relevant stakeholders and partners and in full accordance with all relevant guidance.	No
SA.1.175	There is a greater likelihood of road traffic collisions on and offsite due to increased traffic movements associated with the Proposed Development. Potential schemes allowing more traffic to flow through M1 J10 at peak times would reduce the likelihood.	National Highways		1	Substantial mitigation proposals for M1 J10 are included in the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] . These mitigation proposals increase the capacity and throughput of M1 J10 at peak times.	No

SA.1.176	The PEIR considered extreme natural disasters that would cause catastrophic effects. However, these are deemed extremely improbable, meaning no significant adaptations to the proposed development are required.	National Highways		1	Noted.	No
Construction Traffic						
SA.1.177	Outline CTMP is light on details of full proposals but sets out intention for regular updates of a more complete document. Expect the initial phase to be set out in more detail including definition of 'regular' updates.		Host Authorities	4	Noted.	No
SA.1.178	Covers travel by both labour and materials vehicles separate Construction Workers Travel Plan also mentioned in PEIR but not yet provided.		Host Authorities	4	Noted. An Outline Construction Workers Travel Plan is included in Appendix 18.4 of the ES [TR020001/APP/5.02] .	No
SA.1.179	Currently light on how airport walk / cycle / public transport trips will be managed during construction to minimise impact.		Host Authorities	4	The Outline Construction Traffic Management Plan (CTMP) in Appendix 18.3 of the ES [TR020001/APP/5.02] provides a framework which any appointed contractor(s) will implement. This will require the development of more detailed local plans and measures as the construction strategy is developed.	No

SA.1.180	<p>Royal Mail is concerned about the scheme's potential construction phase and operation phase impacts on its road based operations.</p> <p>Any such impacts could interfere with Royal Mail's ability to meet its service delivery targets as a provider of the Universal Postal Service under the Postal Services Act 2011 and may even result in financial penalties by the Government.</p>	Royal Mail Group		1	<p>The Outline CTMP in Appendix 18.3 of the ES [TR020001/APP/5.02] has identified the levels of construction traffic expected and concluded that these would not be significant or adversely affect the safe operation of the network. Much of the airport related works are off the highway network and as such would have limited impact on the operation of the network itself. Detailed Construction Traffic Management Plans (CTMPs) will be produced at the appropriate time. Where there are works on the network, CTMPs will be developed in consultation with the highway authorities and stakeholders to minimise any disruption to users.</p>	No
SA.1.181	<p>Royal Mail's postal sorting and delivery operations rely heavily on road communications. Its ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.</p> <p>Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory</p>	Royal Mail Group		1	<p>Noted. Please refer to the response to Ref. SA.1.180.</p>	No

	regime for postal services thereby presenting a significant risk to Royal Mail's business.					
SA.1.182	<p>'In exercising its statutory duties, Royal Mail vehicles use on a daily basis all of the local roads that may potentially be affected by the construction and operation of the proposed expansion of Luton airport. Royal Mail own or have an interest in a number of properties which are in the vicinity of the proposed Luton airport expansion, the operations run from which have potential to be affected by the proposals.</p> <p>Royal Mail's network of operational properties in the Luton area links all of the above properties and because of that they are all vulnerable to changes in capacity within the surrounding highway network. However, out of the operational properties that are listed above, Luton Delivery Office is likely to be most prone to disruption by the expansion of Luton airport. Luton Delivery Office operational staff deliver and collect from Luton airport.</p>	Royal Mail Group		1	<p>Noted. Please refer to the response to Ref. SA.1.180. The Transport Assessment [TR020001/APP/7.02] and the Framework Travel Plan [TR020001/APP/7.13] set out where the impacts on the surrounding highway network will be experienced as part of the Proposed Development and respectively what measures are being implemented to ensure that the effects are minimised, through a shift towards sustainable modes.</p>	No

SA.1.183	<p>Traffic Generation: There are currently approximately 280 operational vehicle movements per day, in and out, comprising 12 x 7.5t lorries and 267 small vehicles. Overtime, admin staff and other shift patterns can result in other movements.</p> <p>Owing to the hours of operation approximately 30% of staff at Luton Delivery Office use private vehicles to travel to and from work. The remaining circa 70% use Royal Mail vehicles to travel to and from work. We would draw your attention to the following particular concerns and requirements:</p> <ul style="list-style-type: none"> - Road access to and from Luton Delivery Office is primarily via Cardiff Grove with the large numbers of vehicles and staff, unconstrained access between the Delivery Office and the surrounding highway network is needed at all times. - Shift changeover times are very busy. - Some staff travel up to an hour and a half to get to work. - Royal Mail leases overflow parking at Dallow Road and 	Royal Mail Group		1	Noted. Please refer to the response to Ref. SA.1.180 and Ref. SA.1.182.	No
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	<p>Cardiff Road as not enough parking spaces in the Yard. Continuity of operations at Luton Delivery Office and connectivity with Royal Mail’s operational network is vital to the performance of Royal Mail’s universal postal service functions. Any compromise of the existing operation, including the ability of staff to get to and from work without significant delay, will have impacts on the service and potential for fines on Royal Mail.</p>					
SA.1.184	<p>No of staff, shift times, main modes of transport: - 250 employees work between the hours of 06:00 and 15:00. - 25% (c65 employees) use Royal Mail Vehicles they keep as overnight retentions to get to work. - 65% (c160 employees) use their own cars to travel to work. - 10% (c25 employees) use other modes such as receiving a lift, cycle or walk. - 20 employees work between the hours of 11:30 and 20:00. - 85% (c17 employees) use their own cars to travel to and from work.</p>	Royal Mail Group		1	<p>Noted. Please refer to the response to Ref. SA.1. 180 and Ref. SA.1.182. Transport Assessment [TR020001/APP/7.02] seeks to mitigate impacts felt in Luton and the M1 Junction 10.</p>	No

	<p>- 15% (c3 employees) use Royal Mail Vehicles they keep as overnight retentions to and from work.</p> <p>M1 Junction 10 is of huge operational importance for Luton Delivery Office, all mail for delivery arrives from Home Counties North Mail Centre and uses the Junction 10 to exit the motorway, there is no other viable option to exit the M1. Additionally, the roundabout Junction on the A1081 is equally important as the only means to get towards the town centre and Delivery Office.</p> <p>The vehicles arrive at site over a 24-hour period, but the critical time is between 0400 and 0800 each morning to connect mail onto delivery without delaying the post.</p> <p>Furthermore, as Luton Delivery Office performs collections in the area, Junction 10 is very important in connecting collected mail to Home Counties North Mail Centre for onward processing. Given the location simile with arrivals there is no</p>					
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	suitable alternative route between the two locations.					
SA.1.185	With an estimated total span of 16 years, the construction phase of the proposed airport expansion is long, during which levels of construction traffic are expected to vary substantially with a relatively high percentage of HGV movements. However, it appears from Chapter 18 of the PEIR that if construction traffic routing is adhered to and all proposed mitigations are implemented there is low potential for significant effects on the highway network. Similarly, with the majority of operational traffic not forecast to coincide with peak flows on the network, the assessed traffic impact of the operational phase as set out in the consultation documents is encouraging, but this is predicated to some extent on the currently proposed flight schedule for the airport which may change in the future.	Royal Mail Group		1	Noted. Please refer to the response to Ref. SA.1.180.	No
SA.1.186	So, whilst the consultation documents have provided greater certainty and enabled a down-grading of perceived risk to Royal Mail's business, there	Royal Mail Group		1	Noted. Please refer to the response to Ref. SA.1. 180 and Ref. SA.1.182. The Transport Assessment [TR020001/APP/7.02] seeks to	No

	remains some residual risk during both the construction phase and operational phase, but principally the former. Royal Mail notes in addition to the construction of the airport Access Road that there are fifteen junction improvements proposed in the Luton and Hitchin areas, including works to M1 Junction 10 which is of high operational importance to Royal Mail as indicated above.				mitigate impacts felt in Luton, Hitchin and M1 Junction 10.	
SA.1.187	<p>'The Construction Traffic Management Plan sets out sensible and proficient proposals for Traffic Management, including plans and information on:</p> <ul style="list-style-type: none"> - Construction Traffic Routing - Temporary Traffic Management - Deliveries - Abnormal Loads - Highways Safety - Monitoring of Construction Traffic <p>The Draft Outline Construction Traffic Management Plan does not however contain any specific requirement to consult with or notify major road users (including Royal Mail) in advance of works or traffic</p>	Royal Mail Group		1	Noted. An Outline CTMP is submitted with the application for development consent in Appendix 18.3 of the ES [TR020001/APP/5.02] and detailed CTMPs will be produced at the appropriate time.	No

	management events that may significantly affect the highway network. The only notification that it provides for relates to Abnormal Loads in case of which it is proposed that only the police, the highway authorities or bridge and structure owners will be notified.					
SA.1.188	<p>As a reasonable step to address residual risk of construction phase impact on its business, Royal Mail requests that Luton Rising’s Outline Construction Traffic Management Plan includes a specific mechanism to notify Royal Mail in advance about works affecting the local highways network, with particular regard to Royal Mail’s distribution facilities near Luton airport, as identified above.</p> <p>A good example of potential wording for Luton Rising to consider including is provided by the Construction Traffic Management Plan for Highways England’s A1 Birtley to Coal House Improvement Scheme:</p> <p>“2.8.1 Advanced notifications of programmed diversions and closures will be issued to major</p>	Royal Mail Group		1	Noted. The Applicant has included a section within the Outline CTMP in Appendix 18.3 of the ES [TR020001/APP/5.02] to inform relevant stakeholders – including Royal Mail and many other key stakeholders – of any upcoming road works, including diversions or closures.	Yes

	<p>road users in the vicinity of the scheme including Royal Mail. This will include providing major road users with not less than 7 working days' notice of any road closures, diversions or alternative access arrangements that may affect travel on those routes and (if available) in all cases the agreed hours of working. This will form part of a wider communications plan associated with the scheme. The method of communication will be agreed as part of the final Construction Traffic Management Plan. Highways England will consult with Royal Mail on the content of the final Construction Traffic Management Plan.”</p> <p>This wording was agreed between Highways England and Royal Mail in June 2020 during the Examination into that DCO application. In May 2021 a similar wording was agreed between Highways England and Royal Mail for inclusion in the Construction Traffic Management Plan for the A1 in Northumberland Morpeth to</p>					
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	<p>Ellingham Improvement Scheme.</p> <p>In February 2022 a similar form of wording was agreed by the Secretary of State in determining the DCO application Thurrock Flexible Generation Plant Project as being appropriate for inclusion in the Outline Construction Traffic Management Plan for this scheme, this wording however provided for advance consultation about roadworks and road closures by the developer as distinct from advance notification.</p>					
SA.1.189	<p>It is also requested that Royal Mail is invited to join the Traffic Management Group for Luton Rising. The relevant operational contact for this will be: Royal Mail Special Events Planner for Eastern Region, currently [REDACTED]</p>	Royal Mail Group		1	<p>The airport has an existing Surface Access Airport Transport Forum to which representatives of Royal Mail could be invited. Additionally, during construction there will be on-going liaison with key stakeholders under the CTMP and this would include Royal Mail.</p>	No
SA.1.190	<p>The DCO for the Luton airport expansion will also need to include a Requirement that places an obligation on Luton Rising or its contractors to implement the provisions of the Outline Construction Traffic</p>	Royal Mail Group		1	<p>Please refer to the response to Ref. SA.1.188. The Outline CTMP in Appendix 18.3 of the ES [TR020001/APP/5.02] has identified the levels of construction traffic expected and concluded that these would not be significant or adversely</p>	No

	<p>Management Plan, so that the requirement to notify Royal Mail will be legally secured. A potential suggested wording for this is set out below for consideration by Luton Rising:</p> <p>Traffic management (1) No part of the authorised development is to commence until a traffic management plan for the construction of that part which is substantially in accordance with the outline traffic management plan for construction has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant highway authorities, relevant planning authorities and other bodies identified in the outline traffic management plan for construction on matters related to their function (2)The authorised development must be carried out in accordance with the traffic management plan referred to in sub-paragraph (1).</p>				<p>affect the safe operation of the network. Much of the airport related works are off the highway network and as such would have limited impact on the operation of the network itself. Detailed CTMPs will be produced at the appropriate time. Where there are works on the network, CTMPs will be developed in consultation with the highway authorities and stakeholders to minimise any disruption to users. The Applicant has included a section within the Outline CTMP in Appendix 18.3 of the ES [TR020001/APP/5.02] to inform relevant stakeholders – including Royal Mail and many other key stakeholders – of any upcoming road works, including diversions or closures.</p>	
SA.1.191	<p>National Highways recognises that the engagement on modelling, demand forecasts and the ultimate mitigation</p>	<p>National Highways</p>		1	<p>Please refer to the response to Ref. SA.1.172 which address points on construction traffic. There has been a comprehensive programme of</p>	<p>No</p>

	<p>solution to date has been the priority. However, there is also a need to assess and understand the impacts on the SRN during construction. This is of particular importance given the strategy appears to require movements to and from the airport construction site by lorry via the M1 J10. National Highways' comments below are in part based on PEIR content related to construction and also our experience of other, similar projects.</p> <p>This can be expected to place substantial pressure on the SRN for a period of time. The timing and phasing of construction will be a key factor and it will be important to plan the works to take account of other planned maintenance on the local and strategic road networks.</p> <p>In addition, mitigation may be required during construction, which could involve physical measures (including bringing the permanent mitigation works forward) or softer measures including travel plans and time restrictions.</p> <p>A series of Management Plans will need to be produced and</p>			<p>engagement with National Highways during the project and these discussions will continue for as long as is needed.</p>	
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	<p>agreed with National Highways to prepare for the construction phase. These include a Construction Management Travel Plan (CMTP), a Construction Workers Travel Plan (CWTP) and a Traffic Incident Management Plan (TIMP). A management structure to support the operation of the transport network during construction, such as a Transport Review Group, will be required.</p> <p>These matters will need to be resolved in advance of the DCO submission and National Highways is keen to work collaboratively with the Luton Rising project team to ensure that the assessment methodology is appropriate and to agree adequate mitigation.</p>				
SA.1.192	<p>'- Distribution, construction traffic flows and percentage increase are provided for phases 2a and 2b in tables 18.19 and 18.25. The most appropriate route for construction traffic was identified and presented in the 2019 PEIR. There were no objections to this routing from the highway authorities.</p>	National Highways		1 Please refer to the response to Ref. SA.1.172 which address construction traffic and the deemed small impact on the SRN. There has been a comprehensive programme of engagement with National Highways during the project and these discussions will continue for as long as is needed to secure agreement on the items listed within the comment.	No

	<p>- The draft outline CTMP that will be in place prior to commencement of the Proposed Development will secure a routeing agreement for the construction HGVs. It is expected that the great majority of construction HGVs will use only motorways and 'A' roads. In the vicinity of the airport this will be the A1081 and the M1.</p> <p>- It has been assumed that at the time of peak construction traffic activity, all construction HGVs will be limited to the A1081 and M1. At this stage, it is not possible to predict how the traffic will split when it gets to the M1 and, therefore, two alternatives have been considered. The first of these assumes that four fifths of the traffic will either travel to or from a point that will require the traffic to use the M1 to the south of J10, with the remaining construction traffic using the M1 to the north of J10 (Alternative A). The second test has assumed a reversal of these proportions and is referred to as Alternative B.</p> <p>- The higher flows of construction traffic will occur in</p>					
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	<p>the interpeak hours with construction traffic discouraged during the normal commuter peak periods through the implementation of the CTMP. Whilst traffic might be discouraged from travelling outside of the peak hours it is considered likely that some still will arrive during the peak hours. Therefore, National Highways requests an assessment is undertaken with a proportion of construction traffic arriving during the peak periods as a sensitivity test.</p> <p>- Additionally, the construction assessment should consider the number, distribution and mode of travel of construction workers.</p>					
Modelling						
SA.1.193	Highways Team welcomes further engagement with Luton Rising and the offer to test additional scenarios put forward by Arup at the meeting with the host authorities and WSP on the 25 March 2022.		Luton Borough Council	1	Noted. The applicant welcomes the opportunity to continue working alongside LBC.	Yes
SA.1.194	The traffic modelling strand of the assessment remains incomplete and the WSP Technical Review has raised a series of questions, some		Hertfordshire CC	1	The Applicant has engaged with the relevant technical reviewers and will continue to engage with WSP.	Yes

	technical anomalies and other issues Luton Rising suggest may be resolved with a selection of sensitivity testing – tests which are designed to consider different circumstances such as using different model split and alternative combinations of infrastructure delivery. Naturally, further testing of alternative scenarios will provide a greater understanding of the impact on the local road network, triggers for growth and travel plan interventions.					
SA.1.195	Detailed modelling work has been undertaken but it is considered that the PEIR fails to model the ‘worst’ case scenarios, a point that has been raised by CBC Highways and WSP in response to this consultation.		Central Bedfordshire Council	1	The ES [TR020001/APP/5.02] considers a reasonable worst case scenario and the approach to modelling has been discussed extensively with the relevant highway authorities. The assumed mode shift in the modelling reflects the worst case to assess the impacts on the highway network. The 45% public transport mode shift is a limit, rather than a target. The Surface Access Strategy [TR020001/APP/7.12] will set out targets that provide additional ambition on top of the limits.	No
SA.1.196	The modelling work should include a number of employment sites in Central Bedfordshire and further assessment of residential development assumptions,		Central Bedfordshire Council	1	All known committed developments and transport infrastructure schemes have been incorporated into the models in accordance with WebTAG guidance and best practice. A Local	No

	along with further explanation of Central Bedfordshire Local Plan allocated sites. There is also concern regarding assumptions and the level of commitment in respect to highway schemes in Central Bedfordshire, Luton and the M1. This could have ramifications for many of the approaches to the site, including those in Central Bedfordshire.				Transport Plan (LTP) sensitivity scenario has also been produced. This has included reviewing all planned development against a certainty log and incorporating developments in the relevant scenario. The approach to modelling was agreed with officers at relevant highway authorities including LBC, National Highways and officers at CBC and Hertfordshire CC were aware of this approach. The approach is consistent with that adopted for the 2019 statutory consultation and no material concerns on the approach were raised at the time.	
SA.1.197	The shortcomings in the information raise significant concerns regarding the robustness of the assessment and mitigation measures identified. CBC expects further assessment on the Traffic and Transport matters identified by CBC Highway Officers and WSP. Ongoing input from relevant consultees is required to inform the baseline data and appropriate mitigation measures.		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.196.	No
SA.1.198	Whilst we have worked in partnership with the team and released technical information, including our strategic transport model (CBLTM) we do require		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.196.	No

	confirmation of the detailed assumptions made on land use and infrastructure within Central Bedfordshire since the strategic modelling undertaken to support the 2019 proposals. It is critical that these assumptions are as accurate as possible to ensure that future scenarios are robustly modelled. This could be in the form of the most recent uncertainty log information used to inform the modelling					
SA.1.199	From an initial review of the most recent uncertainty log available, it appears that a number of employment sites that CBC would expect to be within the forecast model are not included, and whilst these may sufficiently remote from the DCO site for this not to impact upon the work undertaken, in the first instance we would be looking to the applicant to clarify the latest forecast development assumptions. Should it be confirmed that some of the sites in question are not included within the model, CBC are of the view that it would be appropriate for any updated Local Plan Scenario sensitivity test to include these. CBC would be		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.196.	No

	happy to work with the applicant team to confirm any additional sites to include					
SA.1.200	Some further detailed comments on residential development assumptions as contained within the most recently shared uncertainty log are also provided below: 1. The Marston Vale development is subject to a planning application and should therefore be considered as 'More than likely'. 2. The certainty of land East of Houghton Regis should be 'reasonably foreseeable.' 3. Land at Chase Farm and West/NE of High Street should be 'reasonably foreseeable.' 4. Land at Luton Road, Barton to 'hypothetical.' 5. Land at Slip End for 158 dwellings – planning approval ref. 19/00032		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.196. This states that the committed developments and modelling assumptions were agreed at the outset of the modelling exercise, a number of the locations identified in the comment are either included or have been removed. This is set out in the Strategic Modelling Forecasting Report and replicated in the Transport Assessment [TR020001/APP/7.02] .	No
SA.1.201	We also require further detail on the results of the modelling scenario inclusive of Local Plan allocated site – at the moment there is reference to a comparison exercise for selected metrics, but we feel the omission of more detailed results of a scenario in which wider future growth is accounted		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.196. Appropriate levels of detail of the outputs of the transport modelling looking at appraisal of the Proposed Development is included within the Transport Assessment [TR020001/APP/7.02] .	No

	for reports warrants further explanation.					
SA.1.202	In terms of infrastructure that is assumed to be in place in a 'do-minimum' scenario, further information on the status of schemes delivered through the East Luton Study is required, including justification for their certainty level i.e.: status of consent, funding etc. This is particularly important given that some mitigation schemes are also designed on the assumption that these improvements have already been made, for example to dualling of Vauxhall Way. It is noted from para. 18.7.43 of Chapter 18 of PIER that there is not a commitment from LBC to implement these improvements detailed by the timescales assumed in the modelling, but that this allows for a more straightforward means of identifying problems associated with added car trips if applied to a local highway network which is not heavily congested. However, this may also mean that the need to implement these works (or additions to these works) and		Central Bedfordshire Council	1	The assumptions for these infrastructure measures have been agreed with the relevant highway authority LBC. LBC considered that these improvements could be included in the Do-Minimum scenario due the reasonable certainty that the schemes would proceed. LBC has already implemented one phase of the works through the upgrades to the Stopsley Way junction area.	No

	the associated trigger points, will not be identified through the modelling process, as they are included in the 'do-minimum' modelling scenarios and therefore treated as committed.					
SA.1.203	New Century Park is only included within the 'do-something' scenarios. Whilst New Century Park is also dependent upon the airport Access Road (albeit potentially in a different form), it could theoretically come forward prior to the airport, and its inclusion could therefore influence some of the modelling work.		Central Bedfordshire Council	1	This matter has been extensively discussed with stakeholders with regards to including New Century Park development in the Do Something scenario only. It would not be realistic to include the development in the Do Minimum without the Airport Access Road (AAR). Therefore, to produce a robust assessment, the development was only included in the Do Something scenario, where all the proposed mitigation measures, such as the AAR, were included. Please find additional information within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No
SA.1.204	Notwithstanding the level of certainty applied to the North of Luton development, the inclusion of the M1-A6 link road in the Core Scenario (excluding the North of Luton development) may provide an unrealistic forecast, with the Local Plan Scenario test including North of Luton considered likely to be more representative. It may		Central Bedfordshire Council	1	The planning assumption at the time of the modelling was that the M1-A6 link has full approval, hence was coded in the TAG-based scenario as it is Near Certain, whereas the North of Luton development has 'Reasonably Foreseeable' status. The Local Plan scenario might give a better understanding on the likely impact and the interaction between the Road and the development and the	No

	therefore be appropriate to update the 'Local Plan Scenario' Sensitivity test, or carry out further new Sensitivity testing to determine whether the changes outlined above would be expected to impact upon the findings of the assessment work				results of this work and information can be provided if required.	
SA.1.205	As such CBC currently have a number of queries with regards to the extent of infrastructure assumed within the modelled scenarios, and upon which the DCO appears to be reliant, but which does not appear to be proposed for delivery as part of the DCO, and for which there are no firm commitments in terms of delivery by others.		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.196.	No
SA.1.206	As the 'With Development' scenario includes mitigation associated with other development, it does not appear possible to fully isolate the impacts of the DCO proposals. A scenario which provides a 'Do-Minimum' forecast including committed development and associated mitigation would allow for the impacts of the DCO to be disaggregated more clearly.		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.196.	No

SA.1.207	Following further clarity on the above matters from the applicant team, it may therefore be the case that revisions to the assumptions contained within the forecast baseline in terms of infrastructure provision will be required.		Central Bedfordshire Council	1	Please refer to the response to Ref. SA.1.196.	No
SA.1.208	Further clarity is also needed on the relationship between the strategic and micro simulation modelling to support the work. Whilst reference has been made to a comparison exercise being undertaken, to correlate the flows between the two models, this process needs further explanation. CBC note and endorse the suggestion within the WSP review that a cordon is taken from the Strategic Model and input into the VISSIM model to help understand how the models compare. In particular to clarify whether there are consistent development and infrastructure assumptions across the models, or whether these have been modified. We would also be seeking to understand how the relationship between the models work in practice and, for example, whether		Central Bedfordshire Council	1	<p>The translation of SATURN flows to VISSIM flows is not straightforward, for example due to the differences in zoning structure. Even if SATURN demands were passed over to the VISSIM model the results would still be different due to the way SATURN and VISSIM model junctions and capacity. Notwithstanding this, the Applicant has reviewed the VISSIM demand and sensitivity tests have been undertaken with some adjustment to the demands through the VISSIM model area to reflect the model flows in the SATURN model.</p> <p>The base and future year cordon matrices of the VISSIM model area have been extracted from the SATURN model and used in the sensitivity test. The growth in background traffic that is forecast within SATURN (from base to future year) has been used as a sensitivity test in VISSIM with the main purpose to assess if any changes in the future year forecasts will impact on</p>	No

	infrastructure proposals within the VISSIM model are then reflected in any 'with mitigation' version of the strategic model.				<p>the proposed highway mitigation schemes. The growth has been applied to the background traffic travelling through the VISSIM model area, as future year traffic demands for the airport and for specific land use developments are calculated separately and applied directly to both the VISSIM and SATURN models.</p> <p>The outcome and results of the sensitivity testing is set out within the Transport Assessment [TR020001/APP/7.02].</p>	
SA.1.209	At present there also does not appear to be a comparison between the 'without mitigation' and 'with mitigation' Saturn models, to determine any redistributive effects of the proposed mitigation works.		Central Bedfordshire Council	1	This scenario was not modelled and is not considered necessary since the mitigation model performance is compared to the do-minimum.	No
SA.1.210	It is currently unclear from the information submitted to date how the traffic demands for the more detailed (individual junction) assessment work have been derived. I.e.: whether they are taken directly from the Saturn Model, the VISSIM model, or based upon an alternate methodology. It is also unclear whether individual junction modelling has been undertaken in order to develop		Central Bedfordshire Council	1	The base VISSIM model was validated to turning counts. This was set out in the Local Model Validation Report (LMVR) which has been shared with CBC. The future Do Minimum and Do Something models have then been developed from the validated base model as have the mitigation measures.	No

	<p>the mitigation Schemes proposed. In the event that flows are taken direct from strategic level or Microsim models, we would be looking for confirmation that the base models validate to turning movements. Should the base models not validate to turning movements then a methodology by which modelled growth is added to observed base flows would be an alternate option to ensure a representative assessment. It was noted from paras. 18.5.13 and 18.5.14 of Chapter 18 of the PEIR that a series of surveys were undertaken in November 2017 to establish a baseline level of traffic, which included queue length surveys. As such these would provide a potential source of data for base model validation (against both turning proportions and queue lengths, or recorded saturation flows for signal junctions).</p>					
SA.1.211	<p>We would also request sight of any more detailed junction assessment work undertaken on a junction by junction basis using LINSIG, JUNCTIONS 9 or other junction specific modelling</p>		Central Bedfordshire Council	1	<p>No specific standalone junction modelling has been undertaken beyond the VISSIM model extents. The VISSIM model cordon has been focused on the key junctions in the vicinity of the airport to appraise, the</p>	No

	software, including full model inputs and outputs. There is currently no comparative information provided with regards to the operation of the junctions assessed in the 'base', 'forecast do-minimum' and 'forecast do-something' scenarios, aside from a high level 'Level of Service' summary, so it is not possible to fully assess the effectiveness of the proposed mitigation or the future operation of the junctions in question.				larger scale strategic SATURN highway model has looked at areas outside of the VISSIM extents.	
SA.1.212	CBC assume that the information summarised above is available and would request that this is shared with the authority to allow for a full review to be undertaken, particularly for works which are predicted to take place within the CBC network and for which CBC will take on future responsibility.		Central Bedfordshire Council	1	Please refer to the response to Refs. SA.1.208 – SA.1.211.	No
SA.1.213	East Luton highway improvement schemes being included in the 2027 case may provide an overestimate of traffic capacity at those locations. Noted that some locations require further modification as a result of the airport. Funding for the initial measures is not		Host Authorities	4	Please refer to the response to Ref. SA.1.202. This demonstrates that assumptions included within the modelling have been agreed in discussion and engagement with Local Authorities, including the East Luton highway improvements and LBC have confirmed that the aim is to have the	No

	confirmed. Uncertain what the mechanism for the full scheme delivery at these locations will happen if they don't come forward.				scheme would be operational prior to 2027.	
SA.1.214	There are three interventions planned on the A505 or A602 in Hitchin these improvements focus on traffic capacity improvements alone and do not appear to introduce new facilities, or improve existing facilities, for travel by active and sustainable travel modes which does not meet the requirements of the Hertfordshire LTP4. The Ground Strategy does not refer to any modelling having been undertaken for these junctions, however, the junction layouts appear to be influenced by changes typically made to increase capacity in and Junctions 10 model, and this information is required to determine the suitability of the proposed 153service153onn.		Host Authorities	4	The interventions have been developed to mitigate the additional traffic generated by the development and as such these mitigation measures and junction changes have been included in the transport modelling of the future year scenario. The Applicant is supportive of measures to improve active and sustainable travel modes and will work with the authorities to implement any improvements, such as to meet their requirements for LTP4 wherever reasonably practicable.	No
SA.1.215	Furthermore, it is unclear from the traffic modelling if any assessment has been undertaken on the wider impacts of the Hitchin junction interventions (such as displaced congestion or impacts on active		Host Authorities	4	The Do Something modelling has been compared to the Do Minimum modelling so any residual displacement effects, such as a result of the Hitchin junction intervention, are accounted for within the existing modelling.	No

	travel and PT services including potential delays to local bus services not associated with the airport).					
SA.1.216	The SATURN model includes the Hitchin area, and the ES should include details of the impacts on junctions on the A505/ A602 within the Hitchin area, including delays and V/C (link and junction), flows, speeds, queues and any significant traffic redistributions identified between Luton and the A1(M) on the A505 and A602, particularly focusing on junctions in Hitchin		Host Authorities	4	Noted. Consultation between the host authorities and the Applicant has and will continue, however, additional information on these junctions identified in the comment can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] submitted as part of this application for development consent.	No
SA.1.217	We are aware that the authorities have been engaged in this process [development, calibration and validation of the models] already and are happy with the model scope, coverage and assumptions around the development / transport and highway scheme uncertainty log.		Host Authorities	4	Noted.	No
SA.1.218	The methodology states that a variable demand model has been used (calculating mode choice, destination choice and time of travel) however, it would appear that the highway assignment model / public transport assignment model has		Host Authorities	4	A fixed mode share has been adopted for airport related trips with the background trips addressed via the variable demand model.	No

	a fixed assumption around the public transport mode share? 45% by PT for the air passengers and the way employee trips and goods movements are dealt with in the models is not explicitly stated.					
SA.1.219	CBL TM-LTN Base model is 2016 and based on an average weekday in June (neutral month) AM peak / interpeak / PM peak models. However, it is assumed that this assessment has been undertaken and that the authorities are content that the validation/calibration exercise was sufficient for the purposes of the model development and scope.		Host Authorities	4	The original CBLTM model has been substantially improved and the approach to modelling has been discussed extensively with the relevant highway authorities.	No
SA.1.220	The VISSIM model had background traffic growth applied at 0.25% for non-motorway traffic and 0.5% for through traffic on the M1 the derivation and assumptions used to generate these is not provided.		Host Authorities	4	Noted. Further information has been provided through the on-going discussions with the relevant consultees. Please find additional information within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	Yes
SA.1.221	Airport related development growth was included for passengers and employees with the generated road traffic taken from the York Aviation Forecasts and predicted changes in modal shift. No further detail is		Host Authorities	4	Noted. Further information has been provided through the on-going discussions with the relevant consultees. Please find additional information within the Transport Assessment [TR020001/APP/7.02]	Yes

	provided about the assumptions that have been made in relation to this and how they have been applied in the model				and Surface Access Strategy [TR020001/APP/7.12].	
SA.1.222	The assumption within the VISSIM is that a 45% mode share by public transport is achievable – this is a ‘best case’ traffic generation scenario. It is recommended that a ‘worst case’ traffic generation scenario is tested to identify the mitigation requirements. There is no mention of the airport goods traffic being included in the modelling.		Host Authorities	4	The 45% passenger modal share figure is seen as a minimum and not simply a target. The public transport work has shown that there is potential to grow modal share beyond 45%, however, for the purposes of ensuring that the residual impact has been robustly considered, realistic targets have been adopted. In the airport trip generations for the future years, allowance has been made for an increase in HGVs as a result of the Proposed Development.	No
SA.1.223	Further assessment of junctions using standalone software is suggested within the report to be undertaken for junctions outside the scope of the model. This is a standard approach to reporting model outputs and considering additional junction hotspots. It is suggested that the local authorities should be active in identifying specific junctions which are of concern and outside the scope of the detailed modelling in VISSIM that has been undertaken to date.		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No

SA.1.224	It is not clear how the different components of the new demand have been built into the demand matrices for the models – increase in goods vehicles, passengers, visitors and employees associated with the expanded airport operations for the operational modelling.		Host Authorities	4	Details were provided in the forecasting report which was shared with the relevant authorities.	No
SA.1.225	The process of identifying the developments for inclusion seems reasonable, following receipt of the Forecasting Report some queries have been raised with Arup about the assumptions used and they have agreed to provide additional information but due to short timescales this will be expected after the consultation deadline, and we can form a view on whether this is acceptable		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No
SA.1.226	Table 4.1 to 4.3 of the Forecasting Report provides details of the forecast households, population and employment by district taken from the TEMPro 7.2 forecasts. The Councils will need to check whether these are appropriate for their forecast local plan growth over the timescale. These forecasts will have a direct impact on the level of		Host Authorities	4	Noted.	No

	background traffic growth included in the models.					
SA.1.227	There is a recognition of the anticipated traffic growth within the report but the mitigation does not seem to go far enough.		Host Authorities	4	Despite measures to increase the proportion of journeys to the airport by public transport, there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development. The proposed strategy aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods. The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken and can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] , to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.	No

SA.1.228	The CBLTM-LTN and VISSIM modelling assumes that by 2027 the improvements to the A505 and related junctions proposed by the East Luton Study will have been implemented. Confirmation required that funding for delivery of these improvements and whether this a reasonable assumption to make for 2027.		Host Authorities	4	The applicant understands that LBC remain committed to the delivery of the scheme. LBC has already implemented one phase of the works through the upgrades to the Stopsley Way junction area.	No
SA.1.229	We are generally concerned that the strategic model and VISSIM model in the future will have different levels of demand and routing patterns. At the meeting it was stated that a high level check had been carried out between the two models and this information would help in our understanding of how the models align with each other.		Host Authorities	4	Please refer to the response to Ref. SA.1.196. Through ongoing engagement, presentations and material has been shared with Host Authorities which demonstrate the outcome of a sensitivity test to provide comfort that the demand in the future VISSIM and strategic are broadly similar, more detail is included within the Transport Assessment [TR020001/APP/7.02] .	No
SA.1.130	Following our meeting it became apparent that there does not appear to be a modelled scenario which isolates the impact of the proposed airport expansion on the local network. The following scenario is therefore missing: Do Minimum with committed highway schemes and developments and mitigation (to resolve DM		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No

	issues)					
SA.1.231	The Strategic Modelling Forecasting Report presents the distribution of the airport traffic but there is a lack of information about the impact the new proposals have on the highway network around Luton airport in terms of increases in delays on links and junctions. Further detailed analysis at a junction level has been requested for review.		Host Authorities	4	Noted. Consultation between the host authorities and the Applicant will continue, however, additional information on this can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] submitted as part of this application for development consent.	No
SA.1.232	The following plots from the existing future scenarios for the area surrounding the airport have been requested to supplement our understanding: DS vs DM changes in junction delay DS vs DM changes in link flows DS vs DM changes in link V/C DS vs DM changes in queuing DS vs DM changes in vehicles travel speeds		Host Authorities	4	Through ongoing engagement, this material has been shared with Host Authorities and is also included within the Transport Assessment [TR020001/APP/7.02] .	No
SA.1.233	It is unclear why the VISSIM model didn't use any outputs from the CBLTM model to generate the future year demand? At first glance traffic flows in the VISSIM look completely at odds with the strategic model results, e.g., PM		Host Authorities	4	Through ongoing engagement, presentations and material has been shared with Host Authorities which demonstrate the outcome of a sensitivity test to provide comfort that the demand in the future VISSIM and the strategic model are broadly similar.	No

	peak performance looks worse in VISSIM whilst reverse seems true in CBLTM.					
SA.1.234	We have requested the comparisons between the VISSIM and the strategic model that were carried out as a check between the two models. Our understanding is that the VISSIM model uses fixed routes and is not dynamically assigned, we therefore have a concern that a fixed routes will not reflect traffic flows and route choices either within the VISSIM model area or potentially externally. This would be captured if outputs from the strategic model had been used. We suggest that a sensitivtestest is undertaken where the difference in flows (via a cordon) between a future year scenario and the base from the strategic is supplied to the base VISSIM model to understand how the two models compare.		Host Authorities	4	Through ongoing engagement, presentations and material has been shared with Host Authorities which demonstrate the outcome of a senstestity test to provide comfort that the demand in the future VISSIM and the strategic model are broadly similar. More detail is included within the Transport Assessment [TR020001/APP/7.02] .	Yes
SA.1.235	As a result of not using the growth from the strategic model, there is no clarity provided in the reporting to evidence the use of the following factors in the VISSIM model. We need to have a better understanding of how these factors were derived to		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No

	understand if they are robust and suitable					
SA.1.236	We need to have a more detailed understanding of how specific junctions have been identified as needing mitigation both within and outside of the VISSIM model area to understand if they are robust and suitable for the assessment.		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No
SA.1.237	We have requested the future year SATURN files to review to help address some of the detailed questions we are receiving around localised impacts This will enable WSP to answer detailed questions in Local Authority areas which cannot easily be understood from the information in the Forecasting Report.		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No
SA.1.238	There is no mention of any high or low growth scenarios in the reporting, just the core scenarios is referenced, it would be helpful to understand whether these have been undertaken not constrained to TempPro.		Host Authorities	4	Please refer to the response to Ref. SA.1.196. Overall growth in the transport model has been capped to TEMPro. There have been a number of sensitivity tests undertaken with relation to faster and slow growth and different M1 configurations. More details are provided in the Transport Assessment [TR020001/APP/7.02] .	No

SA.1.239	It is unclear whether the Butterfield Business Park is included within the Do Minimum as references are contradictory. Strategic Modelling Forecasting Report – Table 3.6 Butterfield not included, but 4.2.7 suggests it is. Please confirm the assumptions adopted for this development.		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No
SA.1.240	Further explanation on why Napier Park and newlands Park were 'adjusted' (4.3.35) and why other developments were not.		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No
SA.1.241	It would be helpful to provide a map of the location of the developments close to Luton airport and highlight those where trip rates have been adjusted to the respective to provide a more comprehensive understanding of these assumptions and any potential impacts on the matrix development.		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No
SA.1.242	In table B1-2, generally speed reductions are less in Luton compared to the simulation network (Modelling Forecasting Report explained in 4.5.7 because of additional infrastructure) but this is not the case in the PM peak despite the increase in vehicle kilometres being lower further information is		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No

	needed to give a clearer reason for this (not explained in Strategic 4.5.7).					
SA.1.243	An explanation is needed regarding why, in AM peak 2027, there is a reduction in veh / Luton whereas in all other areas / peaks show an increase. We have also raised a query around why there are increases in speeds in North Hertfordshire and Dacorum. The most significant increase in speed is in Luton in the PM which sees increases in vehicle kilometres and speeds and an explanation is needed.		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No
SA.1.244	We need to understand why there are decreases in 24 AADT at the highlighted locations between DM and DS scenarios.		Host Authorities	4	Please refer to the response to Ref. SA.1.196.	No
SA.1.245	A traffic model, the Central Bedfordshire and Luton Transport Model for Luton airport (CBLTM-LTN) has been developed. It is noted that the model includes neighbouring models but excludes Milton Keynes. It is not known whether MKC was approached with regard to the inclusion of its own model into the Luton airport model. As a result of the chosen study area and the exclusion of		Milton Keynes Council		The impact on the Milton Keynes area has been included in the Strategic Modelling: Forecasting Report, January 2022, which can be provided to Milton Keynes Council. The report also provides further information on the development and application of the strategic model and shows the impacts on the Milton Keynes highway network to be very small. Please find additional information within the Transport Assessment [TR020001/APP/7.02]	No

	Milton Keynes from the model, there is no indication of the likely impact of the proposals on the Milton Keynes highway network.				and Surface Access Strategy [TR020001/APP/7.12] .	
SA.1.246	Milton Keynes Council would like Milton Keynes' affected junctions to be included to the future transport modelling to understand what the future increase in traffic associated with Luton airport expansion is likely to be.		Milton Keynes Council		Please refer to the response to Ref. SA.1.245.	No
SA.1.247	<p>Modelling Assessment</p> <p>The use of 2016 and 2017 as the base years for transport modelling and forecasting raises concerns. Data published by the Civil Aviation Authority (CAA) for the period 2016-2019 indicates a significant change in passenger travel patterns at Luton airport during this period. This is outlined in Table 1 [of the response submitted by TfL].</p> <p>Between 2016 and 2019 the car/taxi mode share fell from 68 to 56 per cent, whilst the public transport mode share grew from 32 per cent to 43 per cent. An incorrect baseline risks distorting the impacts and it is not clear how this variation in mode share between 2019 and 2016/2017</p>	Transport for London			The base models have been developed, calibrated and validated in compliance with TAG guidance with 2016 and 2017 base years as mentioned. The modelling approach has been agreed with the relevant local and national highway authorities and the base validated model reflected operational conditions at the time. Future baseline models have taken account of the changes in demand and mode share as the airport grows in both the Do Minimum and Do Something scenarios. The future year projections of airport passenger demands and mode split take account of CAA data and trends.	No

	has been captured in the modelling and assessment.				
SA.1.248	It is also of concern that the modelling assessment does not appear to take any account of the impact of airport expansion on London's transport network. This is an issue because CAA data identifies Greater London as Luton airport's primary catchment, accounting for 39 per cent of (non-transfer) passenger trips in 2019. If this proportion were to remain unchanged, expansion would increase the number of passengers travelling between London and the airport from around 6.8 million passengers per annum (mppa) to almost 12.5 mppa. The potential impacts on London's transport network as a result of an increase of this scale requires assessment as part of the DCO application.	Transport for London		The traffic related impacts on the road network around London are expected to be small, with the potential impact on the rail network from Luton airport to London included within the Transport Assessment [TR020001/APP/7.02] and Chapter 18 Traffic and Transport of the ES [TR020001/APP/5.01] submitted as part of this application for development consent. It is also noted that the rail assessment was undertaken against a pre-Covid baseline where rail demand was at a higher level.	No
SA.1.249	Highway Modelling It is therefore vital that an assessment of the expansion proposals on London's road network is undertaken. The 'Full Modelled Area' of the Central Bedfordshire and Luton Transport Model for Luton	Transport for London		Please refer to the response to Ref. SA.1.248. The airport operator already has powers to implement car parking and access charges, and as such it is not necessary to seek further powers through the application for development consent. The approach to	No

	<p>airport (CBLTM-LTN) does not extend beyond the M25. Options to assess impacts in London include increasing the geographical scope of the 'Full Modelled Area' or making use of TfL's LoHAM model – i.e. adding the scheme demand to the LoHAM Reference Case models to compare the traffic impacts with and without the scheme. It is noted that the central case modelling assumption is that parking and forecourt charges apply broadly as currently in the future year assessment. This is despite proposals to introduce road user charging alongside airport expansion. The modelling assessment should fully assess this as a mitigation measure, detailing its impact on the road network and its ability to stimulate mode shift towards sustainable modes.</p>			<p>managing the potential surface access impacts of the Proposed Development do not assume the use of additional road user charging.</p>	
SA.1.250	<p>Rail Modelling The overall transport modelling assessment is heavily weighted towards the highway network, with very little focus on the rail network and other public transport modes. This results in a very incomplete assessment, mostly limited to boarders and</p>	<p>Transport for London</p>		<p>The PEIR and SAETS which were available as part of the 2022 statutory consultation set out the potential impact on the rail network from the airport to London. Further information can now be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] which has been</p>	<p>No</p>

	<p>alighters of services only at Luton Airport Parkway. Even then, the impacts on Thameslink (GTR) services and East Midlands Railway services at this station have not been assessed on a comparable basis.</p>			<p>submitted as part of the application for development consent. It is also noted that the rail assessment was undertaken against a pre-Covid baseline where rail demand was at a higher level. The Applicant has worked with the rail demand and capacity data available to them to ensure a robust and informed assessment of the effects of the Proposed Development. Including on the Thameslink (GTR) and Midlands Railway services.</p>	
SA.1.251	<p>The conclusions drawn on rail capacity also appear contradictory. The assessment presented in section 9.7 of the Transport Strategy indicates that rail services would operate at less than 50 per cent of their total capacity in the peak. Yet, it is suggested in section 7.6 of the Transport Strategy that it would be difficult to drive further increases in rail trips without impacting on other rail users – i.e. constrained by limited capacity.</p>	<p>Transport for London</p>		<p>The peak period rail capacity analysis (based on 45% passenger public transport mode share) indicates that there is indeed sufficient overall train capacity (seating + standing) to accommodate the expected growth in demand on the line (airport & non-airport related) up to 2043. This is even under pre-Covid demand growth assumptions; as per their analysis. However, seats may be at a premium on some southbound services, south of Luton Airport Parkway, and certainly on northbound services at St Pancras, probably up to St Albans. Although seats would become available en route, as passengers disembark at intermediate stations such as St Albans and Harpenden, some people may perceive the lack of comfort as an issue. Adding seating capacity at peak times would prove difficult given train</p>	<p>No</p>

				<p>configuration and line capacity restrictions. The half hourly EMR services may in the future switch seating+standing configurations and go from 8 to 12 car trains; however, any further seating capacity changes may prove more difficult to achieve.</p> <p>The Public Transport (PT) analysis has indicated that:</p> <ul style="list-style-type: none"> • the currently forecast 45% passenger PT share is split as follows: 27% rail and 18% bus/coach; and that • the potential 49% PT share would be split as follows: 28% rail and 21% bus/coach. <p>As such, the Applicant would not expect a further significant demand increase on the rail network. Please find additional information within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	
SA.1.252	In scoping a thorough assessment, Luton airport should consider the potential capacity impacts on its rail catchment more widely. This could include assessment of additional passenger flows on station capacity at Luton Airport Parkway, particularly the	Transport for London		Please refer to the response to Ref. SA.1.250.	No

	connection between National Rail and Luton DART services. The assessment should also detail the effect of additional passenger flows on other key interchanges including West Hampstead, Farringdon and St Pancras, and the resulting impact on TfL services.					
SA.1.253	The consultation brochure is a thorough and comprehensive document, which provides a good summary of the modelling undertaken to forecast surface access demand, modal split and traffic distribution. This reflects the modelling outputs that have been provided to National Highways and which appears – taken at face value – to support the proposals put forward in relation to the SRN. Further detailed information is requested to enable National Highways to validate this position, which in turn will allow the Statement of Common Ground to be progressed in advance of the DCO submission.	National Highways		1	Noted. Discussions with National Highways have continued.	No
SA.1.254	National Highways would like to understand which proposed residential, commercial and transport developments have	National Highways		1	Please refer to the response to Ref. SA.1.196. The Uncertainty Log and modelling Forecasting Report has been shared with National Highways through	No

	<p>been included in the uncertainty log. Whilst Webtag is clear that only committed developments should be included in the core scenario, it is important that sensitivity testing is undertaken on any other large developments that may impact adversely on the SRN. A particular issue, which we would like to understand in detail is the interrelationship between proposed developments adjacent to Luton Airport Parkway Station, the DART and the airport Expansion project. Of particular interest is whether there will be any demand for park and ride at Luton Airport Parkway with passengers to using Dart services to access the airport.</p>				<p>our series of engagement sessions and this clearly sets out the included committed residential, commercial and transport developments. The inclusion of schemes has been agreed with National Highways through scoping. More details are provided in the Transport Assessment [TR020001/APP/7.02].</p>	
SA.1.255	<p>A refinement of the selection of comparable airports has been undertaken using specific indicators such as typology of passengers, passengers' demand distribution and airports' accessibility, to determine the most appropriate benchmark airports. It is noted that 65% of Luton's passengers come from outside of London. Therefore, as the majority come from outside</p>	National Highways		1	<p>Noted. Further information can now be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] which have been submitted as part of the application for development consent.</p>	Yes

	of London it would be useful to have a comparison of the journey times from outside of London, other than those shown in Table 9.1. Furthermore, whilst comparable in time, the mode change and wait time at Luton is arguably less attractive for passengers particularly for those with luggage and with mobility/children than at these comparator airports.					
SA.1.256	Due to COVID-19 and changes in timetable there has been a change in the frequency that destinations are served with a reduction in the number of Thameslink services. National Highways would like to understand how this compares to the likely origins/destinations of airport passengers and their mode shares, as timetable reductions could result in higher mode shares from the areas where there has been a reduction in train service frequency.	National Highways		1	Please refer to the response to Ref. SA.1.196. The Transport Assessment [TR020001/APP/7.02] and supporting Public Transport Strategy provide further details on the impact of COVID-19 related changes to rail, bus and coach services and how this could potentially affect the demand profile across different spatial scales and the effects on mode share.	No
SA.1.257	It is noted that there are fewer bus services that operate to Luton airport in comparison to Stanstead and, whilst it is noted that there will be an increase in the number of layovers at Luton	National Highways		1	The design includes provision for expanded bus and coach facilities. Please find additional information within the Transport Assessment [TR020001/APP/7.02] and Surface	No

	which will be comparable to Stanstead, this will increase the frequency and destinations of services.				Access Strategy [TR020001/APP/7.12].	
SA.1.258	Although National Highways has agreed the base Vissim model, we have yet to see the forecast modelled years in detail.	National Highways		1	Please refer to the response to Ref SA.1.196. The modelling files have been shared with National Highways through our ongoing engagement.	No
General/Other – Monitoring						
SA.1.259	<p>NHC asks LR to:</p> <ul style="list-style-type: none"> • Agree with NHC and HCC the locations and types of all traffic and air quality monitoring equipment to be deployed in North Herts, including at relevant sites allocated in the emerging and future Local Plans, such as East of Luton (Policy SP19). • Consider making available a mobile monitoring station to monitor sites of potential concern identified at a later date. • Agree with NHC a process for reviewing the deployment of monitoring stations to ensure that all affected settlements, now and in the future, are adequately monitored. • Provide calibrated baseline traffic counts for each traffic monitor, broken out by (at a minimum): car, LGV, MGV, HGV and motorcycle. 		North Herts DC	1	<p>A Green Controlled Growth Framework [TR020001/APP/7.08] which will ensure that the airport operates within particular “Limits” is proposed. These limits relate both to surface access (specifically, mode share) and air quality. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time.</p> <p>One of the Applicant’s GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.</p> <p>The Framework Travel Plan [TR020001/APP/7.014] also sets out the proposed monitoring and evaluation regime for the future Travel Plans that will be produced every five</p>	No

	<ul style="list-style-type: none"> • Undertake to manage and maintain all deployed monitoring equipment until at least five years after LLA patronage first reaches 32 mppa, or whatever maximum is agreed as part of the DCO process. • Re-establish a ride-sharing service, and promote it consistently and effectively to staff and passengers. 				<p>years post first occupation for Surface Access related targets. The associated forums will allow discussions between the Applicant, operator and North Herts DC and Hertfordshire County Council in order to understand that the concerns identified in the comment, if materialised, can be addressed through the delivery of the Travel Plan. This will allow discussions around key locations, frequency and modes recorded for the monitoring as requested. There are many measures proposed, including promoting ride-sharing with the Travel Plan's Toolbox of measures.</p> <p>The Transport Assessment [TR020001/APP/7.002] has identified the locations where impacts are expected and includes proposals for mitigation, this will be kept under review through the delivery of future Travel Plans and the monitoring programme proposed.</p>	
SA.1.260	The M1, A1080, A5183, A5 and B653 already have significant congestion. DBC proposes that that there should be ongoing monitoring and assessment of these routes so that impacts upon local communities may be more accurately identified and included in any measures to be		Dacorum Borough Council	1	Please refer to the response to Ref. SA.1.259	No

	identified as part of the proposed GCG regime.					
SA.1.261	It is considered essential that the local highway networks around the airport, including those from within the St Albans District should be subject to robust on-going monitoring throughout any approved expansion of the airport and that a clear system is put in place to enable communities to access mitigation funding or works to resolve any unforeseen impacts on these roads. That process is not set out in sufficient detail at this stage and this must be addressed prior to the Acceptance stage of the DCO process.		St Albans City and District Council		Please refer to the response to Ref. SA.1.259	No
SA.1.262	There have not been any traffic surveys carried out from Kings Walden Parish into Luton, this needs to be done to fully understand the impact on our villages.	Kings Walden Parish Council		1	Traffic surveys were undertaken at various locations in the Parish of Kings Walden in 2017 and this information, in addition to the strategic traffic modelling, has been used as part of the assessment of the Proposed Development.	No
SA.1.263	National Highways is particularly interested in how the travel plan will be managed and monitored, as current demand forecasts for the SRN rely on the travel plan targets being met to achieve the	National Highways		1	Please refer to the response to Ref. SA.1.56.	No

	<p>modal share assumptions. Whilst there is an intention that the travel plan will be monitored and data shared with the local authorities, National Highways requests to be a partner in this arrangement and to have an oversight of the monitoring of the travel plan data.</p>					
Local Impact Fund						
SA.1.264	<p>However, we consider that there remains a case for a general local highway network fund to cover additional improvements in physical highway infrastructure should future monitoring demonstrate that there is a need for such improvements. Unforeseen or unintended consequences of future growth on the highway network should not be left to the highways authorities to fund in the future. Such interventions would be considered alongside demand management and sustainable transport initiatives in the Sustainable Transport Fund with priority given to reducing highways impacts by modal shift prior to capacity interventions given the</p>		Host Authorities	4	<p>As set out in the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12], the Applicant proposes to undertake monitoring to enable the impacts of the Proposed Development to be able to be considered during implementation such as airport related traffic on less suitable roads or parking in residential areas. The Applicant and the operator will work with the local highway authorities and support appropriate measures in the event that there are impacts which occur as a consequence of the implementation of the Proposed Development.</p>	No

	environmental benefits that would result.					
SA.1.265	Attention is drawn to the approach taken at Stansted airport where the Unilateral Undertaking in relation to their 2021 planning permission to grow to 43 mppa provides for a £1million contribution to a 'Local Bus Network Development Fund', £1million to a Local Road Network Fund and a Sustainable Transport Levy of 25p from passenger parking, all of which are managed by the Airport Transport Forum.		Host Authorities	4	Noted.	No
Engagement						
SA.1.266	At this stage in the process the [Surface Access] Strategy, details of Travel Plans and role of the ATF are not clear, and there will need to be substantive engagement in advance of submission.		Hertfordshire CC	1	Engagement with Hertfordshire CC has continued and is expected to continue in the implementation stages.	Yes
SA.1.267	Given the approach towards expansion is incremental with trigger points in capacity increases and associated mitigation, LB Barnet would request the opportunity to be kept informed and further		London Borough of Barnet		Noted. The Applicant welcomes the opportunity to continue working alongside local authorities post DCO submission and grant of permission. Set out within the Framework Travel Plan [TR020001/APP/7.13] is the proposed governance structure for	No

	consulted on the proposals throughout the expansion process.				engagement with surrounding authorities through a steering groups and forums. This will provide opportunity for neighbouring authorities to be kept apprised of the monitoring and evaluation of surface access impacts related to the airport expansion.	
SA.1.268	CBC and the Luton Rising Team have been involved in various discussions detailing the methodology behind the technical modelling of future highway impacts. This has included the receipt and initial high-level review of strategic modelling reports provided by the applicant team as part of ongoing technical discussions prior to the consultation.		Central Bedfordshire Council	1	Engagement with CBC has continued and is expected to continue in the implementation stages.	Yes
SA.1.269	It is not known whether MKC was approached with regard to the inclusion of its own model into the Luton airport model.		Milton Keynes Council		Please note that the impact on the Milton Keynes area has been included in the Strategic Modelling: Forecasting Report, January 2022, which can be provided to Milton Keynes Council. The report also provides further information on the development and application of the strategic model and shows the impacts on the Milton Keynes highway network to be very small. Whilst Milton Keynes Council were not directly approached, the use of various models was considered prior to the development of the CBC-LTN model.	No

SA.1.270	National Highways will require further information and extensive engagement with Luton Rising as the scheme develops given the construction and long-term operation and maintenance impacts on the SRN of the proposals.	National Highways		1	Engagement with National Highways has continued and is expected to continue in the implementation stages.	Yes
SA.1.271	<p>We welcome the engagement we have had with Luton Rising to date and confirm our view that the assessment undertaken and mitigation proposed appear broadly acceptable. Nevertheless, we require further detailed information in a number of key areas in order to validate that position. In addition, there are several issues on which we have not yet been engaged where we will need to reach agreement. The key outstanding issues associated with the impact on the SRN are:</p> <ul style="list-style-type: none"> • Modelling – Although we have been provided with headline strategic Saturn modelling and local VISSIM modelling outputs, we are yet to receive the models to enable us to satisfy ourselves that the 	National Highways		1	<p>Engagement with National Highways has continued and is expected to continue in the implementation stages if development consent is granted. Through reaching agreement with National Highways, a resolution on these concerns has been sought. The modelling files used for the assessment have been provided to National Highways. The approval of the design will be discussed and agreed with National Highways. A sensitivity test has been undertaken to respond to the comments regarding the All Lane Running scheme. However, it should be noted that at scoping stage it was agreed with National Highways that this should be part of the core case.</p> <p>For the environmental elements, there has been a comprehensive programme</p>	Yes

	<p>forecast demand and traffic movements are acceptable to National Highways.</p> <ul style="list-style-type: none"> • M1 J10 Design – Whilst we are broadly comfortable with the mitigation proposals for M1 J10, we will need to review the VISSIM model in detail to confirm our acceptance in advance of DCO submission. In addition, there are detailed matters we will need to resolve in respect of smart motorway technology and operation. • M1 South of Junction 10 – As we have discussed with Luton Rising, the assumption that an All Lane Running scheme will have been implemented in advance of the final phase scheme opening is not secure. There is currently no commitment to implement such a scheme and this will be dependent on the content of future Road Investment Strategies, which are set by government. We will therefore need to understand the implications of a scenario of the airport operating with 32 million passengers per annum without ALR south of M1 J10. 			<p>of engagement with National Highways.</p> <p>For construction, please refer to the response to Ref. SA.1.172.</p>	
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	<ul style="list-style-type: none"> • Environmental Assessment – The Environmental statement as it is currently prepared does not appear to contain sufficient assessment of the impact of the M1 J10 mitigation works (and the main airport works) on SRN receptors. This needs to be addressed to enable National Highways to understand the impact of the proposed scheme on its performance measures, which are monitored on behalf of the Government by the Office of Road and Rail. • Construction Impacts – National Highways will require a detailed understanding of the construction proposals for the entire scheme, including the methodology and timing, which we will need to agree. This is of particular importance since it is envisaged that the majority of lorry movements associated with the construction will use M1 J10. 					
SA.1.272	Chapter 11 [of the SAETS] sets out the air freight projections. It is indicated that the Need Case sets out the details of the air freight forecasts. Further information is required such as the nature of the Need Case and	National Highways		1	The demand forecasts have been refreshed prior to submission, taking into account the latest economic information. Further information is provided in the Need Case [TR020001/APP/7.04] , submitted as	No

	when it was established (looks like potentially 2019), as the freight market outlook has changed to some degree as a result of the pandemic, due to the critical role that cargo has played in sustaining the aviation sector.				part of the application for development consent. The importance of cargo and growth is noted but growth at the airport needs to be balanced with environmental concerns, particularly regarding the operation of freighter aircraft at night. Having regard to the important role played by such deliveries, a limited number of freighter movements each year by these operators is included within the aircraft movement forecasts, but on the assumption that the number of such movements reverts to historic levels. In addition, when longer haul services are established at the airport, it is envisaged that these will also carry some freight in the bellyholds of passenger aircraft.	
SA.1.273	National Highways would also like to review the Need Case.	National Highways		1	The Need Case [TR020001/APP/7.04] is submitted as part of the application for development consent.	No
SA.1.274	It is noted that there are fewer bus services that operate to Luton airport in comparison to Stansted and, whilst it is noted that there will be an increase in the number of layovers at Luton which will be comparable to Stansted, this will increase the frequency and destinations of services. National Highways will require confirmation and further	National Highways		1	Engagement with National Highways has continued and is expected to continue through the implementation stages of the development. It is not possible to provide details on the frequency and destinations of additional bus services as this stage, as this information will need to be agreed with bus operators in line with the Proposed Development.	No

	details of this in advance of the DCO submission.					
SA.1.275	National Highways would like to see a copy of the parking strategy document referenced within the SAETS.	National Highways		1	The parking strategy forms a section of the Transport Assessment [TR200001/APP7/7.02] , rather than a standalone document. It sets out the proposed number of parking spaces at each of the stages of the Proposed Development and provides detail on spaces which are lost or re-provided as part of the development, in the context of the proposed modal share targets.	No
SA.1.276	York Aviation's demand distribution forecasts for 2024 and 2043 have been used to determine the geographical spread of PT demand for the forecasts. Although we have received the headline figures from yourselves, , we are yet to be sent this data to review in detail and confirm our agreement with the approach.	National Highways		1	Engagement with National Highways has continued throughout the assessment of the surface access impacts and related transport modelling. The outputs of the traffic modelling that has utilised the demand distribution forecasts has been shared with National Highways.	Yes
SA.1.277	Based on the high-level outputs we have seen, National Highways is comfortable that the mitigation proposed for J10 in the design years is of an appropriate scale. However, we require sight of the detailed modelling for future years to be able to satisfy ourselves that adequate capacity is provided.	National Highways		1	Please refer to the response to Ref. SA.1.271.	Yes

SA.1.278	<p>The commercial matters to be agreed in advance of the DCO submission will include, but not be limited to;</p> <ul style="list-style-type: none"> • Reviews of the highway mitigation designs are required, to enable an assessment of the future maintenance requirements and calculation of a commuted lump sum, which will need to be provided to National Highways by Luton Rising. • Discussion and agreement on the delivery model for the SRN works and the role to be played by National Highways. • A S278 agreement to fund National Highways costs in support of the scheme during the construction phase. 	National Highways		1	Please refer to the response to Ref. SA.1.271. There has been a comprehensive programme of engagement with National Highways during the project and these discussions will continue for as long as is needed to secure an agreed approach on the items listed.	Yes
SA.1.279	In addition, National Highways requests a discussion about the potential for Luton Rising to fund its costs during the pre-construction stages in support of the project, above and beyond its statutory role. This is in line with National Highways approach on other major third-party NSIPs	National Highways		1	Please refer to the response to Ref. SA.1.271.	Yes

Access Charge						
SA.1.280	<p>LR’s proposals include the potential introduction of access charges to dissuade private motor vehicle use. We consider that revenue from any such charges should be ring-fenced to sustainable transport improvements (including for cycling and walking). The Has highlight that a charging structure for parking to dissuade employee and passenger trips to the airport will only work if the alternatives are in place and at the present time this is not fully demonstrated by the proposals. Moreover, the highway interventions proposed do not consider how these can facilitate improved public transport.</p>		Host Authorities	4	<p>The airport operator already has powers to implement car parking and access charges, and as such it is not necessary to seek further powers through the application for development consent. The approach to managing the potential surface access impacts of the Proposed Development do not assume the use of additional road user charging.</p>	Yes
SA.1.281	<p>A robust charging structure for charging employees and passenger trips within the airport is encouraging but will only work if the alternatives are in place, of high quality and reliable. This isn’t currently fully demonstrated in the proposals. Those that can access the DART (rail users, Luton residents living near to Parkway station) will be able to</p>		Host Authorities	4	<p>Please refer to the response to Ref. SA.1.280.</p>	No

	<p>avoid the road charges by using the high quality replacement for the existing shuttle bus; however those who cannot easily access the DART or bus services serving the airport have fewer travel options, and could lead to areas with poor PT connections to Luton/ Luton airport facing road charges when they have no suitable alternative. This is of particular concern for trips from the east of the airport (particularly from Hertfordshire) where the charging could be highly inequitable due to there being fewer sustainable travel options to the airport and could lead to park and ride behaviour at the rail end of the DART. Further information on demand for pick-up/ drop off at the DART terminus is required to demonstrate that whether the DART terminus becomes a subsidiary pick-up/ drop-off point for the airport.</p>					
SA.1.282	<p>In respect of user charges applying at the airport (for accessing the forecourts for quick drop off and pick up trips, for short-stay parking, and for long-stay parking), it is suggested that a model similar</p>		<p>East Herts District Council</p>	<p>1</p>	<p>Please refer to the response to Ref. SA.1.280. The Framework Travel Plan [TR020001/APP/7.13] establishes the approach to governance and ongoing monitoring so that in future if adverse impacts are recorded there are forums to discuss</p>	<p>No</p>

	to the Stansted Airport Transport Forum be employed to both ensure transparency and to involve local authorities in the area in making decisions to prioritise and direct the income generated towards appropriate sustainable transport projects.				potential mitigation, if required. This will provide a forum for local authorities and the applicant to discuss concerns and mitigation if identified as resulting from the Proposed Development.	
Other						
SA.1.283	We note that in your emerging transport strategy you intend to improve public transport provision and promote sustainable travel through expanded electric vehicle charging infrastructure, expanding bus and coach service and exploring the application of charges for use of airport roads.		Stevenage Borough Council	1	Noted.	No
SA.1.284	The following summary provides Stevenage Borough Council perspective on interventions proposed within the emerging transport strategy (specifically in Table 6-1): - Luton DART and Rail – Support - Bus and Coach – Support - Walking and Cycling – Support - Managing Vehicle Access and Parking – Support		Stevenage Borough Council	1	Noted.	No

	- Highway Improvements – Support - Technology and Data – Support					
SA.1.285	The CCB recognises the efforts being made to maximise access to the airport by more sustainable modes of transport, including specifically the moves to improve access from the mainline railway and the introduction of the DART. However, we do not consider that these go far enough, and the capacity of proposed new car parking at the airport is regrettable evidence of this. We also note that additional arrivals/departures will inevitably result in increased pressure for park-and-ride services in the surrounding area, some of which may impact upon the Chilterns AONB.	Chilterns Conservation Board			Please refer to the response to Ref. SA.1.101. Despite the public transport targets there are expected to be additional journeys made by car due to the scale of growth, which results in the additional parking spaces which are proposed on site. The Applicant has little control over off-site parking provision, however it is noted that neighbouring authorities have raised concerns over the potential for other off-site providers, largely due to increases of off-site traffic volumes associated with new car parks. The applicant will work closely with Local Authorities through monitoring to support approaches to mitigate any adverse impacts resulting from the Proposed Development. The applicant will work together with Host Authorities to find solutions if these concerns materialise.	No
SA.1.286	In addition, the airport Expansion project will need to develop and implement, in consultation with National Highways, a Technology Strategy that will set out a process by which impacts on National Highways' technology	National Highways		1	Noted. The Applicant continues to work with National Highways with regard to any scheme impacts.	No

	<p>assets, including the National Roads Telecommunications Services (NRTS), arising as a result of the implementation of the scheme, will be identified and managed to ensure full service provision during and after construction of the Proposed Scheme.</p>				
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Table A14.2: Regard had to statutory consultation responses on Surface Access comments – Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
Highways Network – Impact				
SA.2.01	<p>Concerns that surface access proposals will impact local people through increased traffic.</p>	7	<p>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 with the opening of Luton DART which provides a direct link to Luton Airport Parkway Station. A new coach station is proposed as part of the Proposed Development, and the applicant is also proposing to expand the coach facilities at the existing terminal.</p> <p>Despite measures to increase the proportion of journeys to the airport by public transport, there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development. The proposed strategy aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>scheduling to minimise additional journeys during peak highway periods. The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken, and can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12], to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.</p> <p>A Green Controlled Growth Framework [TR020001/APP/7.08] is proposed which will ensure that the airport operates within particular “limits”. One of these limits relates to surface access – specifically, mode share. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the Green Controlled Growth Framework submitted as part of this application for development consent. However, one of the GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.</p>	

Ref	Comment	No. PILs	Response	Change
			The signage requirements associated with delivering the package of measures would be a matter for detailed design.	
SA.2.02	Suggest ensure sufficient infrastructure is delivered to minimise impacts on local communities.	1	Please refer to the response to Ref. SA.2.01.	No
SA.2.03	Concerns with the road network, and that the Proposed Development will lead to increased congestion, particularly at peak times, and on the M1, B653, and A505. Some respondents were concerned that an increase in traffic would impact road quality.	2	Please refer to the response to Ref. SA.2.01. There is the potential for increased vehicular trips around the highway network as a result of the Proposed Development however any significant effects on roads such as the M1, B653 and A505, have been identified through detailed modelled assessments and mitigation proposed, more details are provided in the Transport Assessment [TR020001/APP/7.02] .	No
SA.2.04	Concerns that surface access proposals will impact local people through increased congestion, traffic accidents, parking issues for residents, longer journey times because of traffic light proposals and rat running through residential areas.	1	Please refer to the response to Ref. SA.2.01. 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 with the opening of Luton DART which provides a direct link to Luton Airport Parkway Station. A new coach station is proposed as part of the Proposed Development, the Applicant also proposes to expand the coach facilities at the existing terminal. As part of the Proposed Development, there will be on-going monitoring of the surface access impacts of the airport. There is the potential for some redistribution of vehicular trips around the local	No

Ref	Comment	No. PILs	Response	Change
			<p>highway network (aka rat-running) as a result of the Proposed Development however any significant effects have been identified through detailed modelled assessments and mitigation proposed, more details are provided in the Transport Assessment [TR020001/APP/7.02].</p> <p>The Applicant will seek 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. It should be noted however, that it is the responsibility of neighbouring authorities to put in place any parking restrictions as appropriate.</p>	
SA.2.05	<p>Reliable and efficient road connectivity to the airport is of critical importance, both during the planned works and after expansion is complete. The only access to the cargo shed is via Percival Way/President Way. DHL notes that the planned works will see this road as the main access route for construction traffic. DHL welcomes the publication of the Outline Construction Traffic Management Plan and encourages Luton Rising to keep stakeholders informed as this plan evolves.</p>	1	<p>Noted. The Outline CTMP in Appendix 18.3 of the ES [TR020001/APP/5.02] provides a framework which any appointed contractor(s) will implement. This will require the development of more detailed local plans and measures as the construction strategy is developed which will be communicated appropriately to stakeholders.</p>	No
SA.2.06	<p>Any improvements to the highway network should take account of background traffic growth (so as to future-proof any improvements) and any development opportunities that are likely to emerge through the review of the Central</p>	1	<p>Please refer to the response to Ref. SA.1.196. The detailed list of committed schemes included within the modelling is available within the appendices to the Transport Assessment [TR020001/APP/7.02].</p>	No

Ref	Comment	No. PILs	Response	Change
	Bedfordshire Local Plan (2021) and that rely on access to the same highway network. In the case of L&G's landholding, this would include its strategic employment proposals at J10 on the M1 south west of Luton. The cumulative assessment should take account of not just commitments, but reasonably foreseeable developments. In this regard, L&G's site at J10 M1 should be taken into account.		The list of agreed committed developments have been agreed with Central Bedfordshire Council.	
Highways Network – Mitigation				
SA.2.07	Suggest making the airport a low emissions zone to limit the use of private cars.	1	Please refer to the response to Ref. SA.2.01.	No
SA.2.08	Suggest that more work needs to be done regarding the road infrastructure. The airport needs another entry/exit road or one way in and one way out to reduce congestion. Perhaps an exit road could lead out and toward Junction 9 M1. Land will probably need to be obtained to make this happen, but I believe it needs serious consideration and this should be a priority measure	1	Please refer to the response to Ref. SA.2.01. Access proposals to the Proposed Development have been carefully considered and developed to deliver improved accessibility to the airport whilst minimising environmental impact, and this has underpinned the approach to the access arrangements. Please refer to the Surface Access Strategy [TR020001/APP/7.12] for additional information.	No
SA.2.09	Suggestion that any access road should be a new build from the A505 near Lilley across rural Hertfordshire land direct to the airport therefore avoiding residential Stopsley and Wigmore.	1	Please refer to the response to Ref. SA.2.08.	No
SA.2.10	Suggestion that the roads need to be kept clean from dirt and rubbish which will be generated through construction.	1	The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] sets out the approach to	No

Ref	Comment	No. PILs	Response	Change
			managing construction of the Proposed Development.	
SA.2.11	Suggest that the road off M1 will need to be widened, and there must be continuous monitoring to ensure that impacts on local roads will be kept to a minimum.	1	<p>Please refer to the response to Ref. SA.2.01.</p> <p>The modelling work has identified the locations where highway mitigations are required in response to the Proposed Development. The proposed highway mitigation designs, including type of mitigation and land required, are shown in the Transport Assessment [TR020001/APP/7.02]. Various improvements to capacity along the A1081 New Airport Way are proposed in the immediate vicinity of M1 Junction 10, which include improvements to M1 J10 itself.</p> <p>A Green Controlled Growth Framework [TR020001/APP/7.08] is proposed which will ensure that the airport operates within particular “limits”. One of these limits relates to surface access – specifically, mode share. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the GCG Framework submitted as part of this application for development consent. However, one of the GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.</p>	No

Ref	Comment	No. PILs	Response	Change
SA.2.12	Suggestion to build a bypass around Breachwood Green to the north of the village to bypass Dooley Hall and Breachwood Green village.	1	Please refer to the response to Ref. SA.2.01. The suggested route has the potential for substantial environmental impacts to the existing rural landscape.	No
SA.2.13	Suggest using roundabouts in highways proposals.	1	Please refer to the response to Ref. SA.2.01.	No
Highways Network – Accessing the airport				
SA.2.14	Suggest limiting car access to the airport to prevent Wigmore Valley Park being built over.	1	<p>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 with the opening of Luton DART which provides a direct link to Luton Airport Parkway Station. A new coach station is proposed as part of the Proposed Development, and the Applicant also proposes to expand the coach facilities at the existing terminal.</p> <p>Despite measures to increase the proportion of journeys to the airport by public transport, there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development.</p> <p>The number of parking and drop-off spaces has been determined to meet the future demand alongside achievement of the mode share targets. Substantial improvements have been made to the forecourt arrangements including the new multi storey car park (MSCP) which incorporates drop off on the ground floor with improved connectivity to the</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>existing terminal. The current drop off arrangements will be improved as part of the Proposed Development.</p> <p>A new forecourt area with passenger drop-off, taxi and bus stands would be provided to serve Terminal 2. It has been designed to cater for the airport's busiest hours and cater for drop-offs, taxis, regular buses, and shuttlebuses. The design is based on the principle of private car drop-off activity taking place at ground level, with all private car pick-up movements taking place within a short stay MSCP located directly above. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	
SA.2.15	Concerns that there is still no east/west link road.	1	<p>See Ref. SA.2.01.</p> <p>Despite measures to increase the proportion of journeys to the airport by public transport, there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development. The Surface Access Strategy [TR020001/APP/7.12] sets out aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods. The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken, and can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12], to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.</p> <p>The provision of an east west link between the airport and A1(M) to accommodate airport growth was not found to be necessary through the highway modelling, with a significant majority of passengers accessing the airport from the M1 at Junction 10.</p> <p>The design of the Airport Access Road (AAR) is largely based on the previously consented Century Park Access Road (CPAR). The road has been designed to maintain access to properties in the area as well as providing access to Terminal 2 of the airport. The road connectivity to the airport is set out within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] including further improvements measures such as AAR and upgrades to existing infrastructure including M1 J10. The airport benefits from its close proximity to the M1 corridor.</p> <p>As with the consented link road layout, pedestrian and cycle facilities are indicated on all arms of the</p>	

Ref	Comment	No. PILs	Response	Change
			junction between the AAR link road and Eaton Green Road, with the potential for signalised crossings to be incorporated into the junction. Similarly, crossing facilities would be included in the southern junction with AAR.	
SA.2.16	Concerns that car access to the airport is poor and the proposed measures do very little to mitigate this problem.	1	Please refer to the response to Refs. SA.2.01 and SA.2.15.	No
SA.2.17	Concerns that accessing the airport via car will remain the preferable mode due to its convenience.	1	Please refer to the response to Ref. SA.2.01.	No
SA.2.18	Suggest improving access roads to and from the airport.	2	Please refer to the response to Ref. SA.2.01.	No
SA.2.19	Concerns with the design of the airport Access Road.	2	The design of the Airport Access Road (AAR) is largely based on the previously consented Century Park Access Road (CPAR). The road has been designed to maintain access to properties in the area as well as providing access to Terminal 2 of the airport. As with the consented link road layout, pedestrian and cycle facilities are indicated on all arms of the junction between the AAR link road and Eaton Green Road, with the potential for signalised crossings to be incorporated into the junction. Similarly, crossing facilities would be included in the southern junction with AAR.	No
Highways Network – Modelling				
SA.2.20	Suggest ensuring proper consideration and detail of road/traffic improvements is one of the main	1	Please refer to the response to Ref. SA.2.01.	No

Ref	Comment	No. PILs	Response	Change
	priorities on the already struggling road/traffic network.			
Highways Network – Safety				
SA.2.21	Concerns around road safety due to increased numbers of car users.	4	<p>Please refer to the response to Ref. SA.2.01.</p> <p>Despite measures to increase the proportion of journeys to the airport by public transport, there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development. The Transport Assessment [TR020001/APP/7.02] aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods.</p> <p>The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken, and can be found within the Transport Assessment [TR020001/APP/7.02], to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.</p>	No

Ref	Comment	No. PILs	Response	Change
			The design of the proposed junction improvements would be subject to standard safety audits as the design progresses through detailed stage. Notably, the highway improvements are designed to minimise queuing and delay where possible.	
Highways Network – Taxis				
SA.2.22	Concerns with taxi proposals, including the current monopolisation of taxis, leading to high costs for the users, and local taxi companies missing out on business.	2	<p>The monopolisation of taxi companies, cost of taxis and promotion of local taxi companies is outside of the scope of this application for development consent.</p> <p>The number of drop-off spaces has been determined to meet the future demand for cars and taxis, alongside achievement of the mode share targets.</p>	No
SA.2.23	Suggest a taxi rank should be included within proposals.	1	A taxi rank is proposed as part of the Proposed Development.	No
Highways Network – General				
SA.2.24	Concerns that the Proposed Development will create additional traffic and congestion as a result of construction and preparatory works.	8	<p>The modelling work has identified the locations where highway mitigations are required in response to the Proposed Development. The proposed highway mitigation designs, including type of mitigation and land required, are shown in the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12]. Restricting access can impact on other including local communities as well as airport users. As set out in the Transport Assessment, monitoring will</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>form an important part of the on-going commitment of the DCO including understanding any impact that may require traffic management measures to be implemented/adjusted.</p> <p>For additional detail, please refer to the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02].</p> <p>Inevitably, there will be the potential for congestion as a result of the construction works, particularly in those locations where improvements are proposed to the highway. However, the proposed works will generally seek to improve traffic conditions following completion. For traffic associated with the on-site works, to minimise congestion the use of main roads and avoidance of the use of local roads to access the site will be promoted through the Code of Construction Practice.</p> <p>For additional detail, please refer to the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02].</p>	
SA.2.25	Concerns with the existing road network, which already suffers from congestion.	34	Please refer to the response to Ref. SA.2.01.	No
SA.2.26	General concerns that the Proposed Development will lead to increased congestion on the highways network.	81	Please refer to the response to Ref. SA.2.01.	No
SA.2.27	Concerns with the proposals relating the highways network.	17	Please refer to the response to Ref. SA.2.01.	No
SA.2.28	It is essential that all road works taking place are designed to minimise disruption to time critical	1	Please refer to the response to Refs. SA.1.5 and SA.1.179. Construction plans and road closures if	No

Ref	Comment	No. PILs	Response	Change
	<p>freight operations and to ensure that continued access to the cargo shed is maintained. DHL encourages Luton Rising to consider the following points:</p> <ul style="list-style-type: none"> - A significant amount of Express freight movements take place overnight, so road closures overnight would have a disproportionate impact on our operations. - A detailed traffic mitigation plan should be developed for each phase of the works, explaining how congestion is to be managed during the works and the impact on journey times. - Early communication of intended road works, impact on journey time and access, is critical to enable planning. 		<p>and when required will be communicated to local businesses at the appropriate time to support planning for time critical operations and how congestion at peak times during peak construction will be managed.</p>	
SA.2.29	<p>LLAOL recognises the criticality of monitoring to identify and mitigate environmental effects of surface access and is therefore committed to supporting the Applicant with data access.</p>	1	<p>Noted. The Applicant welcomes the opportunity to continue working alongside LLAOL.</p>	No
SA.2.30	<p>The SAETS alludes to far enhanced monitoring of surface access modes than is in place at the airport today, including the introduction of several working groups and a Travel Plan Coordinator role. LLAOL considers the monitoring proposals within the SAETS to be excessive for their intended purpose/scope and overly onerous, and therefore requests the opportunity to work with the Applicant to identify how to deliver the proposed monitoring framework most efficiently and to ensure only the critical data points, working</p>	1	<p>Please refer to the response to Ref. SA.1.112. The Applicant has worked closely through the development of the governance structure for the Travel Plan Coordinator, Green Controlled Growth Framework [TR020001/APP/7.08] and finalising the documentation for submission. The Applicant and LLAOL have now reached mutual agreement on the level of engagement and structure of the monitoring framework.</p>	No

Ref	Comment	No. PILs	Response	Change
	groups and roles that should be in place moving forward.			
SA.2.31	LLAOL supports that the monitoring of passenger mode share should continue via the CAA surveys and will work with the Applicant to identify the most effective form of monitoring for airport staff mode share.	1	Noted. The applicant welcomes the opportunity to continue working alongside LLAOL.	No
Highways Network – Other				
SA.2.32	Suggest improving signage to/from/around the airport.	1	The signage requirements associated with delivering the package of measures would be a matter for detailed design.	No
Public/Sustainable Transport – Rail				
SA.2.33	Concern around current rail capacity, which was felt to be overcrowded already.	7	<p>The Applicant has carried out public transport investigations which included assessing rail capacities and identifying which additional trips could access the airport by public transport. This was then applied to the modelling work to ensure a robust approach.</p> <p>There have been significant improvements to rail capacity, and others are proposed, including the introduction of Luton DART to improve connectivity to Luton Parkway; the Thameslink/Great Northern timetable enhancements (to a maximum of 24 trains per hour per direction travelling through the London core section via St Pancras International); East Midlands Railway future timetable enhancements; Crossrail (Elizabeth line) and East West Rail. Covid-19 has impacted on the rollout of capacity enhancements but has also reduced pressure on</p>	No

Ref	Comment	No. PILs	Response	Change
			some services as user levels remain below pre-Covid-19 levels. More information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	
SA.2.34	Suggest proposals to reduce the impact on local commuters that are already affected by the airport users on the train network are developed.	1	Please refer to the response to Ref. SA.2.33. Peaks in air passenger rail demand do not coincide with commuter peaks. Analysis shows that in 2043, if services remain as at present, the additional rail demand from additional air passengers will take a maximum of 6% of the available capacity (seated and standing) in the peak periods (07:00-10:00 and 16:00-19:00). This is summarised in Chapter 18 Traffic and Transport of the ES [TR020001/APP/5.01] .	No
SA.2.35	Suggest placing pressure on East Midlands Railway to stop more Inter-city trains at Luton Airport Parkway.	1	Please refer to the response to Ref. SA.2.33. Engagement sessions were held through Travel Plan workshops and ongoing discussions with rail operators will continue through the delivery of the Travel Plan and its update over regular 5 year periods and in conjunction with the monitoring programme for the Green Controlled Growth Framework [TR020001/APP/7.08] . Train operating companies will be asked to support sustainable travel to and from the airport and more stopping trains could form one measure that encourages a mode shift to rail.	No
SA.2.36	Concerns with future rail capacity and overcrowding as a result of the Proposed Development.	4	Please refer to the response to Ref. SA.2.33.	No

Ref	Comment	No. PILs	Response	Change
SA.2.37	Concerns with public transport proposals, in particular rail proposals.	8	Please refer to the response to Ref. SA.2.33.	No
Public/Sustainable Transport – Buses/Coaches				
SA.2.38	Concerns that the additional traffic caused by the Proposed Development will also impact buses and coaches.	1	The Proposed Development with a new terminal will increase the capacity of the airport to handle bus and coach services. Therefore, it offers the opportunity for operators to develop new services improving accessibility for parts of the airport catchment area which are not currently well served by public transport. Discussions have taken place with public transport operators and will continue as part of the Proposed Development to ensure that sufficient emphasis is placed on public transport access to both terminals. Discussions with bus providers aim to increase the coverage and frequency of services to airport.	No
SA.2.39	LLAOL recognises the requirement for more focus on bussing and coaching services, to grow the use of public and sustainable transport by passengers and employees.	1	Noted.	No
SA.2.40	LLAOL is keen to work with bussing and coaching partners to grow the range and frequency of services on offer and requests the Applicant's support in seeking to improve local services via its sphere of influence in the community. Subsidies for bussing and coaching should be carefully measured for effectiveness, if implemented, plus the funding of subsidies would need to be agreed between the airport operator and the Applicant.	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
SA.2.41	LLAOL requests the opportunity to work with the Applicant to review the requirement for employee only express bus services, or on-demand services, per clause 2.6.16, to confirm that this need cannot first be fulfilled by current services.	1	Noted. The Applicant welcomes the opportunity to continue working alongside LLAOL in developing and efficient and cost-effective service for employees that seeks to improve staff public transport mode share.	No
Public/Sustainable Transport – DART				
SA.2.42	Concerns around the cost of building the DART.	4	Luton DART will offer direct, seamless, sustainable travel to the airport from more than 60 stations across the Thameslink & East Midlands Railway network, replacing the existing bus transfer service. The Luton DART is aimed at increasing the rail modal share for passengers accessing the airport and supporting the delivery of the Luton 2040 vision of a carbon-neutral town by reducing the environmental impact of journeys to and from the airport and congestion on surrounding roads. The budgeted cost for Luton DART is on public record.	No
SA.2.43	General concerns around the DART, including that people will still prefer to drive.	1	Please refer to the response to Ref. SA.2.01.	No
SA.2.44	Support for the DART.	2	Noted.	No
SA.2.45	Support for the DART, which was felt will encourage public transport use	2	Noted.	No
SA.2.46	it is critical that the Applicant sets the passenger charges for the DART at an appropriate level to incentivise usage by passengers and airport staff,	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
	which is necessary to ensure the achievement of the proposed sustainable mode share improvements.			
SA.2.47	We strongly believe that the DART will make public transport to LUTON a much stronger proposition and improve the green credentials of the airport	1	Noted.	No
Public/Sustainable Transport – Mitigation				
SA.2.48	Suggest delivering a Park & Ride schemes nearby to J10 on the M1 to minimise the traffic into the airport.	1	The Proposed Development does not include off-site car parking, including Park & Ride sites the Proposed Development is only able to take into account consented schemes as part of the modelling of future plans. However, any subsequent provision of Park & Ride has the potential to be beneficial for the airport, and as such the Applicant would seek to work together with operators should proposals move forward.	No
SA.2.49	Suggestion bus routes are kept away from Green Belt villages.	1	Any new future bus services provided which have the potential to reduce the reliance on private vehicles would be targeted at areas where it is considered that the maximum potential for public transport use to the airport could be derived. These are likely to be more built-up areas. 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 with the opening of Luton DART which provides a direct link to Luton Airport Parkway Station. A new coach station is proposed as part of the	No

Ref	Comment	No. PILs	Response	Change
			<p>Proposed Development, which is proposed to expand the coach facilities at the existing terminal. The modelling work has identified the locations where highway mitigations are required in response to the Proposed Development. The proposed highway mitigation designs, including type of mitigation and land required, are shown in the Appendix to the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p> <p>As part of the Proposed Development, there will be on-going monitoring of the surface access impacts of the airport and the Transport Assessment also includes a toolbox of other sustainable measures which could be implemented to support the increase in sustainable trips to the airport from the surrounding areas.</p>	
SA.2.50	Suggest it should be possible to drop off and pick up at Luton Parkway, and then to use the rail/bus link to/from the airport.	1	<p>Luton DART provides a dedicated light rail link between Luton Airport Parkway Rail Station and the airport. The Luton DART link has been developed to improve passenger journey time and connectivity to and from the airport using a modern, sustainable and efficient system. The Applicant has set the Luton DART fare based on independent assessment and sound rationale, reflecting the value of time saved and convenience and the quality of what is being provided compared to what went before. Access is available to all users subject to the purchase of an appropriate ticket. Although the Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the</p>	No

Ref	Comment	No. PILs	Response	Change
			operation and construction of the Luton DART is outside of this application for development consent.	
SA.2.51	Suggest there should be improved traffic management and modelling, including that construction and operational access should be fully controlled and monitored to reduce impacts on local communities. This monitoring should be in place throughout the expansion, and should ensure sufficient considerations are given to the impacts of traffic flow, and the external factors impacting traffic flow.	1	Please refer to the response to Ref. SA.2.24.	No
Public/Sustainable Transport – Targets				
SA.2.52	Concerns that the targets for accessing the airport via active and public transport are not based on evidence.	7	Please refer to the response to Ref. SA.1.105.	No
SA.2.53	Concerns that the targets for accessing the airport via active and public transport are too high and unachievable.	13	Please refer to the response to Ref. SA.1.105.	No
SA.2.54	Concerns that the targets for accessing the airport via active and public transport are too low and not ambitious enough.	2	Please refer to the response to Ref. SA.1.105.	No
SA.2.55	Lastly, significantly increased use of sustainable and public mode types is deliverable only in the instance that new and improved services are well-advertised and well-marketed. Plans to this avail should be drawn-up by the Applicant with the support of LLAOL's expert marketing teams.	1	Noted.	No
SA.2.56	LLAOL supports and commits to cooperating with the Applicant in carefully managing an increase in	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
	travel demand to and from the airport, in order to reduce the impact on surrounding communities and the environment as the airport grows. Surface Access should be high quality, efficient and reliable, 5 not giving rise to unacceptable congestion or environmental impacts, whilst remaining supportive to the delivery of the wider vision for the airport's expansion			
SA.2.57	Proposals by the Applicant to support the operator with increasing the use of sustainable travel and public transport for both passengers and airport staff are welcomed. LLA specifically supports measures that contribute twofold to protecting the environment (where a motorised mode is required) in reducing total journeys and making each journey 'green', such as the use of fully electric, multi-passenger (bussing, coaches) vehicles. At the top of the agenda should remain efforts to increase non-vehicular travel (i.e., walking, cycling) for employees, and passengers where reasonable, to access the airport.	1	Noted.	No
SA.2.58	Whilst LLAOL is committed to carefully managing surface access impacts, it must be highlighted that the Applicant and LLAOL as the operator have only limited influence over surface access mode share; Whilst there are some levers available that may support in influence mode share, external influences are by far the dominant factors (e.g., speed of electric vehicle uptake by the public and the quality of train and bus services).	1	Please refer to the response to Ref. SA.1.120.	No

Ref	Comment	No. PILs	Response	Change
Public/Sustainable Transport – Cost				
SA.2.59	Concerns around the cost of public transport in accessing the airport.	2	Noted. The Applicant is not responsible for setting public transport fares but will continue to liaise with operators to encourage fares to be set at a level which supports the public transport ambitions.	No
SA.2.60	Suggest reducing the cost of public transport for users to encourage its use.	5	Charges will be set by public transport operators and are outside the scope of this application.	No
SA.2.61	Suggest reducing the cost of public transport through taking a subsidy from parking, and investing this in bus routes.	1	<p>Please refer to the response to Ref. SA.2.01.</p> <p>The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] also sets out the that access charges have the potential to generate a net surplus of revenue. However, this is not a primary objective. The services would depend on how the charges are set and the costs associated with operating and enforcing them.</p> <p>A Green Controlled Growth Framework [TR020001/APP/7.08] which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface access – specifically, mode share. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time.</p> <p>One of the Applicant’s GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.</p> <p>The Framework Travel Plan [TR020001/APP/7.13] sets out the approach to monitoring and evaluating surface access mode share to the airport through future Travel Plans and this will be enforced through the Travel Plan Steering Group who will report into the Airport Transport Forum.</p>	
Public/Sustainable Transport – Electric Vehicles				
SA.2.62	Suggestion to deliver electric buses	1	<p>The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] provides detail on accessing the airport through the use of cleaner vehicles.</p> <p>The type of buses used by local operators is outside of the control of the Applicant, however, the applicant will work with local bus operators to encourage the use of sustainable buses. Trends show that electric buses are likely to become much more commonplace.</p>	No
Public/Sustainable Transport – General				
SA.2.63	General concerns with the services and accessibility of public transport in accessing the airport	8	Please refer to the response to Ref. SA.1.70 and SA.2.01.	No
SA.2.64	Support for the public and active travel proposals.	3	Noted.	No

Ref	Comment	No. PILs	Response	Change
Public/Sustainable Transport – Active Travel				
SA.2.65	Concern that the proposals for cycling infrastructure are insufficient.	1	<p>Pedestrian and cycle connectivity to the airport from local residential areas has been a key consideration in terms of meeting the public transport mode share targets, and details of this can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12]. Such linkages will be provided along the new Airport Access Road and onto the roads in the immediate vicinity of both terminals. In addition, all Public Rights of Way (PROW) within the land holdings would be improved, either through surfacing, new signage, or improved connectivity. The provision of segregated cycle and pedestrian routes along rural lanes would impact on third party land which falls outside of our control.</p> <p>Whilst walking and cycling are proposed in the form of upgraded connections to local residential areas, it is also recognised that these modes of transport are unlikely to be utilised by large numbers of passengers due to the wide catchment area and limitations, for example regarding baggage. However, the promotion of walking and cycling will be a key aspect of the airport employee travel plan, and public transport is also a key part of our strategy. Further information can be found in the Transport Assessment [TR020001/APP/7.02].</p>	No
SA.2.66	Suggest improving signage for pedestrians during construction.	1	<p>Pedestrian access and their associated signage requirements will be considered as part of any detail design process during construction periods.</p>	No

Ref	Comment	No. PILs	Response	Change
SA.2.67	Whilst it is recognised that walking and cycling play only a small part in the total number of surface access journeys, walking and cycling are critical modes for airport staff, which, as with other sustainable mode types, contribute to better air quality and overall wellbeing. As the number of airport staff grows alongside passenger throughput, supporting walking and cycling initiatives becomes increasingly important.	1	Noted. Connections to the local highway network are provided between the proposed Terminal for pedestrians and cyclists, with ongoing support for sustainable travel a key aspect of meeting the mode share targets which have been set.	No
SA.2.68	Clause 2.6.19 of the “Getting to and from the airport” document (hereon ‘SAETS’) references improvements to walking and cycling infrastructure. Clause 2.6.20 goes on to reference cycling hubs, facilities and financial grants to subsidise cycles. All measures are fully supported by LLAOL. LLAOL requests that the Applicant uses its sphere of influence with local and regional council entities to improve cycle access to and from the airport, but specifically along the airport Access Road and its environs, per the commitment made in Table 6-1.	1	Noted. The AAR and associated link road are proposed to include shared footway/cycleways which will enable connectivity to the local highway network.	No
Car Parks – Mitigation				
SA.2.69	Suggest less car parking is needed.	1	The number of parking and drop-off spaces has been determined to meet the future demand alongside achievement of the mode share targets. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy	No

Ref	Comment	No. PILs	Response	Change
			[TR020001/APP/7.12] provide further information regarding the modelling of car parking spaces.	
SA.2.70	Suggest keeping all parking on-site.	2	Please refer to the response to Ref. SA.2.48.	No
SA.2.71	Suggest using off-site car parks.	1	Please refer to the response to Ref. SA.1.139.	No
SA.2.72	...the primary concern regarding the expansion proposals relate to the loss of significant areas of car parking which is essential for the continued operation of all TUI Group operations in the area to enable the company to return to its pre-pandemic operation.	1	As part of the proposals, replacement areas of parking would be provided in advance of any parking losses. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] provide further information regarding the modelling of car parking spaces.	No
SA.2.73	We also ask that LLAL carefully consider the proposals in terms of the impact on TUI Group's car parking. At present TUI Group does not consider that any of the mitigation measures proposed to be adequate and that these fall short of what is required to prevent significant disruption to TUI's operations. ...adequate provisions must be made to ensure there is no net loss of car parking spaces used by TUI Group at any stage during construction and following the completion of the airport expansion.	1	Detailed phasing plans would be provided in advance of any works to ensure that TUI operations remained as unaffected as possible. It is not intended that there would be any loss of spaces from TUI parking areas, however it is inevitable that the locations of these parking spaces would move due to the complexity of the development proposals. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] provide further information regarding the modelling of car parking spaces.	No
SA.2.74	Car Park CP4 is located between Prospect Way and Percival Way and currently comprises approximately 166 spaces used exclusively by TUI Group staff in relation to its aircraft maintenance facility [in Hanger 61]. As a result of the alignment of the proposed road, all 166 spaces are expected	1	Areas of replacement parking are proposed to offset losses incurred by the alignment of AAR. The Proposed Development seeks to provide a minimum of the same overall number of spaces as are affected, in close proximity to the existing areas of parking. The Transport Assessment	No

Ref	Comment	No. PILs	Response	Change
	<p>to be lost. Previous road proposals included replacement car parking, however those proposals are considered insufficient to mitigate the loss and impact on TUI's operations. At this stage we are not aware of proposals detailed to mitigate the impact of the current expansion scheme. Provisions must be made and secured to ensure suitable temporary car parking is provided to re-provide all 166 spaces in close proximity to Hanger 61 to ensure the continued operation of the TUI Group's UK aircraft maintenance operation.</p>		<p>[TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] provide further information regarding the modelling of car parking spaces.</p>	
SA.2.75	<p>[Car Park CP4]Without proper mitigation, the loss of this car park will result in significant and preventable disruption to TUI Group operations. It could result in staff being required to park elsewhere within the vicinity, including in the Wigmore Valley Park car park and surrounding residential estates. It also has potential to result on the loss of staff and to prevent TUI recruiting the staff it requires. A replacement car park for the exclusive use of TUI Group should be provided, this should be complete and operational prior to any of the existing spaces being lost. We ask that the LLAL engages further with TUI Group to ensure that adequate mitigation is put in place to enable its maintenance operations to continue in Luton. If the airport expansion results in insufficient car parking within close proximity of the maintenance hanger, TUI may have to</p>	1	Please refer to the response to Ref. SA.2.74.	No

Ref	Comment	No. PILs	Response	Change
	reconsider the location in which its European fleet is maintained in the future leading to the loss of employment in the local area.			
SA.2.76	Car Park CP9 is located to the south of Eaton Green Road and currently comprises approximately 492 spaces used exclusively by TUI Group staff in relation to its head office at Wigmore House. CP9 is also used as the fire assembly point in the event of the evacuations of staff located at Wigmore House. As a result of the expansion proposals, most or all of the spaces are likely to be lost. To help mitigate the loss of car parking spaces during construction, a temporary car park at the southern end of the long stay car park was proposed in previous iterations of the road scheme, comprising approximately 300 spaces. At this stage we are not aware of whether similar mitigations are proposed, or whether any such replacement spaces would be suitably connected to Wigmore House to allow staff to walk between the two.	1	As part of the proposals, replacement areas of parking would be provided in advance of any parking losses. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] provide further information regarding the modelling of car parking spaces.	No
SA.2.77	Car Park CP10 is also located to the south of Eaton Green Road and currently comprises approximately 315 spaces, of which 194 spaces are used exclusively by TUI Group staff in relation to its head office at Wigmore House. As a result of the expansion proposals and major reconfiguration of the landholdings, all 315 spaces are expected to be lost. In previous proposals TUI was advised that:	1	Please refer to the response to Ref. SA.2.76.	No

Ref	Comment	No. PILs	Response	Change
	<ul style="list-style-type: none"> • 145 car parking spaces will be provided on a temporary basis during construction in the remaining area of CP10 to help with the displaced car parking spaces. • 227 permanent spaces will be provided on the northern element of CP10. <p>At this stage we do not know whether similar mitigations will be provided for TUI in the airport expansion scheme.</p>			
SA.2.78	<p>[Car Parks CP9 and CP10] Car Parks CP9 and CP10 comprise of 807 spaces, of which 686 spaces are currently used by TUI Group in relation to its head office at nearby Wigmore House. The proposed airport expansion will result in the loss of a majority of the current spaces.</p> <p>TUI's head office is a major local employer, if staff are not able to park within close proximity of the office it is likely to result in a significant loss of staff and create challenges in recruiting replacement staff. If the office has insufficient car parking to meet staff needs TUI may need to consider relocation to alternative premises. Any such relocation would likely involve considering locations at other locations and could potentially result in a significant loss of local jobs.</p> <p>To mitigate the loss of car parking and allow TUI's head office operations to continue unaffected, it will be necessary for LLAL to provide sufficient replacement car parking within close proximity to Wigmore House. It will also be necessary for LLAL</p>	1	<p>As part of the proposals, replacement areas of parking would be provided in advance of any parking losses. CP9 is proposed to be reconfigured, however this would not require relocation of TUI spaces. Rationalisation of parking is proposed within Car Park P9 at 27mppa, with spaces proposed within this area to accommodate TUI. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] provide further information regarding the modelling of car parking spaces.</p>	No

Ref	Comment	No. PILs	Response	Change
	to provide an alternative space suitable for use as the fire assembly point for Wigmore House			
SA.2.79	...confirmation is sought from Luton airport Limited that appropriate mitigations will be put in place to ensure that sufficient car parking exists for TUI's operations to continue in Luton.	1	Please see the response to Ref. SA.2.78.	No
SA.2.80	We look forward to further engagement with LLAL to ensure that: <ul style="list-style-type: none"> • A minimum of 166 permanent car parking spaces to be re-provided for the exclusive use of TUI Group in relation to the loss of CP4 and located within walking distance of Hanger 61. Assurances must also be made that adequate temporary car parking spaces are provided whilst the scheme is being constructed and the existing car park is not operational. • A minimum of 686 permanent parking car parking spaces to be re-provided for the exclusive use of TUI Group in relation to the loss of CP9 and CP10, with the replacement spaces within walking distance of Wigmore House. 	1	Please see the response to Ref. SA.2.78.	No
SA.2.81	A lack of suitable replacement car parking will significantly negatively impact on TUI's operations in Luton. If insufficient replacement car parking is provided TUI may have to reconsider the long-term future of its operations in Luton. TUI is a major local employer and generator of local economic activity. We consider LLAL and Luton Borough Council must ensure sufficient suitable parking is provided to ensure the impacts of the	1	Noted. The Applicant welcomes the opportunity to continue to engage with TUI.	No

Ref	Comment	No. PILs	Response	Change
	<p>expansion proposals on TUI's operations can be mitigated.</p> <p>When considering the case for a Development Consent Order the Inspector and Secretary of State will balance the benefits of the scheme against its negative impacts. Consequently, mitigation of the negative impacts on TUI and the local jobs it provides will support LLAL's case for the DCO.</p> <p>We invite and look forward to engagement with LLAL to agree provisions and mitigation related to the temporary and permanent loss of TUI Group car parking.</p>			
SA.2.82	Car Parking facilities are required for passengers needing enhanced flexibility in their journey options. Whilst necessary, excessive private car journeys can be harmful to the environment, thus LLAOL commits to working with the Applicant to help mitigate the effects of these journey types.	1	Noted.	No
SA.2.83	LLAOL employs a team of industry experts to manage the day-to-day car parking operations and proposes that this team of experts support the Applicant ahead of the DCO Application to develop the content of the DCO car parking plans.	1	Noted. The Applicant has continued to engage with LLAOL.	No
SA.2.84	Specifically, a detailed review of plans captured within Insets 3-3 to 3-5 should be completed with the support of LLAOL, with commitment from the Applicant to manage and mitigate the impact of operating car parks (such as increasing bussing requirements) that are located far from the terminal. Attention is drawn to the proposal for	1	Noted. The locations and types of parking within the Proposed Development are generally driven by available areas, and the requirement to provide increases in the numbers of parking in cost-effective solutions, i.e., avoiding MSCPs for mid/long term usage. The Transport Assessment [TR020001/APP/7.02] and Surface Access	No

Ref	Comment	No. PILs	Response	Change
	voluminous block parking operations, which generally dictates higher operational costs than the management of self-park products, and specifically when placed in locations far from the terminal.		Strategy [TR020001/APP/7.12] provide further information regarding the modelling of car parking spaces.	
SA.2.85	LLAOL has a different view of certain comparisons made between London Luton airport and other airports' car parking models and offers its support to the Applicant to revisit these areas. Attention should be paid by the Applicant to the ratio of on-site car parking spaces to passengers, which is far lower than any other comparable UK airport. This results in a sizeable off-site car parking market operated by third parties. Proposals need to be developed with due regard to this market and the potential impacts the expansion proposals could have on growth of the off-site car parking market. Whilst LLAOL can control sustainability initiatives in its own carparks, it cannot control sustainability initiatives in respect of off-site car parking spaces	1	Please refer to the response to Ref. SA.1.120. The historic levels of parking at the airport have generally been dictated by available land, which itself is constrained by Green Belt or adjacent residential areas. As such, any planning application needs to be taken forward using existing numbers of parking spaces as a 'base case', rather than an aspirational number of spaces using other airports as a comparator.	No
SA.2.86	It should be highlighted that the Applicant's proposals do not increase the available on-site parking provision on a 'per passenger basis.' This is a cautious decision to underpin and support LLAOL in its efforts to drive sustainable travel. However, as noted above, consideration should be given to LLA's ratio of on-site car parking spaces to passengers compared to other comparable UK airports. Whilst LLAOL supports the Applicant's proposals, it only does so on the basis that the Applicant ensures it does not	1	Please refer to the response to Ref. SA.1.120 and SA.2.85. A key aspect of the surface access proposals is mode share changes. However, despite the public transport targets there will be additional journeys made by car due to the scale of growth, which results in the additional parking spaces which are proposed. The Applicant has little control over off-site parking provision; however it is noted that neighbouring authorities have raised concerns over the potential	No

Ref	Comment	No. PILs	Response	Change
	consider on-site parking spaces in isolation and adequately addresses the potential impact of the proposals on the growth of the off-site car parking market, and the potential impact on the sustainability efforts of the airport, creating impact on the community, and therefore could impact the potential growth of the airport		for other off-site providers, largely due to increases of off-site traffic volumes associated with new car parks. As such, it could be argued that it would not be in the interests of the neighbouring local authorities to permit consent for additional off-site car parks. The Applicant is committed to working with Local Authorities and ongoing discussions will be facilitated through the governance process associated with the Travel Plan Forum and Airport Transport Forum to discuss issues such as those identified in the response if they should arise. More details are included within the Surface Access Strategy [TR020001/APP/7.12] and Framework Travel Plan [TR020001/APP/7.13] .	
SA.2.87	Importantly, technology requirements across the car parks should make for simple, sustainable journeys. Barrierless technology is preferred in the Drop-Off Zone versus the technology discussed in clause 3.7.3 of the SAETS, and LLAOL would be keen to discuss technology requirements further with the Applicant to ensure alignment across current and future car parking facilities.	1	Noted. The Applicant has continued to engage with LLAOL.	No
SA.2.88	LLAOL recognises the impact that car parking prices can have on a passenger's decision to travel to and from the airport via private car, and thus stringently manages car parking capacity and pricing via a team of on-site experts, taking into account the demand within the market. Any scheme, such as that referenced in Section 7 of the SAETS, to set, vary and enforce charges on private vehicles using airport roads, car parks and	1	The operator already has powers to apply charges for parking and drop off. How these are used in future will be considered as part of the package of measures available to help achieve the modal share targets.	No

Ref	Comment	No. PILs	Response	Change
	forecourts should reside solely with the operator, as is the case today. It could indeed be environmentally detrimental for changes to be made to today's practices; Managing car parking pricing without sufficient 'whole market expertise,' perhaps resulting in further increased car parking rates, will not necessarily mean that passengers don't access the airport by private car, but instead that passengers simply choose to park in off-site car parks to avoid the on-site charging mechanism, thus encouraging growth in the wider car parking network, which impacts local communities.			
SA.2.89	Further, LLAOL disagrees that a relationship be drawn between car parking pricing and other modes of access per the suggestion in 7.5.1.b, with surface access modes being wholly incomparable by way of service offering, environmental impact, and operational costs. In the instance that the Applicant, or other entities, must have some input into car parking pricing strategies, this can be raised at the Airport Transport Forum, as is possible today, and will be considered by LLAOL	1	Drop off/parking charges will be/are set by the operator.	No
SA.2.90	Remaining with the subject of private modes, but moving to taxis and private hire operations, clause 2.6.28 of the SAETS alludes to measures which encourage more efficient use of taxi and private hire trips. Whilst such measures are encouraged by LLAOL, little information is given on how these measures will work in practice. LLAOL requests	1	Noted. The Applicant has continued to engage with LLAOL.	No

Ref	Comment	No. PILs	Response	Change
	further engagement on this topic with the Applicant to ensure deliverability.			
Car Parks – Modelling				
SA.2.91	Suggest remove all parking from the airport.	1	Please refer to the response to Ref. SA.2.14.	No
Car Parks – Cost				
SA.2.92	Concerns that there is, and will continue to be, a high drop-off cost for users.	7	Drop off/parking charges will be/are set by the operator.	No
SA.2.93	Concerns that the car parking proposals will increase the cost of parking for users, including for those picking-up and dropping-off.	3	Please refer to the response to Ref. SA.2.92.	No
SA.2.94	Suggestion to expand Airparks car parking, and make it free for residents of Luton to use	1	Airparks is not within the control of the Applicant and is outside the scope of this application for development consent.	No
SA.2.95	Suggest parking should be free for local residents.	2	Parking charges will be set by the operator and are outside the scope of this application.	No
SA.2.96	Suggestions were made on the cost of drop-off and picking-up, including that it should be cheaper for users	1	Drop off/parking charges will be/are set by the operator.	No
Car Parks – Impacts on local people				
SA.2.97	Suggest that proposals must include plans for deterring airport users from parking on streets to avoid parking charges at the airport.	1	Please refer to the response to Ref. SA.1.134.	No
SA.2.98	Suggest introducing a permit only parking system, with sufficient enforcement to prevent airport users parking on residential streets.	1	Please refer to the response to Ref. SA.2.97.	No

Ref	Comment	No. PILs	Response	Change
SA.2.99	Concerns that car parking proposals will increase airport users parking on residential streets.	19	<p>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 with the opening of Luton DART which provides a direct link to Luton Airport Parkway Station. A new coach station is proposed as part of the Proposed Development, the Applicant also proposes to expand the coach facilities at the existing terminal.</p> <p>As part of the Proposed Development, there will be on-going monitoring of the surface access impacts of the airport. The applicant will seek 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. It should be noted however, that it is the responsibility of neighbouring authorities to put in place any parking restrictions as appropriate. Additional information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	No
SA.2.100	Concerns that the car parking proposals will increase airport users parking on residential streets, sometimes blocking driveways and garages, or at the train station, due to the high cost of parking at the airport.	1	Please refer to the response to Ref. SA.2.99.	No
Car Parks – General				

Ref	Comment	No. PILs	Response	Change
SA.2.101	General concerns with car parking proposals.	7	Please refer to the response to Ref. SA.2.14.	No
General/Other				
SA.2.102	Concerns that the Transport Strategy is emerging rather than adopted.	5	The SAETS was in draft during the statutory consultation, however a finalised Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] has been prepared, and is a key component of this application for development consent.	No
SA.2.103	General concern around the surface access proposals.	1	Please refer to the response to Ref. SA.2.01.	No
SA.2.104	Concern that the Transport Strategy would not be delivered.	1	Please refer to the response to Ref. SA.2.01.	No
SA.2.105	Suggest that the cost of transport proposals would be better invested in more sustainable forms of transport/technologies with sustainable employment as its benefit.	1	Please refer to the response to Ref. SA.2.61.	No
SA.2.106	Suggest the proposed highways interventions should be delivered without the Proposed Development.	2	The Proposed Development includes highways improvements which have been identified as necessary to mitigate impacts of the expansion.	No
SA.2.107	General comments of support relating to surface access proposals.	2	Noted.	No
SA.1.108	Suggest extending transport links to Newlands.	1	Currently, there are no plans to extend transport links specifically between the airport and Newlands Park. However, the Proposed Development with a new terminal will increase the capacity of the airport to handle bus and coach services. Therefore, it offers the opportunity for operators to develop new	No

Ref	Comment	No. PILs	Response	Change
			<p>services improving accessibility for parts of the airport catchment area which are not currently well served by public transport.</p> <p>Discussions have taken place with public transport operators and will continue as part of the following granting of planning permission to ensure that sufficient emphasis is placed on public transport access to both terminals. Discussions with bus providers aim to increase the coverage and frequency of services to airport. Further information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p>	

Table A14.3: Regard had to statutory consultation responses on Surface Access comments – Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
Highways Network – Impact				
SA.3.01	Concerns with accessing the airport via car, including that there is currently congestion and that proposals will be insufficient in combatting this, as well as poor existing signage and wayfinding, poor east/west access, and that cars are felt to be the favoured method of accessing the airport.	72	Please see response to the Ref. SA.2.01. The Green Controlled Growth Framework [TR020001/APP/7.08] and the Framework Travel Plan [TR020001/APP/7.13] establish a robust framework and provide the Applicant with tools to ensure encourages and enables increases in public transport mode shares and demonstrates a commitment to sustainable access to and from the airport. The Applicant is committed to working with public transport operators through the delivery of the Travel Plan to improve east-west connectivity and provide improvements that will complement sustainable transport modes. The signage requirements associated with delivering the package of measures would be a matter for detailed design.	No
SA.3.02	Suggest that a clear system is put in place to enable communities to access mitigation funding or works to resolve any unforeseen impacts on these roads.	1	Please refer to the response to Ref. SA.2.01. A Green Controlled Growth Framework [TR020001/APP/7.08] which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface access – specifically, mode share. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time.	No

Ref	Comment	No. CC	Response	Change
			<p>One of the Applicant's GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.</p> <p>The future Travel Plans as described in the Framework Travel Plan [TR020001/APP/7.13] will also monitor and evaluate surface access mode share to the airport and this will be enforced through the Travel Plan Steering Group who will report into the Airport Transport Forum.</p> <p>There is no proposed mitigation fund as the Applicant has sought to mitigate the impact of the Proposed Development through the schemes proposed in the application.</p> <p>The Community First Fund, that will provide £1 in funding for every additional passenger above the passenger cap at the time that the application for development consent is approved, exists exclusively to provide grants to recipients, including in areas outside of Luton which are most affected by airport operation. Bids for funding must demonstrate a clear link to addressing local needs in areas of high deprivation or to decarbonisation projects anywhere within the eligible areas. More information on the scheme can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p>	

Ref	Comment	No. CC	Response	Change
SA.3.03	Concerns with the road network, and that the Proposed Development will lead to increased congestion, particularly at peak times, and on the M1, B653, and A505. Some respondents were concerned that an increase in traffic would impact road quality.	1005	Please refer to the response to Ref. SA.2.01. There is the potential for increased vehicular trips around the highway network as a result of the Proposed Development however any significant effects on roads such as the M1, B653 and A505, have been identified through detailed modelled assessments and mitigation proposed, more details are provided in the Transport Assessment [TR020001/APP/7.02] .	No
SA.3.04	Concerns that surface access proposals will impact local people through increased congestion, traffic accidents, parking issues for residents, longer journey times because of traffic light proposals and rat running through residential areas.	96	Please refer to the response to Ref. SA.2.01 and SA.2.04. There is the potential for some redistribution of vehicular trips around the local highway network (aka rat-running) as a result of the Proposed Development however any significant effects have been identified through detailed modelled assessments and mitigation proposed, more details are provided in the Transport Assessment [TR020001/APP/7.02] .	No
SA.3.05	Concerns that construction of the Proposed Development will create additional traffic and congestion, exacerbating existing problems.	65	Please refer to the response to Ref. SA.2.01.	No
SA.3.06	General concerns raised around the impact of the Proposed Development on the highways network, including that it will create additional pressure on road access, which were felt to be unable to cope with the additional users generated through the Proposed Development.	155	Please refer to the response to Ref. SA.2.01.	No
Highways Network – Mitigation				

Ref	Comment	No. CC	Response	Change
SA.3.07	General suggestion that it is necessary to improve existing road infrastructure regardless of expansion. Including addressing rat-running, reducing congestion, improving road surface quality, using roundabouts rather than traffic lights and access via the east/west and north of the airport, with a strategic approach between all national, county, local highways authorities.	16	The Proposed Development includes highways improvements which have been identified as necessary to mitigate impacts of the expansion.	No
SA.3.08	Suggestions to improve specific roads, including the M1, A1(M), Wigmore Lane, Lower Luton Road, Eaton Green Road, Wigmore Place Junction, A1081, A5183, B653, Holiday Inn roundabout, airport Way, Darley Road, Vauxhall Way, A6, as well as the need for a Hitchin Bypass.	22	Please refer to the response to Ref. SA.2.01 and SA.2.15. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] set out the access improvements and highway mitigation that is being proposed as part of the Proposed Mitigation. This includes improvements and changes to roads and junctions associated with Wigmore Lane, Eaton Green Road, A108, Vauxhall Way, B653 and others.	No
SA.3.09	Suggestions the need to deliver new roads, including through delivering the link road proposed as Scheme 80 in the Hertfordshire Transport Vision High Level Project Appraisal, delivering a link road of limited scale, between the dualled A505 west of Hitchin and Hitchin Hill roundabout, building roads that avoid local residential areas, delivering a new access road to Terminal 2 delivering a new road from the M1 and A1081 to prevent people needing to enter Luton, or widening lanes or building a new road leading from below Puttridgebury to the east of the airport.	4	Please refer to the response to Ref. SA.2.01, SA.2.15 and SA.3.08.	No
SA.3.10	Concerns with the highway proposals. Some respondents felt that additional interventions were	116	Please refer to the response to Ref. SA.2.01.	No

Ref	Comment	No. CC	Response	Change
	necessary on roads which are not in the immediate vicinity of the airport including surrounding villages. Other respondents opposed any improvements, as it was felt that this would encourage car users in accessing the airport over more sustainable methods.			
Highways Network – Accessing the airport				
SA.3.11	Suggest that there needs to be an independent assessment into routes taken to access the airport.	1	The proposals have been developed through consultation and have been reviewed independently by the local authorities including National Highways and the local highway authorities.	No
SA.3.12	Suggest improving access to the airport, including through additional access routes to and from the airport, with some suggesting this should be from the M1, and diverted away from residential and minor roads, as well as suggestions that there must be improved access options from the east, and that access roads should be kept as short as possible.	25	Please refer to the response to Ref. SA.2.15.	No
SA.3.13	Suggest prevent accessing the airport via road, either entirely, or through preventing access from Wigmore or Harpenden, or reducing the number of roads currently present.	4	Please refer to the response to Ref. SA.2.24.	No
SA.3.14	Concerns with proposals for accessing the forecourt of the airport.	3	Substantial improvements have been made to the forecourt arrangements including the new multi storey car park (MSCP) which incorporates drop off on the ground floor with improved connectivity to the existing terminal. The current drop off arrangements will be improved as part of the	No

Ref	Comment	No. CC	Response	Change
			Proposed Development. A new forecourt area with passenger drop-off, taxi and bus stands would be provided to serve Terminal 2. It has been designed to cater for the airport's busiest hours and cater for drop-offs, taxis, regular buses, and shuttlebuses. The design is based on the principle of private car drop-off activity taking place at ground level, with all private car pick-up movements taking place within a short stay MSCP located directly above. Further detail can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	
SA.3.15	Concerns with the design of the airport Access Road, including that it will increase traffic and congestion	28	Please refer to the response to Ref. SA.2.19.	No
Highways Network – Modelling				
SA.3.16	Concern that for Luton airport to be able to promote sustainable transport modes, it should allow passengers to understand the full carbon footprint of their multi-modal travel plans. By not reporting Scope 3 emissions (as is the norm in other transport providers, infrastructure operators in the UK and internationally), it does not allow passengers to make those decisions.	1	Greenhouse Gas (GHG) emissions associated with airport operations are broadly Scope 1 and 2, although with an element of Scope 3 emissions. Scope 3 emissions, by definition, are not within the airport operator's direct control, although they are able to indirectly influence these. As part of the Proposed Development the Applicant is taking steps to encourage sustainable travel set out within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No

Ref	Comment	No. CC	Response	Change
			<p>As such, it is proposed that where any Scope 3 emissions are incorporated into the GCG Framework they should be expressed as a net Limit, inclusive of any offsetting that the airport operator may choose to implement. This would allow the airport operator to take steps to ensure that carbon emissions, net of any offsetting, remain within the Limit even where issues beyond their control have affected their ability to limit gross GHG emissions. This approach would apply to surface access GHG emissions and these will be reported on through monitoring programme for the Green Controlled Growth. Further information can be found in the Green Controlled Growth Framework [TR020001/APP/7.08].</p>	
Highways Network – Safety				
SA.3.17	Concerns around road safety due to increased numbers of car users, with particular concerns for safety on the M1.	84	<p>Please refer to the response to Ref. SA.2.01.</p> <p>Despite measures to increase the proportion of journeys to the airport by public transport, there will be additional journeys made by car due to the growth in passengers as a result of the Proposed Development. The Transport Assessment [TR020001/APP/7.02] aims to mitigate the impact of these journeys through the implementation of a significant package of highway improvements in a phased approach, and flight scheduling to minimise additional journeys during peak highway periods.</p>	No

Ref	Comment	No. CC	Response	Change
			<p>The form and type of the proposed junction improvements have been designed to minimise queuing and delay whilst maximising traffic capacity and accommodating pedestrian and cycle requirements where appropriate. Detailed assessments of the proposed highway layouts have been undertaken, and can be found within the Transport Assessment [TR020001/APP/7.02], to ensure that volumes of traffic (both existing and proposed) can be accommodated and discussions are ongoing with National Highways and relevant local authorities.</p> <p>The design of the proposed junction improvements would be subject to standard safety audits as the design progresses through detailed stage. Notably, the highway improvements are designed to minimise queuing and delay where possible.</p> <p>The effects of safety and is summarised in Chapter 18 Traffic and Transport of the ES [TR020001/APP/5.01] and the M1 was scoped out of the assessment due to it not meeting the threshold for percentage increase in vehicle trips and as such in EIA terminology is it expected that there will be a negligible effect on the M1 for collisions and safety.</p>	
Highways Network – Taxis				

Ref	Comment	No. CC	Response	Change
SA.3.18	Concerns with taxis, including cost, ease and availability of use, perceived monopolisation of companies, that proposals for insufficient parking spaces will mean the need for more taxis, that they are an unsustainable form of accessing the airport, and that disabled people are penalised due to the high costs of taxis.	16	Please refer to the response to Ref. SA.2.22.	No
SA.3.19	Suggestions related to taxis, including subsidising fares for local people, improving the ease, access and wait times for using taxis, undertaking a review of taxi providers to prevent monopolisation, ensuring that taxis serving the airport are electric, providing non-traditional vehicles such as tuc-tucs in summer, delivering a taxi rank, and rank for ride-share vehicles outside of the airport to allow them to wait, drop off, and pick up airport users without penalties.	12	Please refer to the response to Ref. SA.3.18.	No
Highways Network – Electric Vehicles				
SA.3.20	Concern regarding the inclusion of Electric Vehicle provision in proposals, including associated costs for users, timescales for mass uptake, their use over public and active transport in accessing the airport, that their production and disposal still generates greenhouse gases, the number of charging points proposed, and that increased Electric Vehicle use is outside the control of the airport.	11	As part of the Proposed Development, the Applicant is seeking to increase the percentage of journeys to the airport by sustainable modes. Whilst electric vehicles can bring a number of benefits, in terms of the Surface Access mode share targets, electric vehicles are not included and are in addition to the sustainable trips, particularly by rail, bus and coach which the airport is seeking to encourage. The wider rate of uptake of electric vehicles will be driven by factors such as the wider roll-out of charging infrastructure across the UK, the nature and extent of any subsidies introduced by	No

Ref	Comment	No. CC	Response	Change
			<p>Government to encourage the purchase of electric vehicles, and wider societal factors.</p> <p>The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] provide detail on accessing the airport through the use of cleaner vehicles. The provision for electric vehicles/charging points, will be considered as part of detailed design.</p>	
SA.3.21	<p>Some respondents noted that a significant number of airport users will wish to access the airport using private cars, especially with the increased uptake of electric and other zero tailpipe emission vehicles, and therefore suggest that suitable provision must be made for them, including improving accessibility via car and improved signage.</p>	6	<p>The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] provides detail on accessing the airport through the use of cleaner vehicles.</p> <p>Provision for electric vehicles, including the potential for charging points, will be considered as part of detailed design. Whilst electric vehicle can bring a number of benefits, in terms of the Surface Access mode share targets, electric vehicles are not included and are in addition to the sustainable trips, particularly by rail, bus and coach which the airport is seeking to encourage.</p> <p>It is acknowledged that some passengers will continue to access the airport by car. The number of parking and drop-off spaces has been determined to meet the future demand alongside achievement of the mode share targets.</p>	No
SA.3.22	<p>Concern that the 'reduced' rate for those affording Electric Vehicles is simple 'green wash'.</p>	1	<p>Whilst electric vehicles can bring a number of benefits, in terms of the Surface Access mode</p>	No

Ref	Comment	No. CC	Response	Change
			share targets, electric vehicles are not included and are in addition to the sustainable trips, particularly by rail, bus and coach which the airport is seeking to encourage.	
Highways Network – Electric Vehicles				
SA.3.23	Several commitments are made within the SAETS to enable the transition to electric transportation, such as the rapid rollout of EV charging points, the introduction of zero emission vehicle technologies for vehicles operating on the airfield and in and around airport, the introduction of net zero fleets across the airport's car parks and working with taxi and private hire operators to achieve net zero vehicles. Such activity is aligned with the measures set out in LLAOL's sustainability agenda.	1	Noted.	No
SA.3.24	As the owner of relationships with the taxi and private hire operators, and of all airside and landside operations, LLAOL is well-placed to support the Applicant with the rollout of e-vehicle technologies. LLAOL requests to work collaboratively with the Applicant to establish a detailed plan for this transition, to avoid disturbance to the current airport operations, and to enable costs to be understood and allocated appropriately.	1	Noted. The Applicant welcome the opportunity to work collaboratively with LLAOL.	No
SA.3.25	Expectations should be managed that supporting infrastructure and civil engineering works for vehicle electrification projects come with significant costs, which should not in all instances be borne by the operator. LLAOL would welcome further engagement	1	Noted. The Applicant welcome the opportunity to work collaboratively with LLAOL.	No

Ref	Comment	No. CC	Response	Change
	with the Applicant to further identify, clarify and agree the costs, timelines and responsibilities. Further, LLAOL notes that the measurement of success in relation to e-vehicles across car parks specifically should not be the number of charging points, but instead the total charging capacity available to users.			
SA.3.26	As with walking and cycling initiatives, LLAOL requests the Applicant uses its influence within the local council entities and supporting structures, to support Luton-based taxi drivers to transition to vehicles.	1	Please refer to the response to Ref. SA.1.124.	No
SA.3.27	Lastly, visibility of the Applicant's 'Cleaner Energy Charging Strategy' (referenced within 2.6.27 of the SAETS) is requested at the earliest opportunity, to ensure that LLAOL can support the Applicant with proposals therein.	1	Noted.	No
Highways Network – General				
SA.3.28	Concerns with surface access proposals in relation to the negative impact the Proposed Development will have on Public Rights of Way (PROW), including Bridleways	3	<p>There are several Public Rights of Way (PROW) located within the Main Application Site. The site accessibility has been assessed to ensure that there would be good connectivity with existing pedestrian routes on the highway network in the vicinity of the airport.</p> <p>Within Wigmore Valley 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</p>	No

Ref	Comment	No. CC	Response	Change
			cyclists, and appropriate signage and facilities will be included to help support various user groups. An illustrative masterplan showing the bridleways, cycleways and footpaths can be found within the Strategic Landscape Masterplan Report [TR020001/APP/5.10] .	
SA.3.29	Support for the proposed highways improvements, including car parking proposals, off-site highways improvements, access roads and improvements to the M1.	16	Noted.	No
Highways Network – Other				
SA.3.30	Suggest improving facilities for the disabled and elderly, particularly in getting to and from the airport.	1	Please refer to the response to Ref. SA.3.14. The airport seeks to comply with the EC Regulation No 1107/2006, the Equality Act, European Civil Aviation Conference (ECAC) standards, and with best practice in the handling of disabled persons and the Applicant's committed to providing a good standard of service to all its passengers including disabled persons.	No
Public/Sustainable Transport – Rail				
SA.3.31	Concerns with rail proposals, including lack of frequency and reliability, and lack of network coverage including direct routes. Some noted that accessibility is a challenge for those with reduced	97	Please refer to the response to Ref. SA.2.33. The applicant is committed to providing a good standard of service to all its passengers, improving accessibility to the airport, particularly by public transport for all people, including those	No

Ref	Comment	No. CC	Response	Change
	mobility and that there are insufficient east/west links.		that are disabled and/or with reduced mobility. The airport seeks to comply with the EC Regulation No 1107/2006, the Equality Act, European Civil Aviation Conference (ECAC) standards, and with best practice in the handling of disabled persons. Please refer to the Equality Impact Assessment [TR020001/APP/7.11] for additional information.	
SA.3.32	Suggest improving rail networks, including through prioritising rail in accessing the airport, that a direct rail link should be delivered at Luton airport rather than just a link, incorporating Luton into East West Rail, prioritising localised rail networks over national schemes. Some suggested that rail capacity should be increased, through additional services, and 24/7 services, while others suggested that there must be improved accessibility at stations for those with limited mobility, there should be a range of ticketing methods, and that in-station infrastructure should be improved.	47	Substantial investment in improving connectivity of the airport to rail has been made through Luton DART. The applicant would welcome any initiatives to further enhance connectivity however schemes such as East West Rail are beyond the control of the airport or the scope of the application for development consent. Engagement sessions were held through Travel Plan workshops and ongoing discussions with rail operators will continue through the delivery of the Travel Plan and its regular update and during the monitoring programme for the Green Controlled Growth Framework [TR020001/APP/7.08] .	No
Public/Sustainable Transport – Buses/Coaches				
SA.3.33	Suggestions in respect of the coach station, including that there should also be a coach station serving Terminal 1, and that there should be a greater network of local coaches dropping airport users off to reduce car use and need for parking.	3	A new coach station is proposed as part of the Proposed Development, the Applicant also proposes to expand the coach facilities at the existing terminal. Further information on this can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] . Discussions have taken place with public transport operators and will continue as part of the	No

Ref	Comment	No. CC	Response	Change
			Proposed Development to ensure that sufficient emphasis is placed on public transport access to both terminals. Discussions with bus providers aim to increase the coverage and frequency of services to the airport.	
SA.3.34	Suggestions regarding bus provision, including that there should be increased bus services particularly at unsociable hours, the bus network should be extended, capacity of buses should be increased, there should be buses dedicated to airport staff, and there should be Park and Ride schemes.	35	Please refer to the response to Ref. SA.1.108.	No
SA.3.35	Support for proposals relating to bus services.	3	Noted.	No
SA.3.36	Concerns with the proposed design of the new coach station.	2	The new coach station is part of the Applicant's approach to increasing sustainable travel to the airport. The detailed design for the coach station will be developed at the appropriate time. Further information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No
SA.3.37	Concerns with public bus proposals, including lack of frequency and reliability, and lack of network coverage including direct routes. Some respondents noted that buses are not practical for all users.	51	Please refer to the response to Ref. SA.3.34.	No
Public/Sustainable Transport – Luton DART				
SA.3.38	Concerns around the cost of building the DART.	36	Please refer to the response to Ref. SA.2.42. Luton DART (the announcement of an official opening date will be made in 2023) will offer direct, seamless, sustainable travel to the airport	No

Ref	Comment	No. CC	Response	Change
			from more than 60 stations across the Thameslink & East Midlands Railway network, replacing the existing bus transfer service. The Luton DART is aimed at increasing the rail modal share for passengers accessing the airport and supporting the delivery of the Luton 2040 vision of a carbon-neutral town by reducing the environmental impact of journeys to and from the airport and congestion on surrounding roads. The budgeted cost for Luton DART is on public record.	
SA.3.39	Concerns around the cost of the DART for the user.	9	Please refer to the response to the Ref. SA.2.50.	No
SA.3.40	General concerns around the DART, including that it won't be used, was unnecessary or poorly planned, it won't mitigate the impacts of increase car users, is only useful for those arriving by train, and that it was delayed and overbudget.	59	Luton DART provides a dedicated light rail link between Luton Airport Parkway Rail Station and the airport. The Luton DART has been developed to improve passenger journey time and connectivity to and from the airport using a modern, sustainable and efficient system. Prior to this, shuttle buses transported passengers between Parkway station and the airport. The reliability and journey time of the bus service could be affected by traffic congestion, which is difficult to predict in advance. These issues can lead to stressful and delayed journeys to the airport. Luton DART will play an important role in increasing the percentage of journeys to the airport by sustainable modes. Although the Proposed Development is seeking consent for a new Luton DART station at Terminal 2, the operation and construction of the Luton DART is outside of this application for	No

Ref	Comment	No. CC	Response	Change
			development consent. More information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	
SA.3.41	Suggestions on changing the design of the DART, including through allowing access to the DART for all and not just rail users, and through extending the DART network. Suggestions for this extension included providing DART access from the M1, Luton Town Station, Milton Keynes, both airport terminals and car parks to allow for park and ride style access using the DART.	12	Please refer to the response to Ref. SA.2.50. The Framework Travel Plan [TR020001/APP/7.13] sets out a monitoring and survey regime that will seek to understand usage of Luton DART and will allow an opportunity to influence measures related to the operation and running of the Luton DART service.	No
SA.3.42	Suggestions on the user cost of the DART, including that the service should be free, that the cost should be reasonable, and that some users should have discounts on using the DART (including local community groups, Luton residents, and airport staff).	13	Please refer to the response to Ref. SA.2.50.	No
SA.3.43	Support for the DART which was felt will encourage public transport use, improve journey times, contribute towards wider connectivity to the airport, and offer a sustainable alternative to car travel.	78	Noted.	No
SA.3.44	Suggest that in order to meet the sustainable transport targets, the full potential of the DART system will need to be realised, through a seamless transfer to national rail at Luton Airport Parkway station, particularly regarding through ticketing.	1	Luton DART provides a dedicated light rail link between Luton Airport Parkway Rail Station and the airport. Ticketing is outside scope of this application for development consent. However, the Applicant understands the importance of integrating ticketing/contactless and joint marketing for rail-based travel, and all are being	No

Ref	Comment	No. CC	Response	Change
			developed for the launch of a seamless transfer through Luton DART services.	
Public/Sustainable Transport – Mitigation				
SA.3.45	Suggest there should be improved traffic management and modelling, including that construction and operational access should be fully controlled and monitored to reduce impacts on local communities. This monitoring should be in place throughout the expansion, and should ensure sufficient considerations are given to the impacts of traffic flow, and the external factors impacting traffic flow.	12	Please refer to the response to Ref. SA.2.24.	No
Public/Sustainable Transport – Targets				
SA.3.46	Suggestions regarding the sustainable transport targets, including that higher, more ambitious targets are necessary, with some suggesting that a longer term goal of full sustainable transport access should be included within proposals, and that the role that non-UK business and leisure passengers play in the modal share should be considered.	11	Please refer to the response to Ref. SA.1.105.	No
SA.3.47	Suggestion that the sustainable transport targets have not been independently assessed and should be, and that a detailed impact study is required to determine the extent of assumptions used in proposals.	2	Please refer to the response to Ref. SA.1.105.	No
SA.3.48	Support for the proposed targets for accessing the airport via public and active transport.	11	Noted.	No

Ref	Comment	No. CC	Response	Change
SA.3.49	Concerns with how the targets for accessing the airport via active and public transport will be monitored or enforced.	22	A Green Controlled Growth Framework [TR020001/APP/7.08] which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface access – specifically, mode share. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time. One of the Applicant’s GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.	No
SA.3.50	Concerns that the targets for accessing the airport via active and public transport are not based on evidence. Some respondents were unclear about how targets would be achieved, whether road agencies and public transport operators support the targets, and noted that the Applicant has no control over how people access the airport.	159	Please refer to the response to Ref. SA.1.105.	No
SA.3.51	Concerns that the targets for accessing the airport via active and public transport are too high and unachievable, especially given than current public transport usage is so low.	171	Please refer to the response to Ref. SA.1.105.	No
SA.3.52	Concerns that the targets for accessing the airport via active and public transport are too low and not ambitious enough, with the remaining 55% of airport users travelling to the airport by car, which will lead to adverse environment impacts	37	Please refer to the response to Ref. SA.1.105.	No
Public/Sustainable Transport – Cost				

Ref	Comment	No. CC	Response	Change
SA.3.53	Suggest reducing the cost of public transport. For example by the Applicant subsidising or providing free early morning and late night services, public transport for local residents and airport staff. Also providing group tickets for families or other groups travelling together to disincentivise travelling by car, subsidised or free DART access for all, and through providing airfare discounts to those accessing the airport via public or active transport.	33	Please refer to the response to Ref. SA.2.61 regarding the cost of public transport for the user, and Ref. SA.2.50 regarding the cost of the Luton DART.	No
SA.3.54	Concerns around the cost of public transport to travel the airport, including that for families, or groups of people, travelling by car is cheaper. Some respondents felt that unless the cost of public transport is reduced there would not be an increase in users.	28	Please refer to the response to Ref. SA.2.59.	No
Public/Sustainable Transport – Electric Vehicles				
SA.3.55	Suggest electric and emission free vehicles should be encouraged, for example through priority or exclusive access to the airport for electric or emission free buses, coaches, taxis, trains and e-bikes with trailers or e-scooters.	21	Please refer to the response to Ref. SA.2.62. The Framework Travel Plan [TR020001/APP/7.13] sets out the toolbox of measures to encourage cleaner and greener vehicles to access the airport.	No
Public/Sustainable Transport – General				
SA.3.56	Support for the public and active travel proposals.	40	Noted.	No
SA.3.57	Suggestions on how to increase public and active travel use by both airport users and staff, through increased number of services, increasing the area	106	Please refer to the response to Refs. SA.2.01, SA.3.02, and SA.2.61. A new Bus and Coach Terminal is proposed to be delivered as part of the	No

Ref	Comment	No. CC	Response	Change
	covered by services, improving the speed and number of direct services, and through ensuring there are sufficient services running 24 hours a day, which will require adequate funding, incentives and publicity. Some respondents suggested that any profit should be spent on these improvements, while others specified the need for improvements in accessing the airport from the east, west, London, and other airports in the South East, and to deliver an intermodal hub, supporting regional buses and long distance coaches, to provide an integrated public transport system.		Proposed Development that will support regional and long-distance bus routes.	
SA.3.58	General concerns with the services and accessibility of public transport in accessing the airport, particularly that services are insufficient and inadequate, not available or practical from some areas, or that services do not run early enough in the morning, or late enough at night	167	Please refer to the response to Refs. SA.2.33 and SA.3.34. Rail services to and from the airport are run across 24 hours and this is supported by local bus and coach services to provide a comprehensive public transport offer with a good spread of services across the day.	No
Public/Sustainable Transport – Active Travel				
SA.3.59	Concerns that pedestrian and cyclist access proposals include unsuitable pathways to the airport, including confusion about where these pathways are, and scepticism about how many people will access the airport via active transport.	7	Please refer to the response to Refs. SA.2.65 and SA.3.34.	No
SA.3.60	Concerns with proposals relating to cycling infrastructure, including that proposals are insufficient, or haven't considered routes avoiding the	9	Please refer to the response to Ref. SA.2.65.	No

Ref	Comment	No. CC	Response	Change
	A505, as well as scepticism around accessing the airport via bicycle.			
SA.3.61	Suggestions regarding active travel proposals, including that they must be incorporated into design at an early stage and sufficiently financed. Some respondents suggested there should be dedicated cycle lanes and sufficient cycle storage, and a dedicated active travel corridor between terminals and from nearby hotels. Some respondents suggested that an active travel scheme should be implemented throughout the wider area, and that DfT input is required to ensure proposals are sufficient.	19	Please refer to the response to Ref. SA.2.65. The AAR and associated link road are proposed to include shared footway/cycleways which will enable connectivity to the local highway network from areas across the airport and link into existing networks in Luton, which will provide routes to and from the airport terminal to hotels and other areas. Additional information can be found within the Surface Access Strategy [TR020001/APP/7.12] .	No
Car Parks – Mitigation				
SA.3.62	General concerns with both the existing and proposed car parks, including that there is an insufficient number of spaces planned, or that existing car parks are poorly configured and confusing for users. Other respondents stated that there should be no expansion to car parks as airport users should be encouraged to travel via public and active transport.	80	Please refer to the response to Ref. SA.2.14.	No
SA.3.63	Suggest less car parking is needed.	4	Please refer to the response to Ref. SA.2.69.	No
SA.3.64	Suggest more parking is necessary to accommodate demand.	3	Please refer to the response to Ref. SA.3.63.	No
Car Parks – Modelling				
SA.3.65	Concern that it is unclear how proposed on- airport passenger car parking figures at a throughput of	1	Please refer to the response to Ref. SA.2.01.	No

Ref	Comment	No. CC	Response	Change
	21.5mppa 27mppa and 32mppa are, or will take into account the initiatives to be set out in the Green Controlled Growth initiative and Framework Travel Plan. The Environmental Statement accompanying the DCO application should be clear on this important point.			
Car Parks – Cost				
SA.3.66	Concerns that there is, and will continue to be, a high drop-off cost for users.	77	Please refer to the response to Ref. SA.2.92.	No
SA.3.67	Concerns that the car parking proposals will increase the cost of parking for users, including for those picking-up and dropping-off.	57	Please refer to the response to Ref. SA.2.92.	No
SA.3.68	Suggestions regarding the cost of parking and drop off/pick up, including that this cost should be reduced, the time limit for free parking should be extended and that car park users who are disabled, or those who live in the nearby area should qualify for parking discounts. Some respondents suggested that car parking costs should be emission based, e.g. lower for those with less polluting vehicles.	59	Please refer to the response to Ref. SA.2.92.	No
SA.3.69	Query where the profits from car parking fares goes.	1	Car parking fees are not set or collected by the Applicant.	No
Car Parks – Impacts on local people				
SA.3.70	Suggest introducing a permit only parking system, with sufficient enforcement to prevent airport users parking on residential streets.	1	Please refer to the response to Ref. SA.1.134.	No

Ref	Comment	No. CC	Response	Change
SA.3.71	Concerns that the car parking proposals will increase airport users parking on residential streets, sometimes blocking driveways and garages, or at the train station, due to the high cost of parking at the airport.	78	Please refer to the response to Ref. SA.2.99.	No
Car Parks – Electric Vehicles				
SA.3.72	Suggestions relating to Electric Vehicle charging proposals within the airport car parks, including that sufficient charging points should be made a priority.	13	Please refer to the response to Ref. SA.3.20.	No
Car Parks – General				
SA.3.73	Suggestions on how to improve the airport forecourt area, including through improvements to the existing drop-off area which should be closer and more accessible, or located near a back entrance to the airport to keep the forecourt clear. Other suggestions on how to keep the entrance clear included providing a separate area for waiting until confirmation has been received that a flight has landed, which should include cafés.	16	Please refer to the response to Ref. SA.3.14. Suggestions for the detailed design are noted and will be considered at the detailed design stage.	No
SA.3.74	Suggestion to deliver off-site car parks to allow for customer choice rather than only airport delivered car parking. Some respondents suggested that this should be located near to the M1 to prevent airport users from travelling through Luton and other nearby villages, while others suggested that it should be located near to the DART to make the DART more accessible for those accessing the airport by car.	11	Please refer to the response to Ref. SA.2.71. There is a comprehensive plan for providing car parking for the Proposed Development and this is set out in the Transport Assessment [TR020001/APP/7.02] . There are no plans to provide any additional off-siter car parking and the Proposed Development seeks to maximise sustainable access to the airport via promoting the use of public transport.	No

Ref	Comment	No. CC	Response	Change
SA.3.75	Suggestions to improve the proposed car park design, including using landscaping, suitable lighting, technology and solar panels.	10	These comments are noted and will be considered at the detailed design stage.	No
SA.3.76	Suggestion that the Environmental Statement accompanying the DCO application, when considering future on- airport passenger car parking, that tables show future net increases in on- airport passenger car parking spaces, for each of the three on- airport passenger parking segments at the specific phase. Where, in any one phase, existing car parking is reduced due to other construction work, or is lost altogether, it is important that it is recorded in the interests of clarity and transparency.	2	The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] submitted with the application for development consent includes reference to net increases of on-site car parking provision at each assessment phase of development. Details of amendments to existing car parks as a result of the works are also provided.	No
General/Other				
SA.3.77	Concern that forecourt access is currently poor. Some respondents were concerned the forecourt was exposed to the weather and required passengers to walk long distances.	25	Substantial improvements have been made to the forecourt arrangements including the new multi storey car park (MSCP) which incorporates drop off on the ground floor with improved connectivity to the existing terminal. The current drop-off arrangements will be improved as part of the Proposed Development. A new forecourt area with passenger drop-off, taxi and bus stands would be provided to serve Terminal 2. It has been designed to cater for the airport's busiest hours and cater for drop-offs, taxis, regular buses, and shuttlebuses. The design is based on the principle of private car drop-off activity taking place at ground level, with all private car pick-up movements taking place within a short stay MSCP located directly above. Further details	No

Ref	Comment	No. CC	Response	Change
			on this will be provided within the Transport Assessment [TR020001/APP/7.02] .	
SA.3.78	Concerns with the achievability of surface access proposals, and whether the plans will be delivered. Some respondents noted that the proposals are based from a number of external factors, funding sources and 'unknowns' which the Applicant has no control over.	17	<p>Please refer to the response to Ref. SA.2.01.</p> <p>The surface access proposals- including the off-site highway mitigation schemes- have been developed around 'known quantities' which include traffic associated with consented developments in addition to the projected traffic associated with the Proposed Development.</p> <p>With the exception of the proposed Vauxhall Way dual carriageway scheme, the proposed highway improvements would be funded by the Applicant as part of the mitigation package of the expansion proposals and conditioned as appropriate through the granting of planning permission.</p>	No
SA.3.79	Concerns that the Transport Strategy is emerging rather than adopted.	31	The SAETS was in draft during the statutory consultation, however a finalised Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] has been prepared and is a key component of this application for development consent.	No
SA.3.80	Suggestions on how to discourage car usage in accessing the airport, including through incentivising the use of public and active transport, while penalising the use of private cars. Suggestions for incentivising sustainable methods included reducing cost, improving the reliability of public transport, and through implementing car sharing schemes. Suggestions for the penalisation of car users	49	<p>Please refer to the response to Refs. SA.2.14 in respect of measures the Applicant proposes to increase travel by sustainable modes and SA.3.34 in respect of bus routes.</p> <p>The number of parking and drop-off spaces has been determined to meet the future demand alongside achievement of the mode share targets. A drop off zone is required as passengers will</p>	No

Ref	Comment	No. CC	Response	Change
	included limiting parking spaces, increasing parking charges, not providing a drop-off zone at the proposed second terminal, banning car access to the airport, and only allowing access via sustainable methods of transport, implementing and enforcing anti-idling charges, setting limits on the number of airport staff using cars, implementing congestion charges, and conducting further research into the impact of kiss and fly passengers.		<p>continue to access the airport by car. Ongoing monitoring will look into the numbers of kiss and fly passengers, and further information can be found within the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12].</p> <p>The airport operator already has powers to implement car parking and access charges, and as such it is not necessary to seek further powers through the application for development consent. The approach to managing the potential surface access impacts of the Proposed Development do not assume the use of additional road user charging.</p>	
SA.3.81	Suggestion that any emerging and future Transport Strategies have the 'green agenda' as a focus throughout.	1	<p>Please refer to the response to Ref. SA.2.14 in respect of measures the Applicant proposes to increase travel by sustainable modes.</p> <p>A central focus of the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] is to ensure that as part of the Proposed Development, there will be an increase in the percentage of journeys to the airport by sustainable modes.</p> <p>A Green Controlled Growth Framework [TR020001/APP/7.08] which will ensure that the airport operates within particular “limits” is proposed. One of these limits relates to surface access - specifically, mode share. The relevant Limit will be specified in a way which reflects the</p>	No

Ref	Comment	No. CC	Response	Change
			ongoing growth of the airport over time. One of the Applicant's GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.	
SA.3.82	Suggestion that the proposed highways interventions should be implemented without the Proposed Development. Specifically the DART, highway works to improve access and alleviate existing congestion, improvements in public and active travel infrastructure. Some suggested the sustainable travel targets should be met without expansion. There was also a suggestion for a direct rail link to the airport.	40	The proposed highway interventions and sustainable travel targets are intended to mitigate the impacts of expansion of the airport, and therefore coming forward as part of the Proposed Development. A direct rail link to the airport, the Luton DART, is already under construction and is separate to the Proposed Development.	No
SA.3.83	General support for surface access proposals, including car parking strategies, highways improvements and access via car	50	Noted.	No
SA.3.84	Concern that the delivery of high speed rail is out of the control of the Applicant.	1	The delivery of high-speed rail is not included as part of the Proposed Development.	No
SA.3.85	Suggestion that the Environmental Statement should set out clearly those data sources relied upon, and whether they have been disaggregated, in order to ensure there is no amalgamation of what are different modes of passenger access to the airport by car, possessing different sustainability credentials, where it concerns passenger access modes to London Luton airport.	2	This information has been set out in the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] . Because it was premature to produce a Transport Assessment Report at the statutory consultation stage, this level of detail was not published at the time. The main data source for the mode shares has been the departing passenger surveys that are undertaken by the Civil Aviation Authority (CAA) at the main	No

Ref	Comment	No. CC	Response	Change
			<p>airports in the United Kingdom on an annual basis. From the CAA survey data, it has been possible to identify four categories of passenger access to the airport by car which have been used in the analysis:</p> <ul style="list-style-type: none"> a) private car (drop off/pick up); b) private car (on-site car park); c) private car (off-site car park); and d) rental car. 	

A15: COMPENSATION

Table A15.4: Regard had to statutory consultation responses on Compensation - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
Community FIRST						
CP.1.1	We consider that the proposed compensation policies and the 'Community First' proposals should be clearly separated as two different and unrelated initiatives. LR make clear in their Consultation Report that the Community First scheme is not mitigation. However, contradicting this statement, the Community First fund is identified within the PEIR as mitigation, for example in Chapter 13 (Health), the fund is specifically identified under the heading of 'Mitigation.' Accordingly, it is unclear what role Community First plays in the Proposed Development and what weight, if any, it should be accorded in the overall planning balance. It is clearly 'compensation' of sorts but whether and how it is proportionate to some level of defined 'harm' caused by the Proposed Development is not stated.		Host Authorities	4	Community First is intended neither as mitigation nor compensation. Rather it is intended to be an extension of the Applicant's existing policy of giving 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. The Applicant has a long history of continuous investment in local good causes, making it the most socially impactful airport in the UK, and is now seeking to take the opportunity afforded by significant growth of the airport to share more of those benefits with nearby neighbourhoods, and to align that increased support with both local and national policy. This is the reason the Community First fund has been targeted at the specific	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					themes of tackling social need and local decarbonisation projects. Further detail has been included within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] , submitted as part of the application for development consent, and the ES [TR020001/APP/5.02] has been updated to reflect the purpose of the Community First fund.	
CP.1.2	The change in emphasis from earlier proposals to decarbonisation projects is on the one hand understandable, but it brings into question the extent to which community groups in particular are going to be able to define suitable schemes that meet the eligibility criteria such that the fund will successfully perform the role expected of it. Before it is finalised, LR need to engage with the HAs, parish councils and community groups (perhaps by means of workshops) to better establish how the fund would be used and what sort of projects would qualify for funding, the application and assessment process and the monitoring of the fund, to ensure that it will be successful. Once established, we would expect to see the fund fully publicised and community groups and town and parish councils given		Host Authorities	4	The Applicant has deliberately not sought to be prescriptive in the interpretation of local decarbonisation projects specifically to retain as much flexibility as possible for those administering the scheme to be able to award grants to a broad range of appropriate projects which take positive steps towards local decarbonisation and reaching net zero. The application and assessment process, including the identification of appropriate assistance where necessary for those submitting grant applications, will be a matter for the independent administering body of the scheme. At the appropriate time relative to the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	assistance to make appropriate applications to ensure that the money is actually spent.				scheme going live, the Applicant will undertake a publicity campaign targeted at groups likely to bring forward eligible projects. Further detail has been included within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] , submitted as part of the application for development consent.	
CP.1.3	It is also unclear what role the HAs will play in Community First as within the PEIR it appears to indicate that the funding would be directed to local authorities rather than town and parish councils and community groups – we can only assume this is incorrect as it contradicts the Community First document which at para. 10.2.2. states that the funding will be available to registered charities, community groups, and parish and town councils		Host Authorities	4	Any ambiguity within the documents consulted upon in the statutory consultation is regrettable but as noted by the respondent, the Community First document was clear that eligibility will be targeted at registered charities, community groups and town and parish councils. Further detail has been included within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] , submitted as part of the application for development consent.	No
CP.1.4	A number of questions, some of which were raised at first Statutory Consultation, need to be unanswered, namely:- - How the figure of £1 for every passenger over 18 mppa has been arrived at; whether it is proportionate 'compensation' for the harm caused by the Proposed		Host Authorities	4	The level of funding for Community First was a policy decision, and the split between Luton and neighbouring authorities were policy decisions taken by the Board of Directors of the Applicant. The intended use of Community	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Development; also whether this figure will be indexed;</p> <ul style="list-style-type: none"> - What is the basis for the proposed 60/40 split between Luton and the other qualifying local authority areas; - Whether it could or should be extended to allow for unforeseen impacts identified through monitoring (see below); - Type of schemes that are being considered – i.e. whether this funding could or should fund highway schemes if monitoring indicated further improvements were necessary – and how they would be delivered; 				<p>First funds is identified as tackling areas of social need, and for local decarbonisation projects in line with local and national policy, it is not intended that Community First funds should be used for other purposes.</p> <p>Community First is intended to be neither mitigation nor compensation for adverse effects of airport growth, such mitigation is identified and secured through the ES [TR020001/APP/5.01] and in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]. It would not be appropriate therefore for Community First funds to be used to tackle unforeseen adverse effects of airport growth. Further detail has been included within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10], submitted as part of the application for development consent.</p>	
CP.1.5	<p>The fund parameters appear to rule out investment in low-carbon transport, even though this could be highly beneficial, environmentally and socially, to rural communities and towns, including Luton and Hitchin. This is on two counts: firstly,</p>		North Herts District Council	1	<p>Community First is intended neither as mitigation nor compensation. Rather it is intended to be an extension of the Applicant's existing policy of giving back to local communities through</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>transport infrastructure and services need to be planned and delivered at a higher level of organisation than individual communities; and, secondly, that transport infrastructure and services fall under the umbrella of mitigations, rather than compensation. NHC asks LR to: Consider broadening the parameters of the fund to permit investment in sustainable transport, potentially including to:</p> <ul style="list-style-type: none"> - Support bus services - Maintain active travel infrastructure - Integrate information and ticketing systems (which carries a cost overhead) - Market sustainable travel options - Offer personalised travel planning - Provide Bikeability and similar training 				<p>its Community Funding Programme, and therefore the Applicant can set the parameters as deemed appropriate. Additional information can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]. The Applicant has deliberately not sought to be prescriptive in the interpretation of local decarbonisation projects specifically to retain as much flexibility as possible for those administering the scheme to be able to award grants to a broad range of appropriate projects which take positive steps towards decarbonisation of the UK and reaching net zero. It is entirely possible that a case might be made for appropriate transport related projects to be eligible under either the decarbonisation or social need themes. It is noted however that the fund is not specifically aimed at resolving transport infrastructure issues and where such effects resulting from the DCO consented growth have been identified in the assessment work the mitigation for these effects is</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					set out in the Transport Assessment [TR020001/APP/7.02], Surface Access Strategy [TR020001/APP/7.12] and ES [TR020001/APP/5.01] .	
CP.1.6	NHC asks LR to: Engage with LAs, parish councils and community groups, perhaps using workshops, to gather and test ideas for how this fund should be used (i.e. what schemes should qualify) and disbursed (i.e. how applications will be assessed and monitored).		North Herts District Council	1	The aim is for the fund to be open to as broad a range of projects related to either of the two key themes (local decarbonisation and tackling social need) as possible without seeking to narrow flexibility through further tightening of the definition. By way of example only, a local group providing energy efficiency advice could qualify under either theme. At the appropriate time relative to the scheme going live, the Applicant will undertake a publicity campaign targeted at groups likely to bring forward eligible projects. The assessment of grant application will be a matter for the independent administering body for the fund, the Applicant will seek to ensure that awards panels include membership which reflects local knowledge and understanding. Further detail has been included within the Draft Compensation Policies, Measures and	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Community First [TR020001/APP/7.10] , submitted as part of the application for development consent.	
CP.1.7	We welcome the proposed financial uplift in the extent of community benefits to Luton Borough residents and those of surrounding areas, in particular the increase in funding proposed for the Community First funding. Details are sparse as to how the fund will be distributed much beyond statements that weighting will be towards “the most deprived communities.” Whilst laudable in itself we believe some weighting should also be afforded to those neighbouring communities that are substantially affected by the noise and other environmental impacts of LLA. We would wish to see further consideration given towards its development which better reflects the impacts of the airport on neighbouring communities		Dacorum Borough Council	1	Community First is intended to be neither mitigation nor compensation for adverse effects of airport growth, such mitigation is identified and secured through the ES [TR020001/APP/5.01] and in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] . Community First is a policy commitment from the Applicant to further extend its existing Community Funding Programme, and therefore the Applicant can set the parameters as deemed appropriate. The Applicant has not yet allocated this funding, as the funding will be awarded based on the merits of the applications received. Beyond the core split of 60/40 to Luton/other neighbouring authorities it is not intended that grant awards be based on geographical location, rather that they should be based on merit. Further detail has been included within the Draft Compensation	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Policies, Measures and Community First [TR020001/APP/7.10], submitted as part of the application for development consent.</p>	
CP.1.8	<p>Clarification should be provided as to the amounts and principles of distribution to be applied to funding communities neighbouring and impacted by LLA in areas such as skilling, education and creation of job opportunities. Dacorum would expect to be engaged in the development of these principles and associated organisational structures involved in the running of any such funding.</p>		Dacorum Borough Council	1	<p>Beyond the core split of 60/40 to Luton/other neighbouring authorities it is not intended that grant awards be based on geographical location, rather that they should be based on merit. The same body which is responsible for community funding is likely to be the independent body responsible for awarding Community First funding. Community First funds will be available as grant funding to local projects aimed either at tackling social needs at a local community level or to local decarbonisation projects. Community First will be secured through the Section 106 Agreement. Further information can be found in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]. Measures to address access to employment related to the growing airport are set out separately in the</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Employment, Training and Skills Strategy [TR020001/APP/7.05].	
CP.1.9	The proposed Community First Fund will help share the positive social impact with the airport's neighbours and this is welcomed.		Central Bedfordshire Council	1	Noted.	No
CP.1.10	Central Bedfordshire Council believes that the use of the Near Neighbour Fund could also be used for other projects that benefit communities impacted by the airport's growth and not just be limited to relatively narrow criteria of decarbonising schemes and schemes located within deprived areas.		Central Bedfordshire Council	1	The Near Neighbour Fund is separate to, and does not form part of, the application for development consent for the Proposed Development. The objectives of the Near Neighbour Fund are broader than those proposed for Community First, and additional detail on what Community First covers can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].	No
CP.1.11	At the maximum expanded capacity of 32 million passengers per annum (mppa), and assuming the current cap of 19 mppa as the baseline, this would mean £13 million a year is contributed to Community First, of which £5.6 million would be allocated to projects in neighbouring counties. This compares to the current Near Neighbour Fund which is in the region of £25,000 per year. Whilst the figures look impressive, it is important to remember that these amounts relate to the airport being at its full capacity in 2043.		Central Bedfordshire Council	1	This is accurate, the maximum value of £13m per year (or £14m based on capacity starting at 18 mppa) is a direct reflection of growth of 13 million passengers, with the Community First contribution set at £1 per growth passenger. For comparison, in 2018 the Applicant contributed the equivalent of £0.54 per passenger to local good causes and at the time this was over 20 times more than the next most generous	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>airport on the same basis. Also note that pre-pandemic the annual value of the Near Neighbour Fund was circa £100,000, and that whilst this has reduced significantly as a result of the effects of the Covid-19 pandemic, the Applicant continued, throughout the period of the pandemic and recovery, to ensure at all times that its Community Funding Programme remained operational and continued to support local communities at a time of great need and when the ability to provide that support was massively diminished. The Near Neighbourhood Fund is part of the Applicant's existing Community Funding programme; 40% of the proceeds of Community First will be put into the Near Neighbour Fund.</p>	
<p>CP.1.1 2</p>	<p>It would be useful to understand how the £1 contribution per passenger was determined and how the proposed 60/40 split between Luton – and other Host Authorities was arrived at and what it is based on.</p>		<p>Central Bedfordshire Council</p>	<p>1</p>	<p>This was a policy decision taken by the Applicant's Board of Directors. The Applicant has a long history of continuous investment in local good causes, making it the most socially impactful airport in the UK, and is now seeking to take the opportunity afforded by significant growth of the airport to share more of those benefits with nearby</p>	<p>No</p>

Ref	Comment	PC	LA	No PILs	Response	Change
					neighbourhoods, and to align that increased support with both local and national policy.	
CP.1.1 3	It would also be helpful for further information to be provided on the baseline date for the contributions to the fund to commence. It is understood that the baseline could be 18mppa or 19mppa pending the outcome of the recent permission granted by Luton Council to increase passenger numbers to 19mppa, which has been called in by the SoS and is currently awaiting decision.		Central Bedfordshire Council	1	This is correct. Community First will operate from the point at which DCO consented growth occurs. At the time of this application being made the passenger cap at the airport was 18 mppa and that is the adopted baseline position. However, should the airport operator be successful in their request to increase the passenger cap to 19 mppa (at the time of submission of the application for development consent a decision was still awaited from the Secretary of State on this) then 19 mppa will be the baseline from which DCO consented growth would be measured.	No
CP.1.1 4	Furthermore, the Council would like to understand the methodology for determining how the Community Fund will be shared between the other Host Authorities and therefore what percentage/amount of the 40% (circa £5.6million) will be allocated to Central Bedfordshire		Central Bedfordshire Council	1	There is no intention to pre-allocate funds between local authority areas. The fund will be available for any eligible body within the area to submit grant applications to the independent body managing the fund and will be disbursed on merit. Community First is intended neither as mitigation nor compensation. Rather it is intended to be an	No

Ref	Comment	PC	LA	No PILs	Response	Change
					extension of the Applicant's existing policy of giving back to local communities through its Community Funding Programme, and therefore the Applicant can set the parameters as deemed appropriate. Additional information can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	
CP.1.15	Due to our experience in these matters we believe that the proportion of the Near Neighbour fund that is to be allocated to projects within Central Bedfordshire should be allocated to Central Bedfordshire Council, which we would administer and distribute to registered charities, community groups and Town and Parish Councils. We can help ensure that mechanisms and measures would be put in place to ensure there is the local community infrastructure and support for local organisations to help them access the funding and deliver positive outcomes to tackle deprivation and encourage decarbonisation as well as other proposals that directly benefit communities that are directly impacted by the growth at the airport. The impacts of the expansion are also felt further afield within Central Bedfordshire due to the changes to holding patterns that recently came into effect,		Central Bedfordshire Council	1	Please see response to Ref. CP.1.14. To share benefits beyond Luton it is proposed to put 40% of the proceeds of Community First into the Near Neighbour Fund. The Near Neighbour Fund is that part of the Community Funding Programme which exists exclusively to provide grants to recipients in areas outside of Luton which are most affected by airport operations. Sandy, Biggleswade and Potton are all located in Central Bedfordshire and are therefore eligible to apply to Community First for funding to tackle social need and for local decarbonisation projects.	No

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	meaning that areas as far north as Sandy, Biggleswade and Potton and areas along the A1 Corridor generally are now impacted by the airport's operations					
CP.1.1 6	The knowledge and insight local authorities have through our internal departments and collaboration with partner voluntary organisations helps us to be best placed to understand the need in our communities. We can also provide knowledge and insight into deprivation in Central Bedfordshire. We have considerable experience in running local grant schemes and engaging with local communities.		Central Bedfordshire Council	1	The Applicant is sure that the provision of assistance from local authorities with such knowledge to those bodies eligible for grant funding and making applications would be greatly appreciated.	No
CP.1.1 7	Local decarbonisation and deprivation are two very varied criteria, and it would be beneficial to split the fund into two schemes targeting the different areas of focus as well as widening the use to include other potential projects that would benefit impacted communities. Local authorities have mechanisms in place including our Sustainability Plan and a Fairness priority in our Strategic Plan to be able to target and manage this type of process. Local decarbonisation within Central Bedfordshire should be informed by the Sustainability Plan and knowledge and expertise from the CBC sustainability team		Central Bedfordshire Council	1	The Applicant has considered splitting the fund between social need and decarbonisation but felt that more flexibility to adjust to changing priorities would be retained by keeping the fund combined. In view of the corporate policy alignment with LBC as shareholder, the Applicant is opting to retain the twin focus of tackling deprivation and targeting net zero by 2040, as such further broadening of the Community First objectives is not accepted. In order to ensure that the objectives of Community First remain relevant and aligned with changing priorities, the Applicant is including	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>a provision to review the themes for eligible projects on a five-year basis. Any such review will include appropriate consultation with the administering body and relevant local authorities.</p> <p>Community First is intended neither as mitigation nor compensation. Rather it is intended to be an extension of the Applicant’s existing policy of giving back to local communities through its Community Funding Programme, and therefore the Applicant can set the parameters as deemed appropriate. Additional information can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p>	
CP.1.18	<p>If it is decided that the funds will continue to be managed by Beds and Luton Community Foundation (BCLF) then a clear input from relevant officers and Elected Members of the relevant local authorities in the form of a Panel or Advisory Group for decision making on grants that benefit the communities in Central Bedfordshire and elsewhere should be set up. As the local authority, our preference would be to administer the grants directly but if this is not agreed we would want to work closely with</p>		Central Bedfordshire Council	1	<p>Membership of awards panels will be determined by the independent administrator of Community First. Additional information can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10]. The Applicant will ensure that such panels include membership which reflects local knowledge and understanding. The principle of an</p>	Yes

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	the BCLF to advise and guide on the distribution of grants within Central Bedfordshire to ensure the benefits are realised by those communities impacted by the airport's operation and growth.				advisory group to assist the awards panel in understanding local need has some merit and it would be expected that the independent administrator would establish such a body.	
CP.1.1.19	We welcome the Local decarbonisation aspects of the Community First fund and welcome the carbon offsetting that could be achieved through these within Central Bedfordshire. Local decarbonisation should be informed by the CBC Sustainability Plan and knowledge and expertise from the CBC sustainability team.		Central Bedfordshire Council	1	The application process will include a requirement on the Applicant to establish how the proposed project aligns with any relevant local policies.	Yes
CP.1.20	LLAL has not provided any revision to, or further justification for, the calculation of the £1 per additional passenger sum, and it will need to clearly demonstrate that any community compensation fund is proportionate to the environmental harm caused by expansion, as is required by the Airport National Policy Statement and emerging Aviation Strategy		Host Authorities	4	Community First is intended to be neither mitigation nor compensation for adverse effects of airport growth, such mitigation is identified and secured through the ES [TR020001/APP/5.02] and in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] , which have been submitted as part of the application for development consent. Community First is a policy commitment from the Applicant to further extend its existing Community Funding Programme, and therefore the Applicant can set the parameters as deemed appropriate. The	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Community First contribution set at £1 per growth passenger, and therefore the maximum value of £13m per year presuming a starting capacity of 19mppa is a direct reflection of growth of 13 million passengers. For comparison, in 2018 the Applicant contributed the equivalent of £0.54 per passenger to local good causes and at the time this was over 20 times more than the next most generous airport on the same basis. Additional information can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	
CP.1.2 1	In respect of the 'Community First' fund and the discretionary compensation policy strands, which would in future also be extended to include those parts of East Hertfordshire that fall under the airport's flight paths, this initiative is particularly welcomed.		East Herts District Council	1	Noted.	No
CP.1.2 2	It is noted that it is currently only proposed that "applications for support will be open to registered charities, community groups, and Parish and Town Councils within these areas". While it is agreed that this "means that funds will be available at the closest source possible to areas of need", there is		East Herts District Council	1	It is the intention that grant awards will be made to those best placed to address local need, and in this context the eligible bodies will be retained without extension to higher tier local authorities. Should higher tier local authorities wish to	No

Ref	Comment	PC	LA	No PILs	Response	Change
	concern that some rural communities may not have the resources in place to fully engage in the application process. Therefore, the final proposals in the planning application to be submitted should also include discretion for district councils to apply for such funding, as appropriate				provide assistance to town and parish councils or other rural community groups then the Applicant is sure that such support would be welcomed by those bodies. Additional information can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] , which has been submitted as part of the application for development consent.	
CP.1.2 3	It is also recommended that any 'Community First' initiative which is intended to cover such matters as Sound Insulation Grants or Residential Noise Insulation Schemes should be administered through a specifically designated body or group (such as a Community Trust), which should provide a co-ordinated and transparent approach to the application for, and distribution of, funds.		East Herts District Council	1	Community First is intended neither as mitigation nor compensation. Rather it is intended to be an extension of the Applicant's existing policy of giving back to local communities through its Community Funding Programme. The intended use of Community First funds is identified as tackling areas of social need, and for local decarbonisation projects in line with local and national policy, it is not intended that Community First funds should be used for other purposes. The noise compensation and insulation initiatives do not form part of Community First. Those compensation schemes would be	No

Ref	Comment	PC	LA	No PILs	Response	Change
					run in a similar manner to the noise insulation scheme currently offered by the existing airport operator. Please find additional information within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	
CP.1.2 4	It is hard to see how the proposals for the expansion are putting the residents of Kings Walden Parish first.	Kings Walden Parish Council		1	Community First is intended to be an extension of the Applicant's existing policy of giving back to local communities through its Community Funding Programme and therefore the Applicant can set the parameters as deemed appropriate. 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. The Applicant has a long history of continuous investment in local good causes, making it the most socially impactful airport in the UK, and is now seeking to take the opportunity afforded by significant growth of the airport to share more of those benefits with nearby neighbourhoods, and to align that increased support with both local and national policy. This is the	No

Ref	Comment	PC	LA	No PILs	Response	Change
					reason the Community First fund has been targeted at the specific themes of tackling social need and local decarbonisation projects. Further detail has been included within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] , submitted as part of the application for development consent.	
Noise Insulation Schemes						
CP.1.2 5	If consent were to be granted despite this policy conflict, the Noise Insulation Scheme becomes of paramount importance and for the reasons set out above we consider it will be out of step with government policy.		Host Authorities	4	Government policy is that noise insulation should start at 60dB LAeq 16hr, and the Applicant’s noise compensation policies have been updated to reflect this. Please refer to both the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] and Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] for addition information. There is no policy requirement to offer full insulation packages and the package on offer as part of the Proposed Development compares favourably to all other UK airports. Please refer to Chapter 16 Noise and Vibration of the ES	No

Ref	Comment	PC	LA	No PILs	Response	Change
					[TR020001/APP/5.01] for additional detail on noise policy compliance. The Applicant agrees that the Noise Insulation Schemes are important to provide a means for people who are most exposed to noise to provide good internal noise conditions. The Noise Insulation Schemes were extended after the 2019 statutory consultation and represent one of the most generous offers of any UK airport.	
CP.1.2 6	The success of the noise insulation scheme will be crucial to the acceptability of the proposals to the local communities around the airport. WSP's technical analysis (and the appendix to this provided by Suono) suggests improvements to and makes comments on the scheme. We consider that further detailed discussion will be required in respect of the proposed noise insulation scheme, particularly in respect of night time noise, prior to the application being made.		Host Authorities	4	<p>The Noise Insulation Scheme has been updated to include eligibility for the full cost of insulation of residential properties within the night-time air noise Significant Observed Adverse Effect Level (SOAEL) contour. Details are provided in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p> <p>A detailed response to WSP's technical analysis provided by Suono can be found in the Appendix M WSP tables included at the end of this Appendix.</p>	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.27	As was commented previously during the 2019 Statutory Consultation, the proposed scheme does not contain any night-time qualifications. It is therefore questionable whether it is in line with UK good practice. The PEIR sets out that noise impacts affect more local people negatively during the night than during the day and as such there is a clear case for including such criteria. The alternative mitigation of reducing or avoiding night-flights is not discussed and is considered a reasonable alternative mitigation for assessment.		Host Authorities	4	Please refer to the response to Ref. CP.1.25. The Noise Insulation Scheme has been updated to include eligibility for the full cost of insulation of residential properties within the night-time air noise SOAEL contour. Details are provided in Compensation Policy Document [TR020001/APP/7.10] .	Yes
CP.1.28	Whilst recognising that the noise insulation scheme goes beyond that currently operating at the airport, Suono, on behalf of the HAs, also highlight that if the revised scheme is to align fully with proposals set out in emerging government policy (Aviation 2050), there is a case for the daytime threshold for full noise insulation package to be reduced down to 60 dB LAeq,16hour from 63 dB LAeq,16hour currently proposed.		Host Authorities	4	Previous insulation schemes have been based on the requirement in the Aviation Policy Framework to " <i>offer acoustic insulation to noise-sensitive buildings, such as schools and hospitals, exposed to levels of noise of 63 dB LAeq,16h or more</i> ". This requirement has been fulfilled through offering a contribution to insulation. Aviation 2050 proposes to " <i>to extend the noise insulation policy threshold beyond the current 63dB LAeq 16hr contour to 60dB LAeq 16hr</i> ". This proposal has been responded to by extending the offered noise insulation policy threshold at 54 dB LAeq,16h, which covers a substantially larger area. There is	No

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					no policy requirement to offer full insulation packages and the package on offer as part of the Proposed Development compares favourably to all other UK airports. For additional detail relating to noise policy compliance, please refer to Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	
CP.1.29	Moreover, as stated in the Draft Policy and Compensation Measures document, the noise insulation scheme will only begin to be implemented when airport operations reach 19 mppa. We do not see the justification for this and consider that this mitigation should be introduced at the point the DCO is made to ensure that noise insulation to affected properties is provided as soon as possible.		Host Authorities	4	The proposed Noise Insulation Scheme is a consequence of the Proposed Development, accordingly it is wholly appropriate that it takes effect at the point at which the effects of the growth consented by the DCO occur. The proposed Noise Insulation Schemes are mitigation for any increases in noise as a result of the Proposed Development, and further detail on this can be found within Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No
CP.1.30	For public buildings, acoustic insulation is proposed to be offered to noise sensitive buildings within the 63 dB Laeq,16hour contour. Suono highlight that some of these		Host Authorities	4	Noted. For clarity, the Applicant has amended the policy wording within the Draft Compensation Policies, Measures and	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	buildings could be viewed as residential, such as hospices and nursing homes, and so any night-time qualification should also extend to such relevant public buildings.				<p>Community First [TR020001/APP/7.10], which now states as follows:</p> <p>Public buildings may include:</p> <ul style="list-style-type: none"> a) schools and colleges; b) doctor's surgeries, health centres, hospitals, nursing homes and care homes; c) libraries, community centres (unless only used as social clubs), meeting halls and village halls; d) churches and other places of religious worship; and e) children's and other day centres, crèches and nurseries. 	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.3 2	The increase in funding for the Noise Insulation Scheme is welcomed but we question that it goes far enough. - The 54dB contour will cover part only of Markyate, with no other settlements in our		Dacorum Borough Council	1	The proposed Noise Insulation Schemes have been designed to significantly improve on the current Noise Insulation Scheme. The Applicant's proposals are now	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	area benefitting from the scheme despite the acknowledged increase in terms of noise. It seems incongruous that part only of a settlement should benefit from the scheme and may give rise to poor neighbour issues				more generous and will include a greater number of properties. The noise contours will be updated and so should not be read as fixed. Eligibility and prioritisation of roll	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	as one side of a street benefits whilst another does not. We would therefore urge that the noise contour for the purposes of the scheme is revised.				out will involve the London Luton Airport Consultative Committee (LLACC) to provide consistency and independence.	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	- The payments to be provided under the scheme appear to be fixed. As we enter a period of relatively high inflation we strongly urge that those figures are indexed linked. Given the nature of the works intended be				The policy provides a mechanism for regular review throughout the life of the project. Details can be found in the Draft Compensation Policies, Measures and	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	funded by the scheme we suggest that it would more appropriate for the sums to be linked to a construction industry index rather than RPI or CPI.				Community First [TR020001/APP/7.10] .	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.3 3	[The Noise insulation scheme] fails to consider night-time noise, falling short of best practice at other airports, as identified in the WSP review. This is an issue for Central Bedfordshire residents with		Central Bedfordshire Council	1	The Noise Insulation Scheme has been updated to include eligibility for the full cost of insulation of residential properties within the night-time air noise SOAEL	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	increasing implications in terms of sleep deprivation and health and wellbeing. Consideration should be given to reducing or eliminating night-time traffic in the interest of local residents.				contour. Details are provided in Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.3 4	We would suggest that the noise insulation scheme be extended to cover Lmax criteria at night to include specific mitigation for rooms used for sleeping where the number of Lmax events could cause significant		Buckinghamshire County Council	1	The Noise Insulation Scheme has been updated to include eligibility for the full cost for insulation of residential properties within the night-time air noise SOAEL	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	levels of sleep disturbance if there are areas that fall outside of the proposed LAeq limits. This will become increasingly important especially considering the projected growth				contour. The noise metrics used for eligibility (LAeq,T) are those required by aviation noise policy, though the eligibility extends to lower noise contour bands and	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	in the shoulder hours outside the night noise quota period.				hence goes beyond the requirements of policy. Details are provided in Draft Compensation Policies, Measures and	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					Community First [TR020001/APP/7.10] .	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.3 5	The 63 dB to 54 dB range is in line with draft Government guidance from the Aviation Strategy and has been reflected for example in the Gatwick Airport DCO consultation proposals for Noise Insulation (September		Host Authorities	4	The Noise Insulation Scheme has been updated to include eligibility for the full cost of insulation for residential properties within the night-time air noise SOAEL	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	2021). A difference in that regard is that for the 63dB contour, the Gatwick scheme also uses the larger Leq 8 hr night 55dB contour to incorporate the 63 dB, and LLAL should consider this approach.				contour (55dBLAeq8h). This brings the scheme in line with best practice for other airport expansions such as Gatwick. Details are provided in Draft	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.3 6	It would be helpful for LLAL to provide, as for to scheme 1, some examples of the works that may be eligible under schemes 2, which should be closer to full insulation, and schemes 3-4, and that they could normally		Host Authorities	4	As stated in the policy, typical measures are likely to vary at different properties. In general terms windows may be upgraded	

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	be expected to be covered within the contribution cap.				to acoustic double glazing or by the addition of secondary glazing. Ceilings or lofts may be over-boarded with additional lining.	

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					Acoustic thermal insulation may be installed above ceilings in lofts. Suitable ventilation may be provided so that windows can be kept closed in warm weather.	

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					Further information is provided in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.3 7	The document also states that LLAL are also proposing to offer acoustic insulation to other noise sensitive buildings, such as nursing homes, hospices, schools, colleges, registered nurseries, libraries, community		Host Authorities	4	The Applicant is proposing to offer acoustic insulation to other noise-sensitive community buildings lying within the 63dB LAeq,16h. These buildings may include:	Yes

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	halls and places of worship lying within the 63dB LAeq,16h contour. Details of this are not provided, and it should be clarified, for example that this would be equivalent to Scheme 1.				<ul style="list-style-type: none"> a) schools and colleges; b) doctor's surgeries, health centres, hospitals, nursing homes and care homes; 	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					c) libraries, community centres (unless only used as social clubs), meeting halls and village halls;	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					d) churches and other places of religious worship; and e) children's and other day centres, crèches and nurseries.	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					Of these community buildings, acoustic insulation will also be offered to buildings continuously occupied at night, within the	

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					55dBLAeq 8h contours, such as hospitals, nursing homes and care homes.	

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					Community buildings will be treated in the same manner as those buildings qualifying under Scheme 1, with the exception that community buildings will be subject	

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					owners may seek to agree with the contractor to include additional works beyond the scope and contribution level of this scheme, but the costs and any other	

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					responsibilities arising from such works, must be borne by the owner.	

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					Further information is provided in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	

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CP.1.3 8	The proposed double-glazing schemes are open only to residents who live in specific noise contours and even if they were appropriate (they may not be allowed for Grade II Listed buildings, of which there are	Kings Walden Parish Council		1	The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise pollution.	No

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	quite a few). This would not help on a hot summer night when it is more comfortable to sleep with the windows open. Nor would double glazing help when residents wish to				Further details can be found in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	

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	make use of their gardens and the local countryside.				The Applicant has developed the compensation policies so that they offer compensation to those most affected by the proposals based upon the information available. The	

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					Noise Insulation Schemes were extended after the 2019 statutory consultation and represent one of the most generous offers of any UK airport. For those eligible,	

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					ventilation will also be covered as part of compensation measures. Additional detail on this can be found within the Draft Compensation Policies,	

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					<p>Measures and Community First [TR020001/APP/7.10].</p> <p>The Noise Insulation Scheme has been updated to include eligibility</p>	

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					for the full cost of insulation of residential properties within the night-time air noise SOAEL contour. Details are provided in Draft Compensation Policies,	

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					<p>Measures and Community First [TR020001/APP/7.10].</p> <p>If listed building consent is required, the owner will need to</p>	

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					obtain this in the same way they would for any other changes to the property before the works could be undertaken.	

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CP.1.3 9	Noise insulation is not appropriate to all properties within the parameters of the specified noise contours. Double-glazing is only effective when windows are closed, which they will not be on a hot summer day	Kings Walden Parish Council		1	Please refer to the response to Ref. CP.1.38.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	or night. On a hot summer night, residents' sleep will be disturbed by the noise (windows open) or by the heat (windows closed). It also does not help when residents wish to be outside.					

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CP.1.4 0	Double glazing, offered to those who live within particular noise contours, will not help on a hot summer's day when people will want to have their windows open or when	Kings Walden Parish Council		1	Please refer to the response to Ref. CP.1.38.	No

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	wanting to spend time outside in the garden / countryside.					
CP.1.4 1	The compensation scheme on offer should be extended to all of the villages in Kings Walden Parish affected, not just the certain	Kings Walden		1	The Applicant will comply with current guidelines for compensation legislation, and the	No

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	few that Luton Rising assumes are affected by noise etc.	Parish Council			rationale for identifying the recipients of the scheme has been set out within the Draft Compensation Policies, Measures and Community First	

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					[TR020001/APP/7.10] . The policies have been introduced to support those most affected by the proposals and aim to be as generous as any policies in place	

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					Noise and Vibration of the ES [TR020001/APP/5.01] .	
CP.1.4 2	The CAA welcomes the proposed voluntary noise insulation scheme with four tiers. It is not clear to the CAA how eligibility will work	Civil Aviation		1	The Applicant will assess the tier eligibility with the submission of the application for development	Yes

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	within the different tiers. A property may be eligible within one tier, but forecast to fall into a higher tier once the proposed development reaches capacity. Does an application under one tier preclude a	Authority			consent, and then again once works have been completed. Further information can be found within the Draft Compensation Policies, Measures and	

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	subsequent application under another tier at a later date? If so, what happens if an application is deferred until the highest anticipated tier is reached, but subsequently not reached, such that the final eligible				Community First [TR020001/APP/7.10] . The Applicant has clarified the noise mitigation policy, within Chapter 16 Noise and Vibration	

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	insulation scheme could have been claimed earlier? Consequently, there appears to be a risk that noise mitigation substantially lags behind noise detriment associated with the development or may encourage residents to				of the ES [TR020001/APP/5.02] , which has been submitted as part of the application for development consent.	

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	claim earlier for less than their eventual entitlement.					
CP.1.4 3	Compensation schemes and noise insulation scheme information does not address the rights of tenants of these	United Kingdom		1	The Applicant does not propose to compensate tenants directly unless landlord consent has been	No

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	properties, who may often have poor health or be considered vulnerable.	Health Security Agency			obtained. It is standard practice for landlords to control such decisions, and the Applicant will be writing to property owners encouraging them to take up insulation schemes,	

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					<p>however, the Applicant are unable to force noise insulation schemes on landlords who choose not to take them up. The Applicant will make the policies flexible and easy</p>	

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					to access, thereby limiting potential for refusals to offers when made. Further detail can be found within the Draft Compensation Policies, Measures and Community First	

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					[TR020001/APP/7.10] , and Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.02] .	
CP.1.4 4	The PEIR identifies the role for community engagement but makes no mention of the	United Kingdom		1	Please refer to the response to the Ref. CP.1.43.	No

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	potential for supporting tenants in understanding and utilising uptake for compensation and noise insulation.	m Health Security Agency				

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Land and Property Acquisition						
CP.1.4 5	The [Compensation] document states (paragraph 6.2.8) that the scheme entirely discretionary and that there is no automatic		Host Authorities	4	There are no residential properties within the expected contours of the 69db voluntary acquisition policy.	No

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	obligation for LLAL to acquire a property under it. Although factually correct, this seems misleading, as its intent in going beyond statutory compensation is clear, and an offer to residential property owners who				Residential hardship applies from DCO acceptance (i.e. before the application for development consent is secured), and therefore it is reasonable for it to be	

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	may qualify under this scheme should be supported in accordance with the process they have set out. It should not be viewed as discretionary or optional for LLAL to withdraw the scheme, or from the point at				discretionary. The Applicant disagrees with the statement that it is misleading to suggest that the Applicant does not have to acquire any properties. If properties were	

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	which it is triggered following DCO acceptance, LLAL should be committed to pursue any claims submitted and make a binding offer to purchase (which it is as				required by the Proposed Development, they would be included within the scope of compulsory powers, however no such properties are required.	

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	noted in the document, then at the discretion of the property owner to accept or decline).				Where property owners believe that they are blighted, they are able to bring these claims under the blight provisions of the Town and Country Planning Act (1990)	

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					<p>forcing the Applicant to buy the land if the relevant statutory tests are met. The Statement of Reasons [TR020001/APP/3.01], Funding Statement</p>	

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					additional detail around compulsory acquisition.	
CP.1.4 6	Any land or property acquisition scheme, however generous, is no compensation for the loss of a person's or family's home and	Kings Walden		1	The Applicant's intention is to always acquire land/rights by agreement and compulsory	No

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	community. People have chosen to live in Kings Walden Parish, many choosing to live there despite their being an airport close by. They didn't choose to live there with it being as close as the proposals show.	Parish Council			acquisition powers will only be used as a last resort, where agreement cannot be reached. The Proposed Development application	

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					<p>boundary does not include any residential property. The policies have been introduced to support those most affected by the proposals and are as generous</p>	

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					<p>as any policies in place on similar projects. The Statement of Reasons [TR020001/APP/3.01], Funding Statement [TR020001/APP/3.03], and Draft</p>	

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					Compensation Policies, Measures and Community First [TR020001/APP/7.10] set out additional detail around compulsory acquisition.	

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					The Proposed Development is also likely to benefit local residents, through additional provision of jobs, benefits to the local economy through tourism, improved	

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					connectivity, and investment into local decarbonisation projects and deprivation. Additional detail can be found within Chapter 13 health	

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					and Community of the ES [TR020001/APP/5.01] .	
CP.1.4 7	Further details are provided in the [Compensation] document as to what qualifies as 'unable to sell' such as by		Host Authorities	4	Applicants are expected to make all reasonable efforts to sell on the open market. The guidance	Yes

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	marketing the property for a reasonable period, and not have received an offer within 15% of a reasonable asking price. It would be helpful to provide further clarity as to what is considered reasonable in these				provided within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] encourages applicants to recognise that there	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	circumstances, for example, that reasonable will be considered in the circumstances of each case, but ordinarily the period of marketing for sale would be expected to be at least 'X weeks', and that the 'reasonable				is often a delta between an asking price and a sale price. If applicants do not market their property objectively, including dropping the price to try and find the price the	

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	asking price' should be based on the written advice of the selling agent as to their opinion of value				market is prepared to pay, they often fail to meet the effort to sell criteria. 15% is used because it aligns with other hardship policies from similar projects and should be	

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					seen as a guide. Under the Hardship Scheme the Applicant will not be eligible for any other payment. The Applicant has clarified the property hardship	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p> <p>policy, within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] submitted as part of the application for</p>	No

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					development consent. The Applicant is unable to suggest a specific number of weeks of marketing the sale of a property as this will depend on the	

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					circumstances. Similarly, a reasonable asking price will also be based on a number of external factors and circumstances. These are well established principles in	

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					blight cases, and therefore not defined within the Applicant's policy documents.	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.4 8	The [Compensation] document notes that moving costs and expenses are excluded, since that property owner would already be seeking to move. A timescale for determination of applications of three		Host Authorities	4	The Applicant will endeavour to determine hardship applications in under three months and the three months is given as the maximum time it might take. This is based on	No

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	months is proposed. As these applications will relate to issues of extreme hardship, including health issues, it would be helpful for this period to be shorter, and LLAL to use reasonable endeavours to expedite				experience and recognises that detailed information must be collected from the homeowner and a robust process followed to determine each application based	

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	matters as quickly as possible, having regard to the exceptional hardship matter being claimed.				on its facts. The Applicant has clarified the property hardship policy, within the Draft Compensation Policies, Measures and Community First	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p>	No
					[TR020001/APP/7.10] submitted as part of the application for development consent.	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.4 9	The [Compensation] document (paragraph 6.4.9) states that the scheme is entirely discretionary and there is no automatic obligation for LLAL to acquire a property, and they will confirm whether they envisage		Host Authorities	4	Once commenced the scheme will not be withdrawn unless circumstances determine that it is no longer required. Please	No

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	exceptional hardship will arise based on the information provided by the owner. As stated above, the scheme should not be treated as discretionary in the sense that LLAL should not be able to withdraw the				otherwise refer to the response to Ref CP.1.48.	

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	scheme once published, and from the point an application is made LLAL should be obligated to make a binding offer, in any circumstances where they accept that the					

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	case for exceptional hardship has been adequately demonstrated.					
CP.1.5 0	Network Rail has been reviewing the information provided and note that proposals include a small parcel of our land	Network Rail Infrastru		1	The Applicant will continue to liaise with Network Rail to seek to reach agreement on the acquisition of	No

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	to the South of the existing Luton Parkway Railway Station. We are aware that Luton Rising have been engaged with our Property Team in respect of the purchase of this land. However, as this process is not complete	cture Ltd			land and/or rights required from them for the scheme. Compulsory acquisition will be only be sought for use as the option of last resort in this case.	

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	and finalised we are obliged to include the below requirements in relation to protections from compulsory purchase, access rights and works in proximity to the railway environment;					

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CP.1.5 1	Network Rail will be seeking protection from the exercise of compulsory purchase powers over operational land either for permanent or temporary purposes. In addition, Network Rail will wish to agree	Network Rail Infrastructure Ltd		1	Please refer to the response to Ref CP.1.50.	No

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	protection for the railway during the course of the construction works and otherwise to protect our undertaking and land interests. Network Rail reserves the right to produce additional and further grounds of concern					

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	when further details of the application and its effect on Network Rail's land are available.					
CP.1.5 2	Network Rail is prepared to discuss the inclusion of Network Rail land or rights over	Network Rail		1	Please refer to the response to Ref CP.1.50.	No

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	land subject to there being no impact on the operational railway, all regulatory and other required consents being in place and appropriate commercial and other terms	Infrastructure Ltd				

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	having been agreed between the parties and approved by Network Rail's board.					
Costs / Funding						

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CP.1.5 3	Luton Borough Council has a duty of care to its residents and needs to diversify its income-generating and local employment strategy, with a policy of promoting and supporting green industry. It is making	Kings Walden Parish Council		1	The Proposed Development is promoted by Luton Rising (the Applicant), a business and social enterprise that is owned by a sole shareholder, Luton Borough	No

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	plans to spend money that it does not have on an airport expansion development that isn't necessary.				Council (LBC), for community benefit. The Proposed Development will proceed as demand grows.	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					The Funding Statement [TR020001/APP/3.03] , which is submitted as part of this application for development consent, sets out a number of	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p> <p>options for how to finance the Proposed Development. The Funding Statement also provides detail on likely costs of Compulsory Acquisition, and confirms there are</p>	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p>	No
					<p>funds for the compulsory acquisition.</p> <p>The Draft Need Case document as consulted on during the 2022</p>	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p>	No
					<p>statutory consultation has been updated and is submitted as the Need Case [TR020001/APP/7.04]. This provides further detail on the need for the Proposed</p>	

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					Development, including the strategic economic case for aviation growth and the associated economic benefits.	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.5 4	Luton Borough Council and Luton Airport are already in debt, and further loans are being negotiated. It is hard to see how this is a solid business plan to go forward.	Kings Walden Parish Council		1	Please see response to Ref CP.1.53.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.5 5	Funding issues: The airport has borrowed hundreds of millions of pounds and already has to pay a substantial amount to service the interest on its existing debts.	Kings Walden Parish Council		1	Please see response to Ref CP.1.53.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
Unidentified Local Impacts Fund						
CP.1.5 6	Despite the extent of mitigation and the GCG proposal, we remain of the opinion that Unidentified Local Impacts (ULIs) need		Host Authorities	4	The Applicant will be providing the mitigation identified as needed through the Transport	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	to considered and a mechanism and funding to mitigate these be put in place. A separate fund with a specific remit to address ULIs would give the Has confidence that outside of GCG and Community First Funding is in				Assessment [TR020001/APP/7.02] and ES [TR020001/APP/5.02] , and through achieving the GCG Limits (see GCG Framework	

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	place to address issues that arise that are not forecast at the present time.				[TR020001/APP/7.08]) and future Travel Plan targets, more information on which can be found in the Framework Travel Plan [TR020001/APP/7.13] . Together,	

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					Assessment there is proposed to be a monitoring strategy to ensure that traffic volumes coming to and from the airport are monitored and evaluated to ensure that mitigation	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					is provided when and where necessary in response to the evolving transport conditions.	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.5 7	On the basis that LR wish to limit Community First to only being aimed at community based initiatives, we reiterate our view that a separate funding mechanism needs to be set up to fund an Unforeseen		Host Authorities	4	Please refer to the response to Ref CP.1.56.	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	Local Impacts Mitigation Strategy, to include funding mechanisms covering a range of topics including inter alia air quality, landscape, biodiversity, surface access and carbon emissions, providing a resource to					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	deliver additional mitigation particularly where monitoring demonstrates that the environmental, surface access and other effects or impacts assumed within the ES and application material are being exceeded					

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	or not being met or delivered with resultant substantive adverse implications.					
CP.1.5 8	Such a fund could provide additional mitigation including capital and (importantly) revenue funding for the lifetime of the		Host Authorities	4	Please refer to the response to Ref CP.1.56.	

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	development to a range of wider initiatives aimed at mitigating/enhancing the overall impact of the airport in both the rural and urban areas in its vicinity by a range of initiatives.					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.5 9	Consideration would need to be given to how such a Strategy/fund would be linked to other initiatives aimed at addressing future uncertainty, such as the proposed Travel Plan.		Host Authorities	4	Please refer to the response to Ref CP.1.56.	

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Utilities / Asset Protection						
CP.1.6 0	Clean Water • Luton Airport falls outside Thames Water's clean water supply area. We do not have	Thames Water		1	Noted.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	any clean water assets in or near the proposed order boundary.					
CP.1.6 1	Wastewater • Thames Water have a surface water sewer within the New Century Park footprint. The	Thames Water		1	Engagement with Thames Water continued after 2022 Statutory Consultation and will continue.	No

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	sewer may need diverting due to buildings and its outfall location may be disrupted by your proposal. This sewer is the overflow from the balancing pond (south of Eaton Green Road) which is within the order				Diversion may potentially be required if clashes occur with future developments. However, the current scope of works and	

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	boundary but excluded from the New Century Park footprint. • The land at the outfall location from Eaton Green Road balancing pond may be essential for the dispersion of surface water				proposals don't extend as far as New Century Park. At this stage of the project, it is not possible to determine the effects of the groundwater impact if the	

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	but we are unable to determine at this stage what impact your proposal will have on groundwater at this site. • We have noted that your scheme intends to deliver its own wastewater treatment				Application Site does lie close to a soakaway. The Water Treatment Plant (WTP) will discharge via infiltration once the treatment plant opens. When	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	facility. However, there is limited information on whether you intend to discharge flows via Thames Water assets. <ul style="list-style-type: none"> • There are a number of foul water and surface water sewers that may be affected 				Terminal 2 becomes operational the WTP will treat water to grey water standards for recycling within the terminal as well as partial infiltration. However, recent	

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	by Highway adjustments within the order boundary (including within six satellite boundaries for highway junctions). • A Surface Water Pumping Station to the River Lee sits within the order boundary (a				engagement with the Environment Agency has suggested diverting the percentage via infiltration into the Thames Water Assets subject to capacity confirmation. Further	

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	satellite boundary for a highway junction, St Mary's Roundabout). • There may be a Water Industry Act 1991 s105A (2011 private sewer transfer) affected by the DART extension.				engagement has been undertaken with Thames Water and will continue.	

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					Thames Water assets, affected by highways, do not form part of the Applicant's scope of works. It is too early at this stage to determine whether there will be	

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					any impacts on the private sewer transfer as a result of the Luton DART extension. This is a detailed design matter.	

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CP.1.6 2	'National Grid infrastructure within / in close proximity to the order boundary: - Electricity Transmission National Grid Electricity Transmission has no apparatus	National Grid Gas PLC		1	Noted.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	within or in close proximity to the proposed order limits. - Gas Transmission National Grid Gas has no apparatus within or in close proximity to the proposed order limits.					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.6 3	In addition, any rights for power or other lines under, over or alongside the railway line will require appropriate asset protection measures deemed necessary by Network Rail to protect the operational railway and	Network Rail Infrastructure Ltd		1	The Code of Construction Practice (CoCP) in Appendix 4.2 of the ES [TR020001/APP/5.02] requires the project team and the lead contractor to consult with	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	stations. We have standard protective provisions which will need to be included in the DCO as a minimum therefore contact should be made to [REDACTED]				relevant stakeholders such as Network Rail Asset Protection Team. The CoCP also requires that the works comply with all relevant Health and Safety	

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	obtain a copy of the relevant wording In addition a number of legal and commercial agreements will need to be entered into, for example, asset protection agreements, method statements, connection agreements,				legislation such as CDM Regulations in order to minimise the impact of construction and to ensure the work is carried out safely. The Applicant will engage	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	property agreements and all other relevant legal and commercial agreements. This list is not exhaustive and will need to be reviewed once more details of the scheme are discussed between the parties.				with Network Rail and discuss the standard protective provisions, if they are indeed necessary.	

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CP.1.6 4	Consideration should be given to ensure that the construction and subsequent maintenance can be carried out without adversely affecting the safety of, or encroaching upon Network Rail's adjacent	Network Rail Infrastructure Ltd		1	Please refer to the response to Ref CP.1.63.	No

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	land. In addition, security of the railway boundary will require to be maintained at all times. In any event you must contact Network Rail's Asset Protection Engineers as soon as possible in relation to this					

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	scheme on the following e-mail address AssetProtectionEastern@networkrail.co.uk.					
CP.1.6 5	We note that the developer has been working closely with our Asset Protection Team in relation to existing works in	Network Rail Infrastru		1	Noted. Engagement with Network Rail continued after 2022 Statutory Consultation.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	proximity to the operational railway environment and we expect this dialogue to continue as necessary going forward.	cture Ltd				

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CP.1.6 6	Network Rail also reserves the right to make additional comments once we have evaluated the proposals in more detail. Network Rail would be grateful if the comments and points detailed within this	Network Rail Infrastructure Ltd		1	Noted.	No

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	consultation response are considered by Luton Rising. We welcome continued engagement with Luton Rising in respect of this scheme.					

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CP.1.6 7	The impact of your proposal on Thames Water assets will need to be investigated further once more detail becomes available. We would welcome the opportunity to work with you to understand how your proposal	Thames Water		1	Noted. Engagement with Thames Water continued after 2022 Statutory Consultation and will continue.	Yes

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	can be delivered without detrimentally affecting these assets.					
CP.1.6 8	1. It is imperative that all works are carried out in accordance with the guidance provided by the HSE in their document	GTC Pipelines Ltd		1	The CoCP requires the project team and the lead contractor to consult with relevant stakeholders	No

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	HSG47 "Avoiding Danger from Underground Services", ISBN 0-7176-17 44-0. No party should carry out any excavation works or other intrusive works such as piling, blasting				such as utility companies. The CoCP also requires that the works comply with all relevant Health and Safety legislation such as CDM Regulations in order to minimise	

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	or demolition without following the guidance in HSG47.				the impact of construction and to ensure the work is carried out safely. The CoCP requires the main contractor complies with relevant	

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					H&S legislation such as HSG47 (Avoiding Danger from Underground Services). Additional detail can be found in the CoCP in	

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					Appendix 4.2 of the ES [TR020001/APP/5.02] .	
CP.1.6 9	2. We own gas, electricity, water and fibre apparatus located in the highway, private property and through the countryside. Some	GTC Pipeline s Ltd		1	Noted.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	plant may be located in land for which a wayleave or easement has been granted & there may be no surface evidence of the presence of apparatus.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.7 0	3. Ensure that you have obtained detailed plans of existing and proposed gas, electricity water and fibre networks.	GTC Pipelines Ltd		1	GTC Pipelines Ltd has provided the Applicant with plans of the locations of their existing assets, however they have not provided the Applicant with any proposed	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					gas, electricity, water and fibre networks. Following the 2022 statutory consultation, the Applicant has engaged with GTC	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p>	No
					<p>to confirm the location of proposed assets.</p> <p>The CoCP requires the project team and the lead contractor to</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p> <p>consult with relevant stakeholders such as utility companies. The CoCP also requires that the works comply with all relevant Health and Safety legislation such as CDM</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					Regulations in order to minimise the impact of construction and to ensure the work is carried out safely. The CoCP also requires the production of detailed construction	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p> <p>method statements prior to commencement of works on site.</p> <p>The CoCP sets out the requirements for the construction</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					methods to avoid and minimise adverse impacts on existing utilities. Detailed points are noted and will be taken into consideration at the construction stage.	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					Additional detail can be found in the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] .	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					There are standard protective provisions for gas, electricity, water (and separately telecoms). These protective provisions protect GTC	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					Pipelines and resolve their concerns.	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.7 1	4. The position of the networks should be pinpointed as accurately as possible by reference to the plans and by means of a locating device, which has been tested and calibrated within the last twelve months.	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	Excavation work should be carried out where applicable, and carefully follow recognised safe digging practices. Once a locating device has been used to determine position and route, excavation may proceed;					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	trial holes should be dug using suitable hand tools to confirm the position of buried networks. During excavation the locating device should be reused to check position and route of buried apparatus.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.7 2	5. Hand-held power tools can damage buried apparatus and should be used with care until the exact position has been determined . They may only be used to break a paved or concrete surface above	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	the network, unless there are any indications that the network is particularly shallow, in such circumstances, accuracy of plant location is determined and excavation initiated adjacent to the apparatus.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.7 3	6. No manhole, chamber or other structure should be built over, around or under the network. Such structures, other pipes, ducts and cables should be laid to provide a minimum clearance from the network of	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	300mm or 1.5 times the diameter of the network, whichever is the greater. No work should be carried out if this minimum clearance cannot be met or which results in					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	a reduction of cover or protection over the network, without first consulting GTC.					
CP.1.7 4	7. Where an excavation uncovers a network apparatus the backfill should be adequately compacted, particularly beneath the	GTC Pipeline s Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	network, to prevent any settlement, which would subsequently damage the network. Backfill material adjacent to the network should be selected fine material or sand, containing no stones, bricks or lumps of					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	concrete etc. and should be suitably compacted to give comparable support and protection to that provided before excavation. No power compaction should take place until 200mm cover of selected					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	fine fill has been suitably compacted by hand tools.					
CP.1.7 5	8. If the road construction is close to the top of the network, GTC should be asked about necessary precautions. The road	GTC Pipeline s Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	construction depth should not be reduced without permission from the local Highway Authority.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.7 6	9.Costs incurred by GTC through direct or consequential damage will be recharged.	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.7 7	10. Plans do not always show the presence of gas service pipes (from the gas main to premises) but their existence should be assumed.	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.7 8	11. The depth of cover for gas mains is normally 750mm in carriageways and grass verges and 600mm in footways. The depth of cover for gas services is normally 450mm. Remember these covers are to	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	finished level, you may be working in an area, which will be made up or lowered at a later date.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.7 9	12. Plastic gas pipes should be located by hand digging before mechanical excavation begins. When the positions and depth of the pipes have been determined, work can proceed.	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.8 0	13. The danger created by damaging a gas pipe with an excavator is much greater than if the damage is done with a hand-held power tool (the opposite is true for work near electricity cables and this is reflected in	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	the different safe digging practices). Gas pipes may have projections such as valve housings, which are not shown on the plans and to allow for this mechanical excavators					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	should not be used within 500mm of a gas pipe.					
CP.1.8 1	14. If a gas leak is suspected, the following action should be taken immediately:	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	- Remove all people from the immediate vicinity of the escape. If the service connection to a building or the adjacent main has been damaged, warn the occupants to leave the building, and any					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	adjoining building, until it is safe for them to return. It is important to note that a mechanical excavator may not only cause damage/leakage at the point of impact. For example, damage to a service connection					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	outside the building may result in further, unseen damage to the connection inside the building. Gas leaking from the damage inside or gas travelling along the line of the service connection pipe from outside the					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	building may cause a build-up of gas within the building. - Prohibit smoking, and extinguish all naked flames and other sources of ignition					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> - i.e. stop excavator and compressor engines within at least 5.0m of the leak. - Inform National Grid by dialling 0800 111 999 - Remain on site. 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	- Assist National Grid staff, Police or Fire Services as requested.					
CP.1.8 2	15. Where gas pipes cross or are parallel and close to excavations, changes in backfill etc. may cause differential ground	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	settlement and increased stress in the pipe. For pipes parallel and close to excavations, the degree of risk depends upon the depth of the excavation, the distance of the pipe from the excavation, the type of soil and any					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	excessive loading from heavy construction plant and materials. Wherever excavation works may affect the support of the gas pipe or cause excessive loading over the gas pipe then GTC must be consulted.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.8 3	16. No concrete or other hard material should be placed or left under or adjacent to any gas pipe as this can cause pipe fracture at a later date. Concrete backfill should not be used within 300mm of a gas pipe.	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.8 4	17. Where an excavation uncovers a gas pipe with a damaged wrapping, GTC should be told, so that repairs can be made to prevent future corrosions and leakage.	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.8 5	18. Pipe restraints or thrust blocks close to gas mains should never be removed.	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.8 6	19. Anyone who carries out work near underground gas plant should observe any specific requirements made by the site manager, and ensure that access to the plant by National Grid Gas and GTC staff is	GTC Pipelines Ltd		1	Noted.	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	available at all times. No unauthorised repairs to gas pipes should be made.					
CP.1.8 7	20. Where excavation is within 5 metres proximity to above or below ground pressure control equipment, ground workers must be	GTC Pipeline s Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	aware of the possibility of encountering small impulse pipe work that is more susceptible to damage.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.8 8	21. Where PE pipes and cables have been exposed and it is intended hot work (e.g. welding, grinding, etc) be carried out, contact must be made with GTC to confirm	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	additional precautions and actions that may require to be undertaken.					
CP.1.8 9	22. GTC should be consulted if it is intended to carry out any of the following activities:	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> - using explosives within 30m of gas pipes or 400m of gas pressure reduction equipment - piling or boring within 15m of gas plant 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> - excavating within 10m of pressure reduction equipment - reducing the cover or protection of a gas pipe - carrying out nearby deep excavations 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	- working near our intermediate pressure (IP) mains.					
CP.1.9 0	23. Plans do not always show the presence of electric service cables (from the electricity	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	main to premises) but their existence should be assumed.					
CP.1.9 1	24. In most cases there will be no permanent surface marker posts or other visible indication of the presence of a buried	GTC Pipeline s Ltd		1	Please refer to the response to Ref CP.1.70.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	cable. Even if no cables are shown on plans or detected by a locator, there may still be cables present, which could be live and a close watch should be kept for any signs which could indicate their presence such as					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	marker tape, tape tile, concrete tiles and wooden battens. Any marker which is disturbed by our excavations must be replaced once work is completed.					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.9 2	25. Typically underground cables are laid in trenches between 450mm and 1.0m deep, although some high voltage cables will be deeper, however, depths should never be assumed.	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.9 3	26. A cable is positively located only when it has been safely exposed. Even then, digging should still proceed with care as there may be other cables adjacent or lower down.	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.9 4	27. Occasionally, cables are terminated in the ground by means of a seal, sometimes with external mechanical protection. These "pot ended" or "bottle ended" cables should be treated as live and should not be	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	assumed to be abandoned or disused. They can be difficult to detect with locators even when "live".					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.9 5	28. Using hand held power tools to break up hard surfaces often leads to accidents. Where practicable, such power tools should only be used 500mm or more away from the indicated line of a cable buried in or below a	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	hard surface. Having done so, the cable should then be positively located by careful hand digging under the hard surface. The hard surface should be gradually removed until the cable is exposed. If the cable is					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	not exposed then it must be assumed to be embedded within the surface. Where possible a cable locator should be used as a depth guide down the side of the excavation.					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.9 6	29. Because of the difficulty in confirming depth, hand held power tools should never be used over the cable unless either: - the cable has already been exposed by digging under the surface to be broken out	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	and it is at a safe depth (at least 300mm) below the bottom of the hard surface material; or - physical precautions have been taken to prevent the tool striking the cable.					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.9 7	30. Excavating close to electricity cables buried in concrete is dangerous and should not be undertaken unless the cable(s) have been isolated. For this reason alone	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	electricity cables should not be buried in concrete.					
CP.1.9 8	31. Using mechanical means to break up concrete can cause damage to cables and if	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	the cable is live, anyone present is likely to be injured.					
CP.1.9 9	32. Where mechanical excavators are used in the possible vicinity of underground cables, the work should be arranged so that	GTC Pipeline s Ltd		1	Please refer to the response to Ref CP.1.70.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	damage to cables is avoided so far as is reasonably practicable and so that everyone is kept well clear of the excavator bucket while it is digging. Drivers should have been instructed to stay in the cab if a cable is					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	struck. If they have to leave the cab, they should jump clear. If drivers climb down, they may be electrocuted. When a cable is struck, a watch should be kept on the machine and no one should go down into					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	the excavation or approach the mechanical excavator or the cable until GTC are contacted and arranged for the damaged cable to be made safe.					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 00	33. Where cables have been exposed: - any damage should be reported to GTC immediately on 0800 032 6990 and work should not be undertaken in the vicinity of a	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	damaged cable until GTC has investigated its condition; - for more than 1.0m and they cross a trench, support should be provided. If the exposed cable length is shorter than 1.0m					

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	support should still be considered if joints have been exposed or the cable appears otherwise vulnerable to damage. Where advice and help is needed contact GTC;					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	- Suitable precautions should be taken to prevent damage from on-going work in the excavation. This may involve for example the use of physical means (e.g. timber boards, sandbags etc) to prevent					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	mechanical damage. Materials or equipment which could damage or penetrate the outer sheath of the cable should not be used. Cables lying in the bottom of an excavation are particularly vulnerable and should be					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	protected by nail free wooden planks, troughing or other suitable means; - cables should not be moved aside unless the operation is supervised by GTC;					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	- Precautions should be taken to prevent access by members of the public.					
CP.10 1	34. GTC should be consulted if it is intended to carry out any of the following activities:	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> - using explosives within 30m of plant or substations piling or boring within 15m of electric plant - excavating within 10m of a substation - carrying out nearby deep excavations 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	- working near our HV plant.					
CP.1.1 02	35. Plans do not always show the presence of water service pipes (from the water main to premises) but their existence should be assumed.	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 03	36. The depth of cover for water mains is normally 750mm in carriageways and grass verges and 750mm footways. The depth of cover for water services is normally 450mm. Remember these covers are to finished	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	level, you may be working in an area, which will be made up or lowered at a later date.					
CP.1.1 04	37. Water mains should be located by hand digging before mechanical excavation begins. When the positions and depth of the	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	pipes have been determined, work can proceed.					
CP.1.1 05	38. The danger created by damaging a water pipe with an excavator is much greater than if the damage is done with a	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	hand-held power tool (the opposite is true for work near electricity cables and this is reflected in the different safe digging practices). Water pipes may have projections such as valve housings, which					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	are not shown on the plans and to allow for this mechanical excavators should not be used within 500mm of a water pipe.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 06	39. If a water leak is suspected, the following action should be taken immediately: - Remove all people from the immediate vicinity of the damage. It is important to note	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	that a mechanical excavator may not only cause damage/leakage at the point of impact. For example, damage to a service connection outside the building may result in					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	further, unseen damage to the connection inside the building. - Shut down all working plant and machinery in the vicinity of the damage - Inform IWNL by dialling 02920 028 711.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> - Remain on site. - Do not attempt to make a repair. - Assist GTC, approved contractors and Police or Fire Services as requested. 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 07	40. Where water pipes cross or are parallel and close to excavations, changes in backfill etc. may cause differential ground settlement and increased stress in the pipe. For pipes parallel and close to excavations,	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	the degree of risk depends upon the depth of the excavation, the distance of the pipe from the excavation, the type of soil and any excessive loading from heavy construction plant and materials. Wherever excavation					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	works may affect the support of the water pipe or cause excessive loading over the water pipe then GTC must be consulted.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 08	41. No concrete or other hard material should be placed or left under or adjacent to any water pipe as this can cause pipe fracture at a later date. Concrete backfill	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	should not be used within 300mm of a water pipe.					
CP.1.1 09	42. Where an excavation uncovers a water pipe with a damaged wrapping, GTC should	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	be told, so that repairs can be made to prevent future corrosions and leakage.					
CP.1.1 10	43. Pipe restraints or thrust blocks close to water mains should never be removed.	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 11	44. Anyone who carries out work near underground water plant should observe any specific requirements made by the site manager, and ensure that access to the plant by GTC staff is available at all times.	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	No unauthorised repairs to water pipes should be made.					
CP.1.1 12	45. Where PE pipes and cables have been exposed and it is intended hot work (e.g. welding, grinding, etc) be carried out,	GTC Pipeline s Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	contact must be made with GTC to confirm additional precautions and actions that may require to be undertaken.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 13	46. GTC should be consulted if it is intended to carry out any of the following activities: - using explosives within 30m of plant - piling or boring within 15m of water plant	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> - excavating within 10m of water asset structures - reducing the cover or protection of a water main or service - carrying out nearby deep excavations 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 14	47. Plans may not always show the presence of fibre ducts but their existence should be assumed if GTC advise they have fibre services deployed in the given area.	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	Any planned excavation work should only proceed with due care and attention.					
CP.1.1 15	48. Chambers with IFNL marked lids can be used as an onsite indicator that GTC have fibre plant deployed in a given area however	GTC Pipelines Ltd		1	Noted.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	an exclusion of their presence does not necessarily mean there is no plant present.					
CP.1.1 16	49. In most cases there will be no permanent surface marker posts or other visible indication of the presence of a buried	GTC Pipeline s Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	fibre duct. Even if no ducts are shown on plans there may still be ducts present which could have live fibre service installed. A close watch should be kept for any signs which could indicate duct presence such as					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	marker tape. Any marker which is disturbed by our excavations must be replaced once work is completed.					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 17	50. The depth of cover for fibre duct is normally 350mm in footways and grass verges, 600mm in carriageways and 1000mm in agricultural deployments. Remember these covers are to finished	GTC Pipelines Ltd		1	Noted.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	level, you may be working in an area, which will be made up or lowered at a later date.					
CP.1.1 18	51. Fibre ducts should be located by hand digging before mechanical excavation begins. When the positions and depth of the	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	ducts have been determined, work can proceed. Even then, digging should still proceed with care as there may be other ducts adjacent or lower down.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 19	52. If fibre duct damage is suspected, the following action should be taken immediately: - Remove all people from the immediate vicinity of the damage. It is important to note	GTC Pipelines Ltd		1	Noted.	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	that a mechanical excavator may not only cause damage at the point of impact. For example, damage to a fibre connection outside the building may result in further,					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	unseen damage to the connection inside the building. - Shut down all working plant and machinery in the vicinity of the damage					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> - Inform IFNL NOC immediately on 0845 051 1669. - Remain on site. - Do not attempt to make a repair. 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 20	53. Where fibre ducts cross or are parallel and close to excavations, changes in backfill etc. may cause differential ground settlement and increased stress on the duct. For ducts parallel and close to excavations,	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	the degree of risk depends upon the depth of the excavation, the distance of the duct from the excavation, the type of soil and any excessive loading from heavy construction plant and materials. Wherever excavation					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	works may affect the support of the fibre duct or cause excessive loading over the fibre duct then GTC must be consulted.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 21	54. No concrete or other hard material should be placed or left under or adjacent to any fibre duct as this can cause damage to the duct at a later date. Any backfill should comply with the requirements of NRSWA.	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	Concrete backfill should not be used within 300mm of a fibre duct					
CP.1.1 22	55. Anyone who carries out work near underground fibre plant should observe any specific requirements made by the site	GTC Pipelines Ltd		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	manager, and ensure that access to the plant by GTC staff is available at all times. No unauthorised repairs to fibre ducts should be made.					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 23	56. Where fibre ducts have been exposed and it is intended hot work (e.g. welding, grinding, etc) be carried out, contact must be made with GTC to confirm additional	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	precautions and actions that may require to be undertaken.					
CP.1.1 24	57. GTC should be consulted if it is intended to carry out any of the following activities:	GTC Pipelines Ltd		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> - using explosives within 30m of plant or fibre asset structures - piling or boring within 15m of fibre plant - excavating within 10m of fibre asset structures (including the OSCP) 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	- reducing the cover or protection of a fibre duct - carrying out nearby deep excavations					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 25	SGN do not manage the gas distribution network in the Luton /Hitchin area . Cadent are responsible for this area.	Southern Gas Networks PLC			Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 26	In respect of existing Cadent infrastructure, Cadent will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.	Cadent Gas Limited		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 27	Cadent has identified the following apparatus within the redline boundary or within the vicinity of the proposed works: <ul style="list-style-type: none"> ▪ High Pressure (above 2 bar) Gas Pipelines and associated equipment 	Cadent Gas Limited		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> ▪ Medium Pressure and Low Pressure mains or services and associated equipment Note: No liability of any kind whatsoever is accepted by Cadent Gas Limited or their					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	agents, servants or contractors for any error or omission. Please note that Cadent has existing easements for these pipelines which prevents the erection of permanent /					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 28	Where diversions of apparatus are required to facilitate the scheme, Cadent will require adequate notice and discussions should be started at the earliest opportunity. Please be aware that diversions for high pressure	Cadent Gas Limited		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	apparatus can take in excess of two years to plan and procure materials.					
CP.1.1 29	Where diversions of apparatus are required to facilitate the scheme, Cadent will require the party requesting the diversion works to	Cadent Gas Limited		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	obtain any necessary planning permissions and other consents to enable the diversion works to be carried out. Details of these consents should be agreed in writing with Cadent before any applications are made.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	Cadent would ordinarily require a minimum of C4/Conceptual Design study to have been carried out to establish an appropriate diversion route ahead of any application being made.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 30	Where diversions sit outside the highway boundary the party requesting the diversion will be responsible for obtaining at their cost and granting to Cadent the necessary land rights, on Cadent's standard terms, to allow	Cadent Gas Limited		1	The Draft DCO [TR020001/APP/2.01] includes protective provisions for the benefit of gas undertakers. These provisions provide undertakers	No

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	the construction, maintenance and access of the diverted apparatus. As such adequate land rights must be granted to Cadent (e.g. following the exercise of compulsory powers to acquire such rights included within the				such as Cadent Gas Limited with protections for their apparatus. The Applicant has engaged further with Cadent Gas Limited on the	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	DCO) to enable works to proceed, to Cadent's satisfaction. Cadent's approval to the land rights powers included in the DCO prior to submission is strongly recommended to avoid later substantive				matters raised in order to resolve its concerns. The Applicant will, where appropriate, seek to resolve concerns via bespoke protective provisions or a side agreement.	

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	objection to the DCO. Land rights will be required to be obtained prior to construction and commissioning of any diverted apparatus, in order to avoid any delays to the project's timescales. A diversion					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	agreement may be required addressing responsibility for works, timescales, expenses and indemnity.					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 31	Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection for retained apparatus and further discussion on the	Cadent Gas Limited		1	Please refer to the response to Ref CP.1.130.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	impact to its apparatus and rights including adequate Protective Provisions. Operations within Cadent’s existing easement strips are not permitted without approval and will necessitate a Deed of Consent being put in					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	place. Any proposals for work in the vicinity for Cadent's existing apparatus will require approval by Plant Protection under the Protective Provisions/Asset Protection					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	Agreement and early discussions are advised.					
CP.1.1 32	Key Considerations: • Cadent has a Deed of Grant of Easement for each pipeline, which prevents the	Cadent Gas Limited		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	• Please be aware that written permission is required before any works commence within the Cadent easement strip and a Crossing Agreement may be required if any					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	apparatus needs to cross the Cadent easement strip <ul style="list-style-type: none"> The below guidance is not exhaustive and all works in the vicinity of Cadent’s asset shall be subject to review and approval from 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	Cadent's plant protection team in advance of commencement of works on site.					
CP.1.1 33	General Notes on Pipeline Safety: • You should be aware of the Health and Safety Executives guidance document	Cadent Gas Limited		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	HS(G) 47 "Avoiding Danger from Underground Services", and Cadent's specification for Safe Working in the Vicinity of Cadent High Pressure gas pipelines and associated installations – requirements for					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	third parties GD/SP/SSW22. Digsafe leaflet Excavating Safely – Avoiding injury when working near gas pipes. There will be additional requirements dictated by Cadent's plant protection team.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> • Cadent will also need to ensure that our pipelines remain accessible throughout and after completion of the works . • The actual depth and position must be confirmed on site by trial hole investigation 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> • If any excavations are planned within 3 metres of Cadent High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the 					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking place in order to minimise the risk of					

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	damage and ensure the final depth of cover does not affect the integrity of the pipeline. • Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	therefore consultation with Cadent's Plant Protection team is essential: <ul style="list-style-type: none"> ▪ Demolition ▪ Blasting ▪ Piling and boring 					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> ▪ Deep mining ▪ Surface mineral extraction ▪ Landfilling ▪ Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.) 					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> ▪ Wind turbine installation ▪ Solar farm installation ▪ Tree planting schemes 					

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CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 34	Pipeline Crossings: • Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.	Cadent Gas Limited		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	and crossing frequencies to determine the type and construction of the raft required. • The type of raft shall be agreed with Cadent prior to installation.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent. 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> • Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure. • The method of installation shall be confirmed through the submission of a 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	formal written method statement from the contractor to Cadent. • A Cadent representative shall monitor any works within close proximity to the pipeline.					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
CP.1.1 35	New Service Crossing: • New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.	Cadent Gas Limited		1	Please refer to the response to Ref CP.1.70.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	<ul style="list-style-type: none"> Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the 					

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
	service shall cross below the pipeline with a clearance distance of 0.6 metres. • A new service should not be laid parallel within an easement strip					

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	<ul style="list-style-type: none"> • A Cadent representative shall approve and supervise any new service crossing of a pipeline. • An exposed pipeline should be suitable supported and removed prior to backfilling 					

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	<ul style="list-style-type: none"> • An exposed pipeline should be protected by matting and suitable timber cladding • For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative 					

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	procedure will apply therefore an integrity assessment must be conducted to confirm if diversion is required					
Other						

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CP.1.1 36	We have residents who wish to take out equity release on their properties and have been turned down due to their property's close proximity to Luton Airport. The airport	Kings Walden Parish Council		1	For residents who are not having a property acquired but are impacted it may be possible to claim compensation under the Compensation Code, for example	No

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	being closer will only exacerbate issues like this.				Part 1 of the Land Compensation Act 1973. This provides compensation for the diminution in residential property value where this is caused by the physical	

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					<p>Measures and Community First [TR020001/APP/7.10].</p> <p>The Applicant has not received any evidence of equity release being</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] . The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] , the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.	No
					rejected owing to the airport but welcomes such evidence from the parish council. Please refer to Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]	

Ref	Comment	PC	LA	No PILs	Response	Change
CP.1.3 1	Overall there needs to be a more detailed consideration of the metrics used within the PEIR and subsequent EA [Environmental Assessment], to ensure that there is a consistency of approach with the metrics used within Planning Permissions, the Noise Control Scheme (existing and proposed), Noise Action Plans, and compensation policies and measures.		Host Authorities	4	<p>The LAeq,T metric is used as the primary assessment metric in line with aviation noise policy (Ref ²) and guidance from the Civil Aviation Authority (Ref ³) which states that "evidence based decisions should continue to use LAeq,16h". However, supplementary noise metrics including N65 and N60 have been included in the noise assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01]. The primary noise metrics used in the assessment presented in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01], the Noise Envelope within Green Controlled Growth (GCG) Framework [TR020001/APP/7.08] and the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] are consistent.</p>	No
					for detail on the noise and vibration impacts of the Proposed Development.	

Table A15.5: Regard had to statutory consultation responses on Compensation – Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
Community First Scheme				
CP.2.01	Concerns that the Community First scheme is buying support for the Proposed Development, with some respondents raising concerns that linking it with the Proposed Development can be interpreted as bribery.	1	Community First is intended neither as mitigation nor compensation. Rather it is intended to be an extension of the Applicant's existing policy of giving back to local communities through its Community Funding Programme. As the custodian of the airport, the Applicant is committed to ensuring that the benefits arising from its ownership of the airport are shared with nearby communities. The Applicant has a long-standing record of contributing back into the community it serves, made possible by the returns it receives from the airport. The Community First proposals build on that track record and seek to target two themes which are central to the philosophy of being a community airport here to serve and enhance life chances for those in the region. By specifically targeting local decarbonisation projects and areas of deprivation, Community First aligns with the twin objectives of LBC as shareholder, in addition to aligning with Government policy on decarbonisation and levelling up. Additional information on the Community First proposals can be found within the Draft Compensation	No

Ref	Comment	No. PILs	Response	Change
			Policies, Measures and Community First [TR020001/APP/7.10] submitted as part of the application for development consent.	
CP.2.02	Concerns that the Community First scheme is inadequate in mitigating the impacts of the Proposed Development.	7	Community First is not intended to mitigate the impacts of the Proposed Development. Mitigation of airport growth related impacts is identified in the ES [TR020001/APP/5.02] . Community First is a further extension of the Applicant's ongoing commitment to its existing community funding programme for nearby neighbourhoods, made possible through the growth which would be unlocked by the Proposed Development. Additional information on the Community First proposals can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	No
CP.2.03	Concerns that the Community First scheme prioritises profit over the local community.	3	The Applicant already provides more funding per passenger directly to community causes than any other UK airport. The Community First proposal seeks a significant increase in the level of such funding on a per passenger basis. Additional information on the Community First proposals can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	No
CP.2.04	Concern that the implementation of the Community First scheme is unlikely.	1	The Applicant has a long standing record of contributing back into the community it serves, of which it is proud. Their commitment to continuing	No

Ref	Comment	No. PILs	Response	Change
			<p>to support the local communities in this way was tested to the extreme during the Covid-19 pandemic when, despite seeing a massive reduction in income, the Applicant maintained its community funding at levels consistent with previous years.</p> <p>The Community First proposals build on that track record and seek to target two themes which are central to the philosophy of being a community airport here to serve and enhance life chances for those in the region. The funds would be ring fenced for the themes identified and managed independently in the same way as the existing Near Neighbour Fund is, currently through the Bedfordshire & Luton Community Foundation, for all areas outside of Luton. Arrangements for funding within Luton are still to be determined but will most likely be via the Applicant’s shareholder, LBC.</p> <p>Additional detail of this can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p>	
CP.2.05	General concerns relating to the Community First Scheme proposals	6	The Applicant has a long standing record of contributing back into the community it serves, made possible by the returns it receives from the airport. The Community First proposals build on that track record and seek to target two themes	No

Ref	Comment	No. PILs	Response	Change
			<p>which are central to the Applicant's philosophy of being a community airport here to serve and enhance life chances for those in the region. Further detail has been included within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p>	
CP.2.06	Concerns that the proposed Community First scheme focuses on the most deprived residents only.	1	<p>Community First applies to local decarbonisation projects, as well as for deprived residents. It is not intended as mitigation or compensation, but the Applicant is choosing to assist those most deprived through its Community Funding Programme, and therefore the Applicant can set the parameters as deemed appropriate. The Applicant has a long standing record of contributing back into the community it serves. The Community First proposals build on that track record and seek to target two themes which are central to the philosophy of being a community airport aiming to serve and enhance life chances for those in the region. By specifically targeting local decarbonisation projects and areas of deprivation, the Applicant are aligning with its shareholder LBC's twin objectives, in addition to aligning with Government policy on decarbonisation and levelling up.</p> <p>The focus on these two themes for Community First will not have any effect on the wide range of other projects which may be eligible for funding</p>	No

Ref	Comment	No. PILs	Response	Change
			through the remainder of the Applicant's Community Funding Programme. Further information on this can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	
CP.2.07	Paradigm Housing Group Ltd wish to establish how the Community First Scheme will directly apply to their customers. Is there flexibility in addition to the statutory provision, for their more vulnerable customers. They want to understand how this specifically impacts on their affected customers and their homes.	1	<p>Community First is neither a statutory provision nor available to individuals. It is a fund made available to charities / local councils and community bodies in the form of grants to be used for projects which tackle decarbonisation or address matters relating to areas of social deprivation, and Paradigm Housing Group Ltd is welcome to apply should they wish.</p> <p>The Noise Insulation Schemes have been offered by the Applicant to mitigate the impact of noise on residents near the airport. This is above what is required by statutory provision. The five Noise Insulation Schemes are determined by which noise contour the applicant property falls within. Further information can be found in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p>	No
CP.2.08	Suggestions were made to with regard to the Community First scheme, including that compensation should be sufficient	1	Please refer to the response to Ref CP.2.01 and CP.2.02.	No

Ref	Comment	No. PILs	Response	Change
CP.2.09	Suggestion that the focus of Community First compensation should not be on the most deprived only.	1	Please refer to the response to Ref CP.2.06.	No
CP.2.10	Suggestion that the Community First compensation scheme should be implemented prior to the Proposed Development, or without the progression of the Proposed Development	8	<p>The Applicant already contributes significantly to local good causes and has a long standing record of contributing back into the community it serves. The Community First proposals build on that track record to enhance life chances for those in the region.</p> <p>Community First is a further extension of the Applicant's ongoing commitment to its existing community funding programme for nearby neighbourhoods and is made possible through the growth which would be unlocked by the DCO. As such it is wholly reliant for its funding on growth permitted by the DCO, and it follows therefore that without DCO related growth in passenger throughput Community First could not be implemented.</p> <p>Community First would become effective only from the point at which passenger numbers exceed the permitted passenger cap at the time the DCO comes into force.</p>	No
CP.2.11	Suggestion that the Community First compensation scheme should be implemented prior to the Proposed Development, or without the progression of the Proposed Development,	3	This feedback is linked to historic development, not the Proposed Development. Compensation for any historic development of public works will be	No

Ref	Comment	No. PILs	Response	Change
	<p>and that compensation should be made available to those who have been impacted by the non-permitted development which occurred in 2017, 2018, and 2019 leading to the breach of planning condition 10.</p>		<p>assessed in accordance with the compensation code and should be pursued as a separate matter. The Applicant already contributes significantly to local good causes and has a long standing record of contributing back into the community it serves. The Community First proposals build on that track record to enhance life chances for those in the region.</p> <p>Community First is a further extension of the Applicant’s ongoing commitment to its existing community funding programme for nearby neighbourhoods, and is made possible through the growth which would be unlocked by the Proposed Development. As such it is wholly reliant for its funding on growth permitted by the DCO, and it follows therefore that without DCO related growth in passenger throughput Community First could not be implemented.</p> <p>Community First would become effective only from the point at which passenger numbers exceed the permitted passenger cap at the time the DCO comes into force.</p> <p>Community First would not be payable to individuals, it is intended to be a fund made available from which charities, community</p>	

Ref	Comment	No. PILs	Response	Change
			organisations and local councils could apply for grant funding.	
CP.2.12	Suggest that the Community First scheme should cover a wider area and wider impacts.	3	<p>Community First is not intended to mitigate for negative impacts of airport growth, all such mitigation is set out and secured through the ES [TR020001/APP/5.02].</p> <p>The Community First scheme is a proposal to make more money available for community benefit across the area already covered by the Applicant's existing Community Funding Programme. It covers a large area including Luton, Central Bedfordshire, North Hertfordshire, East Hertfordshire, Stevenage, St Albans and parts of the former district of Aylesbury Vale. The Applicant considers the coverage to be extensive for a scheme of its nature. The existing Community Funding Programme is available to cover a wide range of possible recipients in a number of areas, the Community First offer is intended to supplement this existing programme but in a way which is focused on the joint national and local priorities of tackling areas of social need (levelling up), and decarbonisation.</p>	No
CP.2.13	Comments of support were received in regards to the Community First compensation scheme	3	Noted.	No
CP.2.14	LLAOL is supportive of the Community First scheme proposals and notes the valuable	1	Noted.	No

Ref	Comment	No. PILs	Response	Change
	contribution of the scheme to the community. LLAOL also supports the proposed funding of the scheme by the Applicant and the proposed use of the funds, specifically welcoming the proposal's inclusion of local decarbonisation projects in the scheme.			
Noise Insulation Scheme				
CP.2.15	Comments of support in respect of the noise insulation schemes.	1	Noted.	No
CP.2.16	Suggest that the noise insulation schemes should cover a wider area, and wider impacts.	6	<p>The impacts of the Proposed Development have been fully assessed through the EIA process and mitigation has been proposed as required. Full details can be found in the ES [TR020001/APP/5.02].</p> <p>The Applicant has developed the compensation policies so that they offer compensation to those most affected by the Proposed Development. Eligibility is based on contours and as contours may change so will eligibility. The compensation policies and measures have been developed fully in line with the requirements of the Compensation Code and in some cases, include voluntary policies which go beyond those statutory standards.</p>	No

Ref	Comment	No. PILs	Response	Change
			The Applicant recognises that the discretionary policies only go so far and that for those who fall outside the schemes, the statutory code for compensation is available. The code is structured to protect those affected by public works and the Applicant will assess and compensate claimants properly in accordance with the code.	
CP.2.17	Suggest that a one off payment for the noise insulation schemes is insufficient and payments should be offered now and post completion of the Proposed Development.	1	The Noise Insulation Schemes will open when the authorised development is implemented and will provide funding to insulate properties. The payment will be made once the installation works have been carried out. It would not be efficient for installation to be undertaken in multiple stages requiring multiple payments.	No
CP.2.18	Hastoe Housing Association would like to be able to access funding for noise insulation for the properties they manage to ensure that they can retain existing tenants and continue to let their homes to new tenants.	1	Subject to the properties qualifying under the policies the Applicant will, at the appropriate time, write to Hastoe Housing Association to invite it to access the compensation being offered as set out in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] . The Applicant does not handle noise insulation claims from tenants.	No
CP.2.19	Concern that the noise insulation schemes are not effective when in the garden or outside.	27	The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise pollution. Further details can be found in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No

Ref	Comment	No. PILs	Response	Change
			<p>The Applicant has developed the compensation policies so that they offer compensation to those most affected by the proposals based upon the information available. The Noise Insulation Schemes were extended after the 2019 statutory consultation and represent one of the most generous offers of any UK airport.</p>	
CP.2.20	Concerns with the eligibility of the noise insulation schemes.	1	<p>The compensation policies and measures have been developed fully in line with the requirements of the Compensation Code and in some cases, offer voluntary policies which go beyond those statutory standards.</p> <p>Noise Insulation Schemes are designed to benefit those most impacted by the Proposed Development. The Noise Insulation Schemes have been designed to significantly improve on the current noise insulation scheme, not only by increasing the number of properties which may be eligible under the new schemes, but also by substantially improving the level of contribution. They represent a significant improvement on the current offer at Luton and stand to be the best in class in terms of UK airport noise compensation schemes. Further information can be found in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p>	No

Ref	Comment	No. PILs	Response	Change
CP.2.21	Concern that the noise insulation schemes are ineffective in mitigating against the impact of Airplane fumes when windows are open.	1	<p>The Noise Insulation Schemes are designed to mitigate noise and not air quality. Please refer to Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] which sets out other mitigation for noise when windows are open.</p> <p>Air pollution has been assessed as part of the EIA process and no significant effects have been identified. Further information can be found in Chapter 7 Air Quality of the ES [TR020001/APP/5.01].</p>	No
CP.2.22	Concern that the noise insulation schemes provide insufficient funds to cover the full cost of insulating homes.	6	After the 2019 statutory consultation the level of contribution made under each of the Noise Insulation Schemes was increased, making it one of the most generous of any UK airport noise scheme and a significant improvement on the current offer at Luton. After the 2022 statutory consultation it was further updated to include a Noise Insulation Scheme for those properties within the night-time contour.	No
CP.2.23	Concern that the noise insulation schemes are not bespoke, and that a standard approach to insulating all homes is inadequate.	2	All eligible properties making an application under the Noise Insulation Schemes will be visited by an assessor appointed to agree with the owner what works can/should be undertaken for that particular property.	No
CP.2.24	Concern with the noise insulation schemes as insulating homes is ineffective as noise pollution is still present.	6	Please refer to the response to Ref CP.2.16.	No

Ref	Comment	No. PILs	Response	Change
CP.2.25	Caddington Parish Council's main considerations and concerns for Caddington are noise nuisance and compensation for residents.	1	Please refer to the response to Ref CP.2.16.	No
CP.2.26	Concern that the noise insulation schemes are only effective when indoors with windows shut, and is ineffective when windows are open, when in the garden or outside. Some respondents were concerned that insulation is more challenging to provide in Listed Buildings.	2	Please refer to the response to Ref CP.2.19. If listed building consent is required, the owner will need to obtain this in the same way they would for any other changes to the property before the works could be undertaken.	No
CP.2.27	LLAOL would welcome further engagement with the Applicant in regard to any development of these proposals following consultation.	1	Noted. Engagement with LLAOL has taken place since the 2022 statutory consultation and will continue.	Yes
CP.2.28	Whilst LLAOL is broadly supportive of the compensation proposals, it is not clear who is proposed to be responsible for these. LLAOL seeks support from the Applicant to clarify and agree the costs and responsibilities of the proposals mitigations, should it be the case that any of these are expected to reside wholly or partly with LLAOL. In any event, the operator should not be responsible for any compensation scheme (whether discretionary or statutory) that commences or is made available prior to the	1	Engagement with LLAOL on their obligations has continued since the 2022 statutory consultation and will continue beyond submission of the application for development consent.	No

Ref	Comment	No. PILs	Response	Change
	commencement of the development works under the DCO. As a general rule, the obligations of the operator prior to the expansion of the airport under the DCO should be limited to those under the extant planning permission in place at the date of the DCO approval.			
CP.2.29	LLAOL believes that it is appropriate, reasonable, and aligned with standard practice for noise insulation scheme contributions to be capped. LLAOL believes that Scheme 1 should also be capped, for the same reasons.	1	Schemes which are being introduced to remove properties from SOAEL will not be capped. While a full package is offered, the scope and specification of works is subject to the pre-procured contractor who visits each property. Homeowners will have the option of an appeal to LLACC where dissatisfied with the specification of work proposed by the contractor. All other schemes will be capped. Please find additional information within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	No
CP.2.30	LLAOL notes that some properties that will be eligible for the proposed noise insulation schemes may have already benefitted from insulation works from the airport operator under previous or current noise insulation schemes. Where this is the case, this should be considered when determining the eligibility and the contribution amount that should be applied. Similarly, where a property benefits from a Noise Insulation Scheme under the proposed compensation policy that has a lower cap (e.g.,	1	Over time there are anticipated to be circumstances where properties become eligible for different schemes. Should this arise, the Applicant will recognise eligibility for the most preferential scheme and in any subsequent offer for noise insulation, reserve the right to reflect any previous noise insulation compensation payment already made. Please find additional information within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	No

Ref	Comment	No. PILs	Response	Change
	Scheme 4) and then is subsequently eligible for a Scheme with a high cap (e.g., Scheme 2), the contribution available under the subsequent scheme should be the difference between those two caps (for example, £4,500 where the property was insulated under Scheme 4 and then is subsequently eligible for Scheme 2).			
CP.2.31	Regarding non-residential public buildings, LLAOL notes the proposal for property insulation. LLAOL requests that such compensation is capped to ensure it reflects an appropriate amount for the relevant building and its use	1	This scheme will be subject to a capped contribution of £250,000 per building or group of buildings in the same occupation and location. Please find additional information within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	No
CP.2.32	LLAOL is acutely aware and understanding of the concerns of local residents and other parts of the community regarding the noise impact of the proposed expansion. LLAOL considers the compensation proposals to be comprehensive, and indeed some of the most supportive of any prior published proposals in the UK.	1	Noted.	No
Land and Property Acquisition				
CP.2.33	Concern that acquisition proposals are inadequate and ineffective in mitigating the impacts felt by the local community as a result of the Proposed Development. Specific concerns were raised that land purchase will blight resident's homes, and only applies to	1	Please refer to the response to Ref CP.2.16. The Applicant recognises that the discretionary policies only go so far and that for those who fall outside the schemes, the statutory Compensation Code is available. The Compensation Code is a	No

Ref	Comment	No. PILs	Response	Change
	<p>those living very close to the runway. Those who do not qualify for the scheme would have to find a way to prove loss of value to their homes due to noise blight.</p>		<p>collective term used to describe the legislation and case law which regulates the procedures for compensation following compulsory acquisition. The Code is structured to protect those affected by public works and the Applicant will assess and compensate claimants properly in accordance with the Code.</p> <p>For those not having a property acquired but are impacted it may be possible to claim compensation under the Compensation Code. These may include compensation for:</p> <ul style="list-style-type: none"> • Statutory Blight; • reduction in property value under Part 1 of the Land Compensation Act 1973; and • injurious affection caused by construction works under section 10 of the Compulsory Purchase Act 1965. <p>This provides compensation for the diminution in residential property value where this is caused by the physical factors from use of the new airport facilities. Further, it is recommended that specialist advice is obtained in respect of any compensation claim under the Compensation Code.</p>	
CP.2.34	<p>The 'headline' offer to pay the reasonable market price for a home that: a) the owner wishes to sell, and b) is severely affected by noise is completely undermined by the small print condition that this offer would, in fact, be</p>	1	<p>Owners will need to demonstrate that they have put the property on the open market at market price, for a reasonable time period, before applying for this compensation. The reference to 15% is related to the initial asking price, i.e., the</p>	No

Ref	Comment	No. PILs	Response	Change
	subject to the owner not receiving any offers at 15% LESS than the market price. How on earth would someone then be able to purchase a similar property to move to if they were, for example, to sell their home valued at £400,000, and be paid only £340,000? Your offer of a 10% statutory home loss payment clearly does not make up the shortfall. You should add the other 5% as a gap payment and add this condition to your proposals.		price the property is first put on the market for. This approach is to encourage owners to sell the property on the market before making an application under the policy. Please refer to response to Ref CP.1.47.	
CP.2.35	Opposition to the use of compulsory purchase of properties.	1	<p>The Proposed Development has been designed to minimise the acquisition of land; however, a certain amount of additional land (outside of the Applicant's existing ownership) will be required to deliver the Proposed Development. It is usual for major infrastructure projects such as this to include relevant compulsory acquisition powers (which have to be proportional and justified). It should be noted that the compulsory acquisition powers sought in this case are relatively limited.</p> <p>The Applicant's intention is always to acquire land/rights by agreement and compulsory acquisition powers will only be used as a last resort, where agreement cannot be reached. The Proposed Development application boundary does not include any residential property.</p>	No

Ref	Comment	No. PILs	Response	Change
			Please refer to the Statement of Reasons [TR020001/APP/3.01] and Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] for additional detail.	
CP.2.36	Suggest that full market price should be paid for those impacted by property or land acquisitions	4	<p>The Applicant's intention is to always acquire land/rights by agreement and compulsory acquisition powers will only be used as a last resort, where agreement cannot be reached.</p> <p>Compensation for any compulsory acquisition of land or rights would be paid according to the Compensation Code. The Compensation Code is a collective term used to describe the legislation and case law which regulates the procedures for compensation following compulsory acquisition.</p> <p>Specialist valuers will be appointed by each party to negotiate compensation. The valuation will be based on the unaffected open market value (what would have been the value of the property without the airport expansion).</p> <p>Additional information can be found within the Statement of Reasons [TR020001/APP/3.01] and Compensation Policy document [TR020001/APP/7.09].</p> <p>The compensation policy available at the time of the 2022 statutory consultation only provided an</p>	No

Ref	Comment	No. PILs	Response	Change
			outline setting out the schemes available and basic qualifying criteria. This has since been developed and more detailed information on the compensation proposals are set out in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] submitted as part of the application for development consent. The Applicant has also defined the procedure for special cases, general rules for rolling out to qualifying parties, and a mechanism for independent review.	
CP.2.37	Suggest that detailed proposals for property and land acquisitions should be transparent and clear.	1	The Applicant agrees that the proposals for land and property acquisitions should be clear and transparent. The Proposed Development application boundary does not include any residential property.	No
CP.2.38	Suggest that the rate paid to those impacted by land and property acquisitions should be above market rate.	1	Please refer to the response to Ref CP.2.36.	No
CP.2.39	Suggest that the property and land acquisition schemes should cover a wider area.	4	Please refer to the response to Ref CP.2.16.	No
CP.2.40	Acquisition compensation should be borne by the Applicant rather than the operator.	1	The Applicant will pay for any compulsory acquisition and fund discretionary hardship schemes.	No
CP.2.41	...the specific AAR proposals directly impact our operational site, requiring possession of a tranche of land bounding Percival Way, which	1	The GKN site is not proposed to be affected until later in the construction programme, at which point the alignment of the Airport Access Road (AAR) is	No

Ref	Comment	No. PILs	Response	Change
	today houses an essential aerospace manufacturing facility. Losing this building will significantly damage our ability to deliver an important and long-standing customer contract from the site. As such, GKN Aerospace requests further information on how the loss of the facility from our operational site will be addressed by Luton Rising, in order to understand the full impact on our operations today.		<p>shown to require demolition of the building immediately west of the junction with Frank Lester Way. Construction of this phase of the new AAR is anticipated to begin at approximately 2041.</p> <p>The Applicant has been engaged with GKN since 2017, and will seek to continue engagement, to discuss the proposals and provide further information on the potential impact to GKN.</p>	
CP.2.42	The proposed airport expansion includes a major new road comparable to the CPAR scheme proposed some years ago. The road dissects a number of TUI Group buildings and car parks. Whilst the principle of the airport expansion proposals are supported by TUI Group, without proper and full consideration and mitigation, the proposed expansion will severely compromise TUI Group operations.	1	The proposed alignment of AAR is largely identical to that of Century Park Access Road (CPAR), from the junction with A1081 at its western extent, to the junction with Frank Lester Way. Similarly, to CPAR, the AAR proposals include areas of replacement parking in the vicinity of Provost Way and Prospect Way, to replace areas of existing parking which are required to be reinstated or retained. These areas of parking are generally in the same or nearby locations to existing parking, in order to minimise impacts on existing operations. TUI is an important stakeholder at the airport with whom the Applicant has an active dialogue. Discussions are currently ongoing about car parking provision and will continue as the Applicant seeks solutions to the challenges identified.	No
CP.2.43	[In reference to para 3.8.12 of the emerging transport strategy.] We understand that in order	1	Detailed construction phasing is not proposed to be provided as part of the application for	No

Ref	Comment	No. PILs	Response	Change
	<p>to carry out the above work the development consent order includes the power to occupy land temporarily. Whilst we are generally supportive of the proposed expansion at the airport the documentation is not clear on the following points:</p> <ol style="list-style-type: none"> 1. The severity and duration of construction work on the nearby access roads 2. What constraints, if any, will our tenants experience during the construction work. For example will access be maintained at all times? 3. The modelling is not clear on what the future vehicle movements will be at each of the key junctions when the airport construction work is complete and how this might impact our client's tenants ability to access the property. Particularly the impact of the proposed one way system. <p>We look forward to receiving the detailed information in due course.</p>		<p>development consent due to the lengthy timescale over which the highway improvements are expected to be constructed over.</p> <p>Engagement has taken place with Legal & General since the 2022 statutory consultation and will continue, to ensure that construction related disruption is kept to a minimum. Please refer to the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] for additional detail.</p>	
CP.2.44	<p>Having reviewed the 2022 consultation documents we note that the property may be impacted by both the proposed terminal and associated works and proposed onsite highway works. Furthermore there will likely be impacts via the construction of the airport access road.</p>	1	Please refer to the response to Ref CP.2.43.	No

Ref	Comment	No. PILs	Response	Change
Compensation - General				
CP.2.45	Concern that the various proposed compensation schemes are buying support for the Proposed Development, which some respondents felt was bribery.	2	<p>The compensation schemes have been designed to compensate those who are the most affected by the Proposed Development and use defined eligibility criteria.</p> <p>The Applicant is obligated to provide statutory compensation to comply with current legislation, but the compensation policies go beyond in this to deliver a fairer package of compensation for residential property owners in the vicinity of the airport.</p> <p>Further information can be found in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p>	No
CP.2.46	Concern that compensation proposals are patronising and seek only to gain consent, particularly as much of the local community is opposed to the Proposed Development.	1	Please refer to the response to Ref CP.2.45.	No
CP.2.47	Concern that if deemed illegible for compensation schemes, people would have to rely on the Land and Compensation Act and find a way to prove loss of value to their homes is due to noise blight.	2	Please refer to the response to Ref CP.2.33.	No
CP.2.48	Concerns that the proposed compensation schemes are hard to apply for or access	1	Please refer to the response to Ref CP.1.32.	Yes

Ref	Comment	No. PILs	Response	Change
			<p>The application process for the Noise Insulation Schemes and voluntary property acquisition schemes have been reviewed to take on board feedback from the 2022 statutory consultation, including making the process as straightforward as possible while ensuring sufficient rigor to protect against unsubstantiated applications.</p> <p>The new Noise Insulation Scheme will be progressively rolled out, following approval of the application for development consent. This will be based on noise contours and undertaken in accordance with LLACC procedure, who will manage the process on behalf of the Applicant, to make applying and accessing the scheme easier.</p> <p>LLACC will be provided data on eligible properties and will determine the priority areas for noise insulation based on those most significantly impacted and any other appropriate guidance from the Applicant.</p> <p>Further information on the application process and indicative noise contours (which are subject to change) are included in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p>	
CP.2.49	The right is reserved to object to the Proposed Scheme in respect of Stonewater Ltd's other interests in the vicinity of the Properties listed	1	The Land Interest Questionnaire provides the opportunity for recipients to give information on properties in which they have an interest. The	No

Ref	Comment	No. PILs	Response	Change
	above. In particular, we are concerned that the Land Interest Questionnaires only cover a fraction of the properties within the vicinity of the airport in which our client has an interest. In particular, it is noted that the questionnaires do not relate to our client's properties that are actually closest to the airport – these being at Colwell Rise, Thaxted Close and Cutlers Green.		reason the properties closer to the airport were not covered in the Land Interest Questionnaire is because they do not fall within the Order limits, while properties located further away have been included within the Land Interest Questionnaire as they fall within the noise contour boundary. The noise contour boundaries were included as part of the consultation materials for the 2022 statutory consultation, which outline the properties located within the noise contour boundary and therefore will have been included within the Land Interest Questionnaire. Further engagement with Stonewater Limited has been held in relation to this issue.	
CP.2.50	Suggest that there should be sufficient engagement with local people on the proposed compensation schemes.	1	The Applicant is committed to full and inclusive engagement on the compensation policy proposals.	No
CP.2.51	General suggestions were made relating to the compensation proposals, including that eligibility for compensation should be clear and transparent.	2	The Applicant agrees that the compensation proposals should be clear and transparent. Further information is available in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	No
CP.2.52	General suggestions were made relating to the compensation proposals, including that local people should have free parking	1	Parking charges will be/are set by the airport operator. Further information can be found in the Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] .	No

Ref	Comment	No. PILs	Response	Change
CP.2.53	General comments of support were received in regards to the various proposed compensation schemes	4	Noted.	No
CP.2.54	SW is an Affordable Housing Provider with a variety of products and interests. Given the large number of properties that SW have interests in in the vicinity of the Proposed Development boundary, the tenure of some of the affected properties is thought likely to be shared ownership. Accordingly, the calculation of compensation may involve complex calculations with the interests of private individuals/SW customers feeding into the calculation.	1	This feedback was helpful, and the Applicant's Property Team picked this up and engaged directly with the interested Party to address specific issues and resolve concerns ahead of the submission of the application for development consent.	No
CP.2.55	Concern that no substantive discussions between the Promoter and Stonewater Limited and associated companies have, to date, taken place. Stonewater Limited is the registered proprietor of the Properties which we understand will be impacted by the Scheme. However, our client has been provided with no detail in terms of the potential impact of the Scheme on its land holding/assets. We therefore reserve the right to make further representations in the event that it becomes apparent that the Scheme will have an adverse impact on our client's interests.	1	This feedback was helpful, and the Applicant's Property Team picked this up and engaged directly with the interested Party to address specific issues and resolve concerns ahead of the submission of the application for development consent.	No

Ref	Comment	No. PILs	Response	Change
CP.2.56	<p>Concern that the S42 consultation letter does not identify the postal addresses for Stonewater Limited and associated companies' (SW) properties that have resulted in the Promoter identifying SW as a potential Category 3 Statutory Consultee. Through no fault of the Promoter, we only became aware of the addresses of the properties that the Promoter has identified as potentially affected by the Proposed Scheme as a result of calling the Promoters consultation telephone number and ascertaining on 31 March 2022 that land interest questionnaires have already been completed by SW in relation to the Properties. We have only been provided with the consultation letter sent to Stonewater Limited. We assume that Stonewater (2) Limited and Stonewater (3) Limited were also sent letters notifying them of the S42 Consultation. Given the timeframes involved, our client's formal objection to the Proposed Scheme is currently put forward on the basis that it does not have sufficient information to determine whether the Proposed Scheme will have adverse impacts on its land interests. Please note that whilst SW does not at this stage object to the principle of the Proposed Scheme it reserves its position in relation to the specific impact that the Scheme will have on its assets.</p>	1	<p>This feedback was helpful, and the Applicant's Property Team picked this up and engaged directly with the interested Party to address specific issues and resolve concerns ahead of the submission of the application for development consent.</p> <p>We have shared with SW the list of properties affected by the scheme (cat 1 – 3) which are set out in the Book of Reference [TR020001/APP/3.02]. The properties affected are defined by noise contours and having also shared the contour information with SW they are now clearer about which of their properties are affected and which are not. SW are not Category 1 landowners, but they do have interest of owner, lease, or occupier within Category 3. Dialogue between the Applicant and SW continues.</p>	No

Ref	Comment	No. PILs	Response	Change
Compensation- Area / Impacts				
CP.2.57	Suggest that the compensation proposals should cover a wider area and wider impacts.	4	Please refer to the response to Ref CP.2.16.	No
CP.2.58	Suggestion that the local communities should be compensated for the existing impacts of the Airport	3	The Applicant has developed the compensation policies so that they offer compensation to those most affected by the Proposed Development. The Applicant recognises that the discretionary policies only go so far and that for those who fall outside the schemes the statutory code for compensation is available. The code is structured to protect those affected by public works and the Applicant will assess and compensate claimants properly in accordance with the code. Please refer to the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] for additional detail.	No
CP.2.59	General suggestions were made relating to the compensation proposals, including that compensation should be made available to everyone impacted by the Airport	3	Please refer to the response to Ref CP.2.16.	No
CP.2.60	Concern that the amount of compensation awarded to recipients will be insufficient and will not consider the reductions in house values as a result of the Airport.	5	The assessment of statutory compensation is well established in law and the Applicant will approach the assessment and payment of compensation in accordance with current legislation. Homeowners can claim compensation under Part I of the Land Compensation Act 1973 for any diminution in value of their property caused by the physical	No

Ref	Comment	No. PILs	Response	Change
			effects of the new public works. Please refer to the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] for additional detail.	
CP.2.61	Concerns that the level of compensation offered within the proposals for the various compensation schemes is insufficient in mitigating impacts of the Proposed Development on the local community, particularly in special cases such as for listed properties.	1	Please refer to the response to Ref CP.2.16. If listed building consent is required for noise insulation works, the owner will need to obtain this in the same way they would for any other changes to the property before the works could be undertaken.	No
CP.2.62	Suggest that the local communities should be compensated for the existing impacts of the Airport, with some respondents referring to the impacts of the non-permitted development which occurred in 2017, 2018 and 2019 and led to the breach of planning condition 10.	5	This feedback seems to be linked to historic development not the Proposed Development. Compensation for any historic development of public works will be assessed in accordance with the compensation code and should be pursued as a separate matter.	No
CP.2.63	Suggestions that the compensation schemes should cover a wider area, and wider impacts, including compensation for all affected, compensation for future generations, compensation to cover loss of property value, and that Luton Rising should pay a levy to the NHS to compensate for the health impacts of poor air quality caused by the Airport.	1	Please refer to the response to Ref CP.2.16. Air pollution has been assessed as part of the EIA process and no significant effects have been identified. Further information can be found in Chapter 7 Air Quality of the ES [TR020001/APP/5.01] .	No
CP.2.64	Concern that the proposed compensation schemes are inadequate and ineffective in mitigating the impacts felt by the local	1	Please refer to the response to Ref CP.2.16.	No

Ref	Comment	No. PILs	Response	Change
	community as a result of the Proposed Development, and that many of the residents feeling these impacts are opposed to the Proposed Development.			
CP.2.65	Concern that compensation schemes cover both an insufficient area and insufficient impacts.	13	Please refer to the response to Ref CP.2.16.	No
CP.2.66	Concern that compensation schemes cover both an insufficient area and insufficient impacts, such as loss of property value.	3	Please refer to the response to Ref CP.2.16.	No
CP.2.67	Concern that the compensation schemes cover both an insufficient area and insufficient impacts, with responses suggesting that the noise map presented does not reflect the measurements taken by Luton Airport which shows a far higher noise level on Lower Road Breachwood Green.	1	Please refer to the response to Ref CP.2.16.	No
CP.2.68	Concern that the compensation schemes cover both an insufficient area and insufficient impacts. Specific concerns were raised that where people are forced to move due to the Proposed Development, they may be able to make a claim if living close to the runway – but this is after the event. How will they know for sure whether compensation would actually be payable?	2	Please refer to the response to Ref CP.2.16.	No
CP.2.69	Concern that the proposed compensation schemes are inadequate and ineffective in	23	Please refer to the response to Ref CP.2.16.	No

Ref	Comment	No. PILs	Response	Change
	mitigating the impacts felt by the local community as a result of the Proposed Development.			
CP.2.70	Concern that the proposed compensation schemes are inadequate and ineffective in mitigating the impacts felt by the local community as a result of the Proposed Development, including illegal parking and noise pollution.	1	Please refer to the response to Ref CP.2.16. Chapter 13 Health and Community of the ES [TR020001/APP/5.02] provides further detail regarding the proposed mitigation for impacts on the local community.	No
CP.2.71	Concern that the compensation schemes are inadequate or ineffective in mitigating the impacts felt by the local community as a result of the Proposed Development, as well as the impact the Proposed Development will have on future generations, and those already feeling the direct impacts of climate change.	2	<p>The compensation proposals go beyond the current statutory requirements. Additional information can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10].</p> <p>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.</p> <p>The Applicant is also proposing Community First, a further extension of the ongoing commitment to</p>	No

Ref	Comment	No. PILs	Response	Change
			extending its existing community funding programme for nearby neighbourhoods, made possible through the growth which would be unlocked by the Proposed Development. Further information can be found in the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	
CP.2.72	Concern that compensation schemes cover both an insufficient area and insufficient impacts. Some respondents raised concerns that those who do not live in the immediate vicinity but do live under flightpaths and are affected by noise and pollution should also qualify for compensation.	1	Please refer to the response to Ref CP.2.20.	No
CP.2.73	Concerns that the level of compensation offered within the compensation schemes is insufficient in mitigating impacts of the Proposed Development on the local community.	15	<p>The impacts of the Proposed Development have been fully assessed in through the EIA process and mitigation has been proposed as required. Full details can be found in the ES [TR020001/APP/5.02].</p> <p>The Applicant has developed the compensation policies so that they offer compensation to those most affected by the Proposed Development. The compensation policies and measures have been developed fully in line with the requirements of the Compensation Code and in some cases, include voluntary policies which go beyond those statutory standards.</p>	No

Ref	Comment	No. PILs	Response	Change
			The Applicant recognises that the discretionary policies only go so far and that for those who fall outside the schemes the statutory code for compensation is available. The code is structured to protect those affected by public works and the Applicant will assess and compensate claimants properly in accordance with the code. Please refer to the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] for additional detail.	
Compensation – Unclear or unlikely proposals				
CP.2.74	Concerns raised that respondents doubt the implementation of the proposed compensation schemes.	3	The compensation proposals will be secured through the s106 agreement as set out in the compensation policy, and the Applicant will be required to implement them.	No
CP.2.75	Concern that compensation proposals do not include enough detail or are unclear.	20	Please refer to the response to Ref CP.2.36.	No
Compensation – Costs / Funding				
CP.2.76	LLAOL seeks support from the Applicant to further identify, clarify and agree the costs, timelines and responsibilities of managing the environmental effects of growth and aligning these with the operational realities of the airport.	1	Engagement with LLAOL on their obligations has continued since the 2022 statutory consultation and will continue beyond submission of the application for development consent.	No
CP.2.77	As is the case across other environmental topics, LLAOL seeks greater clarity on the	1		No

Ref	Comment	No. PILs	Response	Change
	<p>delivery timelines and the apportioning of costs and responsibilities associated with tackling climate change and the management of GHG Emissions. In particular, references to ongoing water monitoring at Winch Hill Woods, as well as post-construction monitoring of landscape planting within the context of climate change, should be clarified.</p>			
CP.2.78	<p>LLAOL has carried out an initial assessment of the costs associated with environmental impact mitigation during the current concession period, which are not insubstantial. LLAOL requests greater clarity regarding responsibilities for delivering the infrastructure required to drive forward the Sustainability proposals, specifically any elements that the Applicant anticipates are to be delivered by LLAOL</p>	1		No
CP.2.79	<p>In common with earlier comments, whilst LLAOL is supportive of the proposed measures relating to open space, landscaping and ecology improvements, LLAOL seeks support from the Applicant to further identify, clarify and agree the costs, timelines and responsibilities of providing and maintaining the proposed mitigations, should it be the case that some of these reside with LLAOL</p>	1		No
<p>Compensation - Engagement</p>				

Ref	Comment	No. PILs	Response	Change
CP.2.80	Suggest further engagement with Paradigm Housing Group Ltd who have over 100 properties near the airport and/or the M1 and require assurance that their customers will benefit from the Proposed Development, and that their health and wellbeing will not be affected.	1	Engagement with Paradigm Housing group has continued since the 2022 statutory consultation.	No
CP.2.81	Stonewater Limited and associated companies (SW) require early and meaningful engagement as it is critical that SW understands which of its interests the Promoter has identified as potentially affected and the potential impact of the Proposed Scheme before the application for the DCO is submitted to the Planning Inspectorate.	1	Engagement with Stonewater has continued since the 2022 statutory consultation.	No
CP.2.82	Stonewater Ltd and associated companies reserve the right to make further representations in the event that it becomes apparent that the Proposed Development will have an adverse impact on their interests.	1	Noted.	No
Consultation - information				
CP.2.83	Stonewater Ltd and associated companies require the Promoter to confirm which indicative noise contour (if any) applies for each Property they own.	1	Noted. Engagement with Stonewater has continued since the 2022 statutory consultation, including in respect of noise contours.	No
CP.2.84	Stonewater Ltd and associated companies require confirmation on where impacts,	1	Noted. Engagement with Stonewater has continued since the 2022 statutory consultation.	No

Ref	Comment	No. PILs	Response	Change
	mitigation measures and safeguards that might be of interest to our them are dealt with in the consultation documentation, giving precise references to the page numbers and schedules of the relevant documents, as there is a huge amount of consultation information in the public domain.			
Utilities / Asset Protection				
CP.2.85	The London Luton Airport site has been leased to LLAOL under a concession agreement which runs until 2032. Under that agreement, LLAOL has sole responsibility for the operation and management of the airport during the concession period. It is critical that the DCO should not impose any additional obligations on LLAOL or adversely affect LLAOL's rights and protections under the concession agreement without LLAOL's agreement.	1	The Applicant has engaged with the operator in respect to operations.	No
CP.2.86	It is also critical to LLAOL that the Applicant ensures that expansion plans do not interfere with the safe and efficient operation of the airport during the concession period. This includes, but is not limited to, imposition of compulsory acquisition powers to access the airport estate; LLAOL requests immediate notification if such powers are to be used at any point during the Future LuToN Scheme.	1	The Applicant has engaged with the operator in respect to operations.	No

Ref	Comment	No. PILs	Response	Change
CP.2.87	[L&G] has significant concerns that the proposals would prejudice L&G's ability to optimise the potential of its landholdings in terms of land use and development.	1	The Applicant has engaged with L&G's property managers to advise in connection with this matter. A meeting was held on 10 November 2022, at which L&G concerns were aired and addressed. L&G has now appointed specialist compulsory acquisition advisers and the Applicant awaits contact from them to progress matters which remain at issue.	No
CP.2.88	<p>L&G has long standing intentions to develop parts of its landholdings for significant residential and employment purposes and promoted these through the recently adopted Central Bedfordshire Local Plan (CBLP, 2021). The two land parcels with development potential are:</p> <ul style="list-style-type: none"> - About 19 ha of land adjacent to Slip End being promoted for residential development for about 350 houses. - About 44 ha of land south east of J10 on the M1 being promoted for about 94,000 sqm of strategic distribution and logistics uses. <p>The Inspectors concluded that whilst more land could have been allocated for strategic warehousing and distribution uses, such land should be looked at via the early review of the CBLP [Central Bedfordshire Local Plan] (under Policy SP1a – Partial Review of the Local Plan). The report also signalled that future needs should be tested in the context of changing</p>		Noted. The Planning Statement [TR020001/APP/7.01] considers local planning policies and other relevant developments nearby, and the Chapter 21 In combination and Cumulative Effects of the ES [TR020001/APP/5.02] considers nearby relevant development schemes.	No

Ref	Comment	No. PILs	Response	Change
	<p>consumer demands: the demand for strategic warehousing in this area remains very high so the needs case remains strong. The Local Plan review will also need to address the Government's recently revised housing needs under the standard method, which implies a higher rate of growth than provided for the adopted Plan. Policy SP1a states that the Council will undertake a review within 6 months of adoption, and the Council's web site confirms that this will commencing in early 2022.</p> <p>In the context of the scope of the forthcoming Local Plan review, both [potential development] sites remain options that may need to be considered by the Council in order to achieve a sound and sustainable scale and distribution of development. Both sites therefore represent genuine and realistic development opportunities that should be taken into account in any proposals to expand the airport and increase the number of passengers from 18 mppa to 32 mppa.</p>			
CP.2.89	<p>In addition to the above interests, L&G has farm tenancies operating across all its landholdings, including Copt Hall and Someries Farm, which operate on land south of the Airport up to the Airport's southern boundary.</p>	1	Noted.	No
CP.2.90	<p>L&G acquired the land south of the Airport as a long term investment based on its potential to</p>	1	Noted. Engagement has, and will be, continued between the Applicant and Legal & General.	No

Ref	Comment	No. PILs	Response	Change
	<p>accommodate essential transport infrastructure and/or airport-related development. Any habitat creation in this area could prejudice those long term investment aims. The compulsory acquisition of an interest in the land that accommodates the hedgerow can only be acceptable if it passes the test that there must be a compelling case in the public interest. Further, an acquiring authority should be sure that the purposes for which the compulsory purchase order is made justifies interfering with the human rights of those with an interest in the land affected. These are strict tests and place the onus on LLAL to justify the acquisition of any of L&G's land for any landscape/biodiversity/highway mitigation purpose. Based on the available consultation documents, the case in support of compulsory acquisition has not been made, bearing in mind the alternative options referred to in this representation.</p>			
CP.2.91	<p>Further temporary possession is proposed along New Airport Way (A1081) and the M1 to accommodate highway interventions: this may include L&G land in these areas.</p>	1	<p>Noted. All interests subject to temporary possessions are set out within the Land Plans [TR020001/APP/4.03] and in the Book of Reference [TR020001/APP/3.02].</p>	No
CP.2.92	<p>It is also not clear from the Scheme Development and Construction Report what form of tenure is proposed to be acquired or when the process of acquisition by agreement</p>	1	<p>The Applicant's intention is to always acquire land/rights by agreement and compulsory acquisition powers will only be used as a last resort, where agreement cannot be reached.</p>	No

Ref	Comment	No. PILs	Response	Change
	<p>may commence [in relation to the proposed land to be acquired from L&G. Neither is there a reference to any intention to seek to acquire any rights in L&G’s land by agreement; this being a precursor to any compulsory acquisition process.</p>			

Table A15.6 Regard had to statutory consultation responses on Compensation - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
Community First Scheme				
CP.3.01	Suggest Community First payments made to date, to properties severely affected by non-permitted development, should be made public.	1	Community First is not yet operational, it would become effective only from the point at which passenger numbers exceed the permitted passenger cap at the time the DCO comes into force. As such no payments have been made at all. Community First would not be payable to individuals, it is intended to be a fund made available from which charities, community organisations and local councils could apply for grant funding.	No
CP.3.02	Concerns that the Community First scheme is buying support for the Proposed Development, with some respondents raising concerns that linking it with the Proposed Development can be interpreted as bribery.	59	Please refer to the response to Ref CP.2.01.	No
CP.3.03	Concerns that the implementation of the Community First scheme is unlikely, with specific concerns relating to a lack of evidence being provided confirming achievability of the scheme.	30	Please refer to the response to Ref CP.2.04.	No
CP.3.04	Concerns that the Community First scheme is inadequate in mitigating the impacts of the Proposed Development.	120	Please refer to the response to Ref CP.2.02.	No
CP.3.05	Concerns that the Community First scheme covers both an insufficient area and insufficient impacts. Specific concerns were raised regarding the targeting of compensation in areas of high	32	Community First is not intended to mitigate the impacts of the Proposed Development. Mitigation of airport growth related impacts is identified and secured through the ES [TR020001/APP/5.02] . Community First is a	No

Ref	Comment	No. CC	Response	Change
	deprivation, which should not be at the expense of other areas under the flight path.		further extension of the Applicant's ongoing commitment to extending its existing community funding programme for nearby neighbourhoods, made possible through the growth which would be unlocked by the Proposed Development. Additional information on the Community First proposals can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] .	
CP.3.06	Concerns that proposals for the Community First scheme do not include enough detail or lack clarity.	4	Further details of the Community First scheme can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] submitted as part of the application for development consent.	No
CP.3.07	Concerns that the Community First scheme prioritises profit over the local community.	56	Please refer to the response to Ref CP.2.03.	No
CP.3.08	General concerns relating to the Community First scheme, including that it does not put the community first, that using an airport expansion to fund local decarbonisation projects is ironic, that there are wider groups of people impacted by the Proposed Development than just the most deprived, and that the Community First scheme is just a renamed past scheme.	61	The Applicant has a long-standing record of contributing back into the community it serves, more so than any other UK airport on a per passenger basis. The Community First proposals are a significant extension of that historic community investment and seek to target two themes which are central to the philosophy of being a community airport here to serve and enhance life chances for those in the region. Community First is a further development of the FIRST proposals consulted on in 2019, updated to reflect feedback received, a re-focusing of our philosophy, and alignment with key local and national policies.	No

Ref	Comment	No. CC	Response	Change
			Community First is not intended to mitigate the impacts of the Proposed Development, and additional information can be found within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] . Mitigation of airport growth related impacts is identified and secured through the ES [TR020001/APP/5.02] .	
CP.3.09	Suggest that the Community First scheme should be implemented prior to construction of the Proposed Development or without the progression of the Proposed Development. Specific suggestions included that LBC should already be implementing this scheme, that the fund should be used on projects to benefit the local community, that Airport profit should be used to redistribute Luton's poverty levels. Others suggested that profit should be used to compensate those who were adversely impacted by the non-permitted development which occurred in 2017, 2018 and 2019, leading to the breach of planning condition 10.	141	<p>This feedback is linked to historic development, not the Proposed Development. Compensation for any historic development of public works will be assessed in accordance with the compensation code and should be pursued as a separate matter. The Applicant already contributes significantly to local good causes and has a long-standing record of contributing back into the community it serves. The Community First proposals build on that track record and seek to target two themes which are central to the philosophy of being a community airport here to serve and enhance life chances for those in the region.</p> <p>Community First is a further extension of the Applicant's ongoing commitment to its existing community funding programme for nearby neighbourhoods and is made possible through the growth which would be unlocked by the Proposed Development. Community First is wholly reliant for its funding on growth permitted by the DCO, it follows therefore that without DCO related growth in passenger throughput Community First could not be implemented.</p>	No

Ref	Comment	No. CC	Response	Change
			Irrespective of the Community First proposal, and unrelated to the application for development consent, the Applicant's existing Community Funding Programme will continue.	
CP.3.10	Suggest that the Community First scheme should be monitored and enforced effectively, with some suggestions including that this should be undertaken through an independent body, and that policies should be reviewed regularly to ensure they are effective.	6	The Applicant's intention is that funds for areas outside of Luton would be administered in the same way as the existing Near Neighbour Fund, which is currently administered independently by the Bedfordshire & Luton Community Foundation. Arrangements for funding within Luton are still to be determined but the expectation is that this be via the Applicant's shareholder, LBC with appropriate measures in place to ensure the funds are used for the intended purposes only.	No
CP.3.11	Suggest that the Community First scheme should cover a wider area and wider impacts. Suggestions include that all those impacted by existing operations as well as the Proposed Development should be compensated, with some suggesting that compensation should be available for local environment issues such as home insulation, green technology and increased EV charging points, while others suggested compensation for social housing provision, and funding for organisations such as schools, healthcare systems, disability charities, care homes, care leavers, crime mitigation, SEND provision, support for travellers and the homeless.	36	This application for development consent identifies the negative impacts associated with the Proposed Development and sets out, and secures, the required mitigation for those impacts in the ES [TR020001/APP/5.02] . Community First is not intended to mitigate for the adverse effects of the Proposed Development, rather it is a commitment by the Applicant to further extend and enhance its existing Community Funding Programme in line with the Applicant's position that it is the custodian of a community airport and as such should take steps to ensure benefits flow to surrounding communities.	No

Ref	Comment	No. CC	Response	Change
	Others suggested the implementation of proactive grant management to support the highest impact projects.		Through the existing Community Funding Programme, the Applicant already contributes significant sums to local charities and community groups providing many of the services identified. Community First is aimed at extending that programme but focusing on local decarbonisation projects and projects aimed at improving life chances for those living in areas of higher social need. In taking this approach Community First is fully aligned with both local and national priorities.	
CP.3.12	The community funding through Luton Rising has been essential to Stepping Stones. It has enabled our women's charity to continue to deliver its critical work to over 300 women and children a year who are impacted by domestic abuse, substance misuse, offending and increasingly extreme poverty. Without this funding we would struggle to exist. We know that community funding from Luton Rising forms the lifeblood of many charities across the town and that we are particularly fortunate that the airport is so involved and supportive. We hope this will continue through the Community First scheme and that there will still be a focus on specific groups of people and communities who are particularly disadvantaged across the town.	1	Thank you for your comments, the Applicant is delighted and proud to be able to support the essential work that organisations such as Stepping Stones undertake. The Applicant is committed to continuing to support local groups irrespective of whether or not the application for development consent is successful. Community First seeks to extend that offer based on additional funds that would be available with the increased passenger numbers that the Proposed Development would allow.	No
CP.3.13	General suggestions in regard to the Community First scheme, including on the method, amount and timing of funding. Some respondents supported use of the scheme for local community	37	Please refer to the response to Ref CP.1.01.	No

Ref	Comment	No. CC	Response	Change
	groups, sustainable projects and supporting the most deprived groups. Suggestions were made that the scheme should be transparent with eligibility criteria well publicised, other suggested that this scheme should be paid through council tax, rather than through expansion, while others queried the case of compensation schemes should the Proposed Development not progress.			
CP.3.14	Comments of support were received in regard to the Community First compensation scheme.	90	Noted.	No
Noise Insulation Scheme				
CP.3.15	Comments of support in respect of the noise insulation schemes.	14	Noted.	No
CP.3.16	Paragraph 6.10.1 of the 'Policy and Compensation Measures' consultation document which says: "We are also proposing to offer acoustic insulation to other noise-sensitive buildings, such as nursing homes, hospices, schools, colleges, registered nurseries, libraries, community halls and places of worship lying within the 63dB LAeq,16h contour." Shiva Hotels believe that student accommodation should be included within this category of 'noise-sensitive buildings', given that students reside at the Property. In addition, whilst it is very difficult from the noise contouring plans provided to determine which contour the Property sits within, we believe	1	In principle, student accommodation would satisfy the definition of a 'public building' as defined in the policy and in circumstances where the student accommodation is within the identified contour noise insulation will be offered. However, there is no precedent or technical justification for altering the noise contour parameters being offered in the compensation policies which are equal to, or are an improvement on, policies adopted for other airport expansion projects.	No

Ref	Comment	No. CC	Response	Change
	that the offer of acoustic insulation should be widened to further noise contours.			
CP.3.17	Suggest that the noise insulation schemes should cover a wider area and wider impacts, including through provision of double and triple glazing and air conditioning, compensation for noise levels above 20dB, and compensation for all impacts including noise in gardens. Additionally, suggest that the schemes should be well publicised. A respondent suggested that LBC should be a front runner in insulating all homes.	37	Please refer to the response to Refs CP.2.20 and CP.2.19.	No
CP.3.18	Concern that the noise insulation schemes are only effective when indoors with windows shut, and is ineffective when windows are open, when in the garden or outside. Some respondents were concerned that insulation is more challenging to provide in Listed Buildings.	223	Please refer to response to Ref CP.2.19. If listed building consent is required, the owner will need to obtain this in the same way they would for any other changes to the property before the works could be undertaken.	No
CP.3.19	The Applicant should mitigate noise pollution rather than use a noise compensation scheme.	78	The impact of noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise pollution. Further details can be found in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] .	No
Land and Property Acquisition				
CP.3.20	Concerns with proposals for property and land acquisition, including the lack of certainty offered within proposals, concern that people will be forced from homes, concern about loss of	28	Please refer to the response to Ref CP.2.16 and CP.2.36.	No

Ref	Comment	No. CC	Response	Change
	property value and concern with the method for calculating compensation.			
CP.3.21	Suggest that the property and land acquisition scheme should cover a wider area and wider impacts including that the option should be available to all affected by the Airport, anyone within a 2-mile radius of the Airport. Some suggested that full market price, legal and moving costs should be paid to anyone affected by compulsory acquisition. Others suggested that profits of acquisition should fund social housing.	6	Please refer to the response to Ref CP.2.16 and CP.2.36. Properties will be purchased at market value so it is not anticipated that profits will arise from property acquisitions that could otherwise help fund social housing.	No
CP.3.22	Suggest that the level of compensation given though any property and land acquisitions should be fair, reflect market rate and/or be above market rate.	11	Please refer to the response to Ref CP.2.36.	No
Compensation - General				
CP.3.23	Concern that the various proposed compensation schemes will lead to huge costs, and that these costs have not been calculated or clarified.	3	There are costs associated with introducing the compensation policies, however these are important to reduce the impacts of the Proposed Development on the neighbouring communities. The Applicant maintains an up-to-date estimated cost for compensation based on the statutory code which informs the overall project budget. Further details on how the Proposed Development, including compensation, will be funded can be found in the Funding Statement [TR020001/APP/3.03] .	No

Ref	Comment	No. CC	Response	Change
CP.3.24	Concern that the various proposed compensation schemes are buying support for the Proposed Development, which some respondents felt was bribery.	21	Please refer to the response to Ref CP.2.45.	No
CP.3.25	Concern that in the past some people have been compensated through the existing or past compensation schemes when it was not necessary.	1	The Applicant proposes strict criteria for applicants to qualify for compensation, details of which are set out within the Draft Compensation Policies, Measures and Community First [TR020001/APP/7.10] . The Noise Insulation Schemes, Voluntary and Hardship schemes will be managed appropriately, and the Applicant will introduce a level of independent scrutiny to maintain fairness on both sides.	No
CP.3.26	Suggest that there should be sufficient engagement with local people on the proposed compensation schemes.	10	Please refer to the response to Ref CP.2.50.	No
CP.3.27	General comments of support were received in regards to the various proposed compensation schemes	36	Noted.	No
Compensation – Area / Impacts Covered				
CP.3.28	Suggest that the local communities should be compensated for the existing impacts of the Airport, with some respondents referring to the impacts of the non-permitted development which occurred in 2017, 2018 and 2019 and led to the breach of planning condition 10.	63	Please refer to the response to Ref CP.2.62.	No

Ref	Comment	No. CC	Response	Change
CP.3.29	Suggestions that the compensation schemes should cover a wider area, and wider impacts, including compensation for all affected, compensation for future generations, compensation to cover loss of property value, and that Luton Rising should pay a levy to the NHS to compensate for the health impacts of poor air quality caused by the Airport.	45	Please refer to the response to Ref CP.2.16. Air pollution has been assessed as part of the EIA process and no significant effects have been identified. Further information can be found in Chapter 7 Air Quality of the ES [TR020001/APP/5.01] .	No
CP.3.30	General suggestions were made relating to the compensation proposals, including the need to compensate all impacted by the Airport, support for the local community, ease of claiming compensation, reduction in council tax for those impacted, compensation in the form of free public transport for residents, regular review of compensation schemes, and that concrete schemes should be in place prior to achieving the consent of the Proposed Development.	18	Please refer to the response to Ref CP.2.16. It is not within the Applicant's remit to change council tax rebates or offer free public transport to residents.	No
CP.3.31	Concern that the compensation schemes are inadequate or ineffective in mitigating the impacts felt by the local community as a result of the Proposed Development, as well as the impact the Proposed Development will have on future generations, and those already feeling the direct impacts of climate change.	387	Please refer to the response to Ref CP.2.71.	No
CP.3.32	Concern that compensation schemes cover both an insufficient area and insufficient impacts. Some respondents raised concerns that those who do	280	Please refer to the response to Ref CP.2.20.	No

Ref	Comment	No. CC	Response	Change
	not live in the immediate vicinity but do live under flightpaths and are affected by noise and pollution should also qualify for compensation.			
CP.3.33	Concerns that the level of compensation offered within the compensation schemes is insufficient in mitigating impacts of the Proposed Development on the local community.	44	Please refer to the response to Ref CP.2.73.	No
Compensation – Unclear or unlikely proposals				
CP.3.34	Concerns that compensation proposals do not include enough detail or are unclear. Specific concerns included that proposals are vague with no clear detail provided on eligibility, amount of compensation, noise contours and compensation for long-term health deterioration as a result of the Airport. Concerns were also raised regarding the level of compensation to be awarded to residents and construction workers who will be subject to the release of toxic gases from landfill excavations.	50	The majority of the gases found in landfill sites are methane and carbon dioxide, and remaining gases are nitrogen, oxygen, ammonia, sulphides, and hydrogen, which have been confirmed through initial boreholes and studies already undertaken. It is unlikely that there will be any specific compensation provided to construction workers, but the contractor will need to provide a safe method of working to ensure construction workers are not exposed to harm, under Health and Safety legislation. Prior to works commencing on site, a bespoke waste recovery permit will need to be obtained, groundwater and landfill gas monitoring positions will need to be agreed with the Environment Agency and established, a remediation method statement will be developed and approved, a Construction Quality Assurance plan produced and submitted, and a Construction Environmental Management Plan will be developed and approved by the Environment Agency.	No

Ref	Comment	No. CC	Response	Change
CP.3.35	Concern that the compensation schemes will not be delivered, particularly because they were presented as 'draft' compensation policies.	38	The compensation policy document available during the 2022 statutory consultation was labelled as draft as it was not the final version. This has since been updated, taking into account the feedback received during statutory consultation and having been through a review process before the final version was agreed. The final version of this Draft Compensation Policies, Measures and Community First document [TR020001/APP/7.10] has been submitted as part of this application for development consent.	No
CP.3.36	Concern that the compensation schemes are hard to apply for or access, specific comments included difficulty in proving loss of property value due to the Proposed Development and that funds will only be made available once the Proposed Development has completed.	42	<p>Please refer to the response to Ref CP.2.48.</p> <p>The Noise Insulation Schemes will be progressively rolled-out should the application for development consent be granted. It will be rolled-out to homes forecasted to be within the relevant noise contours for the schemes as a result of growth in air traffic movements from the Proposed Development.</p> <p>Compensation for compulsory acquisition is paid from the date at which land and property is acquired. This will take place during the lifecycle of the project.</p>	No

A16: CONSTRUCTION

Table A16.7: Regard had to statutory consultation responses on Construction - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILS	Response	Change
Impact						
CN.1.1	<p>Population Increase, Health & Wellbeing</p> <p>It is evident that during the three construction periods a significant number of construction workers are required to implement the demolition and construction stages of the Project. Information to determine the nature of the construction workforce, their home origin, health status, clinical dependencies, location of any temporary accommodation, which are factors likely to impact on EEAST's operational capacity, resources and efficiency, including its logistical response with healthcare partners, is currently absent from the PEIR. This impact information therefore needs to be presented and assessed,</p>	East of England Ambulance Service (EEAST)		1	<p>The detailed information on the construction workforce, such as home origin, health status is not yet available. Chapter 11: Economics and Employment of the ES [TR020001/APP/5.01] submitted as part of this application for development consent, is based on the assumption that 48% of the construction workforce will travel to the site from within a 40-mile radius, i.e. they would be home based and live within commuting distance, so would not require local accommodation. Employment from the local workforce will be promoted, and further information is set out in the Employment and Training Strategy [TR020001/APP/7.05] submitted as part of this application for development consent. As 48% of the</p>	No

Ref	Comment	PC	LA	No PILS	Response	Change
	with appropriate mitigation and management measures secured within a Section 106 planning obligation or Deed of Obligation, as necessary, as part of any Development Consent Order approval.				construction workforce may be home-based, no significant effects on the local community, with regards to the influx of a temporary construction workforce, are considered likely. As such no mitigation measures are proposed.	
CN.1.2	<p>Transport, Community Safety, Health & Wellbeing Working Group</p> <p>In the light of the above [Principal Areas of Interest and Concern], EEAST recommend that appropriate Terms of Reference, Membership and a Communications Strategy for a Transport, Community Safety Health and Wellbeing Working Group is established in conjunction with the preparation of the ES. This would help to inform and assist the management of relevant aspects of the Scheme requiring a coordinated response from 'health and blue light partners', incorporating representatives from EEAST, the local Clinical</p>	EEAST		1	<p>Engagement with organisations involved in the emergency services for the airport has been undertaken. This has allowed for discussion of issues jointly, and where appropriate specific engagement has been held with organisations individually. As the Proposed Development has developed and more details have been available, the focus has been given to individual meetings. In addition, at key points in the process, presentations have been given at 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, host local authorities, CCG reps, and UK</p>	No

Ref	Comment	PC	LA	No PILS	Response	Change
	Commissioning Groups (CCG's), Bedfordshire Constabulary and Bedfordshire Fire and Rescue Service.				HSA (previously PHE). This working group discusses issues related to physical and mental health and impacts on health service provision.	
CN.1.3	The excavation required for the expansion will remove most of Wigmore Valley Park and the landfill site on which the park was built some 50 years ago. No one fully knows what will be dug up, but with the prevailing westerly wind, communities to the east of the site will be exposed to the noise of the construction vehicles, dust and possibly even contaminated material.	Kings Walden Parish Council		1	Detailed site investigation work has been undertaken on the landfill to understand the waste materials present, landfill gas and groundwater conditions. 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 do not pose a significant pollution risk to human health or the water environment. This is discussed further in Chapter 17 Soils and Geology of the ES [TR020001/APP/5.01] . Construction of the Proposed	No

Ref	Comment	PC	LA	No PILS	Response	Change
					<p>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 during operation. Following application of these measures, it is considered that contamination will not pose a risk to the health of the community, during the construction and operation of the Proposed Development. The proposed mitigation measures include:</p> <p>a. measures proposed to be implemented by the construction contractors to manage risks associated with contamination and potential Unexploded Ordnance (UXO) are set out within the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent. These include good construction site practices, site</p>	

Ref	Comment	PC	LA	No PILS	Response	Change
					<p>briefings, and compliance with legislation;</p> <p>b. the Outline Remediation Strategy for the Eaton Green Landfill in Appendix 17.5 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent, sets 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; and</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 minimise risks during the operational period. For example:</p> <p>i. the location, orientation, and depth of excavation into the landfill for the development</p>	

Ref	Comment	PC	LA	No PILS	Response	Change
					<p>platforms has been designed to reduce the amount of landfill material that will require excavation;</p> <p>ii. all buildings present within the area of the former landfill would have ground gas management measures, to prevent migration of gases into structures;</p> <p>iii. a perimeter ground gas control system would be installed to prevent off-site migration of ground gases to adjacent land uses;</p> <p>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;</p> <p>v. service connections would be modified to accommodate the likelihood of future settlement of the landfill and reduce the risk of</p>	

Ref	Comment	PC	LA	No PILS	Response	Change
					<p>damage to services; and</p> <p>vi. a material cover system is proposed across the area of the former landfill to prevent contact between people, wildlife, and contamination.</p> <p>Construction traffic impacts are addressed in the Outline CTMP in Appendix 18.3 of the ES [TR020001/APP/5.02] submitted with the application for development consent. An assessment of potential impacts to human health arising from the transportation of contaminated material, which found there to be no significant impact arising from the Proposed Development, is included in Chapter 18 Traffic and Transportation of the ES [TR020001/APP/5.01], also submitted with the application for development consent.</p>	
CN.1.4	The best way of minimising the impact of construction is to not expand the airport.	Kings Walden Parish Council		1	The Proposed Development has sought to minimise land take, earthworks and the extent of the former landfill that would need to be excavated. This can be evidenced from the various layouts of the Proposed	No

Ref	Comment	PC	LA	No PILS	Response	Change
					Development that have been consulted on through statutory consultation. Further information can be found within the Consultation Report [TR020001/APP/6.01] and Chapter 3 Alternatives and Design Evolution of the ES [TR020001/APP/5.01] , both of which are submitted as part of this application for development consent. Details about the construction method can be found in Appendix 4.1 Construction Method Statement and Programme Report of the ES [TR020001/APP/5.02] . Please also refer to the response to Ref GN.1.1.	
CN.1.5	The location of the airport, on a hill, means expansion requires expensive and extensive earth moving.	Kings Walden Parish Council		1	The proposed masterplan and construction solution makes best use of the existing topography. The construction strategy enables material to be re-used on site. Please also refer to the response to Ref GN.1.1 and CN.1.5.	No
CN.1.6	No additional mitigation has been proposed with respect to construction or operational effects since no significant	National Highways		1	Noted.	No

Ref	Comment	PC	LA	No PILS	Response	Change
	impacts are reported. As no waste and resources causing significant effects have been identified, no monitoring of significant effects is proposed.					
CN.1.7	No significant effects are anticipated through the construction and operational phases of the Proposed Development that are relevant to the interest of National Highways (e.g., amendments to the SRN), However, it should be noted that Figure 17.2, relating to potential sources for contamination, does not include the area containing the M1 J10 amendments, where any potential effects thereof appear not to have been assessed within the PEIR.	National Highways		1	All off-site highway interventions, including the M1 J10 amendments have been assessed in the Preliminary Risk Assessment (PRA) in Appendix 17.1 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent. Figure 17.2 shows the location of potential contamination sources within the study area, the M1 J10 amendments are not included on Figure 17.2 because there were no potential sources of contamination recorded within the study area around the junctions.	No

Ref	Comment	PC	LA	No PILS	Response	Change
CN.1.8	Construction of the Proposed Development may result in both temporary and permanent effects on businesses arising from disturbance due to other environmental effects (noise, vibration, air quality, visual impacts, access interruption/isolation including employee access). Based on the preliminary residual effect assessment results from the noise, vibration, air quality, assessments, there is not considered to be an effect on employment for the Proposed Development as a whole, so no effects are expected to be caused by the works to M1 J10.	National Highways		1	Noted.	No

Ref	Comment	PC	LA	No PILS	Response	Change
CN.1.9	A significant level and duration of demolition and construction phase work is envisaged, involving large scale plant, equipment and machinery deployment/use, hazardous and non- hazardous waste material arisings/ deposition, import of construction material, specialist construction/ engineering operations/ processes and product storage across the three construction periods. Information to determine the effect of the demolition and construction phase and its impact on EEAST’s operational capacity, resources and efficiency is currently absent from the PEI.	EEAST		1	<p>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 Major Accidents and Disasters (MA&D) – with regards to the risk of a MA&D occurring; and • Chapter 18 Traffic and Transport (inc. Appx. 18.3 Outline CTMP) – with regards to impacts on the local transport network and its users. <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</p>	No

Ref	Comment	PC	LA	No PILS	Response	Change
					application for development consent.	
Mitigation						
CN.1.10	<p>HSE’s construction statistic publications (for Great Britain) indicate that work related incidents, involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the ‘all industry’ rate.</p> <p>In the event of a construction phase accident, appropriate procedures would therefore need to be put in place for emergency access, on-site triage, medical assessment and patient identification,</p>	EEAST		1	<p>Requirement for the provision of occupational healthcare facilities at the construction site is set out within the 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 from the construction site are expected. As set out within the CoCP, the lead contractor will be responsible</p>	No

Ref	Comment	PC	LA	No PILS	Response	Change
	stabilisation and transfer to an appropriate healthcare setting.				for the development of emergency procedures in consultation with the emergency services. An assessment of relevant major accident and disaster hazards is provided within Chapter 15 Major Accidents and Disasters (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 CTMP), no likely significant risks of MA&Ds remain. As such, no regular callouts to the ambulance service during construction are expected.	
CN.1.11	Plans and contingencies for emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders within operationally optimal attendance times (noting the delay risks above) which in urgent cases may require Helicopter Emergency Medical Services (HEMS)	EEAST		1	Please refer to response to Ref CN.1.10.	No

Ref	Comment	PC	LA	No PILS	Response	Change
	access, are considered to be necessary.					
CN.1.12	The Code of Construction Practice will be key to healthy environmental management of the development over its various phases, as such it will need a management and reporting structure (yet to be illustrated) and an independent monitoring role (not self-checking) which will require resourcing.		Luton Borough Council	1	Construction monitoring arrangements are set out in the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent. Compliance with the CoCP will be a requirement of the DCO if granted. Any failure to comply with the requirements would be subject to enforcement by the relevant local planning authority. The Applicant will impose the requirements of the CoCP through the works contracts which will incorporate both general and environmental topic requirements. The lead contractor will be required to comply with the requirements of the CoCP and the Applicant will take appropriate action where required to ensure compliance.	No

Ref	Comment	PC	LA	No PILS	Response	Change
CN.1.13	<p>The CCB would require that the Code of Construction Practice includes the following elements:</p> <ul style="list-style-type: none"> • Since the airport can be accessed from the M1, there should be no justification for construction traffic, including construction waste, to have to use local roads. The Chilterns AONB has had to put up with construction traffic for HS2, which does not benefit from motorway access. We would therefore require a complete ban on airport construction traffic movements on roads within the AONB. • Notwithstanding the potential for exceptions to the normal working hours commitment, we would require that night-time illuminations, whether for working or for security, are avoided or kept to the absolute minimum where necessary. 	Chilterns Conservation Board			<p>The Proposed Development and its access routes to the M1 lie wholly outside the boundary of the AONB, whereas a portion of HS2 is being constructed within the AONB without ready access to a motorway. It is therefore agreed there will be little to no reason for construction traffic related to the Proposed Development to travel on local roads within the AONB. One potential exception to this could be in the event that the origin or destination of a trip were itself located within the AONB, however, in such circumstances the trips would take place irrespective of whether or not they are caused by the Proposed Development. The Outline CTMP in Appendix 18.3 of the ES [TR020001/APP/5.02], addresses the routing of construction traffic and stipulates designated routes for vehicles arriving to and leaving the construction site. This includes the requirement to minimise travel along local roads and any road that does not form part of the Primary Route</p>	No

Ref	Comment	PC	LA	No PILS	Response	Change
					<p>Network. Construction traffic will also be required to avoid the residential area to the north as far as practicable. It is therefore considered a complete ban on construction traffic within the AONB would be both disproportionate and unnecessary given the likelihood for construction traffic to use any routes within the AONB is very low and will be avoided as far as is reasonably practicable.</p> <p>The use of night-time illuminations is now covered in Section 6.5 of the CoCP and Light Obtrusion Assessment in the ES Appendices [TR020001/APP/5.02], which are both submitted as part of this application for development consent. This includes the requirement for lighting to be minimised in terms of frequency and duration wherever possible. Measures that will be implemented to minimise risk of adverse effects on residents and wildlife are outlined in the documents referenced. This</p>	

Ref	Comment	PC	LA	No PILS	Response	Change
					<p>includes confining lighting to the task area and away from any wildlife and dwellings, as well as using lower power security lighting and observing curfews wherever reasonably practicable.</p>	

Ref	Comment	PC	LA	No PILS	Response	Change
CN.1.14	UKHSA expects the Applicant to highlight within the Code of Construction Practice the times/days of particularly noisy works, and the specific measures taken to reduce noise at source, the strategy for actively communicating this information to local communities.	United Kingdom Health Security Agency		1	<p>It is not feasible for the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent, to specify the times and days of particularly noisy works as the detailed programme of works is yet to be defined. Further clarity around this will however become available during detailed design. Best practicable means (BPM) will, however, be applied during construction works to minimise the noise impacts on nearby sensitive receptors as a result of construction activities. BPM are defined in Section 72 of the Control of Pollution Act 1974 and Section 79 of the Environmental Protection Act 1990 as those measures which are “<i>reasonably practicable having regard among other things to local conditions and circumstances, to the current state of technical knowledge and to financial implications</i>”.</p> <p>Wherever reasonably practicable, high noise generating works will</p>	No

Ref	Comment	PC	LA	No PILS	Response	Change
					<p>be undertaken within core daytime working hours and where high noise generating works are required to be undertaken, the lead contractor will seek to obtain consents from the local authority under Section 61 of the Control of Pollution Act 1974. The Section 61 process will ensure that appropriate mitigation is in place and will confirm description of construction works, including details of their duration and proposed work hours, as well as specific measures taken to reduce noise at source. An outline communication strategy for the notification and communication of expectant construction noise impacts on local residents will be developed once the lead contractor has been appointed.</p>	

Table A16.8: Regard had to statutory consultation responses on Construction - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
General				
CN.2.1	We support the proposals [for constructing the scheme].	1	Noted.	No
CN.2.2	Support for how the Applicant proposes to build the airport expansion. LLAOL supports 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
CN.2.3	The environmental effects of the Future LuToN Scheme will need to be effectively managed at all phases, including during construction. LLAOL is committed to working with the Applicant to ensure that existing monitoring of environmental effects is aligned with monitoring requirements during the construction phase.	1	Please refer to response to Ref CN.1.12. The Applicant has engaged with LLAOL to ensure monitoring requirements align with existing requirements as far possible.	No
CN.2.4	Concern that as the airport does not control passenger numbers so the assertion that Terminal 2 would be developed once numbers have reached a certain level makes it impossible to predict construction timings and costs.	1	The proposed construction has been informed by the demand forecasts set out in the Need Case [TR020001/APP/7.04] , which is submitted as part of this application for development consent. It is accepted that the airport does not control the rate of growth so the precise timing when facilities will be built may vary, for example in line with the faster and slower growth scenarios which are	No

Ref	Comment	No. PILs	Response	Change
			subject to sensitivity testing. The construction programme is considered reasonable to deliver the facilities required in line with the core forecast for demand growth.	
CN.2.5	Suggest that all construction staff parking should be accommodated on the airport site; and contractors should not be allowed to park on local residential roads.	2	With regards to construction staff parking, the proposal is for construction staff to park onsite within designated car parking.	No
CN.2.6	Suggest using rail for transportation of materials instead of road; there are rail sidings close to Luton station that could be used for this purpose.	1	The airport is not connected to the main line railway network. Local rail access points are insufficient to handle materials delivery. It is highly likely that materials would need to be transported by road to site therefore not reducing volume of construction traffic to site. This form of operation introduces double handling, which leads to inefficiencies.	No
CN.2.7	Suggest that the construction for the Proposed Development should be put on hold until there is certainty in the future of the project, and all surrounding infrastructure and green space upgrades have been constructed.	1	Wigmore Valley Park replacement open space will be delivered early in construction. The aim is to deliver facilities as far as possible to ensure the delivery of capacity in time to meet demand for people to fly from the airport. If capacity is not available in time to meet demand, then passengers would need to travel substantially further to use alternative airports. This would not be in the interests of passengers and would give rise to further environmental harm.	No
CN.2.8	Suggest that the local workforce and local construction businesses should be employed for the construction of the Proposed Development.	1	The Employment and Training Strategy [TR020001/APP/7.05] , submitted as part of this application for development consent, seeks to make the most of the employment and training opportunities for residents in the wider region surrounding Luton including LBC, Bedford Borough Council, Central Bedfordshire Council, Buckinghamshire County Council (Unitary Authority), Milton	No

Ref	Comment	No. PILs	Response	Change
			<p>Keynes Council, and Hertfordshire County Council. This is for both construction and operation. A Luton Airport Employment and Skills Programme is proposed. The Programme is organised into three parts: 1) Engagement with local Government partners to coordinate, at a strategic level, how their employment and training programmes can support people in the study area into employment at the airport. 2) Recruitment and outreach activities to promote employment and training opportunities across the airport with local employment support and training institutions, helping people in the ETS Study Area into work at the airport. 3) Supporting employment and training good practice across the airport, during construction phase as well as during operations, through an Airport Employer Community Forum (AECF), which will be a forum of HR representatives from across the airport businesses.</p>	
CN.2.9	<p>Concern that there is insufficient information provided on the lorry movements that would be required if contamination of the former landfill site is found.</p>	1	<p>A high-level assessment has been made for construction traffic movements for the Proposed Development; this is contained within Chapter 18 Traffic and Transportation of the ES [TR020001/APP/5.01] and has informed the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02], which is submitted as part of this application for development consent. The earthworks strategy is to limit the volume of material that is taken off site and to reuse material in the permanent construction. The general philosophy is to:</p> <ul style="list-style-type: none"> a. minimise the amount of landfill materials excavated; and b. where it is essential to excavate landfill materials then keep as much a practical on site and reuse in the construction. 	No

Ref	Comment	No. PILs	Response	Change
			Chapter 18 has identified the need to remove up to 18,500m ² of contaminated waste material from the Proposed Development worksite to an appropriate waste facility, via road. This would generate approximately 1,650 round trips. Using robust estimates, the magnitude of potential impact to the road network or human health, associated with moving contaminated material via road is considered to be 'very low', which is not significant.	
CN.2.10	Concern that there is no information provided on the relocation of the waste transfer site.	1	The Proposed Development study boundary includes a safeguarded waste site, the Tidy Tip (formally called the Eaton Green Civic Amenity Site) as illustrated on the Scheme Layout Plans [TR020001/APP/4.02] . The Proposed Development will not have any impact on the Tidy Tip, which will not be used to manage Proposed Development construction or operational waste.	No
Impact				
CN.2.11	Concern around proposals to build on a former landfill site. Respondents were particularly concerned that the potential extent of impacts from building on the former landfill site is unknown.	10	Please refer to response to Ref CN.1.3.	No
CN.2.12	Concern around proposals to build on a former landfill site. Respondents cited particular concern that this will disturb contaminated land.	5	Please refer to response to Ref CN.1.3.	No

Ref	Comment	No. PILs	Response	Change
CN.2.13	Concern that the construction of the Proposed Development will lead to disruption of the current Airport operation.	5	The Lead Contractor and the airport operator will work together to seek to minimise impacts to the ongoing operation of the airport during construction. The construction programme reflects longer durations for key activities in recognition of the fact that the site is adjacent to, and at times within, an operational airport and certain activities will be programmed to avoid busy periods to minimise disruption to passengers, airlines, and staff.	No
CN.2.14	Suggest that measures to minimise construction impacts should go beyond existing measures, and that these measures in the Code of Construction Practice (CoCP) should be monitored and enforced to ensure compliance. Some respondents suggested that an independent body should be appointed to monitor the construction activities for any potential breaches of agreed methodology or limits.	1	The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent, outlines the environmental management and mitigation requirements to be implemented by the Applicant and the lead contractor throughout the construction period for the delivery of the Proposed Development. The purpose of the CoCP is to: a. deliver effective planning, management, and governance throughout the construction period to manage potential impacts upon individuals, businesses and the natural and historic environment; and b. outline processes to engage with the local community and their representatives, such as processes to notify the community of upcoming works.	No
CN.2.15	Suggestion that measures to minimise disruption caused to local communities and airport passengers by the proposed construction works should include: ongoing communication with local communities, notification of road closures via website/email, subscription to 'Considerate Constructors' scheme, no loud working in the evening or weekends, use of rail for transportation of materials instead of road,	1	Should the lead contractor sign up to the Considerate Constructors Scheme, which is a recognised industry wide scheme, it would align with the CoCP. With regards to the transport of materials by rail rather than road, there is no main line rail infrastructure to the airport, therefore the last two to three miles will always have to be by	No

Ref	Comment	No. PILs	Response	Change
	and maintain public access to the park throughout the construction phase.		road. Further, there is no rail freight facility in Luton and so materials cannot be delivered in this manner. Please also refer to the response to Ref CN.1.12.	
CN.2.16	Suggest limiting noise from construction between 8:00 to 18:00 Monday to Friday.	1	The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent, defines control of noise and vibration. BPM will be applied during construction works to minimise noise (including vibration) at neighbouring residential properties and other sensitive receptors (including local businesses and quiet areas designated by the local authority) arising from construction activities. BPM are defined in Section 72 of the Control of Pollution Act 1974 and Section 79 of the Environmental Protection Act 1990 as those measures which are “ <i>reasonably practicable having regard among other things to local conditions and circumstances, to the current state of technical knowledge and to financial implications</i> ”. Please also refer to response at CN.1.14	No
CN.2.17	Suggest that measures should be employed to minimise disruption caused to local communities from construction works.	1	Please refer to response to Ref CN.2.14.	No
CN.2.18	Concern that the construction of the Proposed Development will have adverse impacts on local communities.	7	Please refer to response to Ref CN.2.14.	No
CN.2.19	Concern that Wigmore Valley Park is currently covering asbestos that was disposed many years ago, and that the	1	Detailed site investigation work has been undertaken on the landfill to understand the waste materials present, landfill gas and groundwater conditions. These investigations have	No

Ref	Comment	No. PILs	Response	Change
	construction of the Proposed Development will expose this with adverse impacts to human health.		proven that asbestos is present within the existing landfill site. Information can be found in Chapter 17 Soils and Geology of the ES [TR020001/APP/5.01] . Given the known presence of asbestos appropriate construction management plans will be put in place, in accordance with the Control of Asbestos Regulations, Health and Safety at Work Act, CDM Regulations and other relevant legislation to avoid any adverse impacts to human health once the lead contractor has been appointed. The Detailed Quantitative Risk Assessment – Human Health in Appendix 17.3 of the ES [TR020001/APP/5.02] considers the potential impact of asbestos on human health.	
CN.2.20	Suggest that measures should be employed to minimise dirt and muck on local roads from construction works.	1	Please refer to the response to Ref CN.2.14. Wheel washing facilities will be used at site entrances and road sweeping equipment will be used.	No
Mitigation				
CN.2.21	Concern regarding the effectiveness of the proposed disruption mitigation measures to manage construction impacts. Respondents stated that the construction works will inevitably have impacts.	5	The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent, sets out the requirements for managing the environmental effects of the construction works.	No
CN.2.22	Concern that insufficient information has been provided on the implementation of mitigation measures and their expected effectiveness.	2	In addition, the lead contractors will have an Environmental Management System (EMS) that is certified to BS EN ISO 14001, as set out in the CoCP. The management systems will set out processes, practices, and plans that enable the lead contractors to manage environmental impacts and increase their operating efficiency.	No

Ref	Comment	No. PILs	Response	Change
			The key aim of EMS is to continually improve performance. The Lead Contractors will therefore ensure the EMS is regularly reviewed, audited, and updated. Consideration of the environmental impacts will be imperative during construction to ensure that construction practices reduce the impact of noise, light, visual, air pollution and traffic. The assessments in the ES [TR020001/APP/5.01] consider both the operational and construction impacts, and where appropriate mitigation is proposed.	
Monitoring				
CN.2.23	Concern that the construction monitoring and compliance plans set out in the Code of Construction Practice (CoCP) will not be adhered to on site.	6	Compliance with the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent, will be a requirement of the DCO if granted. The Applicant will impose the requirements of the CoCP through the works contracts which will incorporate both general and environmental topic requirements. The Lead Contractor will be required to comply with the requirements of the CoCP and the Applicant will take appropriate action where required to ensure compliance. Please also refer to the response to Ref CN.1.12.	No
CN.2.24	Concern that the construction monitoring and compliance plans set out in the Code of Construction Practice (CoCP) will not be adhered to on site, given previous breaches of measures set by LLAL.	1		No
Approach to Construction				
CN.2.25	Concern around the phased approach/long construction period of the Proposed Development. Respondents were concerned about rising costs resulting in the Proposed Development ultimately costing much more than currently forecast. The	1	The financial model supporting the application for development consent takes full account of the effect of inflation on costs over time. Detailed historical analysis has been undertaken using the Office for National Statistics (ONS). All construction indices as well as other data sources for example from Royal Institute of Chartered Surveyors	No

Ref	Comment	No. PILs	Response	Change
	causes of increasing costs are outside of the control of the Applicant and therefore, this is a significant risk.		(RICS), and future forecasts taken into account using data published by the Office for Budget Responsibility (OBR) and other sources. An additional margin to manage risk has also been added into the inflation assumptions used in the financial analysis. The Applicant recognizes the risk presented by inflation and has taken appropriate action to mitigate and manage this risk as far as is possible. The Funding Statement [TR020001/APP/3.03] , which is submitted as part of this application for development consent, is based on the financial analysis detailed above, and sets out how the Proposed Development is fundable.	
CN.2.26	Support for the overall construction proposals, including support for the phasing approach and measures proposed to minimise impacts and disruption.	1	Noted.	No

Table A16.9: Regard had to statutory consultation responses on Construction - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
General				
CN.3.1	Concern that the construction of the Proposed Development will be funded by loans from Luton Rising to London Luton Airport Operation Limited (LLAOL), with some interest is as high as 12%.	1	The Funding Statement [TR020001/APP/3.03] , which is submitted as part of this application for development consent, sets out how the Proposed Development is fundable. The source of finance that will ultimately be used to support the construction cost will be determined based on prevailing market conditions and available options at the appropriate time and will depend upon a range of economic variables. The final financing solution will be subject to a value for money assessment.	No
CN.3.2	Suggest that Modern Methods of Construction and recycled building materials should be used to reduce the overall carbon footprint of the construction works.	7	The construction of major infrastructure like airports inevitably entails significant earthworks, use of materials, and other traditionally carbon-intensive activities. The Applicant is working with supply chain partners to reduce carbon emissions, through: - prioritising materials reuse; - using low-carbon forms of concrete where possible; and - using electrically powered vehicles and equipment wherever practicable. More information can be found in the Sustainability Statement [TR020001/APP/7.06] .	No
CN.3.3	Suggest that more efforts should be made to retaining and improving existing structures rather	1	This philosophy has been adopted for early construction works. However, the proposed increase in passenger numbers will result in increased demand on existing	No

Ref	Comment	No. CC	Response	Change
	than building new, in line with advice from the Royal Institute of British Architects (RIBA).		facilities; and therefore, new facilities are required in addition to maximising use of existing facilities. The Proposed Development involves minimal demolition of existing structures to avoid impacts on the operation of the existing terminal.	
CN.3.4	Suggest that PAS2080 should be adopted for all construction works.	1	PAS2080 deals with whole-life carbon of infrastructure schemes. The Greenhouse Gases assessment, undertaken as part of the EIA and provided in Chapter 12 Greenhouse Gases of the ES [TR020001/APP/5.01] , which is submitted as part of this application for development consent, is aligned with the principles, methods and guidance set out in PAS2080:2016. Low carbon design and construction strategies will be applied, where appropriate, and with reference to best practice guidance such as PAS2080:2016. The Sustainability Statement [TR020001/APP/7.06] , which is submitted as part of this application for development consent, outlines the Applicant's commitments to net zero and sustainability.	No
CN.3.5	Suggest that the construction for the Proposed Development should be put on hold until there is certainty in the future of the project, and all surrounding infrastructure and green space upgrades have been constructed.	8	Please refer to response to Ref CN.2.7.	No
CN.3.6	Suggest that the local workforce and local construction businesses should be employed for the construction of the Proposed Development.	16	Please refer to response to Ref CN.2.8.	No

Ref	Comment	No. CC	Response	Change
	Some respondents suggest that targets should be set on use of local workforce, including construction apprenticeships for local school leavers.			
CN.3.7	Concern that poor behaviour and decisions on site by contractors will lead to reduced quality. Respondents noted that the Applicant should avoid employing the cheapest contractors and avoid value engineering exercises that will reduce quality.	9	The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] , submitted as part of this application for development consent, sets out measures to control and manage the construction activities and mitigate potential impacts. In addition, the Sustainability Statement [TR020001/APP/7.06] , outlines the Applicant's commitments to net zero and sustainability. Design Principles [TR020001/APP/7.09] is submitted as part of this application for development consent and will impose requirements on future designers and contractors to ensure the Proposed Development meets expected quality standards.	No
Impact				
CN.3.8	Concern around proposals to build on a former landfill site. Respondents cited particular concern that this will disturb contaminated land and may release contaminants, with adverse impacts to ecology, air quality and health of local residents. Some respondents were concerned that the potential extent of impacts from building on the former landfill site is unknown.	119	Please refer to response to Ref CN.1.3.	No

Ref	Comment	No. CC	Response	Change
CN.3.9	Concern that the construction of the Proposed Development will lead to disruption of the current Airport operation.	30	Please refer to the response to Ref CN.2.13.	No
CN.3.10	Concern about the safety of the planned construction works on local communities, including impacts from disturbance to a former landfill site, potential WW2 unexploded ordnance, and potential contamination leaks to aquifers.	14	Please refer to response to Ref CN.2.14.	No
CN.3.11	Concern around the timescales of the construction of the Proposed Development, including that by completion some early works may need updating. Some respondents raised concern that public transport and road improvements would not be completed in advance of the capacity expansion.	3	Construction is proposed to deliver facilities so that they are ready to meet the predicted demand, this approach means that not all facilities need to be delivered at once. The proposed highway improvements will be tied into the Proposed Development and will be provided as necessary to improve capacity. The Applicant will also continue to work alongside transport operators and local authorities to deliver public transport improvements, in order to meet the ambitious mode share targets. The Design and Assess Strategy [TR020001/APP/7.03] sets out at a high level the construction of the Proposed Development and more detailed information can be found in the Construction Method Statement and Programme Report in Appendix 4.1 of the ES [TR020001/APP/5.02] .	No
CN.3.12	Suggest that measures to minimise construction impacts should go beyond existing measures, and that these measures in the Code of Construction Practice (CoCP) should be monitored and enforced to ensure compliance. Some	21	Please refer to response to Ref CN.2.14.	No

Ref	Comment	No. CC	Response	Change
	respondents suggested that an independent body should be appointed to monitor the construction activities for any potential breaches of agreed methodology or limits.			
CN.3.13	Suggest that construction traffic should avoid using routes on local roads and through towns/villages, with investment in the local road network to minimise congestion where necessary. In addition, respondents suggested that all construction staff parking should be accommodated on the airport site; and contractors should not be allowed to park on local residential roads, and that use of public transport should be encouraged. Some respondents suggested that all construction vehicles should be electric or hydrogen powered.	13	The Outline CTMP in Appendix 18.3 of the ES [TR020001/APP/5.02] , which is submitted as part of this application for development consent, sets out the principles for managing traffic on the local road network, establishment of a traffic management working group, traffic measurement measures, highway safety and the monitoring of construction traffic. With regards to construction staff parking, the intention is for construction staff to park onsite within designated car parking. The Transport Assessment [TR020001/APP/7.02] and Surface Access Strategy [TR020001/APP/7.12] submitted as part of this application for development consent includes extensive provision to support the move towards lower emissions vehicles.	No
CN.3.14	Suggestion that measures to minimise disruption caused to local communities and airport passengers by the proposed construction works should include: ongoing communication with local communities, notification of road closures via website/email, subscription to 'Considerate Constructors' scheme, no loud working in the evening or weekends, use of rail for transportation of materials instead of road, and maintain public	19	Please refer to response to Ref CN.2.14.	No

Ref	Comment	No. CC	Response	Change
	access to the park throughout the construction phase.			
CN.3.15	Suggest that measures to minimise construction impacts should be more sustainable, including: additional tree planting, relocation of trees rather than felling, provision of green roofs, recycling of waste materials, maximising retrofitting Terminal 1 to reduce new building, and ensuring zero carbon.	15	<p>The Sustainability Statement [TR020001/APP/7.06], which is submitted as part of this application for development consent, sets out the following key principles:</p> <ol style="list-style-type: none"> 1. protect and enhance the natural environment; 2. Deliver climate resilience and business continuity; 3. lead the transition to carbon net zero; 4. become a national hub for green technology, finance and innovation; and 5. a place to thrive. <p>The Proposed Development includes additional landscape mitigation in the form of an increase in parkland, off-site hedgerow mitigation and amenity planting where practicable. In response to the 2019 statutory consultation the scheme has been redesigned to retain a larger area of existing woodland. The design of buildings are outline at this stage and more detailed design will progress in the future. However, a Design Principles document [TR020001/APP/7.09] is submitted as part of this application for development consent and will impose requirements on future designers and contractors to meet environmental commitments including minimisation of construction waste.</p>	No
CN.3.16	Suggest that measures should be employed to minimise noise, dust and muck from construction	5	Please refer to response to Ref CN.2.14.	No

Ref	Comment	No. CC	Response	Change
	works. Respondents suggest dust suppression measures, wheel washes for vehicle leaving the site, road sweeping outside the site and creation of a noise bund.			
CN.3.17	Suggest that the construction works should limit the land used in order to minimise impacts on the surrounding areas. In addition, some respondents noted that the Airport Business Park is derelict and could be re-used for temporary car parking in Phase 1.	2	The proposed masterplan as illustrated on the Scheme Layout Plans [TR020001/APP/4.02] and construction solution makes best use of the existing site and topography, including making provision for material to be won on site and re-used in order to minimise wider impacts. The locations of replacement parking, including temporary locations, have been carefully designed around construction of the Proposed Development to suit the airport's needs whilst minimising impacts to the surrounding areas. These include some locations along Percival Way which are currently disused or are affected by the airport access road proposals and are therefore not considered to be feasible options for temporary parking.	No
CN.3.18	Concern that the location of the airport on top of a hill makes it inappropriate for expansion because the extensive construction work required will have maximum impact over the surrounding area.	1	Please refer to response to Ref CN.1.5.	No
CN.3.19	Concern that the construction of the Proposed Development will have adverse impacts on local communities, the environment and ecology, as well as causing significant disruption. Respondents highlighted the significant use of	47	Please refer to response to Ref CN.2.14.	No

Ref	Comment	No. CC	Response	Change
	concrete in the construction proposals as having a large carbon footprint and therefore negatively impacting the environment.			
CN.3.20	Concern that the construction of the Proposed Development will cause damage to nearby residential properties.	1	Please refer to response to Ref CN.2.14.	No
Assessment				
CN.3.21	Suggest that an ongoing assessment should be maintained during the construction phase to enable identification of potential improvements to be pursued. Some respondents suggested preparing an overview of environmental impacts and benefits realisation model between construction phases.	7	Please refer to response to Ref CN.2.14.	No
CN.3.22	Suggest that the former landfill site is assessed to the highest possible standards, and works affecting it are to be completed under stringent environmental conditions.	1	Please refer to response to Ref CN.1.3.	No
CN.3.23	Concern regarding the effectiveness of the proposed disruption mitigation measures to manage construction impacts including noise, dust, smell and construction traffic. Respondents stated that the construction works will inevitably have impacts, and the proposed mitigation measures do not go far enough to preventing harm and disruption to local communities.	157	Please refer to response Ref CN.2.21.	No

Ref	Comment	No. CC	Response	Change
CN.3.24	Suggest more clarity is required around earth movements, particularly due to the presence of toxic material.	1	Please refer to response Ref CN.2.9.	No
Monitoring				
CN.3.25	Concern that the construction monitoring and compliance plans set out in the Code of Construction Practice (CoCP) will not be adhered to on site. Some respondents highlighted that penalties for breaching the CoCP are not harsh enough to ensure compliance.	75	Please refer to the response to Ref CN.2.23.	No
Approach to Construction				
CN.3.26	Concern around the phased approach/long construction period of the Proposed Development. Respondents were concerned about rising costs resulting in the Proposed Development ultimately costing much more than currently forecast. The causes of increasing costs are outside of the control of the Applicant and therefore, this is a significant risk.	33	Please refer to the response to CN.2.25.	No
CN.3.27	Concern regarding the duration of construction of the Proposed Development, which will result in adverse impacts to local residents and businesses for an extended period of time. Respondents raised concern that there have been numerous building projects at the airport in recent years and as such the local community has	70	A construction programme has been developed in order for the impacts of the Proposed Development to be assessed in the ES [TR020001/APP/5.01] . The main construction works for the Proposed Development are expected to take place between 2025 and 2041, although the duration, intensity and scale of construction will vary over this period. The construction program is	No

Ref	Comment	No. CC	Response	Change
	experienced substantial, ongoing disruption already.		described in the Construction Management Plan and Programme Report in Appendix 4.1 of the ES [TR020001/APP/5.01] , although due to the long timescale over which the Proposed Development will be delivered, activities may vary. The proposed construction approach has been adopted to ensure best use of existing assets before moving to development of a new terminal building. Taking this approach allows for incremental increase in demand.	
CN.3.28	Concerns around the phasing of the construction works. Respondents highlighted concern that the works in Phase 1 make no changes to local infrastructure and therefore there are no local benefits in this phase. In addition, some respondents noted that there have been numerous building projects at Luton Airport in recent years with substantial, ongoing disruption.	10	<p>The lead contractor will be required to sign up and adhere to the Considerate Constructors Scheme.</p> <p>The lead contractor will prepare a construction-specific community engagement plan for the construction operations of the Proposed Development. The plan will provide the overall approach to community engagement and a detailed guide to the enquiries and complaints procedure. The plan will include procedures to:</p> <ul style="list-style-type: none"> a. maintain effective community engagement throughout the construction operations to further develop existing relationships with the communities alongside the Proposed Development; b. communicate with affected communities prior to the commencement of the relevant construction operations about how the effects of construction activities will be managed and, where appropriate, mitigated; c. communicate to affected communities prior to the commencement of relevant construction operations regarding the programme of the construction operations; <p>and</p>	No

Ref	Comment	No. CC	Response	Change
			d. present information on the enquiry and complaints procedures and how this is managed and operated.	
CN.3.29	Concerns around the phasing of the construction works. Respondents noted concern that Phase 2 will not commence for a long time, and there are many external factors that may impact the need for and nature of these works by that point. This may lead to compromises on build quality and scope reduction.	16	Please refer to the response to Ref CN.3.27. The Design Principles document [TR020001/APP/7.09], which is submitted with this application for development consent, sets out the design principles of the Proposed Development; detailed design is subject to a requirement in the DCO which requires details (in accordance with the design principles) to be approved by the relevant planning authority and the Proposed Development must be carried out in accordance with those approved details.	No
CN.3.30	Suggest that the construction works commence sooner and are not split into two separate phases but combined into one to speed up the construction of the Proposed Development and ensure that the project is completed on time. Some respondents suggested building the new terminal first.	17	Please refer to response to Ref CN.2.4.	No
CN.3.31	Support for the overall construction proposals, including support for the phasing approach and measures proposed to minimise impacts and disruption.	57	Noted.	No
CN.3.32	Support for the overall construction proposals, including support for the phasing approach, but suggest a more limited expansion should be pursued.	1	Noted. The construction proposals respond to the forecast demand and further information can be found in the Need Case [TR020001/APP/7.04] submitted as part of this application for development consent.	No

A17: PLANNING

Table A17.10: Regard had to statutory consultation responses on Planning - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
Policy context and compliance						
P.1.1	It is accepted that at the present time there is national policy support for the principle of making the best use of the existing runway at Luton. However, this is clearly only one factor in the overall planning balance, with local planning and transportation policy documents likely to be considered 'important and relevant' to the Secretary of State's decision under section 104(2)(d) of the PA2008.		Host Authorities	4	Noted.	No
P.1.2	Moreover, MBU policy itself recognises that the development of airports can have negative as well as positive local impacts, including on noise levels and that “any proposals should be judged by the relevant planning authority [or in this case, the Panel and SoS], taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations.”		Host Authorities	4	Noted.	No
P.1.3	We also accept that at the present time there is no apparent Government appetite for demand management in the		Host Authorities	4	The application for development consent can and should only be	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>aviation sector to be part of the toolkit to achieve net zero by 2050, with the draft Jet Zero consultation instead focussing on, system efficiencies, Sustainable Aviation Fuels, zero emission flight, markets and removals and influencing consumers. This is clearly a national political as well as policy issue. However, the Climate Change Committee’s Report of October 2021 on the Government’s Net Zero strategy criticised this. In short, the exact position with national aviation policy, the weight accorded MBU and potential future changes to this policy context in the context of net zero will need to be reviewed further as the application progresses to submission, Examination and a final decision. We reserve the right to reconsider this policy position, weighed in the balance with local planning and transportation policy and environment effects of the development as against the economic benefits. As we stated previously, we consider that at the very least LR need to recognise and consider how to deal with the uncertainties in respect of future policy and how this could affect the overall need case in the long term.</p>				<p>considered in the current policy context.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
P.1.4	As we stated at first Statutory Consultation we had hoped LR would prepare an umbrella 'Planning Policy Compliance Statement' or similar to assess in one document the overall compliance or conflict with all aspects of planning policy. As well as the NPS, LR need to demonstrate the role played by the National Planning Policy Framework and the applicable development plans in the design development of the proposals as 'important and relevant' to the Secretary of State's decision under section 104(2)(d) of the PA2008 given that the proposed expansion at Luton Airport is outside of any statutory planmaking process.		Host Authorities	4	Planning policy compliance is addressed in the Planning Statement [TR020001/APP/7.01] submitted as part of the application for development consent.	No
P.1.5	LR have responded in their 2019 Statutory Consultation Feedback Report by stating that a 'Planning Statement' will be prepared and submitted with the application. Whilst this is welcomed we assume this will go beyond a policy compliance assessment and look at the overall planning balance given the benefits and environmental effects of the development. We remain of the view that a specific planning policy compliance document is necessary and should be prepared and agreed between		Host Authorities	4	Planning policy compliance has been discussed with the host authorities through the regular Planning Officers Coordination Group meetings.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	LR and the HAs that identifies relevant policy and where the parties consider the Proposed Development to be in accordance with or contrary to this policy, taking into account proposed mitigation. We consider that this should be agreed prior to submission/examination as part of the SoCG process.					
P.1.6	The Government's policy stance in relation to making best use of existing runways at airports in the South East, including Luton Airport, is recognised and noted.		East Herts District Council	1	Noted.	No
P.1.7	There is an absence of up to date national aviation policy. The Airport National Policy Statement of June 2018 supports best use of existing runways but it was based on the Airport Commission's Report of July 2015 which stated that a new runway and air traffic growth could still take place within the national obligations of the climate emergency. Matters have moved on considerably in the intervening years and the national policy does not address the related aspects of aviation strategy, climate action and carbon reduction targets (which has moved from 80% to 100%).		Dacorum Borough Council	1	This is in part addressed by the Jet Zero strategy published in July 2022 (Ref 4). Furthermore, Flightpath to the Future (Ref 5) also provides aviation policy and was published in May 2022. Both of these documents confirm Making Best Use (Ref 6) is still the most recent and valid policy for considering an application for development at an airport (other than Heathrow).	No

Ref	Comment	PC	LA	No PILs	Response	Change
Green Belt						
P.1.8	As part of this [policy] analysis, clarity should be provided as to how Green Belt policy has been factored into the optioneering of the scheme. LR need to demonstrate in detail that the Proposed Development minimises all impacts on the Green Belt both in principle and in practice, considering the openness and permanence of the Green Belt and the five purposes of the Green Belt set out in paragraph 138 of the National Planning Policy Framework. This will need to assess both direct impacts and the visual amenity of the Green Belt by impacts effecting its setting. How the Green Belt has played a role in the detailed scheme development is fundamental to this understanding.		Host Authorities	4	The Design and Access Statement [TR020001/APP/7.03] demonstrates how Green Belt policy is factored into the design development process to minimise impacts. The Planning Statement [TR020001/APP/7.01] includes a Green Belt Assessment to consider the Very Special Circumstances test for any inappropriate development within the Green Belt.	No
P.1.9	Losing Green Belt Land for the expansion goes against Green Belt Policy. It is not as simple as just moving a green space.	Kings Walden Parish Council		1	Please refer to the response to Ref P.1.8.	No
Order limits						
P.1.10	It is noted that the redline boundary is drawn relatively closely around some of the highways works proposed. As outstanding queries associated with the detailed modelling of the mitigation		Central Bedfordshire Council	1	After the 2022 statutory consultation the Order limits around the highway works were reviewed in light of the on-going	No

Ref	Comment	PC	LA	No PILs	Response	Change
	works proposed remain to be addressed, there also remains the potential that updated modelling could identify further amendments to the proposed mitigation, which could have a greater requirement in terms of land take. Where there is scope for earthworks or other supporting works, including revisions to signage, the limited flexibility allowed for within the redline may constrain the extent of the works that could be secured and delivered.				highway modelling work. This review did not identify the need for any amendments to be made to the Order limits.	
Baseline						
P.1.11	WSP highlight in their technical review that there is still a lack of clarity in certain topic areas as to the “Do-Nothing” option to inform the future baseline scenario as required by Schedule 4 of the Infrastructure Planning EIA Regulations 2017. The future baseline with no development taking place needs to be clearly established and consistently applied across all topics.		Host Authorities	4	The approach to defining and considering the Future Baseline is described in Chapter 5 Approach to the Assessment of the ES [TR020001/APP/5.01] , and referred to and expanded on as appropriate, in each technical assessment chapter under the heading ‘Future Baseline’.	No
P.1.12	Indeed, it is fundamental to the communities around the airport (and		Host Authorities	4	The assumptions used in generating flight numbers	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>hence the HAs) to understand assumptions as to changes outside of the scheme itself that may alter the future baseline (for example the change in the aircraft fleet or fleet of road vehicles accessing the airport and the implications on air quality and noise). There needs to be clear ‘with’ and ‘without’ development scenarios as the phasing of the scheme progresses. In particular, the ‘do nothing’ scenario needs to be fully transparent as to flight numbers and fleet make-up and be clear that this is based on compliance with current planning conditions rather than pre-pandemic breaches of these conditions.</p>				<p>and fleet mix, both with and without the development, are described in the Need Case [TR020001/APP/7.04]. The reference to the ‘do nothing’ scenario being based on complaint planning conditions is assumed to be in reference to noise conditions and is addressed in Chapter 16 Noise and Vibration of the ES [TR020001/APP/5.01] and associated appendices which considers actual environmental conditions and those compliant existing planning conditions for each assessment phase. Modelled surface access traffic data, both with and without development have been provided and used in each assessment phase and are provide in the</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					Transport Assessment [TR020001/APP/7.02].	
Mitigation and control mechanism						
P.1.13	It is not considered that the airport has control over some of the key mitigation measures and, in particular, significant reliance is placed on the predicted uptake of quieter 'new generation' aircraft which is outside the direct control of the applicant. The forecasting/ modelling that underpins the assessment of the environmental impacts of the proposal is therefore flawed. Furthermore, forecasting and modelling used to justify previous expansions of the airport have subsequently been found to be unreliable and there is, therefore, reason to be cautious about the accuracy and reliability of the latest forecasting. Given these flaws, it is not possible to say that the impacts of the proposal have been accurately identified, nor that they can be properly managed, in accordance with national aviation policy.		St Albans City and District Council		The fleet mix projections being used for the environmental assessments do not rely on new technology aircraft, although some sensitivity analysis has been undertaken to consider the further potential benefits. In terms of the current fleet transition there has been some slowdown in the delivery of new aircraft during the pandemic but the main airlines using the airport have secured delivery slots and these have been fully taken into account in the fleet mix projections.	No
P.1.14	Luton Airport's 2021 Environmental Policy states that the airport will 'actively participate where possible in local, national or international activities aimed	Kings Walden Parish Council		1	The 2021 Environmental Policy document is a LLAOL document and is therefore a comment for	No

Ref	Comment	PC	LA	No PILs	Response	Change
	at mitigating the environmental impact of airports'. This has not happened in regards to the airport at the size it currently it, moves should be made to mitigate the current issues before expanding the airport and exacerbating the issues further.				them to address as the current operator.	
P.1.15	The extent of mitigation proposed is significant and varied, relying on embedded mitigation and design, control mechanisms (various action and management plans and their associated governance arrangements), compensation proposals and on-going monitoring now included within the Green Controlled Growth strategy and other documents including the Travel Plan.		Host Authorities	4	Noted.	No
P.1.16	The material prepared for this Statutory Consultation now suggests increased complexity in this regard, with layers of proposed mitigation being 'nested' within proposed control documents, making them less obvious. LR have confirmed that a Mitigation Route Map will be prepared. This will be essential to clarify how mitigation will be achieved and we consider it would have been helpful to see this document at this stage, given that the mitigation strategy is now much		Host Authorities	4	Noted. The approach to mitigation has been discussed with the Host Authorities. The draft Mitigation Route Map document itself was not sent to Host Authorities for review prior to submission, however several application documents which contain the	No

Ref	Comment	PC	LA	No PILs	Response	Change
	more developed compared to first Statutory Consultation. We would request that this document is prepared in draft and be the subject of informal engagement with the HAs prior to the application being submitted. This will assist our assessment of the application and the preparation of Local Impact Reports (LIRs).				mitigations were shared for review.	
P.1.17	We would also want further clarity prior to the application being submitted as to which documents are proposed to be 'certified' at the point of the DCO being made and which will be the subject of subsequent engagement and approval through Requirements within the DCO.		Host Authorities	4	The DCO includes a schedule of documents that are to be certified at the end of the examination stage. The draft DCO [TR020001/APP/2.01] has an indicative list. This will be subject to the examination process.	No
P.1.18	It will be important to understand how the GCG proposals are secured through the DCO, to what extent the mechanisms suggested are on the 'face' of the DCO itself or within a certified GCG document that will be approved and be subject to review in the future. The document notes that the DCO will define the necessary procedures relating to the governance of GCG, creating a legal framework for compliance and enforcement. The detail		Host Authorities	4	One of the key principles underpinning the GCG Framework [TR020001/APP/7.08] is that it establishes legally binding Limits, directly linking ongoing airport growth to the extent of the environmental impacts of the Proposed Development. As GCG is legally binding, it will not	No

Ref	Comment	PC	LA	No PILs	Response	Change
	of this will be crucial to the role that GCG will play in the future.				incorporate aspirational goals for the airport. The proposed Limits will be phased, reflecting the approach to forecasting adopted in the application for development consent.	
P.1.19	The green controlled growth mechanism must be divided into tangible deliverables (biodiversity updates within the red line planning application area, for example), policy choices (mechanisms to protect tranquillity) and longer-term visions and goals (net zero, for example). We recommend a detailed set of gateways and ambitions/targets are set out against what can be delivered within a DCO/NSIP as compared to what forms aspirational goals. That both helps the decision-makers, the public and other stakeholders when they come to comment on the future ES/DCO.	Chilterns Conservation Board			Please refer to the response to Ref P.1.18. As explained in the GCG Framework [TR020001/APP/7.08] , it is not considered appropriate to include biodiversity within the scope of the GCG framework as biodiversity impacts are not directly correlated with the growth of the airport and are instead a function of the design and construction of the Proposed Development.	No
P.1.20	There has always been the ability to monitor compliance with noise limits and contours through the original s.106 agreement and planning conditions, but breaches have, nevertheless, still occurred and these have not been		St Albans City and District Council		Please refer to the response to Ref P.1.18.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	robustly enforced. That situation must not be repeated in the future, but there is nothing in the consultation proposals that provides convincing assurances in that respect.					
P.1.21	All mitigation measures must, in any event, be secured via appropriate legal agreement and/or planning condition and tied to the relevant phases of the proposed development.		St Albans City and District Council		The level of impact from the Proposed Development has been assessed within the ES [TR020001/APP/5.01] . It is a legal requirement of the DCO to deliver all mitigation proposed. The GCG process will be adequately controlled by legal agreement and/or DCO requirements as appropriate. Information is also provided in the Mitigation Route Map [[TR020001/APP/5.09] .	No
P.1.22	Assurances will be sought, in any event, that any agreed mitigation measures are adequately controlled by legal agreement and/or planning condition and that robust review and monitoring triggers are put in place to ensure those mitigation measures are implemented successfully. Each phase of the proposed expansion should only be		St Albans City and District Council		Please refer to the response to Ref P.1.21.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	permitted to continue if that review process shows that the assumptions made by the airport in relation to passenger numbers, noise, pollution or highway matters have been effectively realised as predicted, and that any agreed mitigation measures have been implemented.					
P.1.23	Policy aspirations for a 10% + uplift in biodiversity, detailed noise management / mitigation and the goal of delivering a net zero airport terminal operation by 2040, all require explanations, details, and links to multiple compliance mechanisms. The promotion of air travel cannot be deemed sustainable. The applicant needs to accept that. It may be the case that net zero is achievable in the energy used to run the airport terminals in the future. Transport to and from the airport, which must rise commensurate with the increased passenger numbers, is another matter fraught with speculation.	Chilterns Conservation Board			Please refer to the response to Ref P.1.21.	No
Development contributions						
P.1.24	Residents and Councillors are accustomed to developers mitigating the impact development has on the area through Section 106 and Community		Stevenage Borough Council	1	The impact of the Proposed Development has been assessed through the EIA process,	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Infrastructure Levy (CIL). As the Borough of Stevenage is going to be impacted by the Luton Airport expansion, it seems reasonable that Stevenage communities receive mitigation or improvements through the development. The Council would like to open discussions with Luton Rising on potential improvements and funding that will benefit the residents of Stevenage. One example may be funding towards improved public transport schemes across Stevenage with a focus on reducing carbon emissions.				and this includes any potential impacts in Stevenage. Where possible appropriate mitigation has been provided, including to mitigate transport impacts and carbon emissions. the proposals include a Community First fund which will be available to registered charities, community groups, and parish and town councils within the neighbouring areas to address local needs in areas of high deprivation or for decarbonisation projects anywhere within the eligible areas.	
P.1.25	EEAST consider that the Project is likely to give rise to significant effects (impacts) on its operational capacity, staff, vehicle fleet and estate assets which have not been baselined or sufficiently assessed by LLA to date. The Project is therefore considered likely to adversely impact on EEAST's ability to meet and deliver its targets and	EEAST		1	Following the 2022 statutory consultation the Applicant wrote to EEAST responding to the comments they provided during consultation; a response has not been received. However, the Applicant is willing to	No

Ref	Comment	PC	LA	No PILs	Response	Change
	priorities (statutory duties) as a key healthcare and emergency services provider. Identified impacts of the development are likely to require appropriate mitigation and management measures to be secured as part of a Section 106 planning obligation or Deed of Obligation, which ought to be reflected in the Environmental Statement and accompanying DCO documentation. The measures should include a process to assist EEAST and its health and blue light partners to plan for and implement co-ordinated responses to construction phase (and any other Scheme) incidents and accidents, in order to optimise patient outcomes. We trust this is of assistance and look forward to working with LLA to contribute to a complete Project Assessment, incorporating necessary mitigation and management measures to address the areas on interest and concern outlined above.				engage with EEAST in future.	
Housing						
P.1.26	In common with other local authorities in the area around LLA this Borough is tasked with accommodating very significant growth. Dacorum is looking to		Dacorum Borough Council	1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	deliver some 18,500 new homes to 2036 which will see growth in existing settlements.					
P.1.27	The counties of Bedfordshire, Buckinghamshire and Hertfordshire are already under enormous pressure for development as a result of their proximity to London, the success of their own existing local economies, and the growth anticipated (whether supported by a government-sponsored regional plan or not) in the Oxford-Cambridge Arc. Demand for new housing across these counties is already acute, and house prices here are already problematic for people on average wages –even those on the quoted average wage for airport employees (£41,000–Brochurep.30).	Chilterns Conservation Board			Noted.	No
P.1.28	The promised off-airport benefits for the local economies would themselves require additional land for employment development, and these new jobs, plus the new jobs associated with the airport expansion itself, would all add to the need to identify new land for housing.	Chilterns Conservation Board			Noted.	No
P.1.29	The presence of significant numbers of workers could foreseeably have an impact on the local availability of	United Kingdom Health		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	affordable housing, particularly that of short term tenancies and affordable homes for certain communities.	Security Agency				
P.1.30	The PEIR identifies the overall added FTE construction workforce during the construction period (620 FTE). It is assumed that the majority will be home based within the Luton TTWA. It would be useful and re-assuring for the ES to report on the peak number of construction workforce, including non home based workers, against each phase in order to confirm no significant impact on local housing needs or health and social care service provision.	United Kingdom Health Security Agency		1	Chapter 11 Employment and Economics in the ES [TR020001/APP/5.01] reports on the number of 'person years of employment per annum' for construction. In terms of the link to housing and healthcare need, Chapter 13 Health and Community in the ES [TR020001/APP/5.01] reports on the peak period of construction workers, as this is considered to be the worst case scenario in terms of impact at any given time.	No
Conflict of interest						
P.1.31	There is a clear conflict of interest with Luton Rising being owned by a sole shareholder Luton Borough Council who is the planning authority.	Kings Walden Parish Council		1	The ownership and operation of the airport is different to many other airports. Luton Rising (a trading name of London Luton Airport Limited), own the airport and are	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>the Applicant for the application for development consent for the Proposed Development under the Planning Act 2008. Luton Rising is wholly owned by LBC (100% shareholder), which means that the airport is effectively in public ownership.</p> <p>In 1998, the Applicant and LBC entered into a Concession Agreement with LLAOL for the management, operation, and development of the airport. This agreement, which lasts until 2031, means LLAOL has complete responsibility for, and control over, the day-to-day running of the existing airport.</p> <p>LBC and LLAOL are both key stakeholders to the Proposed Development and have been consulted</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>extensively as part of the application process. LBC is neither the applicant nor the Planning Authority for this application so there is no prospect of any conflict of interest for LBC. LBC is instead a statutory consultee in the same way as other host local authorities. LBC will consider the proposals and prepare a Local Impact Report in the same way that the other host authorities will. This will be considered by the Planning Inspectorate in its assessment of the proposals before making a recommendation to the Secretary of State for Transport who will make the final decision.</p>	
19 mppa application						
P.1.32	It is noted and recognised that on 1 December 2021, the local planning authority (Luton Borough Council)		Host Authorities	4	The 19 mppa planning application is being progressed by the airport	No

Ref	Comment	PC	LA	No PILs	Response	Change
	resolved to grant permission for the current airport operator (LLAOL) to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa. Since then, the Secretary of State for Levelling up, Housing and Communities has issued a “holding direction” which prevents Luton Borough Council from issuing a final decision while the Secretary of State considers whether he should call-in and decide the 19 mppa planning application. It would be helpful if the position with this application is resolved prior to the submission of the application for development consent for the Proposed Development to give greater certainty as to the baseline (albeit it is noted that LR have generally taken the 18 mppa as the baseline at this stage, which we support).				operator, LLAOL. The inquiry to consider the called-in 19 mppa application opened on Tuesday 27 September 2022 and ran until Friday 18 November 2022. At the time of submission of the application for development consent the outcome of the inquiry is still unknown.	
Other consents						
P.1.33	The operations of the facility will fall under the regulatory scope of the Environment Agency. It is therefore recommended that the applicant ensures the facility is constructed to comply with the requirements of the Medium Combustion Plant Directive (MCPD) and the Environmental	Environment Agency			Noted. The Applicant has consulted various technical teams within the Environment Agency including the permitting team. Permit requirements related to the Proposed Development have been	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>Permitting (England and Wales) (Amendment) Regulations 2018. Under the terms of the MCPD it is likely that a permit will be required before the plant can operate. The applicant is advised to contact us for further information and/or to apply for a permit by contacting our National Customer Contact Centre by email (enquiries@environment-agency.gov.uk) or by telephone (03708 506 506). Further advice is available on the gov.uk website: https://www.gov.uk/topic/environmental-management/environmental-permits</p>				identified and any required permits will be sought prior to operation in line with applicable legislation.	
P.1.34	<p>The proposed development needs to clarify the capacity and the regulatory regime [fuel storage] falls under. It may require a planning condition securing adequate pollution prevention measures is included on any planning permission granted and/or an Environmental Permit or a COMAH authorisation. Without adequate pollution prevention controls we would object to the proposal in line with paragraph 174 of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.</p>	Environment Agency			<p>The proposed fuel storage facility has been designed with appropriate pollution prevention measures and the capacity is confirmed in the application documents. The Applicant or future operator will comply with all applicable legislation, and appropriate permits and licences sought at the appropriate time. Risk and potential impact to groundwater is considered extensively in the design,</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					and ES [TR020001/APP/7.01] which is submitted as part the application for development consent.	
P.1.35	<p>Hazardous Substance Consent</p> <p>The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended.</p> <p>The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.</p> <p>Hazardous Substances Consent would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in</p>	Health and Safety Executive			The Applicant is seeking DCO from the Secretary of State under the Planning Act, which will be the principal consent for the Proposed Development. However, the DCO may need to be supplemented by other consent applications because a specific consent cannot be contained in the DCO, a consenting authority declines to allow a consent to be contained in the DCO, or it is not appropriate to include a consent within the DCO due to the stage of design	No

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>schedules 1 of these Regulations. Further information on HSC should be sought from the relevant Hazardous Substances Authority.</p>				<p>and level of detail available. The Applicant has prepared a Consents and Agreements Position Statement [TR020001/APP/2.03] which will be submitted as part the application for development consent, this will set out the permits, consents and agreements that may need to be sought separately to the DCO. This includes any permits required under the Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990.</p>	

Table A17.11: Regard had to statutory consultation responses on Planning comments - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change
Policy context and compliance				
P.2.1	Concern that the Proposed Development does not abide by national and/or local planning policy. Some respondents cite contradiction with the Luton local Plan and National Planning Policy Framework in allowing development at Wigmore Valley Park.	1	The application for development consent includes the Planning Statement [TR020001/APP/7.01] which assesses the proposals against relevant national and local planning policy, including policies relating to green and open space.	No
P.2.2	Concern that the Proposed Development is in breach of the Local Plan. Specific reference is made to the use of Eaton Green Road.	1	The Planning Statement [TR020001/APP/7.01] which forms part of this application for development consent considers the compliance of the Proposed Development with relevant local planning policy, including policies relating to green and open space.	No
P.2.3	Remaining with government policy, Luton's expansion leverages the spare capacity on its runway, unlike Heathrow's and Gatwick's expansion plans, for which new runways are required. With this regard, synergies can be drawn between the proposed expansion plans and the Government's policy of making best use of existing airport runways.	1	Noted.	No
Impact				
P.2.4	Concern that the Applicant will continue to seek expansion of the airport beyond that presented as part of this Proposed	5	This application for development consent seeks to expand the airport to 32 mppa in line with the Government policy of	No

Ref	Comment	No. PILs	Response	Change
	Development. Respondents are concerned that there is no guarantee of when growth at the airport will ever cease and that previous limits on growth have been breached, which does not set a reassuring precedent.		<p>making best use of existing runways. There is currently no intention for any further expansion beyond this.</p> <p>Compliance with existing planning conditions is a matter between the current operator, LLAOL, and the local planning authority.</p> <p>This application for development consent has been made by the airport owner, Luton Rising, to central Government, so it is not appropriate to compare it to historic commitments made in planning applications by the operator. Additionally, the DCO is a Statutory Instrument and as a result the Requirements (planning conditions) set within it will be enshrined in legislation.</p> <p>A Green Controlled Growth (GCG) framework which will ensure that the airport operates within particular “limits” is proposed. Limits will be set in respect of air quality, noise, surface access and carbon emissions. The relevant Limit will be specified in a way which reflects the ongoing growth of the airport over time. The full details of GCG are contained in the GCG Framework [TR020001/APP/7.08] submitted as part of this application for development consent. However, one of our GCG proposals is that where a Limit is breached, the airport will be unable to declare additional capacity until such time as it can be demonstrated by monitoring that the relevant environmental effect has fallen below the Limit.</p>	
P.2.5	Concern that the previous application to increase annual passenger numbers from	1	The 19 mppa planning application is being progressed by LLAOL and is separate to this application for development	No

Ref	Comment	No. PILs	Response	Change
	<p>18 to 19m, has been referred to the Secretary of State because there were over 1,000 objections to the application from local communities, which is clearly a significant matter, and will not be decided before the end of this round of consultation. However, the Proposed Development is progressing in increasing passenger numbers by c80% to 32m and inflict significant additional environmental damage on local communities. Additionally, local communities are currently exercising their statutory rights to consider bids to retain Wigmore Park as a local amenity, and this has not been considered within proposals.</p>		<p>consent. The 19 mppa application is subject to a separate Public Inquiry, the outcome of which was unknown at the time this application for development consent was submitted.</p> <p>The environmental impact of the Proposed Development has been assessed and reported in the ES [TR020001/APP/5.01] submitted with this application for development consent. The Proposed Development seeks to maintain as much of Wigmore Valley Park as possible and proposes at least 10% more public open space than what currently exists.</p>	
P.2.6	<p>Concern that there will be a negative impact from the population growth resulting from the Proposed Development. Respondents are concerned that there is not a sufficient level of physical and social infrastructure in the area to support such growth, and that there is already a lack of housing locally, which the increased employment opportunities from the Proposed Development will exacerbate.</p>	7	<p>It is intended that most of the new jobs created by the Proposed Development will go to local people. Rather than requiring more physical and social infrastructure this is aimed at reversing the current daily net migration of people working away from Luton. The Employment and Training Strategy [TR020001/APP/7.05] submitted with this application for development consent sets out proposals to create an environment in which the local community can benefit from the employment opportunities created by the Proposed Development, during both construction and operation. More generally, managing the infrastructure impacts of population growth is a matter for the Local Planning Authorities and cannot be addressed through the Proposed Development.</p>	No

Ref	Comment	No. PILs	Response	Change
			The environmental impacts of the Proposed Development, including noise, traffic, and pollution, have been carefully considered and assessed as part of this application for development consent. The impacts and proposed mitigation measures are set out in the application documents, in particular the ES [TR020001/APP/5.01] and the GCG Framework [TR020001/APP/7.08] .	
Baseline				
P.2.7	It is critical to LLAOL that all obligations (including associated costs), restrictions, and powers approved under the DCO will only apply to growth above the consented baseline position as of the date the DCO is granted (which we expect to be 19mppa) and which is implemented under the terms of the DCO, and where such obligations would fall to LLAOL, that they are agreed with LLAOL. As such, the DCO obligations should only apply above 19mppa.	1	Engagement with LLAOL on their obligations has continued since the 2022 statutory consultation and will continue beyond submission of the application for development consent.	No
Mitigation and control mechanism				
P.2.8	Suggest that the Applicant abide by existing planning conditions.	4	Please refer to the response to Ref P.2.4.	No
P.2.9	Concern that the Applicant has historically not delivered on previous commitments made, including those in planning conditions and/or there is a lack of trust in	35	Please refer to the response to Ref P.2.4.	No

Ref	Comment	No. PILs	Response	Change
	the Applicant. Some respondents specifically referenced breaches in environmental limits (including noise), poor track record of environmental monitoring, promised improvements to public transport have not materialised, previous complaints have not been addressed with no enforcement action taken, and promised economic benefits have not been realised.			
P.2.10	LLAOL already operates under a series of strict environmental controls and understands the need for measures to be implemented to support with mitigation of environmental effects as passenger numbers grow. Section 6 of the Consultation Brochure identifies numerous obligations on the Applicant with this regard. LLAOL wishes to cooperate with the Applicant in finding practical and cost effective ways to deliver the necessary mitigation measures.	1	Noted. LLAOL has been engaged with the Applicant throughout the preparation of the application for development consent.	No
Determination process				
P.2.11	Suggest that an independent third party body manages the Airport and/or airport expansion.	1	The Planning Inspectorate are an independent body who will consider the application for development consent before making a recommendation to the Secretary of State who will make the final decision.	No
P.2.12	Suggest that the Proposed Development should be called in by the Government and every aspect thoroughly investigated.	1		

Ref	Comment	No. PILs	Response	Change
P.2.13	Suggest that the Proposed Development requires an independent review.	1	In respect of ongoing management of the airport, this will be the responsibility of Luton Rising, as the airport owner, and the airport operator.	
P.2.14	Note that a balance needs to be made between allowing the airport to function and requirements of local residents.	1	Noted.	No
Development contributions				
P.2.15	Suggest improvements to the local area should be made to accommodate the forecasted population growth. Respondents suggest that Luton town centre should be revitalised, schools should be improved, infrastructure should be invested in, more hotels should be developed and more housing should be provided to meet the needs identified through local and national policy.	2	Please see response to Ref P.2.6. More generally, managing the infrastructure impacts of population growth is a matter for the Local Planning Authorities and cannot be addressed through these proposals.	No
P.2.16	Query whether LBC has ever given any benefits to their affected neighbours since owning the Airport.	1	Since 2002, the Applicant has provided more than £150 million to local charities and voluntary organisations. The proposals include a new Community First fund, which will allow for much greater support for community projects in Luton and the neighbouring counties.	No
Conflict of interest/airport ownership				

Ref	Comment	No. PILs	Response	Change
P.2.17	Concern that there is a conflict of interest between LBC's ownership role and role as the Local Planning Authority. Some respondents cite that LBC would not oppose the Proposed Development as they receive economic benefits from the Airport's operation and/or do not take enforcement action due to the revenue the Airport brings.	19	Please refer to the response to Ref P.1.31.	No
P.2.18	General concern about current and/or future operation of the Airport and lack of trust in the organisations involved in its ownership and operation. Some respondents cite lack of transparency regarding finances and decision making; no community representation on Airport Board, poor management and customer services; and lack of skills and expertise to facilitate airport growth.	2	<p>Comments about current operation of the airport should be directed to LLAOL as the operator.</p> <p>In respect of the Proposed Development, this application for development consent sets out the approach to the future operation of the airport commensurate with an application for development consent. More detailed operational matters will be agreed in due course.</p>	No
P.2.19	Support the Airport being owned by LBC. With some respondents citing that airport growth is for the benefit of Luton and not driven by shareholders.	1	Noted.	No
P.2.20	Suggest that the Airport remains in public ownership.	1	There is no intention to change the ownership structure of the airport. It will continue to be owned by Luton Rising, who is wholly owned by LBC (100% shareholder), which means that the airport is effectively in public ownership.	No

Ref	Comment	No. PILs	Response	Change
19 mppa application				
P.2.21	Concern about LLAOL's 19 mppa application.	1	Please refer to response to Ref P.1.32.	No
Other planning applications/powers				
P.2.22	Query the reason for expanding to 32 mppa considering that the airport has existing consent to increase its capacity to 18 mppa over a 15 year period up to 2028.	1	<p>The airport has reached its maximum consented capacity of 18 mppa, as per its last planning approval. There is currently a separate application by LLAOL to expand to 19 mppa.</p> <p>This application for development consent seeks to expand the airport to 32 mppa in response to the demand forecasts for the airport which are in line with the Government's overall projections for the growth in air passenger demand over the period to 2040 and beyond.</p>	No
P.2.23	Regarding current planning consents, LLAOL requests that the Applicant ensures that the DCO does not affect any existing planning permissions and conditions or those that will be in effect prior to the grant of the DCO. LLAOL also draws the Applicant's attention to section 17 of LLAOL's Consultation Response herein, referring to 'Management of change once the DCO is granted,' within which further requirements insofar as current and future planning permissions are detailed	1	The relationship between the Proposed Development and any extant planning permissions and conditions is explained within Chapter 2 Site and Surroundings of the ES [TR020001/APP/5.01] and the Planning Statement [TR020001/APP/7.01] .	No

Ref	Comment	No. PILs	Response	Change
Management of change once DCO granted				
P.2.24	Currently, LLAOL has the ability to seek new planning permissions – authorising new physical development or changes to the operational restrictions through variations to planning conditions. It is of utmost importance that LLAOL retains the ability to seek authority for such matters once the DCO is granted.	1	The relationship between the Proposed Development and any extant planning permissions and conditions is explained within Chapter 2 Site and Surroundings of the ES [TR020001/APP/5.01] and the Planning Statement [TR020001/APP/7.01] .	No
P.2.25	In the future, if there is a need for LLAOL to (a) vary any operational restrictions governed by the DCO or (b) make changes to the physical development authorised by the DCO, LLAOL will need the ability to seek changes to the DCO via variations.	1	Engagement with LLAOL has continued since the 2022 statutory consultation and will continue beyond submission of the application for development consent.	No
P.2.26	LLAOL wishes to ensure its ability to apply for such variations is facilitated insofar as possible by the way the DCO is drafted. This should be possible provided that the “undertaker” is appropriately defined in the DCO such that it can include the Concessionaire as well as the Applicant (where relevant). This will be necessary in any event to ensure that LLAOL will have the benefit of the powers to carry out some of the near-term stages of development for which the DCO will seek consent prior to the construction of terminal 2.	1	Engagement with LLAOL has continued since the 2022 statutory consultation and will continue beyond submission of the application for development consent.	No

Table A17.12: Regard had to statutory consultation responses on Planning comments - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
Policy context and compliance				
P.3.1	Concern that the Proposed Development does not abide by national and/or local planning policy. Some respondents cite contradiction with the Luton local Plan and National Planning Policy Framework in allowing development at Wigmore Valley Park.	7	Please refer to the response to Ref P.2.1.	No
P.3.2	Suggest that the application for development consent demonstrates and/or abides by local and national planning policy.	2	Local and national planning policy has been taken into consideration in developing the scheme. The application for development consent includes the Planning Statement [TR020001/APP/7.01] which assesses the proposals against relevant national and local planning policy.	No
Impact				
P.3.3	Concern that there will be a negative impact from the population growth resulting from the Proposed Development. Respondents are concerned that there is not a sufficient level of physical and social infrastructure in the area, that there is a lack of housing, that green belt land is at risk of development, and that there may be an increase in noise, traffic, and/or pollution.	69	Please refer to the response to Ref P.2.6.	No

Ref	Comment	No. CC	Response	Change
P.3.4	Concern that the Applicant will continue to seek expansion of the airport beyond that presented as part of this Proposed Development. Respondents are concerned that there is no guarantee of when growth at the airport will ever cease and that previous limits on growth have been breached, which does not set a reassuring precedent.	28	Please refer to the response to Ref P.2.4.	No
Mitigation and control mechanism				
P.3.5	Suggest that the airport complies with existing environmental limits rather than expanding.	18	Please refer to the response to Ref P.2.4.	No
P.3.6	Concern that the Applicant has historically not delivered on previous commitments made, including those in planning conditions and/or there is a lack of trust in the Applicant. Some respondents specifically referenced breaches in environmental limits (including noise), poor track record of environmental monitoring, promised improvements to public transport have not materialised, previous complaints have not been addressed with no enforcement action taken, and promised economic benefits have not been realised.	393	Please refer to the response to Ref P.2.4.	No
P.3.7	Suggest that the airport operator and/or airlines be incentivised to operate within limits imposed by existing planning permissions.	3	The airport operator, LLAOL, has proposed adjustments to the current limits and these are the subject of a separate planning application and public inquiry. The operator is committed to taking the necessary action to stay within the proposed limits.	No

Ref	Comment	No. CC	Response	Change
P.3.8	Suggest that fixed timescales for delivering mitigation be conditioned as part of the DCO.	1	The timing of the delivery of mitigation will be appropriately controlled through the DCO process.	No
P.3.9	Suggest that where the Environmental Scrutiny Group consider a mitigation plan is required, it should be funded by the Airport Operator and this should be conditioned in the DCO.	1	As set out in the GCG Framework Appendix A: Draft ESG – Terms of Reference [TR020001/APP/7.08] and GCG Framework Appendix B: Draft Technical Panels - Terms of Reference [TR020001/APP/7.08] submitted with this application for development consent, the reasonable travel and secretarial costs of the ESG and technical panels, as well as reasonable costs of the involvement of the ESG chair, independent aviation specialist and independent experts will be funded by the airport operator. This is secured by a requirement to the draft DCO [TR020001/APP/2.01] .	No
P.3.10	Suggest that the Applicant abide by existing planning conditions.	20	Please refer to the response to Ref P.2.4.	No
P.3.11	Suggest no expansion until a mitigation plan is agreed with relevant stakeholders and implemented.	1	Appropriate mitigation measures and implementation plans have been the subject of extensive discussion with multiple stakeholders. Proposed mitigation is set out as part of this application for development consent in several documents, most notably the ES [TR020001/APP/5.01] .	No
Determination process				
P.3.12	Support the Secretary of State for Transport being responsible for making a decision on the application for development consent, and not the Local Planning Authority.	2	Noted.	No

Ref	Comment	No. CC	Response	Change
P.3.13	Suggest that the Government reviews the final Proposed Development to allow for a balanced decision.	5	Please refer to the response to Ref P.2.11.	No
P.3.14	Suggest that an independent third party body manages the Airport and/or airport expansion.	8	Please refer to response to Ref P.2.11 in respect of determination of the application for development consent. In respect of ongoing management of the airport, this will be the responsibility of Luton Rising, as the airport owner, and the airport operator.	No
P.3.15	Suggest that there should be two separate planning applications for each phase of construction.	1	The application for development consent seeks permission for the entire Proposed Development in order to understand the impacts in their entirety and avoid 'salami slicing'. This approach enables the most appropriate mitigation to be identified and planned from the start.	No
P.3.16	Suggest that the Proposed Development requires an independent review.	1	Please refer to response to Ref P.2.11.	No
P.3.17	Suggest that the Applicant appoint local community members to challenge the arguments that are in favour of airport expansion.	1	In developing the Proposed Development, consultation with the local community and other stakeholders has been held to inform the scheme. This includes statutory consultation in 2019 and 2022. All comments received have been carefully considered and responded to in this Consultation Report [TR020001/APP/6.01] .	No
Development contributions				
P.3.18	Suggest improvements to the local area should be made to accommodate the forecasted population growth. Respondents suggest that Luton town	7	Please refer to the response to Ref P.2.6.	No

Ref	Comment	No. CC	Response	Change
	centre should be revitalised, schools should be improved, infrastructure should be invested in, more hotels should be developed and more housing should be provided to meet the needs identified through local and national policy.			
P.3.19	Suggest local towns, including Luton, should be improved and regenerated, which could also provide a form of employment for the community. Respondents suggest cleaning town centres, removing graffiti, increasing awareness of waste, reducing vehicle speeds, as well as promoting interpersonal skills, arts and crafts, music, and sport.	5	The regeneration of existing towns is generally a matter for local authorities to manage. However, the proposals include a Community First fund which will be available to registered charities, community groups, and parish and town councils within the neighbouring areas to address local needs in areas of high deprivation or for decarbonisation projects anywhere within the eligible areas.	No
Conflict of interest/airport ownership				
P.3.20	Concern that there is a conflict of interest between LBC's ownership role and role as the Local Planning Authority. Some respondents cite that LBC would not oppose the Proposed Development as they receive economic benefits from the Airport's operation and/or do not take enforcement action due to the revenue the Airport brings.	195	Please refer to the response to Ref P.1.31.	No
P.3.21	General concern about current and/or future operation of the Airport and lack of trust in the organisations involved in its ownership and operation. Some respondents cite lack of transparency regarding finances and decision making; no community representation on Airport	47	Please refer to the response to Ref P.2.18.	No

Ref	Comment	No. CC	Response	Change
	Board, poor management and customer services; and lack of skills and expertise to facilitate airport growth.			
P.3.22	Support the Airport being owned by LBC. With some respondents citing that airport growth is for the benefit of Luton and not driven by shareholders.	4	Noted.	No
P.3.23	Suggest that the Airport remains in public ownership.	3	Please refer to the response to Ref P.2.20.	No
P.3.24	Suggest that LBC sell the Airport. With some respondents suggesting that the money from the sale be invested in nearby communities.	2	Please refer to the response to Ref P.1.31. There is no intention to sell the airport which generates significant dividends that are returned to LBC, along with numerous grants to Community Funding Programmes.	No
19 mppa application				
P.3.25	Concern about LLAOL's 19 mppa application.	6	Please refer to response to Ref P.1.32.	No
Other planning applications/powers				
P.3.26	Query the reason for expanding to 32 mppa considering that the airport has existing consent to increase it's capacity to 18 mppa over a 15 year period up to 2028.	1	Please refer to the response to Ref P.1.32.	No
P.3.27	Concerns relating to the New Century Park permission.	2	The Green Horizons Park development is the planning permission formerly known as New Century Park (NCP). The Proposed Development supersedes much of the development consented as Green Horizons Park LBC ref: 17/02300/EIA. The key changes and relationship with the	No

Ref	Comment	No. CC	Response	Change
			Proposed Development are summarised in Chapter 2 Site and Surroundings of the ES [TR020001/APP/5.01] .	
Other				
P.3.28	Suggestion that the airport should not be expanded and that instead efficiencies should be improved by assessing the impact of previous growth plans once they have been completed.	1	In designing the Proposed Development previous growth at the airport has been considered. More information about how capacity and demand has increased over time at the airport is set out in the Need Case [TR020001/APP/7.04] submitted as part of this application for development consent.	No
P.3.29	Concern that complaints continue to not be addressed by the Applicant and/or airport operator.	21	Any complaints regarding the current operation of the airport should be addressed to LLAOL as the airport operator, rather than the Applicant.	No
P.3.30	Suggest that the consultation document for the Development Consent Order itself sets out data in an open and transparent way, so it is clear for all to understand the impact of the operator's plans.	1	All information submitted with this application for development consent will be available on the Planning Inspectorate website, in a similar way to all other applications for Nationally Significant Infrastructure Projects.	No

A18: CONSULTATION AND STAKEHOLDER ENGAGEMENT

Table A18.13: Regard had to statutory consultation responses on Consultation - Planning Act 2008: Section 42 – Prescribed consultees and local authorities

Ref	Comment	PC	LA	No PILs	Response	Change
General						
CON.1.1	Overall, we consider significant progress has been made in the breadth, clarity and quality of the published material and we look forward to working further with LR as matters progress towards an application.		Host Authorities	4	Noted.	No
CON.1.2	In providing a single joint response in the form of the WSP report and this document, the HAs emphasise the value of engagement wherever possible on a joint and co-ordinated basis throughout the DCO process. That said, the overall position of the authorities on the Proposed Development remains a matter for each authority and this document does not preclude individual authorities from expressing their views on the Statutory Consultation material as well as the overall case for or acceptability of the Proposed		Host Authorities	4	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	Development. However, the views expressed in this document are shared by all four authorities and for clarity the word 'we' in this document refers to those authorities.					
CON.1.3	Generally speaking, we consider that the quality and clarity of the material presented at this second Statutory Consultation is much improved and the description of the development parameters (including the Worst Case Scenario) and the phasing of the development is now generally much clearer and understandable. We consider that the works descriptions are considerably more developed although LR will need to justify that the flexibility proposed in relation to the Worst Case Scenario is no more than absolutely necessary.		Host Authorities	4	Noted.	No
CON.1.4	Whilst Central Bedfordshire Council recognises that since the initial statutory consultation in late 2019, Luton Rising have made significant improvements to the way in which the Host Authorities		Central Bedfordshire Council	1	Noted. Regular engagement with Central Bedfordshire has continued since the 2022 statutory consultation.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	have been engaged, both at higher level with the more regular Policy Officer briefings and meetings, as well as the more detailed technical meetings with specialist Officers from the Host Authorities; we still have a number of concerns and outstanding issues, as set out below, which are yet to be satisfactorily resolved.					
CON.1.5	It is welcomed that Luton Rising and their consultants have been engaging with Central Bedfordshire Officers since the first statutory consultation in 2019 and it is expected that this will continue throughout the DCO process.		Central Bedfordshire Council	1	Noted. Engagement with Central Bedfordshire has continued since the 2022 statutory consultation.	Yes
CON.1.6	The high level details of the proposed development are currently insufficient for NATS to make a formal representation highlighting specific issues. However, NATS will be happy to collaborate with the relevant stakeholders in order to review further information as it becomes available. NATS will also be willing to work with all interested	NATS		1	Noted. Engagement with NATS has continued since the 2022 statutory consultation.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	parties in order to understand the impact and identify any solutions that may be required in order to help deliver the proposal.					
CON.1.7	We are pleased that Luton Rising has engaged with the residents of Stevenage in respect of your proposals for the expansion of Luton Airport, including a leaflet drop to all residences in the Borough and the in-person event at Stevenage Arts and Leisure Centre.		Stevenage Borough Council	1	Noted.	No
CON.1.8	Could I ask you to keep me in the loop as matters progress in order to determine whether there is any direct impact on BT buildings in and around the Luton area please.	BT Group PLC		1	Noted. Engagement with BT Group has continued since the 2022 statutory consultation.	Yes
CON.1.9	Royal Mail welcomes the extensive consultation time and work that has been put in by LLAL / Luton Rising and Arup subsequent to Royal Mail's initial consultation response on August 2018. It has enabled Royal Mail to assess the risks presented by	Royal Mail Group		1	Noted.	No

Ref	Comment	PC	LA	No PILs	Response	Change
	the scheme and identify appropriate mitigating measures.					
CON.1.10	The Statutory Consultation 2022 documents provide an excellent level of information that has assisted Royal Mail in assessing risk to its business during the construction phase and operational phase.	Royal Mail Group		1	Noted.	No
CON.1.11	Royal Mail carried out an initial review of the potential risks presented by this scheme in July 2018, since which time London Luton Airport Limited (LLAL) / Luton Rising and its consultants Arup have been very attentive and helpful in providing information about the scheme as it progressed.	Royal Mail Group		1	Noted.	No
CON.1.12	We note that the present documentation, which now runs to in excess of 15,000 pages, devotes 1,538 pages to feedback on the 2019 consultation. The amount of documentation is now so comprehensive that it is not possible, without the sort of resources available to	Slip End Parish Council		1	Information was provided in a variety of formats as part of the 2022 statutory consultation. Non-technical documents included the Consultation Brochure, Summary and FAQ, and Consultation Boards which provided a high level	No

Ref	Comment	PC	LA	No PILs	Response	Change
	organisations such as the LLAOL, to respond effectively to it. However, our serious concerns about the airport expansion remain.				summary of the Proposed Development and sign posted to more technical documents. A balance was sought in providing the necessary technical detail whilst also ensuring documents were written in a non-technical style and in plain English.	
CON.1.13	We congratulate you on the comprehensiveness of your documentation (which is twelve times longer than Tolstoy's War and Peace), but can see no benefit within it for the community of Slip End Parish. We therefore strongly oppose your proposals.	Slip End Parish Council		1	Noted.	No
CON.1.14	On 9 February 2022 Dacorum was notified that it was a Host Authority for the application. It is unclear whether this was in response to a change in the boundary at that time or as a result of an oversight. Nonetheless, prior to that Dacorum had been participating in the process as a Neighbouring Authority.		Dacorum Borough Council	1	Following a review of draft Order Limits for the Proposed Development before the start of the 2022 statutory consultation it was identified that a small area of highway works within the draft Order Limits was located inside Dacorum Borough. The draft Order Limit red line was not amended between 2019 and 2022 and as such Dacorum Borough Council should have	No

Ref	Comment	PC	LA	No PILs	Response	Change
					been consulted as a host authority, rather than neighbouring authority, in 2019.	
CON.1.15	[Ch 16 of PIER data on noise levels in 2027] These numbers ought to be have been mentioned in the consultation brochure.	United Kingdom Health Security Agency		1	The Consultation Brochure was intended to provide a summary and signpost where more detailed information could be found, this included a signpost to Chapter 16 Noise and Vibration in the PIER. The Consultation Brochure included a description of the noise effects focusing on 2043 because this is identified as the worst-case year i.e., where Proposed Development noise contours cover the largest area and the difference between the following scenarios is the greatest.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CON.1.16	UKHSA recommends that the Applicant considers whether immersive audio-visual simulations at future consultation events may help local communities better understand the potential impacts that the Scheme may have on their neighbourhood and their health and quality of life.	United Kingdom Health Security Agency		1	No further rounds of consultation are scheduled as part of the preparation of the application for development consent, however this will be considered should future consultations be undertaken.	No
CON.1.17	National Highways is eager to continue collaborative arrangements between our organisations to find solutions and make progress to ahead of your DCO submission. We are confident that Luton Rising has the capability to address these issues in the time available and would encourage the Project Team to continue engaging with us through a series of structured meetings to address the issues raised in this response at the earliest opportunity. National Highways is keen to help facilitate the successful delivery of the Luton Rising project, whilst protecting the future safe and effective operation of the SRN.	National Highways		1	Noted. Engagement with National Highways has continued since the 2022 statutory consultation, included through structured meetings.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
2019 Statutory Consultation Feedback Report						
CON.1.18	In the Feedback Report Appendix A/1 there are comments which relate to specific points raised by SEPC, though, of course, there are other issues which we share with other respondents. Essentially there are two directions of reply from LLAOL. The first is to sweep everything environmental into the Green Controlled Growth (GCG) plan (e.g. our comments 3.1.46 (impact of doubling flight numbers), 3.1.68 (current noise levels), 3.1.80 (increased noise levels)), the second is to just say it is not being considered, marked by 'no' in the right hand column (such as 4.1.22 (wide body jets), 5.1.21(emissions monitoring west of the airport), 5.1.47 (fixed point monitoring strategy)). We cannot find a response to the issue of 'fly parking' in the parish.	Slip End Parish Council		1	This application for development consent is submitted by Luton Rising and as such the responses to comments set out in this Consultation Report are provided by Luton Rising, not LLAOL. GCG is an important aspect of the Proposed Development and, where relevant, reference was made to this as the mechanism through which the Applicant proposes to manage potential environmental effects. The righthand most 'Change' column in the Appendix to the 2019 Statutory Consultation Feedback Report recorded whether a change has been made to the Proposed Development in response to comments - it does not indicate that a comment was not considered. All comments received were considered carefully, and the responses provided in the	No

Ref	Comment	PC	LA	No PILs	Response	Change
					<p>Report set out why it was not appropriate to change the scheme in response to some comments.</p> <p>Fly parking was an issue raised in the 2019 consultation. The response included in the 2019 Statutory Consultation Feedback Report noted that the Applicant cannot comment on illegal car parks off site as it is a matter for the relevant local authority to address.</p>	
CON.1.19	<p>The Applicant should clarify if in the 2019 Statutory Consultation Feedback, concern over existing and potential future increases in noise pollution were in relation to just quality of life, or also health (16.4.1 a). Given that the issue of health and quality of life featured so prominently, it is important that the Applicant gives it appropriate consideration in its assessments for the final ES.</p>	<p>United Kingdom Health Security Agency</p>		1	<p>The Health Impact Assessment in Chapter 13 Health and Community of the PEIR (presented at the 2022 statutory consultation) assessed the likely significant effects of the Proposed Development on the physical and mental health and wellbeing of local residents. The assessment identified that there could potentially be negative effects on health for some people in certain locations due to changes to the environmental</p>	No

Ref	Comment	PC	LA	No PILs	Response	Change
					conditions, particularly noise, as a result of increased aircraft movements. See for example Appendix A12, Reference 12.1.3 of the 2019 Statutory Consultation Feedback Report, which is duplicated in Appendix M of this Consultation Report. The assessment included in Chapter 13 Health and Community of the PEIR has been updated and can be found in Chapter 13 Health and Community of the ES [TR020001/APP/5.01] submitted as part of this application for development consent.	
Future engagement						
CON.1.20	We recognise that there have been on-going discussions between LR and the HAs since the first Statutory Consultation and this has been welcomed. Whilst in some topic areas this has been more information sharing rather than interactive engagement, we particularly welcome the discussions on		Host Authorities	4	Noted. Engagement with the Host Authorities has continued since the 2022 statutory consultation.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	Green Controlled Growth (GCG) and the work of the Noise Envelope Design Group (NEDG).					
CON.1.21	Whilst we consider that progress is being made as to the drafting of the application, there are still areas of concern and a lack of clarity around certain aspects of the proposals and associated environmental impact assessment work. There are some topics where there is still more information to be provided and further discussion would be needed and welcomed prior to the application being submitted including inter alia, noise, surface access, and landscape and visual assessment, as well as discussion around the various control, mitigation and compensation documents.		Host Authorities	4	Noted. Engagement with the Host Authorities has continued since the 2022 statutory consultation, including in respect of noise, surface access, landscape and visual assessment, and the various control, mitigation, and compensation documents.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
CON.1.22	We consider that further engagement on key aspects such as noise, surface access, landscape, Green Controlled Growth and the Employment Training Strategy in particular should continue in the coming months. Detailed discussions regarding the drafting of the Development Consent Order itself, including mitigation and compensation proposals and protective provisions for the HAs also needs to take place prior to the application being made.		Host Authorities	4	Noted. Engagement with the Host Authorities has continued since the 2022 statutory consultation, including in respect of noise, surface access, landscape, GCG, the Employment and Training Strategy, the Development Consent Order itself, as well as mitigation, compensation proposals and protective provisions.	Yes
CON.1.23	We are pleased to see that much progress has been made since the first consultation and welcome the strong focus on the environment and green growth.		Luton Borough Council	1	Noted.	No
CON.1.24	The Council's Public Health team raise specific comments in relation to a number of areas, including: the need to call on the expertise of voluntary, community and social enterprise organisations in the area.		Luton Borough Council	1	Noted. More detailed comments were provided and are responded to in the Need Case and Wigmore Valley Park topics contained in this document.	No

Ref	Comment	PC	LA	No PILs	Response	Change
CON.1.25	Together with the other host authorities the County Council has been engaging technically with you on your emerging scheme, both prior to and since the first statutory consultation. That process has also involved local authorities and other agencies.		Hertfordshire CC	1	Noted.	No
CON.1.26	The host authorities have commissioned the same consultancy services to prepare a further Technical Review to assist in responding to this second statutory consultation. With your consent, the host authorities' and your consultancy teams have been liaising during the consultation period and this engagement has hopefully proved to ensure the output of the Technical Review and collective response is as productive as it possibly can be. It will provide a platform from which to focus our ongoing engagement in the period up to submission and beyond.		Hertfordshire CC	1	A briefing session was held on 1 March 2022 with WSP who were appointed by the host authorities to review and comment on the consultation documents, in particular the PEIR. This session provided an overview of the PEIR, a summary of the changes since the 2019 statutory consultation and contact details of the Applicant's technical specialist leads. WSP's technical specialists were also contacted directly by the relevant project team member to offer topic specific meetings or answer questions via email. Additional briefing sessions were offered to the Host	No

Ref	Comment	PC	LA	No PILs	Response	Change
					Authorities and WSP during the consultation period to answer any questions. The Applicant is pleased this engagement proved helpful and the Host Authorities were able to confirm on 28 March 2022 that they were satisfied that their queries had been resolved.	
CON.1.27	<p>You will recall that the host authorities' and the County Council's own response to the first statutory consultation raised concerns about the nature of engagement to that point and the need for this to be substantively improved moving forward. Significant progress has been made in this regard, though as the collective response states, this has been more productive in some areas than others. I hope we can sustain and improve the nature of our engagement moving forward.</p>		Hertfordshire CC	1	Noted. Engagement with Hertfordshire County Council has continued since the 2022 statutory consultation.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
CON.1.28	Whilst the Applicant asserts that significant changes have been made in respect of this present proposed application against previous applications the magnitude of the proposed expansion and its impacts are near identical in practice and accordingly there is no substantive difference between these and previous proposals.		Dacorum Borough Council	1	Key changes were made to the Proposed Development in response to the feedback received during the 2019 statutory consultation. These changes were described in the 2019 Consultation Feedback Report which was published during the 2022 statutory consultation and included, for example, the introduction of GCG, changes to the footprint of the airfield and the amount of earthworks, and the inclusion of the Airport Access Road.	No
CON.1.29	We would be pleased to be closely involved in any working groups and the continued development of further detailed assessments as they emerge.		Dacorum Borough Council	1	Engagement with Dacorum Borough Council has continued since the 2022 statutory consultation including through their role on the Planning Officers Coordination Group (POCG).	No
CON.1.30	We would be grateful if the Council could be informed of all future consultation and informed of key stages in the proposal's development, including submission of the application to the Planning Inspectorate.	Welwyn Hatfield Borough Council		1	No additional further formal consultation was undertaken on the Proposed Development after the 2022 statutory consultation, with the exception of a targeted consultation for landowners.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
					Prescribed consultees, including Welwyn Hatfield Borough Council, have been notified of the submission of the application for development consent.	
CON.1.31	We advise that the Chilterns Conservation Board remain to be consulted by the determining authority about this scheme. The Board's contribution will, we believe, be necessary for a full understanding about how the airport expansion scheme would impact on the Chilterns AONB, given their detailed knowledge of the area, its special qualities, other major development pressures and its potential susceptibility to this sort of development.	Natural England		1	A response to the comments raised by the Chilterns Conservation Board was sent after the 2022 statutory consultation.	Yes
CON.1.32	If you have any queries relating to the advice in this letter please contact me on [REDACTED] or by email [REDACTED]@naturalengland.org.uk . Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would	Natural England		1	Engagement with Natural England has continued since the 2022 statutory consultation.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	be happy to provide advice through our Discretionary Advice Service. Should the proposal change, please consult us again.					
CON.1.33	In terms of the impact of the development on Grade II listed assets, we would expect the historic environment advisors to the Local Planning Authorities to provide comments (and we do not intend to offer comments).	Historic England		1	The host local authorities commissioned WSP to provide comments on the PEIR, which included comments on the cultural heritage assessment. These comments have been considered carefully in developing the proposal.	No
CON.1.34	It is also requested that Royal Mail is invited to join the Traffic Management Group for Luton Rising. The relevant operational contact for this will be: Royal Mail Special Events Planner for Eastern Region, currently [REDACTED]	Royal Mail Group		1	It is assumed that the 'Traffic Management Group' refers to the Construction Traffic Management Group which would be formed at the time of construction. Members of this group will be confirmed at the time of formation, and the request for Royal Mail to be included is noted.	No
CON.1.35	Royal Mail would be pleased to have the opportunity to review and comment on a revised Draft Outline Construction Traffic Management Plan and an associated Draft DCO	Royal Mail Group		1	Engagement with Royal Mail has continued since the 2022 statutory consultation, including in respect of the proposed approach to	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	Requirement to include wording along the lines of the above.				managing construction traffic and DCO requirements.	
CON.1.36	Royal Mail would be willing to assist with preparation of a Statement of Common Ground, if required by Luton Rising to assist with the future DCO Examination.	Royal Mail Group		1	The comments made by Royal Mail cover standard operational concerns, a separate agreement will be progressed with them prior to construction. This is a more appropriate route than a SoCG.	Yes
CON.1.37	A starting point for a more positive relationship between the airport and its environment would be to recognise more explicitly (both in the proposals and in the long-term operation of the airport) its location within the Chiltern Hills and its relationship with the designated protected landscape of the Chilterns AONB. The CCB would welcome the opportunity to discuss making the most of this relationship in more detail, whether or not the expansion goes ahead.	Chilterns Conservation Board			Please see response to Ref CON.1.31	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
CON.1.38	The CCB would like the opportunity to engage more directly with development the open space and landscaping proposals. While the areas in question are not currently within the designated AONB, they could in future be a part of the extended area, and, in any case, we have experience and expertise in this area that we believe could be of value to the best implementation of these elements of the project. In addition, there is also the possibility that these programmes could be linked with other work that we are involved with in the Luton area, including our Chalkscapes project.	Chilterns Conservation Board			Please see response to Ref CON.1.31	Yes
CON.1.39	We would like to build a more constructive relationship with the airport's owners and operators to see how the airport could become more of a net contributor to the conservation and enhancement of the Chilterns AONB, perhaps building on initiatives like our Chalkscapes project mentioned above. We look forward to	Chilterns Conservation Board			Please see response to Ref CON.1.31	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	working with Luton Rising in the future.					
CON.1.40	We would also welcome opportunities to discuss the design and management of landscaping within the airport to maximise opportunities for the conservation and recovery of nature here, as well as the enhancements proposed with regard to open spaces to the east and south.	Chilterns Conservation Board			Please see response to Ref CON.1.31	Yes
CON.1.41	The wider community engagement proposed could form an important element of mitigation of significant health effects and particularly mental health. The PEIR does not however identify opportunities to work through partners and local Voluntary, Community and Social Enterprise (VCSE) organisations. These organisations offer the potential for engagement with vulnerable groups and may gain greater acceptance by the wider community. It is unfortunate that	United Kingdom Health Security Agency		1	Community engagement has been ongoing throughout the project life cycle. The Applicant undertook a joint community workshop in 2019 (prior to the Covid pandemic) with local VCSEs to share information and gain feedback. Ahead of 2022 statutory consultation a workshop was held with North Hertfordshire County Council, LBC, and Central Bedfordshire Council to present the approach to	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	<p>this issue was identified in the previous PEIR consultation and remains outstanding.</p>				<p>engaging with hard-to-reach groups and agree any further contacts or methods of engagement. The Applicant has undertaken extensive engagement with community groups throughout the development of the project as described in this Consultation Report. Additionally, the CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02], submitted as part of this application for development consent, has a requirement for a community engagement plan to maintain effective community engagement throughout construction, this will include consideration of potential impacts on mental health and how these can be managed.</p>	

Ref	Comment	PC	LA	No PILs	Response	Change
CON.1.42	A key role for any community engagement teams will be to mitigate potential effects on mental health. The PEIR notes the intention to employ experienced community engagement teams but does not specify what competencies or experience this will cover. As significant effects on mental health have been identified, a critical mitigation measure will be the community engagement operation and their individual competencies.	United Kingdom Health Security Agency		1	The CoCP in Appendix 4.2 of the ES [TR020001/APP/5.02] , states that ' <i>The lead contractor will provide appropriately experienced community relations personnel to implement the plan</i> '. The comments are noted and will be considered prior to the commencement of construction.	Yes
CON.1.43	People operating any community engagement team should have sufficient competency in public health, including public mental health, in order to help support local communities. The aim would be to establish a workforce that is confident, competent and committed to: <ul style="list-style-type: none"> • promote good physical and mental health across the population • prevent mental illness and suicide • improve the quality and length 	United Kingdom Health Security Agency		1	The Applicant agrees with the points raised, and this will be considered in due course when the community engagement team is established.	Yes

Ref	Comment	PC	LA	No PILs	Response	Change
	of life of people living within effected communities					
CON.1.44	The role of the community engagement teams should be broadened to include support for home-owners and tenants across the compensation schemes, including the noise insulation scheme.	United Kingdom Health Security Agency		1	This comment will be considered when the approach to implementing the compensation schemes is developed after the application has been submitted.	No

Table A18.14: Regard had to statutory consultation responses on Consultation - Planning Act 2008: Section 42 – PILs

Ref	Comment	No. PILs	Response	Change						
General										
CON.2.1	Suggest that proposals are considered closely.	1	The proposal has been developed over a number of years, taking into consideration feedback from consultation. Once submitted the application for development consent will be considered closely by the Planning Inspectorate who will make a recommendation to the Secretary of State.	No						
CON.2.2	Respondents who have been identified as occupiers of land that maybe subject to acquisition or be impacted as a result of the expansion of the airport, welcome the opportunity to raise their views.	1	Noted.	No						
CON.2.3	Concern regarding the financial and environmental cost associated with the consultation process, including the carbon footprint of physical consultation material.	2	<p>The 2022 statutory consultation was digitally led partly in response to potential Covid-19 restrictions but also to allow it to be delivered as sustainably as possible. By reducing the number of in person events the volume of printing and distances travelled were significantly reduced.</p> <p>The Applicant has calculated the carbon footprint of the entirety of the 2022 statutory consultation, as summarised below and will offset this.</p> <table border="1"> <thead> <tr> <th>Activity Category</th> <th>Carbon emissions (tCO₂e)</th> </tr> </thead> <tbody> <tr> <td>Travel</td> <td>5.9</td> </tr> <tr> <td>Promotional materials distribution</td> <td>5.7</td> </tr> </tbody> </table>	Activity Category	Carbon emissions (tCO ₂ e)	Travel	5.9	Promotional materials distribution	5.7	No
Activity Category	Carbon emissions (tCO ₂ e)									
Travel	5.9									
Promotional materials distribution	5.7									

Ref	Comment	No. PILs	Response	Change										
			<table border="1" data-bbox="1077 288 1778 517"> <tr> <td>Promotional materials production</td> <td>5</td> </tr> <tr> <td>Catering</td> <td>2.7</td> </tr> <tr> <td>Accommodation</td> <td>0.6</td> </tr> <tr> <td>Use of event space</td> <td>0.3</td> </tr> <tr> <td>Total</td> <td>20.2</td> </tr> </table> <p>The 2022 statutory consultation was necessary to comply with the requirements of the Planning Act 2008, and the financial cost of holding the consultation is therefore an essential part of the DCO application process. However, the digitally led approach reduced the overall cost by reducing the volume of printing, venue hire costs, travel costs and staff time.</p>	Promotional materials production	5	Catering	2.7	Accommodation	0.6	Use of event space	0.3	Total	20.2	
Promotional materials production	5													
Catering	2.7													
Accommodation	0.6													
Use of event space	0.3													
Total	20.2													
Consultation material														
CON.2.4	Concern the consultation material was vague or lacked detailed information, including that there is no mention of other projects which will expand as a result of the Proposed Development, such as private airport parking providers who will increase capacity which will impact on local communities with more cars and coaches to ferry passengers to airport from villages around airport i.e. Slip end.	5	<p>Information on the impacts of the Proposed Development were set out in the non-technical consultation materials in plain English and more detailed information was available in the technical documents.</p> <p>Offsite private airport parking is not part of the Proposed Development and as such information was not provided during the 2022 statutory consultation. The Transport Assessment [TR020001/APP/7.02] submitted as part of this application for development consent includes all known, planned, or committed developments and allows for traffic growth in future years over and above committed and planned developments to reflect the potential for</p>	No										

Ref	Comment	No. PILs	Response	Change
			<p>additional traffic associated with other unknown development.</p> <p>The Applicant has no control over off-site car parking and any expansion of existing car parks or new parking developments would be subject to planning applications, which the relevant local authority would be required to consider, including considering the potential for increased traffic volumes on their local networks.</p>	
CON.2.5	Concern the consultation material was vague or lacked detailed information, including that the consultation documents say the current design reduces earth movements by two Wembley Stadiums, but does not say what percentage of the earth movements this saves, where it will be located or how it will be used.	2	The Consultation Brochure included reference to the current design reducing earth movements by two Wembley Stadiums. The Consultation Brochure was designed to give an overview of the Proposed Development in plain English and signpost the reader to where more detailed information could be found. More information about earthworks and platform design could be found in the Works Description Report (WDR) and the draft Construction Method Statement and Programme Report in Appendix 4.1 of the PEIR, including the total volume of earth to be moved and the location of the earthworks platform.	No
CON.2.6	Concern the consultation material was vague or lacked detailed information, including that there was a lack of certainty regarding the impacts of the Proposed Development as the PEIR is 'preliminary'.	3	Please refer to response to Ref CON.2.4. Since the 2022 statutory consultation further environmental assessment has been undertaken and this is reported in the ES [TR020001/APP/5.01] submitted as part of this application for development consent.	No
CON.2.7	Concern the consultation material was vague or lacked detailed information, including that it is not clear what the capacity	1	Please refer to response to Ref CON.2.4. Information on how the public transport mode share targets would be achieved and the potential impacts on the local road	No

Ref	Comment	No. PILs	Response	Change
	(person per hour) can be conveyed using the DART, and to what percentages the various travel options are expected to be adopted, and how the increased traffic will be supported by the new road system.		network were included in the Getting to and from the Airport - Our Emerging Transport Strategy.	
CON.2.8	Concern the consultation material was vague or lacked detailed information, including that there was no information on the relocation of the waste transfer site that is currently located on the site.	1	Please refer to response to Ref CON.2.4. 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
CON.2.9	Concern the consultation material was vague or lacked detailed information, including that cultural heritage assets would experience significant adverse effects. Chapter 10, Vol 2 in the PEIR does not adequately document these effects. It does not assess the impact on the Grade 1 listed garden at St Paul's Walden Bury. The effects of expansion should be analysed as for Luton Hoo.	1	<p>Please refer to response to Ref CON.2.4.</p> <p>The Desk Based Assessment included in Appendix 10.1 of the PEIR set out potential impacts to listed buildings in the 2km study area, including the 250m study area around highways interventions and a wider study area (> 2km) for heritage assets that may be affected by aural and visual intrusion. The assessment of likely impact was informed by the nature of the Proposed Development in that area, the setting of the individual heritage assets, and the extent to which this setting extends into the Proposed Development area, resulting in change to the asset's setting. Additional commentary explaining this process is included in Chapter 10 Cultural Heritage of the ES [TR020001/APP/5.01] and the Cultural Heritage Desk Based Assessment in Appendix 10.1 of the ES [TR020001/APP/5.02] submitted as part of this application for development consent.</p> <p>The Grade I registered park and garden of St Paul's Walden Bury is included in the ES. A minor adverse effect</p>	No

Ref	Comment	No. PILs	Response	Change
			during operation of the Proposed Development has been assessed, arising from a slight increase in aviation noise.	
CON.2.10	Suggest publishing how the mode share target compares to the relevant figures today and 2019.	1	The Transport Assessment [TR020001/APP/7.02] submitted as part of this application for development consent includes information on how the mode share targets for the modelling were determined. The Surface Access Strategy [TR020001/APP/7.12] also contains information about future mode share targets and how they were developed.	No
CON.2.11	Supportive of the consultation material and consultation meetings. Some respondents praised the detailed content of the consultation material.	1	Noted.	No
CON.2.12	Concern the consultation material presented misleading or biased information to gain support for the Proposed Development, including that consultation material did not present a business case and ignored critical costs (e.g. the net cost of outbound tourism over inbound tourism, the cost of CO2 offsetting, the up front capital cost paid for by a long and uncertain revenue stream). Respondents also noted the negative economic and environmental effects of the Proposed Development was not included, which was against good impact assessment practice. Additionally, respondents noted the negative economic impact on local	17	Please refer to response to Ref CON.2.4. The Draft Need Case document set out the positive and negative economic impacts of the Proposed Development, including in respect of local business and UK tourism. The PEIR set out the positive and negative environmental impacts and included the methodology for calculating biodiversity. 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. More information can be found in the Net Gain Report (Defra Metric) in Appendix 8.5 of the ES [TR020001/APP/5.02] .	No

Ref	Comment	No. PILs	Response	Change
	businesses and UK tourism as well as the flawed methodology used for biodiversity offsetting in presenting cumulative and indirect effects.			
CON.2.13	Concern the consultation material provides inaccurate information, including figures on night flights and claims that council tax did not increase.	6	The consultation materials presented a balanced and accurate view of the benefits and potential impacts of the Proposed Development. Accurate information on night flights was set out in the Draft Need Case. Council tax is not within the scope of the application, and it is not known where this comment refers to.	No
CON.2.14	Concern the consultation material provides inaccurate information, including that the base year of 2019 used in modelling is not a true reflection of flights.	1	Please refer to response to Ref CON.2.13. The 2019 baseline has been modelled based on the actual flights that occurred (so it is a true reflection) and was validated based on actual radar data. The 2019 baseline was chosen to represent the last year of normal activity at the airport pre-Covid pandemic.	No
CON.2.15	Concern the consultation materials provide inaccurate information, including the claim of the airport being central to the Oxford and Cambridge arc, which is supportive of the Governments levelling up policy. This was felt to be incorrect.	1	Please refer to response to Ref CON.2.13. The airport is located within the Oxford to Cambridge Arc and is marked on their Prospectus, albeit it is accepted that it is on the southern edge but still centrally located in an east-west direction. The role of the airport in supporting levelling up reflects Luton's status as a priority for levelling up, alongside other pockets of deprivation throughout the airport's catchment area.	No
CON.2.16	Concern regarding the accessibility of consultation material. Some respondents stated documents were too large and used too much technical language for the general	6	Information was provided in a variety of formats. Non-technical documents included the Consultation Brochure, Summary and FAQ, and Consultation Boards provided a high-level summary of the Proposed Development and a	No

Ref	Comment	No. PILs	Response	Change
	public to understand with important information lost in the detail, with some respondents stating they couldn't find certain documentation or materials online. Other respondents stated difficulty in providing a consultation response online, rather than in person. Some respondents suggested this was the purposeful approach of the Applicant to deter effective consultation.		<p>sign post to more technical documents. A balance was sought in providing the necessary technical detail whilst also ensuring documents were written in a non-technical style and in plain English.</p> <p>All consultation materials were available on the project website throughout the consultation period. They were also available in hard copy at the consultation events and Document Inspection Venues, and upon request.</p> <p>The consultation response form could be completed in hard copy and returned free of charge using the FREEPOST address. Hard copies of the consultation response form were available free of charge at the consultation events, Document Inspection Venues and upon request.</p> <p>The Applicant deliberately sought to make the consultation process as easy as possible to engage with to ensure everyone who wanted to participate was able to do so.</p>	
CON.2.17	Concern the consultation material provides inaccurate information. Some respondents stated the proposals did not reflect the true cost to the environment or that the various figures and data presented were inaccurate.	1	Please refer to response to Ref CON.2.13.	No
Consultation process				
CON.2.18	Concern regarding the timing and location of consultation events.	1	<p>The 2022 statutory consultation was digitally led in response to the uncertainty over face-to-face engagement created by the Covid-19 pandemic and the desire to conduct the consultation in a sustainable way.</p> <p>Consultation included a virtual exhibition space to enable</p>	No

Ref	Comment	No. PILs	Response	Change
			<p>people to view the consultation materials in an interactive and engaging manner. The virtual exhibition space was open 24/7 throughout the consultation period, so that people could access it at a time of their convenience. There were also 13 in-person consultation events. The event locations were selected to provide a good geographical spread to enable affected communities across the area to attend. The locations were discussed and agreed with the host local authorities. They were chosen on a number of factors including geographical location, attendance from the 2019 consultation events, and venue capacity and accessibility. Consultation events were proposed on different days of the week including Saturdays and took place at different times of day including evenings.</p>	
CON.2.19	<p>Concerns regarding staff at consultation events. Some respondents stated that staff were not local and did not appreciate local issues, were dismissive or did not know how to respond to difficult questions. Some respondents noted the absence of LBC representatives at meetings.</p>	3	<p>Staff were in attendance at events to cover the range of topics being consulted on, for example design, environment, and surface access. All staff were very familiar with their topic specialism and the Proposed Development. The Application is being promoted by Luton Rising, and LBC is a consultee to the process. It was therefore not appropriate for LBC to be represented at the events.</p>	No
CON.2.20	<p>Suggest the consultation process should prioritise local voices.</p>	1	<p>The Applicant takes the views of local communities very seriously. The 2022 statutory consultation was undertaken in accordance with the Planning Act 2008 which places a duty on the Applicant to have due regard to all comments received. In developing proposals comments from local</p>	No

Ref	Comment	No. PILs	Response	Change
			communities have been considered alongside those raised by other stakeholders.	
CON.2.21	Concerns the consultation process is meaningless, as comments raised during the previous consultation, including those on the Environmental Statement are not considered, with proposed developments continuing despite the views of local communities.	4	Please refer to the response to Ref CON.2.20. Changes were made to the scheme in response to the 2019 consultation feedback and these were described in the Consultation Brochure and in more detail in the 2019 Statutory Consultation Feedback Report.	No
CON.2.22	Concern that there appears to be a removal of objections to the Proposed Development due to one proposal regularly being superseded by another. For example, it was felt that with every round of consultation, fewer people respond, as they feel they have already objected. Additionally, it was felt that Hertfordshire residents are negatively impacted, but as Bedfordshire Councils own the airport, it is unclear how democratic rights are present in making changes to proposals which significantly affect lives.	1	It is incorrect to state that the Bedfordshire Councils own the airport. The airport is owned by Luton Rising, a company which is wholly owned by LBC. There have been three rounds of consultation on the Proposed Development - non-statutory consultation in 2018, and two statutory rounds of consultation in 2019 and 2022. After each round of consultation all feedback has been carefully considered and the proposal updated. It was necessary to consult again in 2022 because changes were made to the proposal after the 2019 consultation and the Applicant needed to let communities have their say before submitting this application for development consent. The number of responses to consultation has increased with each round of consultation, with 892 responses received in 2018; 3,501 responses received in 2019; and 3,790 responses received in 2022. Regarding the relationship between LBC and the application for development consent, the application will be considered by the Planning Inspectorate, which in turn will	No

Ref	Comment	No. PILs	Response	Change
			make a recommendation to the Secretary of State for Transport to make a decision. The host local authorities (LBC, North Hertfordshire, Hertfordshire County Council, Central Bedfordshire and Dacorum) will assess the proposals and prepare a Local Impact Report which will be considered by the Planning Inspectorate in its assessment of the proposals, before making a recommendation to the Secretary of State for Transport. The decision-making process is therefore independent of LBC.	
CON.2.23	Suggest that consultation material should be sent to schools, and that engagement specific to them should be offered.	1	As part of the 2022 statutory consultation schools, colleges and universities within the host local authorities and Newsletter Mailing Zone were contacted to share promotional packs to advertise the consultation to students.	No
CON.2.24	Concern the consultation process lacked transparency.	1	The 2022 statutory consultation was undertaken in accordance with Planning Act 2008 requirements. Consultation has been held in an open and transparent way, and everyone wishing to participate was encouraged to do so. The consultation was digitally led to encourage participation, and everyone was welcome to engage with consultation materials online or at one of the consultation events. All feedback received is reported in this Consultation Report, and this Report will be considered by the Planning Inspectorate in making their recommendation to the Secretary of State.	No
CON.2.25	Concern the consultation process is meaningless as voices won't be heard, as	11	Please refer to response to Refs CON.2.20 CON.2.21.	No

Ref	Comment	No. PILs	Response	Change
	the Proposed Development will go ahead regardless of the consultation outcome and community opposition.			
CON.2.26	Concern that the consultation process is insufficient, as some respondents have not been contacted by the Applicant in relation to the Proposed Development.	1	A variety of methods were used to publicise the consultation including local press and radio adverts, posters sent to local community facilities and placed on local buses, newsletters were sent to approximately 350,000 properties within the vicinity of the airport, emails were sent to those on the mailing list, community groups and local businesses and the consultation was promoted on social media. A small number of locations on the edge of the Newsletter Mailing Zone, and residents in Dagnall, did not receive the newsletter at the start of the consultation. These properties were sent newsletters by first class post on 15 February and 24 February 2022 respectively.	No
CON.2.27	Concerns that there have been reports of respondents clicking on 'Save for Later' and subsequently being unable to retrieve text.	1	We apologise for any inconvenience caused by being unable to retrieve previously drafted text. These respondents were able to submit new responses which have been considered in the same way as all other responses.	No
Future engagement				
CON.2.28	Suggest more engagement and collaboration was required. Some respondents suggested more engagement was required with the community generally, whereas other suggested they themselves	2	Since the 2022 statutory consultation informal engagement with key stakeholders has continued and this has informed the Proposed Development. The Applicant continued to work with local communities and provided regular and timely updates on the project.	No

Ref	Comment	No. PILs	Response	Change
	were open to or requested more direct, personal engagement. Some respondents with experience in aviation offered their skills. Some respondents suggested there should be more engagement with local communities and other airports, to better determine how benefits and compensation are applied.			
CON.2.29	Suggest consulting with Heathrow and Gatwick on their compensation proposals for local residents.	1	In developing the noise compensation proposals, the offer at other airports including Heathrow and Gatwick was considered. The Draft Compensation Policies and Measures document which was consulted on in 2019 presented a significant improvement on the current offer at Luton and were more generous than any other UK airport. Since then, other airports have moved on and in response the proposed compensation has been further improved such that it compares favourably in terms of UK airport noise compensation schemes. Consultation with Heathrow and Gatwick is therefore not considered to be necessary.	No
CON.2.30	Suggest further engagement, including local organisations and Parish Councils.	2	Please refer to response to Ref CON.2.28.	No
CON.2.31	Suggest there should be a local referendum or vote on the Proposed Development.	1	The application for development consent, like all DCO applications, will be examined by the Planning Inspectorate who will make a recommendation to the Secretary of State who will determine the application. It would not be appropriate to hold a referendum.	No

Ref	Comment	No. PILs	Response	Change
CON.2.32	Suggest further engagement, with some respondents specifically asking to engage in discussions.	2	Please refer to response to Ref CON.2.28.	No
CON.2.33	We encourage London Luton Airport Limited (LLAL) to engage further with TUI Group to ensure its proposals do not compromise TUI Group assets and operations in Luton.	1	Noted. Engagement with TUI has continued since the 2022 statutory consultation.	Yes
CON.2.34	LLAOL wishes to engage with the Applicant on the comments enclosed as soon as possible, with a view to supporting the Future LuToN proposals at examination.	1	Noted. Engagement with LLAOL has continued since the 2022 statutory consultation.	Yes
CON.2.35	LLAOL notes that a number of mitigation measures are proposed, such as encouraging airlines to use sustainable fuels and incentivization schemes through 'green slots'. It is important that, before any such measures are confirmed, these need to be considered and developed in close collaboration with LLAOL as well as relevant organisations such as airlines and fuel suppliers to determine whether the proposed mitigation measures are deliverable. This is particularly important in the context of GHG emissions, air quality and noise, which are critical factors in the context of the Green Controlled Growth proposals.	1	Noted. Engagement with LLAOL and other relevant organisation, such as the airlines, has continued since the 2022 statutory consultation.	Yes

Table A18.15: Regard had to statutory consultation responses on Consultation - Planning Act 2008: Section 47 – Duty to consult local community

Ref	Comment	No. CC	Response	Change
General				
CON.3.1	Support for the consultation process. Some respondents stated they were glad to see feedback from the previous round of consultation had been acted on or that the consultation process had been improved.	8	Noted.	No
CON.3.2	Suggest the applicant delay the Proposed Development as many objectors will no longer be around.	1	All views received during the consultation process have been considered equally regardless of age.	No
CON.3.3	Suggest delaying this consultation until the current, outdated flight paths are addressed by ACOG's FASI-S. Much has changed since the pandemic and a delay would allow flight passenger forecasts to be revisited.	1	Since the 2022 statutory consultation the demand forecasts have been updated again and additional sensitivity testing has been undertaken to consider different runway mode splits and distributions of aircraft along the existing flight paths to demonstrate that the noise envelope would not act as a constraint on potential airspace change in the future. Further information on sensitivity testing can be found in Chapter 5 Approach to Assessment of the ES [TR020001/APP/5.01]. In order to represent a reasonable worst case scenario, the environmental assessments in this application for development consent have been made based on the current flight paths, recognising that the FASI-S process is likely to bring about further improvements, reducing the noise impacts to population on the ground.	No

Ref	Comment	No. CC	Response	Change
CON.3.4	Concern regarding the financial and environmental cost associated with the consultation process, including the carbon footprint of physical consultation material.	24	Please refer to response to Ref CON.2.3.	No
CON.3.5	Concern regarding the renaming and rebranding of London Luton Airport Limited to Luton Rising. Respondents raised concern regarding the cost associated with this exercise as well as general confusion regarding the new name choice.	13	London Luton Airport Limited has been rebranded as Luton Rising to avoid confusion with the operator, London Luton Airport Operations Limited, and to better communicate that the organisation represents more than just the airport. Most of the rebrand work was done in-house, costing approximately £10,000.	No
CON.3.6	Support for consultation events. Some respondents stated staff were helpful and that the consultation area reflected those affected by flight paths.	4	Noted.	No
Consultation material				
CON.3.7	Suggest a document outlining the environmental impact of the Proposed Development, highlighting losses and gains, should be included as part of the consultation material.	1	The PEIR consultation document set out in detail the environmental impact of the Proposed Development. High level information was also available in the PEIR Non Technical Summary (NTS) and the Consultation Brochure.	No
CON.3.8	Suggest that the consultation material regarding open space and landscaping is not detailed enough, and that this should be remedied.	1	As part of the 2022 statutory consultation information on open space and landscape was set out in the PEIR. This information has been updated and included in the ES [TR020001/APP/5.01] submitted as part of this application for development consent.	No

Ref	Comment	No. CC	Response	Change
CON.3.9	Suggest that the consultation material provided on highways proposals in and around Hitchin require additional clarity.	1	Information available at the 2022 statutory consultation included a description of the highway works at Hitchin and accompanying drawings in the Getting to and from the Airport - Our Emerging Transport Strategy . More detailed information is available in the Transport Assessment [TR020001/APP/7.02] and the Junction Mitigation Drawings included in its appendix.	No
CON.3.10	Suggest that a 3D view of massing and design views would have been very easy to have shown, and this would clearly show the true negative impact on the open countryside before and after.	1	As part of the information available during the 2022 statutory consultation views of the Proposed Development were included in the PEIR. These were used to assess the visual impact of the Proposed Development. It was not necessary to produce a 3D model, however this suggestion is noted.	No
CON.3.11	Concern the consultation material presented misleading or biased information to gain support for the Proposed Development.	1	Please refer to response to Ref CON.2.4.	No
CON.3.12	Suggest consultation material should highlight the positives of the Proposed Development to mitigate against the negatives.	1	Information on the benefits of the Proposed Development was presented as part of the 2022 statutory consultation, in particular in the Draft Need Case and Consultation Brochure.	No
CON.3.13	Suggest consultation material is too difficult or extensive to consume and should be more clearly summarised.	1	Please refer to response to Ref CON.1.16.	No
CON.3.14	Suggest consultation material outlining impacts of the Proposed Development should be published on a monthly basis. These include, but are not limited to, air quality and pollution, GHG emissions and noise.	1	The 2022 statutory consultation set out information on the impacts of the Proposed Development when constructed and operational; the predicted impacts are unlikely to change from month to month.	No

Ref	Comment	No. CC	Response	Change
			<p>Regular monitoring is an important part of GCG. Whilst it is proposed that compliance with the Limit will be assessed on the basis of annual monitoring reports (as some impacts, such as noise, are seasonal) it is acknowledged that there may be value in providing more frequent informal monitoring, to allow early identification of any potential issues. This would be similar to the current airport noise monitoring approach, where an annual noise monitoring report is supported by both quarterly monitoring reports and more ad hoc community noise reports.</p> <p>Ongoing monitoring information on the current operation of the airport is a matter for the operator, LLAOL.</p>	
CON.3.15	Suggest the creation of consultation tool which can be used to better understand noise impacts, at the postcode level.	1	<p>The Draft Compensation Policies and Measures consultation document included plans illustrating the relevant noise contours which would be used for each of the compensation scheme.</p> <p>The Applicant has noted the call for a postcode based mapping tool to help illustrate the Noise Insulation Schemes and this will be developed before the schemes are launched.</p>	No
CON.3.16	Support the consultation material. Some respondents praised the detailed content of the consultation material. Others noted the information helped them understand the Proposed Development better, responded to their queries appropriately and reflected changes addressed since the 2019 consultation.	18	Noted.	No

Ref	Comment	No. CC	Response	Change
CON.3.17	Concern regarding the accessibility of consultation material. Some respondents stated documents were too large and used too much technical language for the general public to understand with important information lost in the detail, with some respondents stating they couldn't find certain documentation or materials online. Other respondents stated difficulty in providing a consultation response online, rather than in person. Some respondents suggested this was the purposeful approach of the Applicant to deter effective consultation.	42	Please refer to response to Ref CON.2.16.	No
CON.3.18	Concern the consultation material provides inaccurate information. Some respondents stated the proposals did not reflect the true cost to the environment or that the various figures and data presented were inaccurate.	71	Please refer to response to Ref CON.2.13.	No
CON.3.19	Concern the consultation material was vague or lacked detailed information. Some respondents stated the level of information provided was not sufficient to make a proper assessment of environmental or transport related impacts. Other respondents stated there was not enough information on employment figures, flight numbers, flight paths, enforcement or earth movements.	248	In addition to the non-technical consultation documents which sought to provide an easy to understand summary of the Proposed Development in plain English, a suite of technical documents were available online and in hard copy during the consultation period. These included detailed assessments of the potential impacts of the Proposed Development, along with proposed mitigation. Information on employment figures and flight numbers were provided in the Draft Need Case, information on earth movements was included in the draft Construction Method Statement appended to the PEIR. The Application is not seeking consent for flightpaths;	No

Ref	Comment	No. CC	Response	Change
			however, these would have been inherently considered in all of the relevant assessments, for example the noise assessment. The consultation materials did not provide information on enforcement in relation to the existing operation of the airport, as this is not a DCO matter, however information about the proposed approach to ensuring the airport operates within defined environmental limits was included in the Draft GCG consultation document.	
CON.3.20	Concern the consultation material, including the consultation questionnaire, presented misleading or biased information. Some respondents noted the benefits of the project were very well explained, while negative impacts were light touch or omitted entirely. Others stated the consultation material, such as the questionnaire, was manipulative or structured in a manner which only supported expansion.	333	Information was presented in a balanced and unbiased way, with the benefits of the Proposed Development being presented alongside the impacts. Information on the impacts of the Proposed Development were set out in the non-technical consultation materials in plain English and more detailed information was available in the technical documents. The questionnaire included open ended questions to allow respondents to express their opinion on a range of topics clearly.	No
CON.3.21	Concern the consultation questionnaire asked irrelevant questions. Some respondents stated the questionnaire asked questions with a predetermined outcome in mind.	9	Following feedback that the 2019 statutory consultation questionnaire was too long, a shorter questionnaire was used in 2022. This included open questions allowing respondents to freely express views on a range of topics. It was not necessary to answer all questions on the questionnaire.	No
CON.3.22	Concern the consultation questionnaire is too long and takes a long time to complete.	2	Please see response to CON.3.21.	No

Ref	Comment	No. CC	Response	Change
CON.3.23	Suggest consultation material should include more or clearer maps. Respondents stated maps should be used to easily distinguish the different types of compensation to be applied to different areas or the location of flight paths. Other respondents suggested maps should provide street names more clearly.	3	Please see response to Ref CON.3.15. The comment regarding street names has been noted and taken into consideration for the application.	No
CON.3.24	Suggest more information is required as part of consultation. Respondents suggest more information is required on a range of issues including surface access vehicle numbers, noise contours, flight paths and holding patterns, the application of compensation and the number of stands to be constructed at the airport during each phase of development. Some respondents also requested further information be sent to them directly.	48	Detailed information on the potential impacts of the Proposed Development was available as part of the consultation. Information on vehicle numbers was provided in the Getting to and from the Airport - Our Emerging Transport Strategy consultation document; compensation information was provided in the Draft Compensation Policies and Measures document; the number of stands was illustrated in the Scheme Layout Drawings and described in the Works Description Report. The application is not seeking consent for flightpaths, nevertheless flight path information was provided in all relevant documents, for example the noise assessment included in the PEIR. All consultation documents were available upon request, and copies of several documents were posted in response to requests received during the consultation period.	No
Consultation process				
CON.3.25	Concern the consultation process is meaningless as voices won't be heard. Some respondents stated the outcome of the	149	The 2022 statutory consultation was undertaken to meet the Planning Act 2008 requirements to consult with people in the vicinity of the Proposed Development and	No

Ref	Comment	No. CC	Response	Change
	consultation was predetermined, with the project to go ahead regardless of the consultation outcome or community opposition. Other respondents stated the consultation was simply a corporate box ticking exercise and consultation responses would be largely ignored.		other stakeholders. All information received has been carefully considered and changes have been made to the scheme in response, as set out in this Consultation Report.	
CON.3.26	Concern the consultation process lacked transparency. Some respondents stated the process had largely been undertaken in private and therefore the Proposed Development, and its associated cost, has not been subject to full public scrutiny. Some respondents stated the community had no oversight of the Applicant or Luton Borough Council's decisions or that consultation was purposely undertaken in areas where respondents were less likely to be negative or during a time when peak travel behaviour had not returned post-Covid and therefore impacts could not be assessed effectively. Some respondents queried why members of the public were asked to comment on technical documents.	44	Please refer to response to Refs CON.2.18 and CON.2.24.	No
CON.3.27	Concern the Proposed Development as presented in the 2022 consultation material does not reflect any changes following the 2019 consultation. Some respondents expressed concern that the proposed changes to the	12	Changes were made to the scheme in response to the 2019 consultation feedback and these were described in the Consultation Brochure and in more detail in the 2019 Statutory Consultation Feedback Report.	No

Ref	Comment	No. CC	Response	Change
	Proposed Development from 2019 would not significantly mitigate negative impacts.			
CON.3.28	Concern regarding the timing and location of consultation events. Some respondents had concerns regarding the location of events, with some respondents stating they were not held in villages located beneath flight paths, with many referencing Kensworth, Studham and Whipsnade. Others stated the timing of consultation events was unclear and impractical for their attendance.	30	Please refer to response to Ref CON.2.18 Three events were held within 7 miles of Kensworth (Luton, Slip End and Markyate). Two events were held within 7 miles of Whipsnade (Pitstone and Markyate). The Markyate event was within 4 miles of Studham.	No
CON.3.29	Concern regarding the promotion of consultation events. Some respondents stated they were not given proper advance notice of events and missed their opportunity to take part in the consultation process.	9	Please refer to response to Ref CON.2.26	No
CON.3.30	Concerns regarding staff at consultation events. Some respondents stated that staff were not local and did not appreciate local issues, were dismissive or did not know how to respond to difficult questions. Some respondents noted the absence of LBC representatives at meetings.	15	Please refer to response to Ref CON.2.19.	No
CON.3.31	Suggest consultation events should have been held in Dagnall and Hatfield.	2	Please refer to response to Ref CON.2.18. Two events were held within 7 miles of Dagnall (Pitstone and Markyate). The St Albans event was within 7 miles of Hatfield.	No

Ref	Comment	No. CC	Response	Change
CON.3.32	Suggest there needs to be face to face consultation sessions, with tangible consultation material, rather than virtual platforms.	1	Please refer to response to Ref CON.2.18.	No
CON.3.33	Concern the consultation process for the Proposed Development, preempts or supports the later development of a second runway.	1	The 2022 statutory consultation sets out information on the Proposed Development which seeks to make best use of the airport's existing single runway. The Proposed Development does not pre-empt or support a second runway. At this current time, the Applicant has no intention of progressing a second runway.	No
CON.3.34	Suggest the consultation process preempts findings of Jet Zero consultation process.	2	The Jet Zero consultation materials were fully taken into account in developing the proposals.	No
CON.3.35	Suggest the Applicant rethink the Proposed Development in light of seeking climate advice and listening to their conscious.	10	Government has made clear that, notwithstanding climate change policies, it still supports airports making best use of their existing runways. The proposed development complies with this policy.	No
CON.3.36	Suggest the consultation process should prioritise local voices.	23	Please refer to the response to Ref CON.2.20.	No
CON.3.37	General concern that the consultation process has been insufficient.	46	The 2022 statutory consultation was undertaken in accordance with Planning Act 2008 requirements. The consultation was well publicised, accessible to all and provided comprehensive information about the Proposed Development to enable people to form a view. All comments received have been considered in developing the proposal.	No
CON.3.38	Suggest the findings of the consultation processes, and associated analysis, are made publicly available.	1	This Consultation Report submitted as part of this application for development consent reports in detail the	No

Ref	Comment	No. CC	Response	Change
			comments received during the 2019 and 2022 statutory consultations and the project's response to them.	
Future engagement				
CON.3.39	Suggestion that the airport engage with local educational institutions to: increase awareness of waste within towns and on the roadside, promote courtesy, reduce vehicle speeds, develop positive social interpersonal skills, and encourage arts, crafts, music and sport – to increase endorphins and promote well-being.	1	The Employment and Training Strategy [TR020001/APP/7.05] considers partnerships with local educational institutions to be an important way of developing those connections to the local community, both young people developing skills that will allow them to enter the workforce for the first time, and more experienced workers who wish to upskill and make the most of the opportunities the airport has to offer. The training developed would be collaborative between the operator, airport employers and the educational institutions to ensure the local workforce is prepared for the future jobs that will be on offer. This approach also supports investing in the relationships and offer of local institutions to help build their capacity and resilience for the long-term success of their programmes. This engagement will cover matters of relevance to the airport, however, matters such waste, vehicle speeds, arts, craft, music and sport are likely to be outside of the remit of future engagement on the airport.	No
CON.3.40	Suggest more engagement and collaboration was required. Some respondents suggested more engagement was required with the community generally, whereas other suggested they themselves were open to or requested	56	Please refer to the response to Ref CON.2.28.	No

Ref	Comment	No. CC	Response	Change
	more direct, personal engagement. Some respondents with experience in aviation offered their skills. Some respondents suggested there should be more engagement with local communities and other airports, to better determine how benefits and compensation are applied.			
CON.3.41	Bloor Homes suggest they work with the Applicant to better understand the impacts of the Proposed Development.	1	Noted.	No
CON.3.42	Suggest the Applicant hire people trained in dealing with complaints and people management to encourage better dialogue with the community.	1	This comment is noted. The Applicant has continued to engage with the community since the 2022 statutory consultation.	No
CON.3.43	Suggest there should be a local referendum or vote on the Proposed Development.	2	Please refer to the response to Ref CON.2.31.	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

Term	Definition
BREEAM	Building Research Establishment's Environmental Assessment Method
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

Term	Definition
CoCP	Code of Construction Practice
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
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

Term	Definition
DoWCoP	Definition of Waste: Code of Practice
DS	Do-Something
ECC	Essex County Council
EEAST	East of England Ambulance Service
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

Term	Definition
FWRA	Foundations Works Risk Assessment
FTP	Framework Travel Plan
GCG	Green Controlled Growth
GDP	Gross Domestic Product
GHG	Greenhouse Gases
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

Term	Definition
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
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

Term	Definition
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
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

Term	Definition
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
PRoW	Public Rights of Way
RICS	The Royal Institute of Chartered Surveyors
RNAV	Area Navigation
ROA	Remediation Options Appraisal
RPG	Registered Park and Garden

Term	Definition
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
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.

Term	Definition
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 horse riders
WDR	Works Description Report
WFD	Water Framework Directive
WHO	World Health Organisation
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility

¹ London Luton Airport. 2019. Surface Access Strategy 2018-2022.

² Department for Transport (2017), Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace.

³ Civil Aviation Authority (2021), CAP1506: Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition.

⁴ Department for Transport, July 2022, Jet Zero Strategy Delivering net zero aviation by 2050.

⁵ Department for Transport, 2022, Flightpath to the Future.

⁶ Department for Transport, June 2018, The future of UK aviation: making best use of existing runways.