

Principal Areas of Disagreement Summary Statement (PADSS) from Buckinghamshire Council		Version Number: 1 Submitted at: 23/06/2023	
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<p>Lack of public transport services connecting Buckinghamshire and London Luton Airport</p> <p>(For reference see 7.12 Surface Access Strategy – 6.4 Bus and Coach; 6.4.2; 7.12 Surface Access Strategy – 6.4 Bus and Coach; 6.4.4; 7.13 Framework Travel Plan – 5.2 Interventions and measures, table 5.1 Luton DART and Rail, 7.13 Framework Travel Plan – 5.2 Interventions and measures, table 5.2 Bus and Coach)</p>	<p>Buckinghamshire currently lacks a direct bus or coach service to the airport. East-West Rail will initially only have limited impact on travel to the airport from Buckinghamshire, as this will only serve the north of the county.</p> <p>Although discussed in the Framework Travel Plan, the airport operator has not yet engaged with Buckinghamshire Council regarding connecting bus and coach services. This appears to be an omission. Mention is made regarding the potential to increase the use of coaches, but no suggestions are made regarding how this will be achieved.</p> <p>We welcome investigating opportunities with the applicant for a bus/coach service connecting Aylesbury, but there may be opportunities for both types of service. Additionally, a bus service</p>	<p>Engage with Buckinghamshire Council to develop public transport offering for direct bus and/or coach services.</p> <p>Suggest restoration of a local bus route (61) connecting Luton and Aylesbury, and the possibility of a more strategic express service to Aylesbury and points further west.</p> <p>BC welcome engagement around the proposed route with the applicant.</p>	<p>BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.</p>

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	which previously provided a direct connection was recently shortened to terminate at Dunstable due to the opening of the guided busway.		
Impact on local highway network in Buckinghamshire. In particular junctions of the B488 and B489 in Ivinghoe	<p>There is a large catchment area to the west of the airport that is not well served by the motorway network and therefore the local road network will continue to provide preferential routes across Buckinghamshire. the highway network in Aylesbury acts as a route hub for all directions and is therefore very sensitive to congestion and small changes in traffic have a significant impact on the performance of the network. Additionally, the villages of Pitstone, Marsworth and Ivinghoe are also sensitive to traffic changes, noting they are situated on a direct route to the airport.</p> <p>It is acknowledged that the projected peak hour traffic in this area is expected to be low, but the</p>	Agreement from the applicants for highway mitigation works at the junction of the B488 and B489 in Ivinghoe to change the junction priority, in accordance with Policy TRA2 of the Ivinghoe Parish Neighbourhood Plan 2014-2033.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.

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	Council considers that this is a major route from Buckinghamshire and Dacorum to the Airport, and the sensitivity of the network in this area is such that small changes would have unacceptable impacts.		
Strategic Traffic Model, Local Model Validation Report (LMVR)	The full potential impacts of any change in the traffic modelling data (in line with the request of the Examining Authority in their letters dated 16 <sup>th</sup> May 2023 and 13 June 2023) are not fully known in respect of the following matters: traffic and transport, noise and air quality. In addition, the growth of Aylesbury is not currently accurately represented within the analysis for the DCO.	Agreement as to the appropriate methodology if the traffic modelling data is not re-based. Accurate representation of the planned growth of Aylesbury within the LMVR.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.
Insufficient information to determine how BC communities have been assessed in their entirety	BC would be interested to learn if any transport assessments have been undertaken which suggest that the Airport is or will be a regular attractor of trips from the south of Buckinghamshire, in particular Chesham, Amersham or High Wycombe, for which public transport access is also unavailable.	Further information provided with regards to the scope of the transport assessment and implications for south Buckinghamshire.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.

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Insufficient information to understand the impact of HGV movements upon the local highway network of Buckinghamshire during the operational phase of the Proposed Development.	For post-build movements, BC note that the increase in HGVs (rising from 133 currently to a projected 2043 figure of 268) is unlikely to impact upon local roads in Buckinghamshire. A large proportion of the projected HGV flows appear to serve the extended passenger terminal facilities – these do not identify Buckinghamshire as being a generator of these movements, but BC would welcome clarification of this.	Further information to identify the generator of operational HGV movements	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.
Routing of construction traffic (See Volume 5 Environmental Statement and Related Documents, 5.02 Appendix 18.3 Outline Construction Traffic Management Plan, 4.2.2)	Noting that travel will be minimised along routes other than the Primary Route Network, this does not preclude any works traffic/spoil deliveries in the vicinity of the airport through Buckinghamshire.	Reassurances regarding routing of traffic in the final CTMP.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.
Impacts of glint and glare upon highway safety	It is noted that in their letter dated 13 June 2023, the Examining Authority has asked the applicant to undertake a Glint and Glare Assessment in relation to the PV panels proposed on the roof of the proposed buildings and constructed	Glint and Glare Assessment prepared.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.

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	on canopies in surface car parks. BC will await the receipt of this assessment to understand if there are any likely impacts upon highway safety as a result of glint and glare.		
Monitoring data for PM <sub>10</sub> and PM <sub>2.5</sub> (particulate matter) in 2023	It is noted in the exceedance summary monitoring data for PM <sub>10</sub> and PM <sub>2.5</sub> (particulate matter) in 2023 there is limited data and what data is available is at very low capture rates (between 10 and 60%). It is therefore recommended that the automatic monitor is inspected to understand why this pollutant is no longer being measured as the data could prove to be very important to understand the impact the proposed development may have on the local air quality.	Inspection of the automatic monitoring station and an explanation provided for the low capture rates in 2023 of PM <sub>10</sub> and PM <sub>2.5</sub> .	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.
Impact on the Chilterns AONB	The tranquillity of the AONB is not currently adequately protected in respect of noise impact. At present the LVIA is ambiguous as to the potential effects on the Chilterns AONB and locations such as Ivinghoe Beacon regarding impacts	The applicant should demonstrate that noise impact upon the AONB is better than Air Navigation Guidance and Civil Aviation Authority recommendations.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.

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	<p>on tranquillity. Whilst the Applicant has identified significant adverse effects on the AONB it is not clear from the submitted information as to the extent of the area affected. BC request that this is addressed.</p> <p>There is an absence of information to address possible glint and glare impact upon the AONB. In a similar vein the applicant should identify the extent of any lighting impacts on that area of the Chilterns AONB within Buckinghamshire</p>	<p>To protect the tranquillity of the AONB the applicant should update the LVIA and accompanying information to demonstrate how Impact upon the tranquillity of the AONB has been addressed and remove ambiguity around this matter. The applicant should be specific as to the extent of the AONB adversely affected.</p> <p>The applicant should prepare a Glint and Glare Assessment and assess any lighting impacts.</p>	
Green Controlled Growth Framework	The applicant claims that GCG provides a more robust and transparent approach to noise monitoring and enforcement than the current planning condition. This framework will only be effective if the body managing it is truly independent and includes BC as a party to the Environmental Scrutiny Group. This should therefore be	Explanation of Noise Envelope Design Group and Environmental Scrutiny Group accountability and governance, as well as the inclusion of BC within the ESG.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.

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	established early with clear terms of reference set out.		
Airspace change	Change is needed to allocate more airspace for safe departures and arrivals across the southeast airports to allow expansion. It is acknowledged that this will be subject to a separate regulatory process to the DCO, however, there is a degree of uncertainty over how these changes will impact residents. Change to airspace and in combination effects with Heathrow should be reflected in the DCO.	Explanation of how the Applicant intends to integrate the CAA's CAP1616 and expansion whilst mitigating noise impacts. Consideration of how airspace change will impact local communities with possible implications for the area's heritage assets.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.
Sustainable Aviation Fuels (SAF) and next generation aircraft  (For reference see Chapter 9 Climate Change Resilience, chapter 12, 12.1, 12.2, 12.1.14, 12.5.11, 12.23 point 4, 12.4 and 12.11.5)	Future legislative targets relating to the introduction of Sustainable Aviation Fuels (SAF) and next generation aircraft are presented as "certainties" without accounting for probability of delivery.  In addition, "efficiency savings" are presented as pure gains. This has implications for the assessment of greenhouse gas emissions, air	Assess and account for, in a meaningful way, the probability of the delivery of hydrogen/Low Carbon aircraft and sufficient quantities of SAF being available in the future.  Sensitivity analysis using uncertainty analysis should be undertaken to reflect the probability of realisation. Graphics should be updated to show this meaningfully and clearly e.g.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.

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	quality and noise generated by the Proposed Development.	<p>apply uncertainty bars / probability bars to figures 12.1 and 12.2 of ES chapter 12.</p> <p>Historically, efficiency improvements are offset by increased use, see Jevons Paradox. Any efficiency gains in future and next generation aircraft are likely to be at least in part or totally offset by an increase in flying. For example, although jet engines are considerably more efficient than in the 1950s, they are also significantly larger and more powerful. Aircraft size is typically increased to accommodate more passengers thus negating the efficiency savings. This must be adequately accounted for and graphically displayed within the conclusions.</p>	
Ensuring the delivery of local benefits to Buckinghamshire from the Local Employment and Training Strategy (including procurement)	Not clear that the development maximises the benefits locally in Buckinghamshire	Continue to engage with BC on the Local Employment and Training Strategy. BC would welcome involvement in the Economic Development Working Group.	BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.

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<p>Extent of consultation in relation to potential amendments to the Limits of Works and the discharge of DCO Requirements</p> <p>(For reference see the following elements of the draft DCO: Article 6(3); paragraphs 2(1) and 2(4) of Part 1 of Schedule 2; paragraph 6 of Part 2 of Schedule 2; paragraph 10 of Part 2 of Schedule 2; paragraphs 31-33 of Part 4 of Schedule 2 and paragraph 36(3) of Part 5)</p>	<p>When considering the implications of paragraph 36 (3) of Part 5 of Schedule 2 of the draft DCO on consultation, as part of the requirement discharge process, BC would emphasise the need to ensure that relevant consultees are stated within the wording of requirements, where considered necessary and appropriate. As currently written the draft DCO allows for the agreement of the aforementioned DCO requirements, as well as for works outside of the limit of works established by Article 6, without the need to consult outside of the relevant planning authority. Due to the uncertainty of the nature of any future changes BC has concerns that key consultee input could be absent from the decision-making process.</p>	<p>Amendments to the referenced article/paragraphs/requirements to include a requirement to consult with key external consultees, where relevant. In the absence of details regarding any proposed future change it is not possible to rule out the need for external consultee input into the decision-making process.</p>	<p>BC are willing to engage positively with the Applicant with a view to addressing its concerns within the Examination timeframe.</p>
<p>Absence of Buckinghamshire Council from membership of the Environmental Scrutiny Group</p>	<p>Given the remit of the Environmental Scrutiny Group (ESG), particularly in relation to any</p>	<p>Amending of Requirement 27 of the draft DCO to include</p>	<p>BC are willing to engage positively with the Applicant with a view to</p>

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	approved increase in the Night quota cap (requirement/paragraph 27 of Part 4 of Schedule 2 of the draft DCO) and when considering the current uncertainty regarding the submitted traffic data, BC would request its inclusion in the ESG moving forward in order to allow it to represent its communities' best interests effectively.	Buckinghamshire Council as a member of the ESG.	addressing its concerns within the Examination timeframe.