



# Luton Airport DCO Principal Areas of Disagreement

<b>DATE:</b>	22 June 2023	<b>CONFIDENTIALITY:</b>	Public
<b>SUBJECT:</b>	Luton Airport DCO Principal Areas of Disagreement Summary Statement (PADSS)		
<b>PROJECT:</b>	70107305-WSP-EAC-0000-RP-EI-00001	<b>AUTHOR:</b>	Various
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## LUTON AIRPORT EXPANSION DCO PRINCIPAL AREAS OF DISAGREEMENT SUMMARY STATEMENT (PADSS)

This report has been prepared by WSP UK Ltd (WSP) on behalf of Hertfordshire Host Authorities (Hertfordshire CC, Dacorum BC, and North Herts Council) for the London Luton Airport Expansion Project (the Proposed Development). Luton Rising (the Applicant) has submitted an application for development consent for the Expansion of London Luton Airport from its current permitted cap of 18 million passengers per annum (mppa) up to 32 mppa (the Proposed Development) and this was accepted by the Examining Authority for Examination on 27 March 2023.

This document identifies the principal areas of disagreement that have been identified by WSP's specialists when reviewing the Proposed Development's Environmental Statement for input into the Hertfordshire Host Authorities' Principal Areas of Disagreement Summary Statement to be submitted to the Examining Authority.



**Table 1 – Principal Areas of Disagreement Summary Statement (PADSS) from North Hertfordshire District Council**

Principal Issue in Question	Concern Held	What needs to change / be amended / be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
<b>Air Quality</b>			
Methodology in relation to assessing ammonia emissions	The Applicant stated in the PEIR (Vol 3, App 7.1, paragraph 3.2.5) that “ <i>Consultation with Natural England on the method for assessing ammonia emissions for the ecological sites will be carried out and any updates to the methodology will be included in the ES.</i> ” No reference is made to this consultation in ES Chapter 7.	The Applicant should confirm if Natural England have agreed to the methodology used for assessing ammonia emissions on ecological sites.	TBC
Method for modelling NH <sub>3</sub> and nitrogen deposition	The approach taken in modelling NH <sub>3</sub> and nitrogen deposition was to use the ‘National Highways Ammonia N Deposition Tool version 2 – DRAFT’ (2022).	The Applicant should confirm that the use of this draft tool was agreed with Natural England. The Applicant should provide a copy of this tool and report from National Highways (it is not readily available in the public domain).	TBC
Green Controlled Growth Framework, Table 4.3	The limit for annual mean PM <sub>2.5</sub> concentration up to 2040 is not set to the Government target of 12µg/m <sup>3</sup> for 2028, and the level 1 and 2 thresholds do not reflect this.	The Applicant should update this table to reflect the Government PM <sub>2.5</sub> target of 12µg/m <sup>3</sup> for annual mean concentrations.	TBC

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<p>Green Controlled Growth Framework, Chapter 4 and Appendix D - Air Quality Monitoring Plan</p>	<p>The GCG Limits and Thresholds for air quality that are given in Chapter 4, Table 4.2 only serve to address issues of compliance with Government standards for annual mean pollutant concentrations. This does not support a proactive approach to emissions management as it can only address the measured annual mean pollutant concentrations retrospectively. It also does not serve to help protect people from acute health conditions such as asthma that can be brought on by short-term air pollution episodes - and could be associated with emissions from airport related sources (LTO, airside, landside and roads carrying airport related traffic). As such, the proposed air quality monitoring plan is inadequate.</p> <p>Furthermore, the proposed use of “<i>AQMesh or equivalent</i>” (Appendix D, paragraph D2.1.1) is not sufficient to demonstrate compliance with Government standards as such indicative methods (even with MCERTS certification) do not meet Defra reference method equivalence criteria (refs: <a href="https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-">https://laqm.defra.gov.uk/wp-content/uploads/2022/08/LAQM-TG22-August-22-</a></p>	<p>The Applicant should revisit the Air Quality Monitoring Plan as proposed under the current Green Controlled Growth Framework so as to include 24-hour mean PM<sub>2.5</sub> thresholds to better address the matter of acute human health impacts and enable a more proactive approach to emissions management.</p> <p>The Applicant should include continuous monitoring using a method that meets the Defra reference method equivalence criteria for PM<sub>10</sub> and PM<sub>2.5</sub>.</p>	<p>TBC</p>

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	<p><a href="#">v1.0.pdf</a> and <a href="https://uk-air.defra.gov.uk/networks/monitoring-methods?view=mcerts-scheme">https://uk-air.defra.gov.uk/networks/monitoring-methods?view=mcerts-scheme</a>). The Palas Fidas 200, which meets the Defra reference method equivalence criteria and enables simultaneous measurement of PM<sub>10</sub> and PM<sub>2.5</sub>, would be suitable for this purpose.</p> <p>With substantial evidence accumulating linking finer fractions of particulate matter (especially PM<sub>2.5</sub> and smaller) to chronic and acute health conditions, there is a need to have short-term thresholds to protect human health. Although at present there are no Government standards to address short-term concentrations of PM<sub>2.5</sub> (or finer fractions), the World Health Organisation (WHO) gives interim targets and guideline levels (<a href="https://www.who.int/publications/i/item/9789240034228">https://www.who.int/publications/i/item/9789240034228</a>) for 24-hour mean PM<sub>2.5</sub> which could be adopted now. As the Government has recently legislated a 10µg/m<sup>3</sup> target (for 2040) for annual mean PM<sub>2.5</sub>, which is the same threshold as the WHO interim target 4, with a Government interim target of 12µg/m<sup>3</sup> (for 2028), it would seem appropriate to set thresholds for 24-hour mean PM<sub>2.5</sub> concentrations based at least on the WHO</p>		



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	<p>interim target 3, which is 37.5µg/m<sup>3</sup> not to be exceeded more than 3-4 days per year (the corresponding WHO interim target 3 for annual mean PM<sub>2.5</sub> is 15µg/m<sup>3</sup> - so it is reasonably in-line with the Government's interim annual mean target). A 24-hour mean threshold would enable a more proactive approach to emissions management than would be possible if only annual mean thresholds are used.</p>		
<b>Climate Change Resilience</b>			
N/A	N/A	N/A	N/A



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<b>Cultural Heritage</b>			
Built Heritage			
Setting impacts to non-designated cultural heritage assets.	Appendix 10.2 Cultural Heritage Gazetteer: the gazetteer states that there are no physical impacts to non-designated above ground assets, so these are then scoped out. The settings impacts to non-designated assets should be considered. As per the National Planning Policy Framework (NPPF) para 203: 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application.'	The Applicant should assess the setting of non-designated assets.	TBC
Historic Hedgerow Assessment	It is unclear if an assessment has been made of historic hedgerows (please see Legislation, Policy and Guidance).	Confirmation that no assessment of historic hedgerows is required or an assessment of historic hedgerows if required.	TBC
Visualisations	Appendix 14.7 includes wirelines for some views and block forms for others. It is considered that block forms should have been used throughout.	The Applicant should consider providing block forms where wirelines have been provided.	TBC



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Assessment against NPPF	Although the NPPF is mentioned in the reports, at no point is there is an assessment in NPPF terms (e.g. no harm, less than substantial harm, substantial harm, etc) in Appendix 1.	Assessment in terms of the NPPF compliance should be carried out.	TBC
<b>Archaeology</b>			
Possible Roman Building (HER ref. 7358)	The ES Chapter has not sufficiently established whether the possible Roman building (HER ref. 7358) is present within the Proposed Development Site or not, and the potential adverse environmental effect is unreported.	The Applicant should establish with greater certainty whether the asset is within the site or not. The Applicant should carry out further trial trench evaluation in the eastern part of phase 2 area 4. This will require surveying in the aviation pipeline and reducing the 50m buffer around it so that further trenching can take place. Should the asset be present within the site the ES chapter should consider the impact of the proposals upon it and put in place a suitable mitigation strategy.	TBC



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Potential impacts on Winch Hill Farm	The ES Chapter has not reported the potential adverse environmental effect arising from construction phase impacts on possible buried remains associated with Winch Hill Farm, a 17th century farmstead with medieval origins (HER 11016).	The ES Chapter should consider the potential impacts on buried remains of Winch Hill Farm and put in place appropriate mitigation if required.	TBC
Potential for possible, previously unrecorded archaeological remains dating from the prehistoric period onwards	The ES Chapter has not reported on the environmental effects of the Proposed Development in respect of the potential for possible, previously unrecorded archaeological remains dating from the prehistoric period onwards. In the unevaluated areas of the Proposed Development Site these could be significant. The assessment of such potential is provided in TR020001-000708-5.02 Environmental Statement Appendix 10.1 Cultural Heritage Desk-based Assessment but needs to be summarised in the ES Chapter.	The majority of that part of the site that lies within Hertfordshire has not yet been subject to trial trench evaluation and the potential for archaeological remains dating from the pre-historic period onwards has not been clarified from the initial desk based assessment. The impact on such possible, previously unrecorded archaeological remains needs to be assessed in the ES chapter and where impacts are identified, a suitable mitigation strategy put in place.	TBC





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Site archaeological evaluation	The ES should clarify that part of the Proposed Development Site has not yet been evaluated and state this as a clear limitation.	The Applicant should add this information to the limitations and ideally include a figure in the ES Chapter showing areas that have been evaluated to date and areas that are to be evaluated post-determination. Areas to be evaluated post-determination should be secured by a requirement in the DCO.	TBC
Archaeological impacts	The ES should provide information on the nature of the development proposals that might have an archaeological impact.	The ES should include a section describing the details of the enabling works and construction works proposed and how this might have an archaeological impact e.g. preliminary top soil strip, landscaping, planting, services and utilities, temporary works areas and temporary access.	TBC
<b>Economics and Employment</b>			
Effects related to outbound tourism.	The effects related to outbound tourism have not been assessed. A justification for the lack of quantification is provided but some elements of the	The Applicant should refine and report on the more easily quantifiable elements for outbound tourism	TBC

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	increase in passenger numbers from 18mppa to 32mppa would seem to lead to quantifiable economic effects, such as the additional use of local services and retail.	including use of local infrastructure e.g. hotels and public and private services.	
Forecast level of passenger demand.	There is no justification in the chapter for the level of passenger demand.	The Applicant should provide justification and / or cross references for the level of passenger demand.	TBC
Supply chain	No assessment of economic effects in relation to the supply chain have been carried out for the specific materials, services and equipment required for the Proposed Development.	The Applicant should include a supply chain assessment.	TBC
<b>Health and Community</b>			
Consideration of communities in close proximity to the airport	The baseline has not given enough attention to the communities situated in close proximity to the airport, but which fall outside of the 'local neighbourhood area' portion of the study area. By reporting on the 'wider area' at a county level, there is a risk that vulnerable groups within the districts situated in close proximity to the airport	The Applicant should provide evidence of consideration of vulnerable groups within districts situated in close proximity to the airport.	TBC



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	have not been identified, and potential impacts missed.		
Securing of mitigation measures to address effects on mental wellbeing.	Mitigation to address the significant effect on mental wellbeing that has been identified once the Proposed Scheme is operational should be secured to minimise harm on the affected populations.	The Applicant should demonstrate how it is securing mitigation to address significant effects on mental wellbeing.	TBC
<b>GHG</b>			
N/A	N/A	N/A	N/A

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<b>Traffic and Transportation</b>			
Future year VISSIM modelling related to Traffic and Transportation	<p>We have the following concerns about the future year VISSIM modelling:</p> <ul style="list-style-type: none"> <li>• Inconsistent with strategic modelling.</li> <li>• Unconventional method of applying growth – therefore lack of confidence in forecast models</li> </ul>	Confirmation of whether the VISSIM models have been developed using outputs from the strategic model. Share the associated results and assumptions for the junction capacity assessments.	TBC
Core Scenario for traffic modelling and assessment	We are concerned that the Core Scenario includes highway improvements which are not committed associated with the M1 9-10 hard shoulder running as this scheme is not in the National Highways RIS programme. This will have an impact on congestion levels and wider traffic routing which is not currently reflected in the assessments. The mitigation response could be different to that currently presented.	The core transport modelling scenario should be refined to reflect the expected improvement scheme (if any). More detailed data and assessment of the sensitivity test that excludes this improvement should be provided to understand the impacts and mitigation in the wider local road network.	TBC



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Covid 19 and baseline traffic	There is insufficient baseline information incorporating any impacts of the Covid-19 Pandemic. The basis for the traffic forecasts and mode share targets is not based on the post-pandemic situation and the Base model is 7 years old.	Evidence of how traffic flows and public transport usage have changed between 2016 and 2022/ 2023 should be provided.	TBC
Geographic distribution of airport trips (all modes)	The assumptions around the geographic distribution of airport trips (all modes) is not adequately represented. It is not possible to fully appreciate the share that travels through North Herts and the forecasts	Additional detail on the geographic distribution of airport trips (all modes) including the detail through Hertfordshire	TBC
Target mode shares are only supplied as a percentage	The percentages mask the trends in absolute numbers of trips and it is unclear whether these match to the numbers of trips assumed within the Transport Assessment	Additional detail on the numbers of trips rather than just percentages should be provided to be able to appreciate the impacts that are being presented in real terms	TBC
The proposed mitigations are in conflict with local policy for	The mitigations proposed in Hitchin provide increased capacity for vehicular traffic which is in	Further detail on the need for the mitigation and incorporation of active	TBC



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improving sustainable modal choice	conflict with local plans and policies to enable and support active travel	and sustainable travel with the design. North Herts would like to see interventions which make access to the airport by sustainable modes, including public transport, more attractive.	
The traffic impacts in North Herts	Insufficient information about how the traffic impacts in North Herts would be mitigated, monitored and managed	Additional detail should be provided by the Applicant in the TA and from the modelling about the impacts in North Herts, particularly for the sensitivity test scenario which is the most realistic traffic scenario presently and is insufficiently detailed in the TA.	TBC
Public transport investment in new / improved services	Insufficient detail is provided on the level of investment and responsibility for providing support for additional public transport services, this is mentioned in the application material but there is no commitment towards implementation	Details of who is the responsible party for securing, providing and funding additional public transport from the east of the airport. Expected programme for their introduction and where the funding will come from	TBC

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GCG surface access thresholds and limits	There could be a long time lag between detection of a breach in surface access controls and the halting of airport growth. Localised impacts could be untenable for an extended period of time before any mitigating action is necessary.	A clearer mechanism for detecting a breach and halting growth and implementing mitigation.	TBC
GCG surface access mode share targets	The GCG mode share targets for non-sustainable mode share (based on passenger CAA annually collected data) are not related to representative outcomes: decarbonisation, air quality, public health and safety, and road traffic congestion		TBC
GCG surface access mechanisms for managing growth	Unclear relationship between GCG mode share, TRIMMA and Travel Plan monitoring which means impacts on the surface access network could be undetected or continue over an extended period before requiring restrictions on airport growth. Additional detail is required for the adjoining local authorities to fully understand the potential impacts of the growth impacts within their network before mitigating action is taken.	More detail on the expected passenger sample rates / absolute passenger numbers for each target and threshold associated with the GCG. Relationship between the different monitoring mechanisms and requirements for mitigation need further explanation.	TBC



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<b>Water Resources and Flood Risk</b>			
Water Quality	<p>The assessment of impact to water quality of surface and groundwater receptors relies on the treatment specified in the DDS (Appendix 20.4). Given that the review of the DDS has identified data gaps, the Lead Local Flood Authority (LLFA) agree cannot agree with the conclusions regarding impact to surface water and groundwater quality.</p> <p>Furthermore a review of Appendix 20.6 identifies that insufficient evidence is presented to justify that pollution to the chalk aquifer is insignificant.</p>	The data gaps in the Drainage Design Statement (Appendix 20.4) need to be addressed.	TBC
HEWRAT	More clarity is required on how the additional mitigation measures required as identified in the HEWRAT assessment would be secured through the DCO process. Paragraph 7.2.3 of the DDS (Appendix 20.4).	The Applicant should confirm if HEWRAT assessment has been carried out and provide the outputs for the Host Authority's to review.	TBC





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	<p>It is unclear whether HEWRAT assessment has been completed or if it is to be completed at detailed design stage.</p> <p>If a HEWRAT assessment has been completed the details of this should be provided so it can be reviewed by consultees.</p> <p>If the additional mitigation measures are being specified at detailed design stage, confirmation is required that there is sufficient space within the site boundary to deliver the additional mitigation measures required.</p>	<p>The Applicant should confirm if there is sufficient space available to provide the mitigation required to mitigate the effects of the Proposed Development.</p>	
<p>Flood Risk Assessment (Appendix 20.1)</p>	<p>Discussions of existing surface water overland flow paths should be included and assessed and how the development may change or disrupt those flow paths should be included. Appropriate mitigation should be included where there is a change in existing flow paths.</p>	<p>Existing surface water overland flow paths should be assessed.</p>	<p>TBC</p>



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	<p>Details on the off-site Highway Interventions and their potential impact on fluvial flooding should be expanded. It states that the proposed works are limited in scope and scale, however no details are provided on those works.</p> <p>Clarification on what improvements to the local surface water management provision should be expanded upon and more certainty given as to their inclusion and technical feasibility.</p> <p>Flood risk mitigation is not currently secured via an appropriately worded requirement in the dDCO; this needs to be addressed.</p>	<p>Details on the off-site Highways Interventions should be provided and their potential impact on fluvial flooding should be assessed.</p> <p>Information should be provided on improvements to the local surface water management provision.</p> <p>Flood risk mitigation should be secured in a requirement in the DCO.</p>	
Hydrogeological Characterisation Report (Appendix 20.3)	The report states that the “chalk matrix has a high average porosity of approximately 35%.” Typically, porosity is highly spatially variable. It is essential that the Applicant provides data where this is available from previous geotechnical or hydrogeological investigations, if this is not	<p>More information, including calculations, should be provided to support the assumptions and conclusions in the report. Including:</p> <p>Justification for the assumed porosity of the chalk matrix.</p>	TBC



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	<p>available then justification on not undertaking GI until detailed design needs to be provided. A citation should be provided for porosity.</p> <p>The impacts (negative or positive) that are identified through a predictive scenario are not described in detail in the documents. The predictive scenarios are evaluated under the high hydraulic conductivity of upper chalk (2.37E-5m/s). However, typically, the site-specific packer test results indicate significantly lower hydraulic conductivity, in the range of 1E-7 to 1E-8 m/s (Table 5.3). It generates high uncertainty.</p> <p>The WTP (classified as potential for groundwater flooding of property situated below ground level) and southern infiltration tank (classified as potential for groundwater flooding to occur at surface) are located in areas susceptible to groundwater flooding, as per Figure 20.5.</p>	<p>Provide more detail no the impacts of the predictive scenario including justification for the use of the high hydraulic conductivity of upper chalk. Justification of the location for the WTP in an area of groundwater flooding, should be provided.</p>	



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<p>Drainage Design Statement (Appendix 20.4)</p>	<p>Large capacity tanks are required for maintenance and access. There is no reference to provision or the number of tankers required to empty the tanks during periods of routine and emergency maintenance.</p> <p>No drawing is provided showing proposals for Sustainable Drainage Systems (SuDS) features and it is not clear if sufficient space is included in the design for them. Clarification is required on whether the water quality requirements are based on Design Manual for Roads and Bridges (DMRB) or SuDS Manual.</p> <p>This report references filter drains to be provided in areas with limited space. Without benefit of drawings it is hard to understand if there will be a maintenance/access issue or if this has been considered within the available land.</p> <p>The estimated volume of existing soakaways is based on assumptions. The volume of existing</p>	<p>There is quite a lot of missing information, including calculations, in the DDS. The Applicant should provide the missing information listed in column 2.</p> <p>The Applicant should demonstrate, that the water consumption data is appropriate to use for the Proposed Development.</p>	<p>TBC</p>



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	<p>soakaways should be checked and clarified based on what is available on site.</p> <p>The Applicant references Appendix 20.4 Drainage Design Statement, stating a calculated average demand of potable water of 7.5 l/s. Review of Appendix 20.4 Drainage Design Statement indicates this value was calculated based on 2019/2020 potable water consumption data. The dates that data was collected are unknown. Given the significant nationwide lockdowns experienced in 2020 it is probable that the baseline data will not represent the 'average' year.</p> <p>There is no reference to what rainfall data was used.</p> <p>There is no information or reference made with respect to the condition of the existing network or residual life of the existing network.</p>		



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	<p>No reference has been made to what method was used in calculating greenfield run off rates.</p> <p>The drainage design statement states it is 'based on a conservative approach' but no information or detail is provided on this conservative approach.</p> <p>In reference to rainwater harvesting further information is required including how these systems designed and managed and whether the design is in accordance with SuDs Manual.</p> <p>Potential locations of rainwater harvesting tanks are provided but no information has been provided on how these potential locations were arrived at.</p> <p>Clarification is required on how surface water runoff be diverted away from the water environment, (including the techniques for the management and monitoring) for when the fire training ground is both in and not in use. Also</p>		



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	clarification is sought on how fire water will be managed during an emergency scenario.		
Water Cycle Strategy (Appendix 20.5)	<p>The report provides no reference to the Environment Act 2021 that sets new polices and targets for improving the natural environment, including those relating to sewage, abstraction and water quality. In particular the Act may change the requirements and operation of the relevant sewerage and water supply utility companies, which may in turn affect Proposed Development operations.</p> <p>The assessment of post-development water demand for each Assessment Phase ranges from a baseline of 18 mppa to a future post-development number of 32 mppa. It is unclear if 32 mppa is the maximum permitted capacity and therefore provides some assurance that passenger numbers will not increase beyond this number without a requirement for further assessment. Inset 3 in Section 4.8 indicates significant growth in</p>	<p>The Applicant should review the requirements of the Environment Act 2021 and understand the implications that this may have for the Proposed Development, and set out any proposed measures to ensure with compliance with the Act.</p> <p>The Applicant should clarify if the post water demand is a maximum.</p> <p>The Applicant should provide justification for the use of the figures used to calculate water demand.</p> <p>The Applicant should provide detailed calculations for the storage tank and provide information on how seasonal</p>	TBC



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	<p>passenger numbers from c.10 mppa in 2015 to c.18 mppa in 2019.</p> <p>The calculation of water demand in Assessment Phase 1 uses the calculation “0.9*9l/s – 7.5l/s = 0.6l/s”. It is unclear where the figure of 9l/s comes from as this does not align with the predicted water demand figures in Table 5.1. Similarly the report states a calculated water demand for Assessment Phase 2a of 10.1l/s. It is unclear how this figure has been calculated. Applying the same formula used in Para 6.2.7 suggests a water demand of 10.0l/s (0.9*11.1l/s) if applying 1 decimal place.</p> <p>The report calculates that a storage tank of approximately 3,000m<sup>3</sup> would be sufficient to maintain a constant monthly supply of approximately 3,400m<sup>3</sup>. Detailed calculations have not been provided for review. It is unclear how this assessment has taken into account seasonal fluctuations and, most importantly, reduced rainfall during summer months that may be exacerbated</p>	<p>fluctuations have been taken into account as detailed in column 2.</p> <p>The Applicant is required to clarify the assumptions made in the report, including information regarding non-terminal water uses and viability for collection and re-use along with clarifying assumptions made regarding variability of supply and demand throughout the year.</p>	





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	<p>by the effects of climate change. It is also expected that the rainfall predicted during the summer months (including climate change effects) is compared against the peak demand that may be experienced during the summer months, rather than the annual average. The calculations appear to only refer to the average water demand. Consideration does not seem to have been given to the peak water demand.</p> <p>The report predicts a potential increase in non-terminal water of 1.7l/s in Phase 2a and 2.5l/s in Phase 2b, increasing the total demand to 5l/s in Phase 2a and 5.8l/s in Phase 2b. The report surmises that this water could be collected following use and treated to be re-supplied as a non-potable water supply. However, it is understood that there is uncertainty about how the non-terminal water is used and therefore we conclude that there would also be uncertainty about how easily this water could be collected for re-use, or how easily these uses could be supplied</p>		



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	<p>with a non-potable supply. The report also surmises that there would be a relatively consistent supply and demand balance, which we conclude is currently unknown based on the information provided in the report.</p> <p>The report references Table 5.1 and states a water demand figure of 13.3l/s. This appears to be incorrect and should state 13.2l/s.</p>		
Hydrogeological Risk Assessment (Appendix 20.6)	<p>The infiltration tanks have been designed to an infiltration rate of 0.085 m/hr. The risk of clogging is not considered, which would reduce the infiltration rate over time and should highlight maintenance and mitigation plans.</p> <p>The assessment states “A constant discharge to ground in the Northern Infiltration Tank has been assumed for this assessment based on an estimated average discharge rate of 30 l/s”. The calculation is not provided.</p>	The Applicant should provide an update to the Hydrological Risk Assessment to ensure that these issues are addressed in particular ensuring that the missing information/ justifications and calculations are provided.	TBC



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	<p>The assessment states “the proposed discharge concentrations of cadmium, chromium, copper and chlorine are considered to be acceptable and are unlikely to result in significant pollution of groundwater.” The discharge concentration of the above-mentioned elements is not described, and impact assessment is also not provided. These contaminants, in high enough concentrations, could have a significant impact on the groundwater quality aspect of the chalk aquifer.</p> <p>The required mitigation has not been provided.</p> <p>The impact of contaminants on groundwater has been identified; however, it has been recommended to evaluate it during the detailed design. It should be assessed at this stage.</p>		
<b>Noise - External</b>			



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Baseline	The incorrect baseline is used, where the airport was in breach of a noise-related panning condition during the day and night.	2019 'compliant' or 2022 baseline should be used.	TBC
Policy compliance	<p>Whether the policy requirement to limit and where possible reduce the number of people significantly affected by aircraft noise is complied with.</p> <p>Whether the policy requirement for a balance between growth and noise reduction is appropriately weighted.</p>	The Applicant needs to revise their assessment to comply with UK aviation noise policy.	TBC
<b>Landscape and Visual</b>			
Landscape Chapter lacks clarity and requires a paper chase to determine impacts.	<p>The Chapter and its associated appendices are not well summarised, requiring continual cross checking of other documents. This makes understanding of the Chapter circuitous and time consuming.</p> <p>Whilst much of the assessment is agreed with, the Chapter lacks clarity, transparency and a</p>	If there is an opportunity, the Applicant should update the chapter to ensure that the assessment is clear to the reader and to ensure that the Host Authorities' can agree with the outcomes.	TBC

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	<p>robustness of reporting that diminishes confidence in the reader. The Chapter should be complete as a standalone document, incorporating all necessary key information to make understanding of the assessment possible. It should not require review of all associated appendices in order to understand the Chapter.</p>		
<p>Lack of consideration of aesthetic and perceptual qualities contributing to landscape character and of landscape effects on the Area of Outstanding Natural Beauty (AONB).</p>	<p>Numerous clarifications are still required and various inconsistencies are noted. In particular, there is a lack of consideration of aesthetic and perceptual qualities contributing to landscape character. It is considered that impacts on the Area of Outstanding Natural Beauty (AONB) are not fully considered, particularly in terms of landscape effects.</p>	<p>Clarifications need to be addressed, aesthetic and perceptual qualities relating to landscape character need to be addressed, full consideration of impacts on the AONB are required.</p>	<p>TBC</p>
<p><b>Biodiversity</b></p>			
<p>Justification of Methodology</p>	<p>'Important' ecological features at county scale and below are not effectively justified, judgements made in the assessment at this scale could be said to be unevidenced.</p>	<p>The Applicant should justify the judgements at this scale.</p>	<p>TBC</p>

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Embedded mitigation	The approach to embedded mitigation does not appear to be appropriate and in some cases refers to compensatory habitat provision for features that are lost. Therefore the validity of the assessment in this regard can be questioned.	The Applicant should update the assessment to ensure embedded mitigation captures the appropriate design measures and not additional mitigation or compensation.	TBC
Approach to identifying features requiring additional mitigation and why additional mitigation is required.	Several measures are proposed on receptors that are not considered to have significant effects in the assessment e.g. birds. The process of identifying the required additional mitigation should be clarified. Therefore, the chapter does not provide a clear narrative for these features.	Several features are assessed in the mitigation and residual effect sections and not in the initial assessment (where embedded mitigation only is included).	TBC
Long term effects	The assessment of significance in the long term is usually presented without evidence. Where woodland and trees are requiring mitigation or compensation the extent of the period considered 'long term' requires detail to provide the appropriate certainty that it will be successful.	Where woodland and trees are requiring mitigation or compensation the extent of the period considered 'long term' requires detail to provide the appropriate certainty that it will be successful.	TBC