

London Luton Airport Expansion

Buckinghamshire Council Local Impact Report

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Directorate for Planning, Growth & Sustainability

Planning & Environment

Buckinghamshire Council

King George V House, King George V Road

Amersham, Buckinghamshire, HP6 5AW

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1. Introduction

1.1. Terms of Reference

- 1.1.1. This report comprises the Local Impact Report (LIR) of Buckinghamshire Council, herein referred to throughout this report as the 'Council'. The Council is a neighbouring authority and is commenting on the London Luton Airport Expansion Development Consent Order (DCO), referred to as 'the Scheme'.
- 1.1.2. The LIR intends to provide the Examining Authority (ExA) with the Council's understanding of the Application Site, surrounding area, relevant local issues, planning policies and how the Scheme positively and adversely impacts this context. The review of impacts highlights the key issues arising from the Scheme, the importance of these impacts, and the extent to which the applicant's draft DCO (dDCO) (AS-067) adequately addresses them.
- 1.1.3. The LIR presents a broad view of the impacts on the local area. In producing the LIR, the Council has not sought the views of local interest groups as to any particular matters that should be reflected in the report.
- 1.1.4. While the LIR mentions the key issues, it does not provide the detail of the Council's positions on the merits of the application. This detail is presented in the Council's Written Representation (WR).

2. The Scheme Context

2.1. Description of the area

- 2.1.1. London Luton Airport is located on a raised platform at the north-eastern end of the Chiltern Hills.
- 2.1.2. The land on which the Scheme will be constructed is referred to as the Application Site. The Applicant has split the Application Site into four distinct geographical components: the Main Application Site; off-site car parks; off-site highways interventions; and off-site planting.
- 2.1.3. The Main Application Site encompasses approximately 428ha of land to the east of the airport, within the administrative areas of Luton Borough Council, Central Bedfordshire Council and North Herts Council.
- 2.1.4. The two areas proposed for off-site car parks measure 1.04 ha and 2.41 ha of land respectively. The two locations for the proposed Off-site Car Parks to be delivered are to the south-west of the airport, within the administrative area of Luton Borough Council.
- 2.1.5. In total an area of approximately 24ha is included for off-site highways interventions including works to the following roads, all located within the administrative areas of the Councils of Luton, North Herts, Central Bedfordshire and Dacorum:
- Windmill Road and Kimpton Road.
 - A1081 New Airport Way, B653 and Gipsy Lane.
 - A1081 New Airport Way, A505 Kimpton Road and Vauxhall Way.
 - Eaton Green Road and Lalleford Road.
 - Wigmore Lane and Crawley Green Road.
 - Eaton Green Road and Wigmore Lane.
 - A1081/London Road (North).
 - A1081/London Road (South).
 - Windmill Road/Manor Road/St. Mary's Road/Crawley Green Road.
 - Crawley Green Road/Lalleford Road.
 - A602 Park Way/A505 Upper Tilehouse Street.
 - A505 Moormead Hill/B655 Pirton Road/Upper Tilehouse Street.
 - A602 Park Way/Stevenage Road.
 - M1 Junction 10.
 - Eaton Green Road/Frank Lester Way.
 - A505 Vauxhall Way/Eaton Green Road.

- 2.1.6. Agricultural field margins both to the north-east and south of the Main Application Site are proposed for off-site mitigation planting. This land is located within the administrative areas of North Herts Council and Central Bedfordshire Council.
- 2.1.7. No development is proposed within the administrative area of Buckinghamshire Council; however, the Applicant acknowledges in a number of locations within the DCO documents that there is potential for impacts associated with the Proposed Development within Buckinghamshire including: construction activities; changes in traffic flows and composition; employment opportunities; and from aircraft using flight paths associated with London Luton Airport. The potential for cumulative impacts to be experienced in Buckinghamshire is also acknowledged by the Applicant.

2.2. Need for the Scheme

- 2.2.1. There is expected to be strong growth in demand for air travel, with the market recovering to 2019 (pre-COVID 19) levels by around 2024. This growth is expected to continue, and the airport is expected to reach 32 million passengers per annum (mppa) at some point between the years 2042 and 2049. Additional capacity will be required at London Luton Airport if it is to keep pace with this level of projected demand.
- 2.2.2. There is clear government policy support for aviation growth and for airports making best use of their runways, as set out in various national aviation policy documents.
- 2.2.3. The Scheme seeks to expand the current operational airport on a phased basis, including the construction of a new passenger terminal and additional aircraft stands to the north-east of the runway. This will take the overall passenger capacity to 32 million passengers per annum (mppa). In addition to the above and to support the initial increase in demand, the existing infrastructure and supporting facilities will be improved in line with incremental growth in capacity of the airport.
- 2.2.4. The Council understands Government policy on aviation in the context of the need case for the Scheme. The general principle of the Scheme is understood, and the Council can see some benefits for Buckinghamshire, particularly in respect of economic development and growth. Notwithstanding this, the Council has some concerns about the conclusions drawn relating to the assessment of the potential environmental, sustainability and social impacts of the Scheme on Buckinghamshire. These concerns are set out in this LIR, supported by the Council's WR.

2.3. Statutory Development Plan

- 2.3.1. Given that the Scheme is a Nationally Significant Infrastructure Project (NSIP), the following national documents have the status of material considerations in planning terms:

- Aviation Policy Framework (APF), March 2013.
 - Airports National Policy Statement (ANPS), June 2018.
 - Beyond the Horizon: The future of UK aviation – Making best use of existing runways (MBU) June 2018.
 - Aviation 2050 – the future of UK aviation, December 2018.
 - Flightpath to the Future (FttF), May 2022.
 - Jet Zero Strategy: delivering net zero aviation by 2050, July 2022.
 - National Networks National Policy Statement (NNNPS), December 2014.
 - National Planning Policy Framework (NPPF) 2021.
- 2.3.2. The Airports National Policy Statements recognises the relevance of development plan policies.
- 2.3.3. The relevant Development Plan documents of the host authorities (Luton, North Hertfordshire, Central Bedfordshire and Dacorum) are as follows:
- Luton Borough Council Local Plan 2011-2031 (adopted 2017).
 - Central Bedfordshire Council Local Plan 2015-2035 (adopted July 2021).
 - North Hertfordshire District Council Local Plan 2011-2031 (adopted November 2022).
 - Dacorum Borough Council Core Strategy 2006-2031 (adopted September 2013).
 - Saved policies of the Dacorum Borough Local Plan 1991-2011 (adopted 2004).
- 2.3.4. As stated above, whilst the submitted DCO Application does not propose any development within the administrative boundaries of Buckinghamshire Council, effects associated with the Proposed Development may be felt within Buckinghamshire. The development plan for Buckinghamshire Council is a relevant material consideration in the assessment of these effects.
- 2.3.5. The relevant development plan documents for Buckinghamshire Council are as follows:
- Vale of Aylesbury Local Plan (adopted 2021).
 - Buckinghamshire Minerals and Waste Local Plan 2016-2036 (adopted 2019)
 - Edlesborough Neighbourhood Plan (Made 2017).
 - Wingrave with Rowsham Neighbourhood Plan (Made 2016).
 - Pitsone Neighbourhood Plan (Made 2016).

- Ivinghoe Neighbourhood Plan (Made 2018).
- Slapton Neighbourhood Plan (Made 2018)
- Cheddington Neighbourhood Plan (Made 2015).

3. Review of Impacts

- 3.1.1. This section of the LIR addresses each topic that the Council considers relevant within a separate sub-section. Sub-sections follow the same format. Policies in the Local Plan are highlighted where they are considered relevant to the impacts of the Scheme on the topic, supported by references to strategies as appropriate. This context is used to support the expression of the key issues for the local authority and the local community; followed by a commentary on the extent to which the Applicant addresses these issues by reference to the application documentation, including the DCO articles, requirements and obligations, as relevant.
- 3.1.2. Where appropriate, the LIR reinforces points made previously within the Council's Relevant Representations (RR-0166) and the Principal Areas of Disagreement Summary Statement (PADSS) (AS-053), such that the ExA and the Secretary of State have clarification of the Council's views.

3.2. Climate Change and Greenhouse Gases

Policies

- 3.2.2. The Vale of Aylesbury Local Plan (VALP)¹, adopted 2019, contains the following: *"The Council will manage development in a way that ensures that climate change is adapted to and mitigated against" (Objective Number 7); and Policies "S1 Sustainable Development for Aylesbury Vale"; and "C3 Renewable Energy".* The Council's Climate Change and Air Quality Strategy (CCAQS)² was adopted in 2021. The most relevant policy is *"Action 48. Work with neighbouring local authorities ... to reduce air pollution impacts from cross-border and major transport hub developments"*. It sets out the Council's policy with respect to the mitigation of and adaptation to climate change to achieve net zero carbon emissions by 2050 and improve air quality across Buckinghamshire. It sets out the aims, objectives and actions that the Council has committed to.

Issues

- 3.2.3. The Council is keen to ensure that the inherent uncertainty associated with technological development in the aerospace sector is correctly factored into the assessment of impacts on Climate Change. As described in detail within the WR, the Council believes the Applicant's Greenhouse Gas (GHG) Assessment to be inadequate in relation to this matter. It is reasonable that the Applicant has based its core planning case upon established Government policy as outlined in the Jet Zero Strategy (JZS) (2022). However, the Applicant has failed to reflect the inherent uncertainty of the technological development outlined within the JZS by

¹https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Aylesbury_local_plan_L46JWaT.pdf (Accessed 22/08/2023)

² <https://www.buckinghamshire.gov.uk/environment/climate-change-and-sustainability/view-the-climate-change-and-air-quality-strategy/climate-change-and-air-quality-strategy/> (Accessed 22/08/2023)

failing to conduct appropriate sensitivity analyses with respect to the resulting GHG emissions from different air traffic movement (ATM) scenarios, even though it has conducted such sensitivity analyses elsewhere within the Application to assess their effect upon other quantities.

- 3.2.4. The enforcement arrangements proposed by the Applicant would involve the Environmental Scrutiny Group (ESG), which includes Luton Borough Council, recommending the undertaking of enforcement action by the relevant planning authority – also Luton Borough Council. It is observed that Luton Borough Council is also the airport owner, and it is unclear that this potential conflict of interest has been adequately addressed.

Impacts

- 3.2.5. The Council is in agreement with the methodology outlined for assessing the impacts of climate change and the use of Representative Concentration Pathways (RCP) 8.5 modelling (APP-035). No objection is raised to the baseline or future baseline climate assessments. No objection is raised to the proposed mitigations during construction and operation from a climate change resilience perspective.
- 3.2.6. The review of key issues by the Council has enabled the identification of two impacts that are considered relevant to this topic. These impacts are described in this sub-section, supported by an explanation of the way in which the Council would wish to see them addressed by the Applicant.
- 3.2.7. There is a need to account for uncertainty in the assessment of impacts of technological change in the aerospace sector on GHG emissions. This requires two core sets of actions by the Applicant:
- The Applicant should quantitatively assess the effect upon GHG emissions of the “Faster Growth Scenario” as set out in the JZS.
 - The Applicant should conduct sensitivity analyses with respect to the effects of the different technological development trajectories that are recognised within the JZS. This should include, as a minimum:
 - a) What would be the effect upon cumulative emissions of annualised efficiency improvements that still meet the 2% over the whole period, but where the initial improvements are lower and made up for with accelerated development in the 2040s?
 - b) What if sufficient feedstock is not available to supply the required levels of Sustainable Aviation Fuel (SAF)?
 - c) What would the impact upon cumulative emissions if the zero emission aircraft do not develop at the anticipated rate?
- 3.2.8. The above are all uncertainties that are recognised as challenges within the JZS and a sensitivity analysis leading to quantitative assessment is therefore appropriate.

- 3.2.9. There is a need for independent scrutiny of the assessment work undertaken within the environmental workstreams. It is acknowledged that the ESG has been established to provide this oversight and this is welcomed. The Council has reviewed the current membership of the ESG and given its role in relation to enforcement, wishes to be part of the ESG to aid in ensuring its independence. The Council would also support the ESG being given a right of appeal to the relevant Secretary of State (SoS), on the same basis of the equivalent right conveyed to the airport operator.
- 3.2.10. The Council also wishes to have representation of suitably qualified and experienced technical officers on each of the four Technical Panels being proposed, which relate to Air Quality, GHG, Noise and Surface Access – the GHG Technical Panel is the one relevant to this topic.

[Adequacy of the draft DCO / Mitigation](#)

- 3.2.11. The draft DCO (dDCO) (AS-067) has been reviewed from the perspective of controlling impacts on Climate Change and GHG. Key points arising from this review are set out in this sub-section.
- 3.2.12. The Council should be added to the ESG and all four Technical Panels – see Requirement paragraph 20 of the dDCO (AS-067).
- 3.2.13. Within the GCG Framework the ESG Terms of Reference (paragraph A2.3.3) (APP-219) and the dDCO (AS-067) has identified that Airport Operator has a right of appeal to the SoS for Transport. The Council recommends that, in addition to the Council being admitted to the ESG, each of the (then) five Local Authorities sitting within the ESG are additionally given a right of appeal to the SoS. It is noted that de-commissioning of the Scheme has been scoped out (para 9.3.18 of Chapter 9 – Climate Change Resilience of the Environmental Statement (APP-035)). The Council recommends a requirement of the DCO to ensure that a separate assessment is required for future de-commissioning.

3.3. [Transport and Highways](#)

[Policies](#)

- 3.3.2. The Council has reviewed the submissions supporting the DCO application against relevant local policies and strategies, including the Vale of Aylesbury Local Plan, Buckinghamshire's Local Transport Plan 4³ and the Buckinghamshire Council Corporate Plan⁴. The NPPF and the ANPS have been reviewed. Consideration has also been given to Buckinghamshire's Neighbourhood Plans.
- 3.3.3. The NPPF Paragraph 104 states:

³ <https://www.buckinghamshire.gov.uk/parking-roads-and-transport/our-local-transport-plan/> (Accessed 22/08/2023)

⁴ <https://www.buckinghamshire.gov.uk/your-council/corporate-plans-and-policies/corporate-plans-and-priorities/corporate-plan-2020-2025/key-priority-improving-our-environment/> (Accessed 22/08/2023)

“Transport issues should be considered from the earliest stages of plan making and development proposals so that:

(a) the potential impacts of development on transport networks can be addressed;

(b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated.

(c) opportunities to promote walking, cycling and public transport use are identified and pursued;”

3.3.4. Paragraph 110 (b) requires that development should ensure that “safe and suitable access to the site can be achieved for all users”.

3.3.5. Buckinghamshire Council’s Local Transport Plan (LTP) 4 (2016-2036) Policy 6 states the following:

“We will work with partners to improve connections with key airports, to maximise the potential for growth whilst protecting the county’s unique environment. We will work with partners to ensure the views of Buckinghamshire’s residents are represented so aviation works for Buckinghamshire.”

3.3.6. Buckinghamshire Council’s forthcoming LTP5 will seek to prioritise public transport solutions over the use of the private motorcar in order to meet the requirements for ‘Quantifiable Carbon Reduction’. This is under preparation at present and will set the ambitions, policies and plans for delivering transport improvements until 2040. It interacts with England Economic Heartland’s Transport Strategy for the region; and incorporates actions designed to meet the commitments of addressing transport related carbon emissions set in the Climate Change and Air Quality Strategy.

3.3.7. The Buckinghamshire Council Corporate Plan key priority ‘improving our environment’ also sets out that the Council should:

“Continue to manage and mitigate the impact of national infrastructure schemes such as HS2 and East West Rail, on Buckinghamshire’s residents, businesses and special environment.”

3.3.8. Ivinghoe Neighbourhood Plan⁵ contains two policies relating to transport, TRA1:

“Proposals to provide traffic calming, on-street and off-street vehicle parking spaces and safe crossing points in Ivinghoe and Ivinghoe Aston will be supported provided that the proposals are not detrimental to the setting of historic assets and/or settlement character. “

3.3.9. The second policy TRA2:

“All development (other than householder) which generates additional traffic will be expected to contribute proportionately to improved safety and parking through

⁵ https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/IPNP_Referendum_Version_FINAL-accessible.pdf (Accessed 22/08/2023)

agreement with the Highways Authority and Parish Council. In Ivinghoe, this should comprise traffic calming measures, the provision of safe crossing points and additional off-street parking spaces. In Ivinghoe Aston this should comprise traffic calming measures and the provision of safe crossing points.”

Issues

- 3.3.10. The Council is unable to conclude its position regarding the highways impacts within Buckinghamshire, until such time as the Applicant has completed the additional work required by the ExA to update the strategic modelling as set out in the letter from the Applicant to the Examining Authority dated 27th June 2023 (AS-064). In addition to addressing these matters, the Council does not consider that the strategic model is suitable for use in relation to the Buckinghamshire highway network in its current form. The suitability of the traffic model is a fundamental issue affecting the robustness of the conclusions drawn by the Applicant in respect of the Buckinghamshire highway network.
- 3.3.11. Notwithstanding the above, the Council has reviewed the information available at the current time and has identified a series of issues with the transport and highway work undertaken in respect of Buckinghamshire. These are described under a series of sub-headings in this part of the LIR. The requirements of the Council for the Applicant to address the issues is included within the following subsection, under the ‘impacts’ heading.

Issue 1- Technical Concerns with Strategic Model

- 3.3.12. The Council does not consider that the validation and calibration of the strategic model is of an adequate standard within Buckinghamshire to provide certainty of the traffic impacts within the county.
- 3.3.13. Without the certainty of the quality of the modelling as an assessment tool, the exact nature of the impacts within Buckinghamshire cannot be quantified by the Applicants or the Council, and the Council is unable to agree that the assessment methodology is suitable or appropriate in this location.

Issue 2 – Impact of Scheme trip generation within Buckinghamshire

- 3.3.14. The primary link between Aylesbury and the Main Application Site takes the A41 and the B489 before leaving the county on the B488 heading east towards the airport.
- 3.3.15. The Council is aware that sections of this primary link, particularly on the B489, already experience issues due to traffic flows that are poorly suited to the narrow sections that pass through historic villages including Ivinghoe, Marsworth and Pitstone.
- 3.3.16. The Ivinghoe Neighbourhood sets out local policies regarding local highway matters, TRA2 is the most relevant to this proposal. The supporting text explains the existing issues with traffic volumes on the constrained routes through the

village, with HGVs being a particular concern, and highway safety and the lack of suitable crossing points.

- 3.3.17. The route is already subject to a number of measures to protect it from excessive and inappropriate use. Traffic calming measures within the villages, and shuttle working traffic signals on narrow and historic bridges have also been implemented. Within the Council's Freight Strategy⁶ Objective 1 (and sub-policies) is to ensure appropriate road use for HGVs and other freight vehicles. This includes mitigation of freight travelling along unsuitable roads. The Council has implemented a 7.5 tonne weight restriction zone in and around Ivinghoe⁷
- 3.3.18. Accommodating additional traffic flow along this section of the B489/B488 route raises concerns that these pre-existing issues will be exacerbated and existing mitigation measures may be insufficient to appropriately address impacts. The Council has articulated the concerns regarding the level of confidence that can be applied to the assessment of this route by the Applicant within its WR.
- 3.3.19. The Council's objective is to secure mitigation against that pre-existing issue to ensure that the conditions that are currently experienced on this route do not suffer from a deterioration as a result of intensification of use by long distance commuting to the airport as a result of airport expansion.
- 3.3.20. The Local Model Validation Report (LMVR) for the strategic modelling identifies this as a long-distance commuting route and therefore intensification of use of the route is to be expected. It is also noted that based on the information that has been presented to the Council to date, the Applicant is indicating that in the region of an additional 30 movements are expected within the peak hour periods. This would indicate to the Council that this route requires further assessment in order to fully understand the impacts of the Scheme, noting the Council does not consider the strategic model to be fit for assessment purposes within Buckinghamshire at present. The Council at present cannot consider this figure to be reliable due to the outstanding work required to demonstrate that the strategic model can be relied upon.
- 3.3.21. The B488 provides an alternative route between the junction with the B489 and the A41, which the Council considers to be more suitable for through traffic, including that which would be generated by the Scheme and the long-distance commuting route.
- 3.3.22. This is supported by the findings of the Council's review of the accident record on this route, which indicates that there were a greater number of accidents within the past 5 years on the B489 than the B488. The Council does not consider the

⁶ <https://www.buckinghamshire.gov.uk/parking-roads-and-transport/road-freight-and-heavy-goods-vehicles-hgvs/freight-strategy-2018-to-2036/> (Accessed 22/08/2023)

⁷ <https://www.buckinghamshire.gov.uk/parking-roads-and-transport/road-freight-and-heavy-goods-vehicles-hgvs/ivinghoe-freight-zone/> (Accessed 22/08/2023)

B489 to be a safe and suitable or preferential route for accommodating additional trips due to the Scheme.

- 3.3.23. The Council considers it necessary to have continued engagement with the Applicant in order to address the concerns regarding the assessment within the Transport Assessment (APP-203, AS-123, APP-205 and APP-206) and reach an agreement for mitigation on this route to protect the sensitive locations on the B489. The Council reserves its position on the final mitigation measures that may be required to address the impacts on traffic within Buckinghamshire.

Issue 3 – Inadequate Public Transport provision

- 3.3.24. The Council's LTP5 will place greater emphasis on the prioritisation of public transport over the use of the private car as part of achieving 'Quantifiable Carbon Reduction'. It is against this emerging policy context and the existing policy background that the Council considers that the existing public transport commitments by the Applicant (Framework Travel Plan AS-131) are inadequate to address sustainable surface access requirements from the Buckinghamshire area and west of the airport.
- 3.3.25. The Council has been informed that there is to be a Sustainable Transport Fund created, however, there are currently no clearly defined parameters set for establishing the value of that fund. If the Sustainable Transport Fund is not sufficient to support the services across all parts of the highway network needed to support sustainable transport to serve the Scheme it shall not be able to make the provisions necessary to make the application acceptable. On this basis, the Council considers that there is no certainty that any public transport provision can be secured, nor is there clarity around the process for assessing need and benefit.
- 3.3.26. The Council considers it necessary for the Sustainable Transport Fund to be established on the basis of a robust and locationally specific assessment of Luton Airport and its surrounding areas, rather than benchmarking from other airports within the UK, as has been presented as Applicant's proposed approach.
- 3.3.27. The Council considers it necessary for key provisions to be established prior to the setting of the Sustainable Transport Fund's value to ensure that strategic needs are clearly defined and secured through the DCO process.
- 3.3.28. It is also the Council's position that the governance of the Sustainable Transport Fund has not been adequately presented, and therefore it is unclear what structure is to be and if it provides the interested parties and transport authorities with a strong enough voice to ensure that key strategic provisions shall be delivered.
- 3.3.29. Public Transport provision to the airport from the western approaches is an essential provision that is required to provide adequate opportunities for sustainable transport choices for both staff and customers of the airport. Without this provision Buckinghamshire residents shall be reliant on the private car for all journeys to and from the airport.

- 3.3.30. Therefore, the Council considers it necessary that both a high-speed bus is provided from Aylesbury to the airport and the number 61 local service is reinstated to the airport (the PADSS (AS-053) and Relevant Representation (RR-0166) introduce these matters) to provide employee commuting and passenger access from the Buckinghamshire area. The high speed bus will provide a real alternative to the private car on the basis of it offering a high quality, high frequency, high speed service from Aylesbury. The number 61 local service will incorporate a greater number of stops and offer a lower cost alternative to the private car and high speed bus service for local trips and staff commuting to the airport.

Issue 4 – Certainty of the impact of Construction Traffic on the Buckinghamshire highway network

- 3.3.31. The code of construction practice (APP-049) and the outline Construction Traffic Management Plan (CTMP) (APP-130) uses the M1 motorway to the west of Luton Airport and routes to the east into Bedfordshire and Hertfordshire during the construction period. However, it does not identify last mile locations, especially for groundworks movements and Buckinghamshire is already heavily impacted by High Speed 2 (HS2) and East West Rail (EWR) construction HGV movements. The CTMP is silent on protections for the Buckinghamshire network from freight operations and lack detail on freight routing strategy. Councillors and residents are already expressing concerns about the impacts from extensive movements from HGVs through the county from other national infrastructure projects, as set out in the health and communities issues within this LIR.
- 3.3.32. Without strong provision within the CTMP, the Council does not have confidence that there will be suitable control of potential impacts from freight operations in respect of the Buckinghamshire transport network. The Council seeks to secure consultation on these documents where they affect Buckinghamshire's network and residents, and the ability to require changes and/or clarifications and controls within the management strategies be included within the documents.

Road safety assessment

- 3.3.33. The Council has assessed the publicly available information regarding the accident statistics on the B489 between the A41 and Ivinghoe as well as the B488 between the A41 and its junction with the B489. The route has a number of sensitive receptors along its length, including Ivinghoe parish church, Brookmead School, Pitstone Pavilion, Marsworth Pre-School. The accident data shows that the B489 has been subject to 1 fatal accident, 3 severe, and 11 slight accidents within the last 5 years. The B488 has experienced 1 fatal, 1 severe and 11 slight accidents within the same time period.
- 3.3.34. The Council's position is that the B489 does not appropriately meet the requirement for safe and suitable access for through traffic due to the alignment of the road, width of the carriageway, the presence of signal-controlled bridges,

and modal conflict with pedestrians within the villages of Ivinghoe, Pitstone and Marsworth.

- 3.3.35. Alternative routes along the B488 are therefore required to be considered to be the primary access route for traffic commuting on the long-distance route to the airport. It should also be noted that this route would be considered wholly inappropriate for any HGV movements associated with construction of the airport expansion and so should feature as an excluded route within the Code of Construction Practice (APP-049). This would accord with the Council's Freight Strategy.

Impacts

- 3.3.36. The analysis of the key transport and highways issues by the Council enables the identification of the impacts that are considered relevant to this topic. These impacts are summarised in the list below, followed by a fuller explanation of the way in which the Council would wish to see them addressed by the Applicant:
1. Certainty of the traffic impacts within the County, which requires a validated and correctly calibrated strategic traffic model to underpin all aspects of the technical assessment.
 2. Detailed consideration of traffic impacts due to Scheme trip generation along the A41, B489, B488 route, with a specific focus on Ivinghoe, Pitstone and Marsworth.
 3. Impacts on modal shift due to the proposals for the provision of public transport to support the Scheme in construction and operation.
 4. Impacts of construction traffic on the Buckinghamshire Highway Network.
- 3.3.37. The Council requires the following to address impact 1 and therefore enable the Council to have confidence in the nature of the traffic impacts of the Scheme within the county:
- Journey time data to confirm the model's appropriateness for the purposes of assessing development proposals within Buckinghamshire.
 - Calibration and validation data to confirm the model's appropriateness for the purposes of assessing development proposals within Buckinghamshire.
 - Confirmation that long stay survey data was included in the Civil Aviation Authority trip rate data.
 - A Forecasting Report that confirms how growth has been calculated and applied within the model to ensure that growth within Buckinghamshire has been taken into account appropriately.
 - An updated Local Model Validation Report (LMVR) that addresses the above.
- 3.3.38. Impact 2 relates to the level of confidence that can be applied to the assessment of the of the Scheme on the principal access route to the airport through Buckinghamshire – the A41, B489, B488. The Council requires the following:

- Details of link flows for the base year and future years with and without development for the B489, B488 and A41.
 - Select link analysis of development traffic only for the B489, B488 and A41 links.
- 3.3.39. The Council anticipates that the updated modelling information will support the case for some form of traffic intervention at Ivinghoe. Matters that the Council considers will need to be explored include junction re-prioritisation at the B488/B489 junction, modal conflict, traffic speeds and safety for all users. The Council wishes to be consulted on the findings of the updated modelling work and discussions regarding mitigation and/or enhancement works along the whole of this route.
- 3.3.40. The Council is seeking efficient, effective and reliable public transport connections to the airport for residents of Buckinghamshire and communities to the west of the London Luton Airport, in order to support modal shift away from the private car and support sustainable transport behaviours. Addressing impact 3 is also seen as an essential means of realising the full economic benefits of the Scheme to the County, by securing connectivity for a greater proportion of the population. The Council requires the following:
- The provision of a high speed, high quality, high frequency bus service between Aylesbury and the airport.
 - The reinstatement of the number 61 local service to the airport, on at least an hourly service frequency.
 - Certainty of an appropriate Sustainable Transport Fund.
 - Clarity of how the Sustainable Transport Fund will be calculated.
 - Certainty of mode shift, linked to specific targets and hold points and embedded in the Sustainable Transport Fund.
 - The Framework Travel Plan (APP-229, superseded by AS-131) is required to be updated to provide certainty of governance of the Sustainable Transport Fund. Further details on the review by the Council of the Framework Travel Plan can be found in the Council's WR.
- 3.3.41. It is acknowledged that the proposals for construction traffic movement do not currently include the Buckinghamshire highway network. However, the CTMP is in outline form only (AP-130) and the full details of use of the wider highway network, including by construction workers, are unlikely to be clear until this is further developed. The Council therefore requires the following:
- Consultation on the further development of the CTMP, which should incorporate specific targets for each mode to expand on the current division between sustainable and unsustainable modes.

- Consultation on freight routing and suitable controls to be included within the CTMP.
- The Outline Construction Workers Travel Plan (APP-131) is required to be updated to show how the Buckinghamshire network is to be affected; and this should be tested within the updated traffic modelling as appropriate. Further details on the review by the Council of this Travel Plan can be found in the Council's WR.

Adequacy of the draft DCO / Mitigation

3.3.42. The dDCO (AS-067) has been reviewed from the perspective of transport and highways. There are three items that the Council considers relevant:

- The Council should be included within the Airport Transport Forum as Highway Authority and secured through the dDCO (AS-067)
- The dDCO Schedule 2 Part 3, paragraph 24 should set out the maximum timescales for delivery of any actions.
- A list should be included to indicate which bodies are responsible for monitoring the findings of the GCG Framework and the FTP, including the data collection and authorisation of changes to in order to address any failures to meet targets.

3.4. Noise and Vibration

Policies

3.4.2. The VALP Policy S1 is relevant. This refers to the NPPF and Residential amenity, including noise.

Issues

3.4.3. Within Buckinghamshire, the areas most likely to be affected by changes to aircraft noise along existing flightpaths are Dagnall, Pitstone and an area east of Aylesbury, including Wendover, which is also overflowed by low level northbound traffic from Heathrow. Edlesborough Parish Council is voicing concern in its relevant representation (RR-0404) about what it describes as potential "noise impacts" from expansion.

3.4.4. A large area of the Chilterns AONB falls within the Council's administrative area and The Air Navigation Guidance 2017 (ANG 2017)⁸ says:

"Where practicable, it is desirable that airspace routes below 7,000 feet should seek to avoid flying over Areas of Outstanding Natural Beauty (AONB) and National Parks."

3.4.5. Given the increasing importance of such areas to community health and wellbeing the Council encourages the Applicant to place particular emphasis on protection of

⁸ <https://www.gov.uk/government/publications/uk-air-navigation-guidance-2017> (Accessed 22/08/2023)

the Chilterns AONB. Currently the Chilterns AONB is somewhat overflowed but radical changes in airspace management could lead to the area being substantially overflowed. The Council would like to see overflight of the Chilterns AONB formally reviewed by the Noise Envelope Design Group (NEDG). The NEDG themselves recommended that the Noise Envelope should be reviewed if there were to be any significant changes to the airport's operations. Especially as such a change will result from the anticipated modernisation of airspace known as Future Airspace Strategy Implementation South (FASI-S).

3.4.6. The noise and vibration assessment in Section 16.9 of the ES (16 Noise and vibration Chapter) (APP-042 superseded by AS-080) demonstrates how the Applicant proposes to mitigate and reduce to a minimum potential adverse impact resulting from noise from the Scheme and avoid noise giving rise to significant adverse effects on health and the quality of life (Noise Policy Statement for England (NPSE) March 2010⁹). The Council understands the arguments presented by the Applicant, that there will be no observed adverse significant effect with Buckinghamshire and therefore no specific Buckinghamshire mitigation is necessary. However, to protect this position the Applicant relies on the mechanism Green Controlled Growth Framework (APP-218) to prevent/mitigate impacts. The Council is concerned that this mechanism is not clear or transparent.

3.4.7. The Council welcomes the Applicant's commitment to sharing the benefits of future technological improvements (in terms of aircraft noise reduction) between communities and industry. The benefit of the transition to 'new generation' aircraft (e.g. the Airbus 320Neo and 321Neo and the Boeing 737Max) and the sharing of these in the early years of expansion with the community using the Noise Envelope limits. It is noted that the Noise Envelope contains a mechanism for the limit to be reduced in future years (beyond the 2030s) if 'next generation' aircraft are quieter than existing 'new generation' types, or an airspace change is implemented that would enable lower noise levels to be achieved than that forecast in the reasonable worst-case assessment reported in the ES. The Noise Envelope Design Group (NEDG) Final report (December 2022) Paragraph 56 is reproduced below, providing comment relating to the role of the ESG:

"The NEDG welcomes the proposals for an independent group that will hold the Airport to account with regard to its environmental performance. The concept of setting up specialist technical panels would feed into the ESG is supported. The key issue, though, is the certainty that the ESG would have the necessary authority to prevent the Airport from exceeding the prescribed limits. To make the Noise Envelope meaningful and effective, this aspect has to be legally watertight".

3.4.8. Although broadly in agreement with the role of the ESG, the Council is further concerned that the ESG may not be fully independent. This is because (according to The Green Controlled Growth Framework Explanatory Note (APP-217)) the independent chair will initially be nominated by the airport operator, following

⁹ <https://www.gov.uk/government/publications/noise-policy-statement-for-england> (Accessed 22/08/2023)

consultation with the London Luton Airport operator. The Council suggests the initial appointment be reviewed by all ESG members within the first year of operation and this continues on a rolling basis.

- 3.4.9. Due to the Council's concerns regarding the robustness of the traffic modelling that underpins the noise assessment (see Transport and Highways sub-section), it is felt to be appropriate that the Council reserves its final position in respect of related noise impacts.
- 3.4.10. It is acknowledged that the Applicant has provided information indicating that construction will take place outside the Council boundaries. Notwithstanding this, there are aspects of the DCO that are yet to be developed in detail, including the Construction Traffic Management Plan (CTMP), which is currently in Outline (APP-130). Noise and vibration impacts could arise should any lorry routes run into Buckinghamshire, especially if they go through small villages.

Impacts

- 3.4.11. Based on the Environmental Statement (APP-042, superseded by AS-080) and Green Controlled Growth Framework (GCGF) (APP-218) the Applicant does not predict air noise to rise above the Lowest Observed Adverse Effect Level (LOAEL) in Buckinghamshire, nor are any construction impacts predicted. The Council is in general agreement with the methodology used to reach this conclusion and the baseline information that has informed the assessment undertaken.
- 3.4.12. The analysis of the key noise issues by the Council enables the identification of the impacts that are considered relevant to the noise topic. These impacts are summarised in the list below, followed by a fuller explanation of the way in which the Council would wish to see them addressed by the Applicant:
- The Noise Envelope has a fundamental role to play in the ongoing management and future mitigation of adverse noise effects that could arise from noise impacts associated particularly with any changes in airspace usage, arising from FASI-S.
 - Due to the incremental growth proposed by the Scheme, the noise impacts and their consequential effects are anticipated to evolve. There is a need for the implications of these changes to be robustly analysed, including within Buckinghamshire.
 - Impacts of increases in noise disturbance to the Chilterns AONB.
 - Adherence of noise levels to WHO Environmental Noise Guidelines.
 - Confirmation of the noise impacts of Scheme construction on receptors within Buckinghamshire.
- 3.4.13. In order to ensure the correct application and efficacy of the Noise Envelope, the Council is seeking reassurance that the Noise Envelope will be subject to timely review at such time as changes in airspace are proposed (i.e. through FASI-S). In addition to this, the Council wishes to see a review one year after operation and a

mechanism to trigger intervening reviews more frequently than the five years currently proposed within the Terms of Reference for the NEDG, secured appropriately through the DCO.

- 3.4.14. The NEDG, which includes representation from the Council, should be in a position to check all of the parameters and ensure that these are adopted as appropriate targets within the GCGF, on a rolling basis. In addition, the NEDG should continue to operate as an independent entity from the ESG, with this independence secured through appropriate means as part of the DCO.
- 3.4.15. There is understood to be an intention to form an Aircraft Noise Technical Panel in relation to noise impacts of the Scheme. The Council is seeking representation from suitably qualified and experienced technical officers from the Council on this Panel.
- 3.4.16. The ESG is intended to provide oversight and scrutiny of the ongoing development of the Scheme, and then the environmental performance of the Scheme. The Council is seeking representation from suitably qualified and experienced technical officers from the Council on the ESG.
- 3.4.17. The Council wishes to see overflight of the Chilterns AONB included within the Terms of Reference for the NEDG, and secured appropriately through the DCO, as the Noise Envelope is developed further. In addition, the Council is seeking a guarantee that the Noise Envelope review process will provide certainty that any future airspace changes will ensure that noise impacts are no greater than those relied upon should the DCO be granted.
- 3.4.18. To protect residents from local impacts, as far as reasonably practicable, the Council asks that the Scheme should be compliant with “WHO Environmental Noise Guidelines 2018 (as they relate to aircraft noise) for the European Region”.
- 3.4.19. The Council is seeking additional clarity on the controls that will be incorporated within the CTMP as it is developed. Ideally this will include controls preventing mass haul and lorry routes and construction compounds or other sites supporting construction (e.g. spoil disposal) being sited within Buckinghamshire.

[Adequacy of the draft DCO / Mitigation](#)

- 3.4.20. The relationship between GCGF, Noise Envelope and the ESG are not yet fully defined, and the Council is concerned that the Noise Envelope, which is national policy, is not referenced in the dDCO whilst the GCGF and ESG which are not policy feature prominently. Additionally, references are made to legal frameworks that are not explained – this explanation should be included.
- 3.4.21. To protect the interests of Buckinghamshire residents, the Council wishes to become a member of the ESG. The Council is currently missing from the ESG member authorities listed in the dDCO Requirement paragraph 20 of Part 2, Schedule 2 (AS-067)

3.5. Air Quality

Policies

- 3.5.2. The Vale of Aylesbury Local Plan Policy NE5 seeks to ensure that development avoids negative impacts on air quality. It requires the preparation and submission of an air quality assessment in support of development proposals. It states that any development that may have an adverse impact on air quality will be required to provide evidence that the effect of the proposal would not exceed the National Air Quality Strategy Standards and that the surrounding area would not be materially affected by existing or continuous poor air quality. This can be achieved through the submission of an air quality impact assessment including detailed air dispersion modelling and appropriate monitoring.
- 3.5.3. The Vale of Aylesbury Local Plan policy is supported by the NPPF, which states in section 186 that planning policies and decisions should sustain and contribute towards compliance with the relevant limit values or national objectives for pollutants for air quality. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. This should also be completed at the plan making stage to ensure a strategic approval and limit the need for issues to be reconsidered when determining individual applications.
- 3.5.4. The Council's Climate Change and Air Quality Strategy¹⁰, adopted in 2021, sets out how the Council will achieve net zero carbon emissions by 2050 and improve air quality across Buckinghamshire. Aim 2 of the Strategy is to improve air quality across Buckinghamshire pursuant to achieving national air quality objectives and to reduce human exposure to harmful levels of air pollution. The Council would expect any impacts from the DCO Application would not have a negative impact on air quality as outlined within the Strategy.

Issues

- 3.5.5. There are nine air quality management areas (AQMA)¹¹ present within the Buckinghamshire Council area. However, only three of the AQMAs are located on routes where the Council anticipates there to be increases or changes in traffic due to the DCO Application. There are the Stoke Road AQMA, Friarage Road AQMA and Tring Road AQMA all located within Aylesbury. The Council's Strategic Environmental Protection Team would seek to ensure that these AQMAs are not negatively impacted by the DCO Application. This is especially as air quality monitoring data collected by the council in 2022 found exceedances of the

¹⁰ <https://www.buckinghamshire.gov.uk/environment/climate-change-and-sustainability/view-the-climate-change-and-air-quality-strategy/> (Accessed 22/08/2023)

¹¹ https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=513 (Accessed 24/08/2023)

National Air Quality Objectives within the Friarage Road AQMA. The results of the air quality monitoring can be found within the 2023 Annual Status Report¹².

- 3.5.6. The Council's Highways Officers report that the preferential route to access Luton Airport through Buckinghamshire is the A41, B488, B489. This route passes through a number of villages with some properties fronting the highway. On the basis that the Council has concerns about the validity of the transport modelling undertaken by the Applicant to date, there are also concerns that the air quality modelling will be based on inaccurate transport information in respect of the Buckinghamshire highway network. This gives rise to an issue around the accuracy of the air quality assessment findings relating to receptors along the preferential airport access route.
- 3.5.7. The Council's Climate Change and Air Quality Strategy notes the connection between increased use of sustainable transport modes as a proportion of overall modes and improvements in air quality. As such, the availability of sustainable transport options for Buckinghamshire residents to access Luton Airport is an important issue for tackling air quality.

Impacts

- 3.5.8. The Council's Strategic Environmental Protection team attended Air Quality Working Group meetings with the Applicant's air quality consultants and other stakeholders prior to the submission of the Environmental Statement. Discussions were held in relation to the methodology used within the assessment and the initial results. The Council is satisfied that the methodology and baseline air quality data used for the air quality assessment accords with relevant guidance and is acceptable. However, the Council has concerns about the traffic modelling that has been used to underpin the assessment, and this has implications for the conclusions drawn regarding the air quality impacts of the Scheme, which are set out in this sub-section.
- 3.5.9. The principal impacts on air quality are associated with traffic emissions during construction and operation of the Scheme. The Council has stated within the relevant representations (RR-0166) that 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. The Council can see no reference to Aylesbury within the impact assessment. The Council would therefore wish to see the evidence underpinning the conclusion that this location is not going to experience adverse impacts, noting also that as yet the construction traffic management plan is yet to be defined, and this could have implications in terms of HGV movements.
- 3.5.10. The Council's Highways team has also highlighted that there is the potential for the villages within the north of Buckinghamshire to be negatively impacted by

¹² <https://www.buckinghamshire.gov.uk/environment/air-quality/air-quality-management-reviews-and-annual-reports/air-quality-annual-status-report-2022/> (Accessed 22/08/2023)

changes in traffic from the Scheme. If the revised traffic data shows that the screening thresholds, as outlined within the Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance document 'Guidance on land-use planning and development control: Planning for air quality'¹³, are exceeded in any area within Buckinghamshire then there may be a requirement to conduct an additional air quality assessment.

- 3.5.11. In order to address the two impacts referenced above, the Council requests updated traffic modelling, in accordance with the requirements set out in the Transport and Highways sub-section above; updated CTMP to include either details of HGV routing through Buckinghamshire or clauses to prevent such movements; and updated air quality modelling that makes use of this updated traffic information. The Council is seeking quantitative data, particularly in relation to impacts on Aylesbury and relevant receptors along the A41, B489, B488 route through the county.
- 3.5.12. It is recognised that public transport options for residents seeking to access Luton Airport from towns and villages within Buckinghamshire could be significantly improved. Any improvement in the form of additional public transport options would also have a positive impact on local air quality generally through enabling a modal shift to a more sustainable form of transport. This is because there would be less reliance on private cars for all journeys to and from the airport for both staff and customers. Therefore, the Council's Strategic Environmental Protection team supports the comments made by the Council as the Highway Authority in relation to this – the Council requests the provision of an express bus service between Aylesbury and Luton Airport; and the reinstatement of service 61 to provide a reliable, frequent and effective connection between Buckinghamshire villages and the airport along the preferential access roads.

[Adequacy of the draft DCO / Mitigation](#)

- 3.5.13. The draft DCO (dDCO) (AS-067) has been reviewed from the perspective of controlling impacts on Air Quality. No specific issues have been identified at this time based on the DCO Application as submitted. However, the Council reserves the right to re-consider this position once the outstanding information has been provided by the Applicant.

3.6. [Economy, Tourism and Employment](#)

[Policies and Strategies](#)

- 3.6.2. This section provides an overview of the ambitions set out in the Buckinghamshire Strategic Vision for 2050¹⁴, a document that is owned by the Buckinghamshire Growth Board.

¹³ <https://iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> (Accessed 22/08/2023)

¹⁴ https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Bucks_Strategic_Vision_-_accessible.pdf (Accessed 22/08/2023)

- 3.6.3. The Buckinghamshire Growth Board is a partnership of public and private sector organisations including the Council, the Local Enterprise Partnership, and the business and health sectors.
- 3.6.4. The 2050 vision states that new and existing employment areas need to be linked and serviced by sustainable infrastructure and transport modes, and that Buckinghamshire's educational facilities must be engaged with to ensure people are training in the right skills to support growing sectors.
- 3.6.5. The Council, with partners, is currently developing an Employment and Skills Strategy. The aim of the Strategy is to provide residents with the opportunity to realise their potential, enabling businesses to flourish and supporting a productive and inclusive economy. Collaboration, anticipating change, boosting business and improving opportunities to achieve are key emerging themes within the Strategy.

Issues

- 3.6.6. The Council recognises the potential positive benefits of the Scheme for the Buckinghamshire economy and seeks to maximise any economic opportunities available to residents and businesses of Buckinghamshire as a result of the Scheme.
- 3.6.7. The Council's comments on this topic are predicated on the assumption that the forecast employment and Gross Domestic Product (GDP) figures provided by the Applicant are reasonable and accurate as set out in the Environmental Statement (APP-037). This has not been investigated by the Council, which does not intend to explore this further unless a reason arises for such examination to be undertaken.
- 3.6.8. Whilst the Council welcomes the activities outlined in the Employment and Training Strategy (APP-215) and supports a focus on some of the more deprived areas within Buckinghamshire, it is vital that accessibility is addressed. As noted above in relation to surface access transport (see Transport and Highways sub-section), at present there are no effective public transport connections between Buckinghamshire and Luton Airport that could be utilised by potential employees of the airport. Without significant improvements in accessibility, the prospect of Buckinghamshire residents taking up employment at London Luton Airport are limited and will undermine the aims of the Employment and Training Strategy. Note also that the airport is to continue operating throughout the expansion, so it is just as relevant for the immediacy of this issue to be noted – it is already disadvantaging the opportunities of people with limited mobility to access employment.
- 3.6.9. Where the Employment and Training Strategy includes an initiative to encourage local employment and local businesses as part of the construction and operation phases of the expansion, the Council would welcome initiatives to support local procurement and look forward to discussions with Luton Rising on this.
- 3.6.10. The Employment and Training Strategy makes several references to the importance of ongoing engagement with local government, including Goal 1

“Maximise the impact of the Proposed Development through engagement with local government partners who can coordinate with their skills and growth strategies” and the creation of a Local Economic Development Working Group (LEDWG) that includes representation from relevant local authority teams, e.g. economic development. The Council would welcome involvement in this working group, to ensure alignment with local employment and skills strategies and to help facilitate links with other appropriate stakeholders (including, but not limited to, the Bucks Skills Hub, Buckinghamshire College Group, Buckinghamshire New University). The Council would also seek to be part of the working group to help identify and encourage activities that maximise the benefits for Buckinghamshire’s residents and businesses and support the overarching aim of the Employment and Training Strategy (ETS) “to ensure that, as many of the jobs and economic opportunities generated by the Proposed Development as possible, go to the residents of Luton and the “ETS Study Area”.”

Impacts

- 3.6.11. The Employment and Training Strategy helpfully covers both the construction and operation phases. The Council is looking for further clarity on the way in which local benefits will be realised and the mechanisms that will be used to secure them. This is discussed within this sub-section.
- 3.6.12. According to the Employment and Training Strategy, 623 FTE jobs are expected to be created in the construction period. It needs to be recognised that with other major infrastructure projects ongoing in Buckinghamshire, including HS2 and EWR, the availability of an adequate construction workforce locally is a challenge.
- 3.6.13. In the operation phase, approximately 6100 additional jobs (direct, indirect and induced) are forecast to be able to be supported by airport expansion. It is noted that the majority of these jobs will be in air transport, but will also include employment in hospitality and retail, security, warehousing and land transport.
- 3.6.14. According to the latest Claimant Count report produced by the Buckinghamshire Local Economic Observatory¹⁵:
- “London has experienced the largest increase in Claimant Count rates since the start of the pandemic, with edge-of-London areas (particularly those close to Heathrow and Gatwick airports) tending to see higher than average increases in Claimant Count rates”.*
- 3.6.15. With a history of employment within the aviation sector, there is potentially a cohort of potential employees on which to draw.
- 3.6.16. Whilst the claimant count rate has been falling in Buckinghamshire and remains below national rates, there are variations across the county, with some persistent pockets of higher unemployment and deprivation. The importance of ‘levelling up’ has been recognised by the Council in the Opportunity Bucks programme which

¹⁵<https://www.buckseconomy.co.uk/jobs-and-skills/jobs-skills-research-reports/#Jobs-and-Skills-Claimant-Count:~:text=Bucks%20Claimant%20Count%20%E2%80%93%20July%202023> (Accessed 22/08/2023)

has identified ten priority wards on which to target activity. The programme includes a focus on jobs, careers, skills and learning. In line with references made to inclusivity within the Employment and Training Strategy, the Council would welcome opportunities for Employment and Training interventions targeted at the ten priority wards.

- 3.6.17. Generally, skills levels across Buckinghamshire are comparatively high, although there is an issue with the migration of younger people from the area. Many young people leave Buckinghamshire to go to university and choose not to return to the area. Local opportunities, that offer quality employment, with high wages and opportunities for career progression, need to be available and promoted. The Employment and Training Strategy makes reference to career progression and above average wages, as well as to apprenticeships. The Council would welcome opportunities, through engagement with the LEDWG, to promote such opportunities to young people and residents across the county.
- 3.6.18. The focus on local procurement, both at the construction and operational phases is encouraging and again, the Council with appropriate business representative organisations (such as Bucks Business First) would look to work with the Applicant to ensure Buckinghamshire based businesses were informed of, and able to apply for, supply chain opportunities.
- 3.6.19. Based on the above, the Council's expression of economy, tourism and employment impacts and requests for ways in which the Applicant could seek to address them are summarised as follows:
- Maximising beneficial economic impacts for Buckinghamshire residents through securing accessibility to job opportunities – the Council considers the provision of sustainable transport modes to access the airport to be key to addressing this impact. As set out in the Highways and Transport sub-section, an express bus connection between Aylesbury and the Airport is sought, together with the reinstatement of an at least hourly bus service along line 61.
 - Realising the beneficial economic impacts of procurement for local businesses – the Council is keen to work with the Applicant to develop specific initiatives for inclusion in the further development of the Employment and Training Strategy, which should also target the ten priority wards listed in the 'Opportunity Bucks' programme¹⁶.
 - Tackling adverse impacts of out-migration of skills from Buckinghamshire – the Council is keen to work with the Applicant as part of the LEDWG to exert influence on the way in which employment opportunities are developed. In particular, the Council will look to promote opportunities to young people within the Buckinghamshire communities.
 - Maximising beneficial economic impacts and developing transferable legacy skills within the supply chain – the Council wishes to partner with appropriate

¹⁶ <https://www.buckinghamshire.gov.uk/community-and-safety/opportunity-bucks/> (Accessed 22/08/2023)

organisations, such as Bucks Business First, to work with the Applicant on supply chain readiness and accessibility of local businesses to suitable supply chain opportunities.

[Adequacy of the draft DCO / Mitigation](#)

- 3.6.20. The dDCO (AS-067) does not include any specific reference to ensuring how the economic benefits associated with expansion will be secured. It is to be assumed that this detail will emerge through further development of, and discussions around, the Employment and Training Strategy. The Employment and Training Strategy includes a commitment to engaging with local authorities so to reiterate, the Council would be seeking a place on the LEDWG to ensure collaborative efforts to maximise economic benefits across the county. This should be reflected in the dDCO (AS-067) as appropriate.

3.7. [Landscape and Visual](#)

Policies

- 3.7.2. The Vale of Aylesbury Local Plan policy NE3 is of greatest relevance to landscape and visual impacts. It seeks to ensure that any major development affecting the Chilterns AONB must demonstrate that they a) conserve and enhance...the Chilterns AONB's special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation, b) are appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment, c) within the AONB areas, meet the aims of the statutory Chilterns AONB Management Plan, making practical and financial contributions as appropriate; d) within the AONB area, have had regard to the Chilterns Building Design Guide and technical notes by being of high quality design which respects the natural beauty of the Chilterns, its traditional built character and reinforces the sense of place and local character, and e) avoid adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated

Issues

- 3.7.3. The principal issue for this topic is the nature and extent of impacts on the Chilterns AONB. These need to be fully understood through clear reporting by the Applicant, supported by reference to impacts on the viewpoint from Ivinghoe Beacon.
- 3.7.4. It is acknowledged that the Applicant has provided information indicating that construction will take place outside the Council boundaries. Notwithstanding this, there are aspects of the DCO Application that are yet to be developed in detail, including the Construction Traffic Management Plan (CTMP), which is currently in Outline (APP-130). Landscape and visual impacts could arise should any lorry

routes or construction works run into Buckinghamshire, especially if they go close to the Chilterns AONB or through small villages.

Impacts

- 3.7.5. The submitted Environmental Statement Chapter 14 Landscape and Visual Revision 1 (AS-079) identifies significant adverse effects on the Chilterns AONB as a result of 'a noticeable deterioration to the aesthetic and perceptual characteristics of the AONB' during both the construction and operation of Phase 2b of the Scheme, as a result of increased aircraft movements.
- 3.7.6. The Environmental Statement is unclear as to the extent of these effects with considerable ambiguity between the submitted elements of the Environmental Statement. For example, despite identifying that there would be significant effects in the Chilterns AONB, the assessment does not appear to identify any significant effects in the Landscape Character Areas (LCAs) that fall within Chilterns AONB in the Study Area.
- 3.7.7. There also seems to be a discrepancy between the extent of the study area and the areas identified as being overflowed by increased flight numbers (the potential source of adverse effects). The Study Area stops at approx. 5km whilst flights below 7,000ft are shown to extend out to approx. 35km. As a result, the Environmental Statement is unclear whether the identified significant adverse effects extend beyond the Study Area and into Buckinghamshire. The Council requires additional clarification of the assessment, to confirm whether the conclusions drawn are applicable to the parts of the Chilterns AONB that are within Buckinghamshire.
- 3.7.8. In addition to over flights, it also appears that there is potential for highway works and increased traffic on rural roads (particularly in the Chilterns AONB) in the Buckinghamshire area that have not been explored within the Environmental Statement. There is the potential that further development of the CTMP, which is currently in outline form (APP-130) will identify aspects of the Scheme that could introduce additional landscape and visual impacts within Buckinghamshire. This will particularly be the case should HGV routes or construction activities be sited close to the Chilterns AONB or the more rural villages of the County. In the absence of the resolution of these ambiguities and the provision of clearer information, the Council reserves its position on the potential adverse impacts of the Scheme on the Buckinghamshire area. The Council is seeking additional clarity on the controls that will be incorporated within the CTMP as it is developed. Ideally this will include controls preventing mass haul and lorry routes and construction compounds or other sites supporting construction (e.g. spoil disposal) being sited within Buckinghamshire.

Adequacy of the draft DCO / Mitigation

- 3.7.9. The dDCO (AS-067) has been reviewed. No specific issues have been identified at this time based on the DCO Application as submitted. However, the Council

reserves the right to re-consider this position once the outstanding information has been provided by the Applicant.

3.8. Heritage

Policies

- 3.8.2. Policy BE1, BE2 and BE3 of the Vale of Aylesbury Local Plan require proposals that affect the significance of heritage assets to be properly considered, weighing the direct and indirect impacts upon heritage assets and their setting.
- 3.8.3. Information relating to Designated heritage assets including Conservation Areas, Listed Buildings and Scheduled Monuments within Buckinghamshire can be sourced through the online county Historic Environment Records - Buckinghamshire Heritage Portal¹⁷.
- 3.8.4. Information relating to Non-Designated Heritage Assets can be sourced through the online Local List project platform - Buckinghamshire Local Heritage List¹⁸.

Issues

- 3.8.5. The Scheme as currently described (AS-074) is reported as not resulting in any direct physical impact to heritage assets in Buckinghamshire. Based on the Noise Contour information submitted with the DCO documents and additional submissions, the Council has no concerns in relation to adverse impacts on setting. This is because the predicted noise levels for heritage assets in Buckinghamshire fall within levels recommended to be scoped out of any such assessment in line with research carried out on behalf of Historic England (Aviation Noise Metric – Research on the potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England)¹⁹. Historic England guidance on The Setting of Heritage Assets HEGPA Planning Note 3 (2017)²⁰ has also been considered.
- 3.8.6. However, due to the Council's concerns regarding the robustness of the traffic modelling that underpins the noise assessment (see Transport and Highways sub-section) it is felt to be appropriate that the Council reserves its final position in respect of related noise impacts to heritage assets.
- 3.8.7. In addition, it is unclear whether there may be further implications to heritage assets in Buckinghamshire as the Scheme is further defined. For example, in relation to construction traffic routes in proximity to sensitive assets or passing through historic landscapes and villages, which could arise following further development of the detail in the CTMP (APP-130). Potential impacts to setting could also arise if off-Site Highways works sought by the Council are developed, for example, at Ivinghoe.

¹⁷ <https://heritageportal.buckinghamshire.gov.uk/> (Accessed 22/08/2023)

¹⁸ <https://local-heritage-list.org.uk/buckinghamshire> (Accessed 22/08/2023)

¹⁹ <https://historicengland.org.uk/research/results/reports/87-2014> (Accessed 22/08/2023)

²⁰ <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> (Accessed 22/08/2023)

Impacts

- 3.8.8. The analysis of the key issues within Buckinghamshire enables the identification of the following impacts that are considered relevant to the heritage topic. These impacts are associated with an explanation of the way in which the Council would wish to see them addressed by the Applicant:
- Potential for new heritage impacts to be identified following update to the noise modelling and subsequent analysis – the Council has set out how it wishes the Applicant to address the updates to the traffic modelling. Once this is completed, the Council wishes to receive updated noise modelling and analysis of consequential impacts for the heritage topic.
 - Potential for additional heritage impacts to be identified following further development of the CTMP (APP-130) – the Council is keen to be in a position to influence the further development of the CTMP (APP-130), as set out in the Highways and Transport sub-section.

Adequacy of the draft DCO / Mitigation

- 3.8.9. The dDCO (AS-067) has been reviewed. No specific issues have been identified at this time based on the DCO Application as submitted. However, the Council reserves the right to re-consider this position once the outstanding information has been provided by the Applicant.

3.9. Health and Community

Policies

- 3.9.2. This section provides an overview of the policies within the Vale of Aylesbury Local Plan that relate to health and communities. This is followed by consideration of the Neighbourhood Plans within Buckinghamshire County, which provide an indication of the issues that communities are most concerned about in relation to growth and development.
- 3.9.3. Policy S1 Sustainable development of the Vale of Aylesbury Local Plan seeks applicants to secure development that improves the economic, social and environmental conditions of the area. Specific sub-clauses include: (e) minimising impacts on local communities; and (h) providing high quality accessibility through the implementation of sustainable modes of travel including public transport, walking and cycling.
- 3.9.4. Policy S5 Infrastructure of the Vale of Aylesbury Local Plan requires all new development to provide appropriate on and off site infrastructure in accordance with the Infrastructure Delivery Plan (IDP) to “avoid placing a burden on the existing community, avoid or mitigate adverse social, economic and environmental impacts and make good the loss or damage of social, economic and environmental assets”. There are three clauses to the policy, with part b stating that development must avoid or mitigate adverse social, economic and environmental impacts.

- 3.9.5. Policy NE5 Pollution, air quality and contaminated land of the Vale of Aylesbury Local Plan seeks to minimise and prevent adverse noise, lighting and air quality impacts on existing and proposed land-uses, sensitive human or animal receptors and the environment. The policy requires noise mitigation to accord with the latest Government guidance. Part b of this policy relates to lighting and includes a requirement to consider glare, which was also raised previously by the Council within the PDSS (AS-053). The air quality aspects of the policy highlight the need for developers to ensure that their proposals do not result in an exceedance of National Air Quality Standards (or the latest equivalent).
- 3.9.6. Policy BE3 Residential amenity of the Vale of Aylesbury Local Plan states that planning permission will not be granted where the proposed development would unreasonably harm any aspect of the amenity of existing residents and would not achieve a satisfactory level of amenity for future residents. The policy states the intention of the Council to enter into planning obligations to secure elimination or appropriate control of potential adverse impacts.
- 3.9.7. Policy NE3 of the Vale of Aylesbury Local Plan relates to the Chilterns AONB. Parts of particular relevance to health and community refer to maintaining tranquillity and the quality of key views – public vantage points that offer visual amenity (part l). The policy includes a requirement for landscape and visual impact assessment (LVIA) to be undertaken for development within or affecting the AONB. The policy is drafted with a presumption against major development.
- 3.9.8. Policy NE4 of the Vale of Aylesbury Local Plan recognises the individual character and distinctiveness of specific landscape character areas as set out in individual Landscape Character Assessments (LCAs). Relevant criteria in relation to managing impacts on health and communities are (a) minimising impact on visual amenity; (e). minimising the impact of lighting to avoid blurring the distinction between urban and rural areas, and in areas which are intrinsically dark and to avoid light pollution to the night sky; and (g). not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value. The policy requires developers to follow the NPPF mitigation hierarchy (cross-referencing para. 152 of the NPPF as published in 2012) and, as a last resort only, compensation is supported in the policy.
- 3.9.9. Ivinghoe Neighbourhood Plan was made with community input in 2018. There are two policies within the Ivinghoe Neighbourhood Plan that are considered relevant to health and communities, Policy TRA2 and Policy BUS1. Both allude to an underlying community concern that traffic and general growth has a deleterious effect on the amenity of the settlement, creating relating issues of road safety from modal conflict and impacts on the quality of the residential environment.
- 3.9.10. Policy TRA2 of the Ivinghoe Neighbourhood Plan states that all non-householder development that generates additional traffic should contribute proportionately to improved safety and parking through agreement with the highways authority and

parish council. It also notes that in Ivinghoe, the aspiration is that this includes traffic calming and safe crossing points.

- 3.9.11. Policy BUS1 states that the expansion of businesses will be supported provided that three conditions are met - i the expansion does not cause severe impacts on the residential environment and amenity; ii the expansion does not create significant additional traffic; and iii the developer should provide infrastructure commensurate with the required business operation.
- 3.9.12. There are neighbourhood plans relating the Edlesborough; Wingrave with Rowsham; Pitstone; Cheddington; and Slapton. These are not considered to contain policies that are directly relevant to the health and communities assessment for the Scheme, on the basis of the latest description of the development (AS-074).
- 3.9.13. Buckinghamshire Joint Local Health and Wellbeing Strategy 2022 to 2025²¹ sets out the strategy to improve the health and wellbeing of Buckinghamshire residents. The strategy is underpinned by several Joint Strategic Needs Assessment reports, which focus on improvements throughout life with the themes of Start Well (focusing on children and young people), Live Well and Age Well. This document provides relevant baseline context for the health and communities assessment and the priorities and actions provide a locally focused perspective on the link between growth and development and impacts on determinants of health and well-being.

Issues

- 3.9.14. At the UK level, the Council is aware of growing precedent for health assessment to be informed by a more granular consideration of the impacts of changes to particulates (e.g. PM2.5) and noise levels than is required through the application of standard methodologies for air quality and noise assessment. This is a matter that is increasingly being raised by the UK Health Security Agency in consultation responses on DCO documents. The underlying issue is that relatively small changes (i.e. below thresholds reported as significant in contributing assessments) in concentrations of particulates and/or noise levels, sources or frequencies can have notable impacts on human health. It is considered that this may be an issue for certain communities within Buckinghamshire where changes in the traffic flow, composition of different vehicle types and/or the time of traffic movements could result in noticeable and potentially intrusive traffic noise and increases in particulate concentrations, to the detriment of human health.
- 3.9.15. The number, size, timing and routing of HGV (and abnormal load) vehicles is a major and widespread concern of local communities in relation to strategic infrastructure, with communities in Buckinghamshire already experiencing the impacts of East West Rail (EWR) and High Speed 2 (HS2). The Council is aware of

²¹ <https://www.buckinghamshire.gov.uk/health-wellbeing-and-sports/buckinghamshire-joint-local-health-and-wellbeing-strategy-2022-to-2025/> (Accessed 22/08/2023)

the particularly strong feeling on this issue expressed through receipt of complaints and concerns raised by community members. The relevant representation made by the Wingrave with Rowsham Parish Council (RR-1592) references the disruptive nature of HS2 construction traffic and concern of repeat and/or additive cumulative impacts with the Scheme. Ivinghoe Neighbourhood Plan includes a policy seeking to ensure that traffic impacts (on health and communities) of new development are appropriately addressed.

- 3.9.16. There is a need to recognise that at the regional and local level there is a large catchment to the west of the Main Application Site, including across Buckinghamshire. As such, as stated in the PADSS (AS-053) and relevant representation (RR-0166), the local road network will continue to provide a preferential route and it is essential that this is adequately assessed and addressed within the DCO. Allied to this need, is the issue of ensuring the growth of Aylesbury, including the Berryfields development, is accurately represented within the traffic modelling and subsequent analysis for the DCO Application (as raised in the Examining Authority correspondence dated 16th May 2023 and 13th June 2023) (referenced in the PADSS (AS-053) and relevant representation (RR-0166)).
- 3.9.17. It is particularly notable that Aylesbury is a route hub for multiple directions of travel and therefore very sensitive to changes in traffic flows and congestion, with consequential health and community issues arising related to air quality, noise, environmental quality, amenity and severance. There are three AQMA within Aylesbury (see the Air Quality sub-section), all associated with traffic derived pollutants. The health implications of air quality impacts are a particular issue within AQMAs and, as stated in relation to the air quality sub-section of this LIR, the Council's Strategic Environmental Protection Team is requesting further evidence to ensure that these AQMAs are not negatively impacted by the Scheme. This should comprise downstream air quality modelling, to be based on the amended traffic modelling that should be validated for use in Buckinghamshire by the relevant Council technical officers (as set out in the Transport and Highways sub-section).
- 3.9.18. The PADSS (AS-053) raises concerns regarding the availability of accurate baseline data for PM10 and PM2.5 (particulate matter) in 2023 due to faults with the automatic monitor. Ivinghoe Parish Council (RR-0587) raises that the inadequacies in technology resulted in no noise monitoring in the Ivinghoe Parish Council area. It is also recognised that there are no continuous monitors located in Aylesbury (air quality chapter of the Environmental Statement (AS-076). There is a need for this to be addressed so there is a credible baseline from which to be able to understand the implications of changes to particulates and noise, including in relation to human health.
- 3.9.19. The villages of Pitstone, Marsworth and Ivinghoe (particularly the B488 and B489 junction) are very sensitive to changes in traffic movements. At the local scale, these villages are situated on a major route from Buckinghamshire and Hertfordshire to the Airport and the sensitivity of the network should reflect that

small changes can create substantial issues associated with congestion, including for the health and well-being of resident communities, which has been raised in the PADSS (AS-053). It is also noted that the Transport Assessment (APP-204, superseded by AS-123) cites the first flight times as 05.00, with a peak between 06.00-07.00, and high frequency until 09.00. Given that passengers are encouraged to arrive typically two hours before flights, there is a concern that residents fronting the preferential access route to the airport may experience noticeable changes (increases) in traffic flows from the early hours of the morning due to the Scheme, when the baseline flows would be typically very low.

- 3.9.20. The Council's relevant representation (AS-053) requests that the Applicant undertake trip profiling from locations in the south of the County, including Chesham, Amersham and High Wycombe where no public transport to Luton Airport is currently available. This demand information should then be added into the updated traffic modelling. This is to ensure that there is an accurate understanding of impacts, which are considered likely to relate to effects on health and communities (e.g. isolation, barriers to accessing employment).
- 3.9.21. As an authority with a substantial proportion of rural communities, connectivity between key centres and through the villages is of great importance, particularly in supporting rural accessibility and connecting people with limited access to private vehicles to key services. This is intrinsically connected to health, on the basis that the ability of people to access and engage in suitable employment is a key determinant of mental health and well-being. The issue operates at two scales – there is a lack of direct express bus or coach service from Aylesbury to Luton Airport; and there is poor connectivity of villages along strategic routes between Aylesbury and Luton Airport.
- 3.9.22. At the strategic scale, it is noted that EWR has the potential to improve accessibility of the airport for communities in the north of the county. However, the County's southern communities are not well connected to EWR and there are no existing public transport options available that present a realistic and appealing alternative to the private car to access Luton Airport, representing poor modal choice. The PADSS (AS-053) emphasises the need for a more strategic express service to connect Luton Airport to Aylesbury and points further west in order to enhance modal choice – this is not currently committed to by the Applicant. The Council desires engagement with the Applicant around route development, with a view to inclusion of a strategic express service between Aylesbury and Luton Airport within the Surface Access Strategy (stated in the relevant representation (RR-0166)).
- 3.9.23. Securing enhanced public transport accessibility at the local scale between London Luton Airport and Aylesbury is a key local issue – the restoration of service 61 (referenced in the RR and PADSS) providing this connection through the villages of Eaton Bray, Edlesborough, Pitstone, Ivinghoe, Marsworth and Cheddington has already been raised as an important means of addressing this issue (AS-053 and RR-0166). It is also important to address accessibility to employment

opportunities, including at the airport – consequently, service frequencies of at least 60 minutes are considered essential along this and other comparable public transport routes to provide effective modal options for commuting.

- 3.9.24. The scope of the Applicant’s health and community assessment (AS-078) includes aircraft noise and changes to the character and quality of neighbourhoods due to combined environmental impacts (noise, air quality, traffic, light and visual effects). The Council welcomes recognition of these types of individual and in-combination impacts as meriting assessment and asserts that they are likely to be relevant to a number of the communities within the authority.
- 3.9.25. It is essential that the baseline information relating to existing noise levels and traffic flows can be used with confidence in underpinning the assessment – reservations about these aspects are highlighted in the Transport and Highways and Noise sub-sections of this LIR – these need to be resolved for the downstream assessment work to be completed effectively. It will also be essential for the potential sources of these impacts to be clarified – construction traffic routes need to be defined; and further information is needed about the likely routing of aircraft as the phases of the Scheme are implemented. This work is fundamental to correctly identifying relevant receptors within the Buckinghamshire Council area portion of the wider study area – i.e. those that may potentially experience changes due to construction traffic routing, spoil disposal, Off-Site Highways works and aircraft noise. This detail is currently absent from the assessment.
- 3.9.26. The Chilterns AONB is considered an essential and highly valued resource for community recreation, supporting the health and well-being of residents, as well as visitors. The qualities of the AONB include visual amenity from important vantage points, such as Ivinghoe Beacon, as well as tranquillity. On this basis, the Council views protection of this AONB from potential impacts of noise and visual intrusion as a key issue for supporting health and communities.
- 3.9.27. The PADSS (AS-053) raised concerns about whether the ETS for the Scheme was sufficiently prescriptive to secure delivery of local benefits to Buckinghamshire. This is of relevance to the topic due to the recognised link between employment and mental well-being. There is a need for improved clarity around the measures and their delivery to provide confidence that the Scheme will be effective in realising the potential for benefits for Buckinghamshire – this clarity is fundamental to enabling an assessment of impact magnitude to be completed. In addition, as stated in the PADSS (AS-053) and relevant representation (RR-0166), the Council is seeking involvement in the LEWDG to ensure health and community impacts are included in the consideration of economic development strategy and policy for the Scheme.

[Impacts](#)

- 3.9.28. The analysis of the key issues within Buckinghamshire enables the identification of eight combinations of impacts that are considered relevant to the health and community topic. These impacts are summarised in the list below, followed by a

fuller explanation of the way in which the Council would wish to see them addressed by the Applicant, either in a general sense, or specifically in relation to construction or operation:

1. Impacts from HGV traffic movements: contributing to noise effects, severance and reduction of amenity. Relevant to construction and operation.
 2. Impacts from increasing Luton Airport traffic demand using the Buckinghamshire highway network, as a preferential route at the county and sub-regional scale: contributing to noise effects, severance, visual intrusion, reduction of environmental quality (particularly where routes are unsuitable for traffic flows and/or vehicle composition) and reduction of amenity. Relevant to operation and meriting consideration of the timing of these increased flows, which may be earlier than typical peaks.
 3. Impacts from increased vehicular traffic within Aylesbury, including the three AQMAs: contributing to congestion and driver delay/stress, reduced air quality from traffic derived pollutants, severance, reduction of environmental quality, modal conflict and reduction of amenity. Relevant to construction and operation.
 4. Impacts from increased vehicular traffic within the villages of Pitstone, Marsworth and Ivinghoe: contributing to noise effects, severance, visual intrusion, reduction of environmental quality (particularly where routes are unsuitable for traffic flows and/or vehicle composition), modal conflict, increased risks to safety of all modes and reduction of amenity. Relevant to construction and operation.
 5. Impacts from increased travel demand from south Buckinghamshire including Chesham, Amersham and High Wycombe: contributing to noise effects, severance, visual intrusion, modal conflict, increased risks to safety of all modes and reduction of amenity. Relevant to operation.
 6. Impacts on the ability of rural communities to access employment opportunities: contributing to effects on rural connectivity (including to healthcare and community assets that support physical health), social cohesion and mental well-being. Relevant to construction and operation.
 7. Impacts from increased noise (construction and operational traffic and aircraft) on areas valued for tranquillity and/or environmental quality: contributing to effects on tranquillity, reduced amenity, environmental quality and neighbourhood characteristics, and mental health and well-being. Relevant to construction and operation.
 8. Impacts from increased employment opportunities for Buckinghamshire residents: contributing to mental well-being and social cohesion.
- 3.9.29. The Health and Community Assessment (AS-078) acknowledges that increased traffic generated from the expanded airport and changes to the highway network will result in adverse impacts on social capital and access to services. Consideration

is also given to the direct relationship between air pollutants and mortality rate, leading to a reported minor adverse health effect. However, the analysis of impacts derived from traffic modelling, such as changes in air quality and noise, are focused on the local neighbourhood study area. Detailed consideration of traffic derived impacts on receptors within the wider study area, which is the category that Buckinghamshire County is placed in, is not provided.

3.9.30. The potential for changes in traffic to affect health determinants is acknowledged in the Environmental Statement in the context of health effects associated with pollution, changes in traffic flows and disruptions to access resulting in uncertainty and negative perceptions about potential negative impacts during construction and operation, which may give rise to stress, worry / negative impact on mental wellbeing, citing that this was raised during public consultation. The Environmental Statement does report a moderate adverse temporary effect on mental wellbeing which is significant (for the local neighbourhood of the area and the Wider Area), but in the absence of underlying detail, there is limited scope to propose effective mitigation, and this is considered a weakness of the assessment. It relates directly to the impacts listed above at nos. 1, 2, 3, 4, 5, 6 and 7. The Council wishes to see this addressed in the following ways:

- Expansion of the study area for traffic related health and community impacts to include Buckinghamshire County highway network.
- Application of traffic modelling for the Buckinghamshire County highway network, to the satisfaction of technical officers in relation to relevant third-party developments and validation, in accordance with the requirements presented in the Transport and Highways sub-section of this LIR.
- Use of updated traffic modelling, addressing the concerns raised earlier in this LIR regarding validation of the modelling for use in Buckinghamshire, to enable a greater confidence to be assigned to downstream topic analysis. In particular, the noise and air quality assessment will need to be updated, in accordance with the requirements presented in the relevant sub-sections of this LIR. This should include qualitative analysis of potential health implications of all changes of greater than 1dB in noise, to reflect the increasing scrutiny of this matter within health assessment.
- Further development of the detail within the Construction Traffic Management Plan (APP-130), sufficient to allow identification of relevant receptors for health and community impacts from changes to traffic flows within Buckinghamshire. For example, clarifying the longer-distance haul routes; and proposals for the disposal of spoil – this could either be through early contractor engagement, or adopt the approach of restrictions preventing certain activities within Buckinghamshire.
- Further development of the detail within the Surface Access Strategy (APP-228), sufficient to allow identification of relevant receptors for health and community impacts from changes to traffic flows within Buckinghamshire.

- Updated downstream topic analysis, using modelling as appropriate, to ensure that receptor identification (i.e. the study area may need to be reviewed), sensitivity and impact magnitude is updated and the analysis of significance of effects is robust for Buckinghamshire health and community receptors.
 - Review of suitable mitigation to address significant effects that may be identified following the updated analysis (see further detail to follow); including any relevant environmental appraisal of interventions that might be proposed.
 - Development of suitable delivery mechanisms and assurances for the delivery of mitigation.
- 3.9.31. The Outline Traffic Management Plan (APP-130) does not preclude any works traffic/spoil deliveries in the vicinity of the airport passing through Buckinghamshire. The uncertainty that this presents in relation to understanding potential impacts on the communities of Buckinghamshire has been raised as an issue in the Buckinghamshire PADSS (AS-053). This clarity is key to addressing impact no.1 regarding HGV movement; and may subsequently be linked to the need to explore disturbance related impacts on additional communities in Buckinghamshire, depending on whether there are relevant works locations proposed in the County.
- 3.9.32. In addition to the above list of actions, the Council requires consideration of the impacts of the Scheme on Aylesbury, which relates to impact no. 3. This relates both to the proposals for traffic movement on the highway network in and around Aylesbury and specifically in relation to the impacts on the AQMAs, which are not reported within the health and communities chapter of the Environmental Statement (AS-078). An update to the assessment is sought and should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.
- 3.9.33. Impact 4 relates to the rural villages on the preferential route to the Airport. For the villages of Pitstone, Marsworth and Ivinghoe, it is acknowledged that the projected peak hour traffic is expected to be low (AS-078). However, as noted in the transport and highway sub-section of this LIR, the Council has concerns about the level of confidence that can be assigned to the traffic modelling in the county due to reservations about the validity and transferability of the strategic modelling to local issues. The Council asserts that traffic movements through these villages will merit a high level of impact control, noting that they are situated on a direct route to the airport. This should also be reflected within the sensitivity assigned within the health and communities assessment, which the Council would wish to be elevated in recognition of the local transport context.
- 3.9.34. In order to fully address impact nos. 5 and 6, the Council requires completion of the items listed above in addition to specific trip profiling for the communities within the south of the county; and potential commuting demand for employment

associated with the Scheme. It is considered imperative to understand the potential additional trip generation from the Scheme and how people may seek to use the network in order to inform the identification of the potential for impacts, appropriate levels of sensitivity to change and to complete the assessment. Should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.

- 3.9.35. Impact 7 relates both to traffic derived disruption, but also aircraft noise. In order to address this issue and impact, the Council requires completion of the items listed above such that the potentially sensitive receptors can be accurately identified – this will inform the assessment of traffic derived impacts on the Chilterns AONB and other relevant sensitive locations (at present the Environmental Statement (AS-078) only considers the community recreational assets of Wigmore Valley Park and Prospect House Day Nursery in relation to aircraft noise, both of which are in Luton). In addition, there is a need for the noise baseline concerns to be overcome and additional information supplied and modelled in relation to aircraft noise, including potential changes to flight paths (as set out in the Noise sub-section of this LIR).
- 3.9.36. The health and communities chapter of the Environmental Statement (AS-078) reports increased aircraft movements and changes in aircraft noise exposure in the population as a moderate adverse permanent effect on health outcomes across the study population. This is considered very generalised and the health and community assessment should be expanded to assess the impacts on tranquillity of affected parts of the Chilterns AONB, as well as any sensitive community receptors that are scoped in following the updates. Should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.
- 3.9.37. Impact 8 relates to the potential effects from the implementation of the ETS (APP-215), which are currently reported in the Environmental Statement (AS-078) as contributing, generally (not specifically to any section of the population) to a moderate beneficial temporary effect on mental and physical health associated with increased income, skills and job security. The Council is keen to ensure that actions are secured to deliver benefits at the local scale, meeting specific areas of need. In order to correctly assess and underpin such actions, the Council is seeking clarity on the implementation of the LETS, such that impact magnitude can be understood and assessment reviewed. The Council is also seeking involvement in the Economic Development Working Group, particularly in order to be able to express the local priorities and shape the mitigation and enhancement proposals.

[Adequacy of the draft DCO / Mitigation](#)

- 3.9.38. The dDCO (AS-067) has been reviewed in the context of delivering mitigation relevant to the impacts of the Scheme on Health and Communities. The principal

focus has been the draft requirements presented in Schedule 2. The following observations are made:

- 3.9.39. Schedule 2, Part 2 (1) references ‘the’ relevant planning authority (singular entity). However, some of the matters to be considered have trans-boundary implications. It is suggested that this should be broadened to state ‘all relevant authorities’ (plural) so, for example, the CoCP is scrutinised by all authorities that may experience impacts. There would be consequential changes to (2) and (3) as well, to change to authorities (plural), The CoCP is considered an important mechanism for controlling the magnitude of impacts, particularly those linked to construction pollution and nuisance, on the physical and mental health of community members.
- 3.9.40. Schedule 2, Part 2 (8). As per the point above, the CoCP has trans-boundary implications that mean that there could be impacts across more than one highway authority. Consequently, it is considered that the approval should be sought from all relevant authorities, linked to where the impacts will occur (geographically).
- 3.9.41. Schedule 2, Part 2, 8 (2) - the Council agrees that these plans need to be developed pre-commencement, but there should also be reference in the requirement to them being ‘implemented’ pre-commencement. In the context of the health and community assessment, the specific rationale here is 8 (2) (e) Community Engagement Plan, which the Council would expect to include pre-commencement activities, for example, to ensure that affected communities are fully aware of the impacts and potential effects that they will experience and able to feel supported and heard, should any adverse effects arise once construction is underway.
- 3.9.42. It is noted that the requirements currently listed in Schedule 2 principally have a spatial dimension in terms of their implementation. However, the Council is keen to understand whether there is potential for the Employment and Training Strategy (APP-215) to be included within the Schedule 2 list of documents that need to be approved (and implemented, as per earlier comment) in advance of construction. Or to receive clarification of alternative proposed means for ensuring that this strategy is developed and implemented pre-construction; and monitored thereafter.
- 3.9.43. Schedule 2 – Environmental Scrutiny Group 20 (2) and Technical Panels - does not include representation from the Council. The Council is requesting inclusion within the ESG and this would then need to be updated here.

3.10. Cumulative effects assessment

Policies

- 3.10.2. There are no policies in the local plan that especially relate to the context of this sub-section.

Issues

- 3.10.3. The Council recognises that Buckinghamshire is not a host authority for the geographical scope of the Scheme, as currently described (AS-074). On this basis, the majority of intra-Scheme impacts (i.e. multiple impacts from the Scheme on the same receptor(s)) are unlikely to have implications for Buckinghamshire and the County is principally scoped out of inter-project cumulative assessment (the Scheme plus other developments) due to distance from the Scheme. The principal issues will therefore relate to impacts that have transboundary impacts – surface transportation; aircraft movements; and resource requirements (physical resources and demand for people/workforce). In terms of other projects interacting with the Scheme, HS2 and EWR have relevance.
- 3.10.4. Notwithstanding the above, the Council has set out concerns regarding the exacerbation or existing issues on the highways network due to the Scheme; and the need for the provision of public transport improvements to support effective, reliable and appealing alternatives to the private car for members of communities within Buckinghamshire wishing to access the airport for work or leisure. These would lead to the Applicant including additional Off-Site highways works within the County (e.g. at Ivinghoe); and providing confirmation of freight and HGV movements, as well as securing public transport provision to support operational and commuting movements that could alter the identification of the distribution of impacts by extending them into Buckinghamshire. In turn, this could merit consideration of not just direct effects, but also cumulative effects.

Impacts

- 3.10.5. The cumulative effects assessment does not consider the cumulative interactions from the expansion of airspace on residents in Buckinghamshire. The relevant representation (RR -0166) raises concerns that there is no consideration of the potential cumulative impacts of aircraft noise for residents under Heathrow, Stansted and Luton flight paths. The Council PADSS (AS-053) also raises concerns surrounding the change required to allocate more airspace for safe departures and arrivals across the south-east of England airports to allow expansion. There is a need for the ES to consider how these changes will impact residents and review whether there are potentially significant cumulative effects that would then require mitigation.
- 3.10.6. It is recognised that that the assessment includes proposed development at Stansted, Heathrow, Gatwick and London City airports. However, it has been identified that would be no overlap with the core Zone of Influences (ZOI) for the Scheme and therefore the cumulative effects with other airport expansions are not considered further. The Council considers this conclusion to be premature and wish it to be kept under review pending further clarification of how airspace and flight paths may be altered in order to accommodate planned expansion.
- 3.10.7. The relevant representation (RR-0166) notes that this is also highlighted as a parish concern within the health and communities issues outlined previously.

These are manifesting as issues of disturbance, anxiety, mental health and, for residents with pre-existing conditions, some instances of physical health impacts. The potential addition of similar impacts due to the Scheme raises issues around cumulative impacts. The relevant representation (AS-053) cites the need to check last mile locations for groundworks such that this issue and the cumulative interactions are correctly articulated and addressed.

- 3.10.8. The Council notes that the relevant representation from BMKALC (RR-0165) asserts that cumulative impacts on ecological connectivity have not been accurately portrayed – it claims that the sum of numerous 'minor adverse effects' (not significant) are not commented on. The Council is of the view that this is an essential requirement of the cumulative effect assessment and would wish to see further justification of this approach by the Applicant. The Council notes that explanation offered presently – that ecology has not been assessed further in the in-combination effects assessment as interactions of different aspect effects upon these receptors are provided in relevant Environmental Statement chapter (interactions between AQ, noise upon ecological receptors). The Cumulative Effects Assessment chapter of the Environmental Statement considers the combined impact on different ecological receptors. The Council would like to see confirmation that this combined impact assessment considers all impacts on ecological receptors, rather than narrowing scope to those that only record significant effects from single impacts.

[Adequacy of the draft DCO / Mitigation](#)

- 3.10.9. The draft DCO (AS-067) has been reviewed in the context of delivering mitigation relevant to the cumulative impacts of the Scheme. The principal focus has been the draft requirements presented in Schedule 2.
- 3.10.10. There are no specific mitigation proposals relevant to potential cumulative impacts experienced by receptors within Buckinghamshire. However, there are some requirements that have the potential to result in impacts within the County and, as such, the Council is keen to ensure that there is a mechanism for the Council to be involved with their approval and implementation. On this basis, the following observations are made:
- 3.10.11. Schedule 2, Part 2 (1) references 'the' relevant planning authority (singular entity). However, some of the matters to be considered have trans-boundary implications. It is suggested that this should be broadened to state 'all relevant authorities' (plural) so, for example, the CoCP is scrutinised by all authorities that may experience impacts. There would be consequential changes to (2) and (3) as well, to change to authorities (plural), The CoCP is considered an important mechanism for controlling the magnitude of multiple intra-Scheme impacts acting in combination, particularly those linked to construction pollution and nuisance.
- 3.10.12. Schedule 2, Part 2 (8). As per the point above, the CoCP has trans-boundary implications that mean that there could be impacts across more than one highway

authority. Consequently, it is considered that the approval should be sought from all relevant authorities, linked to where the impacts will occur (geographically).

3.11. Draft Development Consent Order

3.11.1. In this LIR, the Council has made recommendations for changes to the dDCO (AS-067). These are summarised in this section, along with further comments on the dDCO. The Council’s detailed review of the dDCO is presented within its WR submitted at Deadline 1.

3.11.2. A summary of the points made by the Council in respect of the dDCO (AS-067) can be found below:

DCO Wording	Suggested Changes	Comments
Part 1 Paragraph 2, Interpretation “Relevant highway authority” “Relevant planning authority”	“To which the provision relates” is insufficient to capture all circumstances.	Amend to “provision of the Order, part of development or relevant effects of the development relate” To allow for Buckinghamshire Council Planning Authority/ Highway Authority to be consulted, if required.
Amendments to approved details, Sch.2, paragraph 2	As above, amendments to wording to allow for sufficient flexibility to definition of ‘Relevant Planning Authority’ and to allow for sufficient consultation period with consultees.	‘Relevant Planning Authority’ definition to be expanded to include consultation of neighbouring authorities, such as Buckinghamshire Council, where appropriate; and standard consultation period to apply. Please see Section 2.10 of Written Representations
Parameters of authorised development, Sch.2, paragraph 6	Make provision for the relevant planning authority to undertake consultation on any changes to the parameters specified.	Absence of consultee specification to inform paragraph 2(4) of Part 1 of Schedule 2 of the dDCO. Please see Section 2.10 of Written Representations
Code of construction practice, paragraph 8	As above, amendments to wording to allow for sufficient flexibility to definition of ‘Relevant Highway Authority’ and to allow for sufficient consultation period with consultees.	To include consultation Buckinghamshire Highways, who would like to be party to details relating to construction matters. Please see Sections 2.2 and 2.10 of Written Representations

DCO Wording	Suggested Changes	Comments
	Implementation Trigger required.	The construction of the development must be carried out in accordance with The Code of Construction Practice Please see Section 2.2 Transport and Highways of Written Representations.
Construction workers, paragraph 15	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.	'Relevant Planning Authority' to include, consultation with Buckinghamshire Highways, who would like to be party to details relating to construction matters. Please see Section 2.2 Transport and Highways of Written Representations.
Landscaping design, paragraph 9	Implementation Trigger required.	Landscaping to be carried out prior to first use of the development. Please see Section 2.10 of Written Representations
Landscape and biodiversity management plan, paragraph 10	Implementation Trigger required.	To be carried out prior to construction/ occupation, which ever is most appropriate.
	Amendment to allow consultation with Natural England.	Given the implications of the management plan for protected species Buckinghamshire Council would suggest that paragraph 10, sub paragraph 1 makes provision for the relevant planning authority to undertake consultation on the landscape and biodiversity management plan with Natural England. Please see Section 2.10 of Written Representations
Construction traffic management, paragraph 14	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for	Relevant Planning Authority' to include consultation with Buckinghamshire Highways, who would like to be party to

DCO Wording	Suggested Changes	Comments
	sufficient consultation period with consultees.	details relating to construction traffic matters. Please see Section 2.2 Transport and Highways of Written Representations.
Construction workers, 15	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.	Relevant Planning Authority' to include consultation with Buckinghamshire Highways, who would like to be party to details relating to construction worker travel plan matters. Please see Section 2.2 Transport and Highways of Written Representations.
ESG, paragraph 20 (2)	Suggested wording changes to Paragraph 20 to include Buckinghamshire Council in the ESG.	Please see Section 2.10 of Written Representations
	The 'representation from an airline industry body' must not be the airport owner/ Luton Rising.	The ESG must remain an independent body, this will be assisted with Buckinghamshire Council being on the panel. Please see Sections 2.1, 2.2 and 2.3 of Written Representations.
Technical Panel, Paragraph 20 (8-9)	Tighter definition to name the individuals and bodies	Buckinghamshire Council would like to be a named body on the Technical Panel. Please see Section 2.10 of Written Representations Highways rep
Exceedance of Limit. Paragraph 24	An implementation timeframe for the Mitigation Plan, once approved, needs to be provided.	To ensure that mitigation is carried out in a timely manner. Sub para (4) insert new (b) must "include a timetable for implementation" Please see Section 2.2 Transport and Highways of Written Representations.

DCO Wording	Suggested Changes	Comments
Review of implementation of this Part, Paragraph 25	Review of implementation should be undertaken annually. Amend sub para (1) from 5 to 1 year	To ensure mitigation is quickly applied, when required. Please see Section 2.2 Transport and Highways of Written Representations.
Passenger cap for the authorised development, paragraph 26	Amended to address the inconsistency with the Green Controlled Growth Framework (GCGF).	As currently drafted, the Council is of the opinion that these requirements do not adequately deal with the phased approach to increasing passenger numbers to the cap. This places the Requirements at odds with the GCGF. Please see Section 2.10 of Written Representations
Night quota cap, paragraph 27	Amend paragraph 20 for Buckinghamshire Council, and other neighbouring authorities, to form part of the ESG.	makes provision for the relevant planning authority to approve a variation to the night quota cap, in consultation with the ESG. Buckinghamshire Council is concerned that its absence from the ESG would prevent it, and other neighbouring authorities, from representing the best interests of their communities on this matter. Please see Section 2.10 of Written Representations
Offsite highways works paragraph 29	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.	Relevant Planning Authority' to include, Buckinghamshire Highways, if off-site highway works fall within Buckinghamshire Council. Or to allow consultation with Buckinghamshire Council, where required; who would like to be party to the transport related impacts monitoring and mitigation approach.

DCO Wording	Suggested Changes	Comments
		Please see Section 2.2 Transport and Highways of Written Representations.
	Trigger required for implementation of mitigation scheme	Within X period. – to ensure timely implementation of mitigation. Please see Section 2.2 Transport and Highways of Written Representations.
Travel Plans paragraph 30	Amendments to wording to allow for sufficient flexibility to definition of ‘Relevant Highway Authority’ and to allow for sufficient consultation period with consultees.	Relevant Planning Authority’ to include consultation with Buckinghamshire Highways, who would like to be party to the travel plans. Please see Section 2.2 Transport and Highways of Written Representations.
	(3) Updating of travel plans should take place annually.	To ensure mitigation/intervention is quickly applied, when required.
	Mitigation/ successful implementation strategy/ review required.	To ensure targeted intervention should travel plan targets not be met. Please see Section 2.2 Transport and Highways of Written Representations.
Operational air quality plan paragraph 31	Amendments to wording to allow for sufficient flexibility to definition of ‘Relevant Planning Authority’ and to allow for sufficient consultation period with consultees.	Relevant Planning Authority’ to include consultation with Buckinghamshire Environmental Health, who would like to be party to air quality matters. Please see Section 2.10 and 2.4 of Written Representations
Greenhouse gas action plan, paragraph 32	Amendments to wording to allow for sufficient flexibility to definition of ‘Relevant Planning Authority’ and to allow for sufficient consultation period with consultees.	Relevant Planning Authority’ to include consultation with Buckinghamshire Climate Change Officers, who would like to be party to the Greenhouse gas action plan. Please see Section 2.10 and 2.1 of Written Representations

DCO Wording	Suggested Changes	Comments
Operational waste management plan, paragraph 33	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.	Relevant Planning Authority' to include consultation with Buckinghamshire Council, who would like to be party to the water management plan. Please see Section 2.10 of Written Representations
Applications made under requirements, paragraph 35	Amendment to allow for statutory 21 day consultation period for consultees and further extension of this period, should it be required.	To make provision for a minimum consultation period for applications made under requirements, akin to the 21 days defined in Paragraph 18, of Part 3, of Schedule 2 of the dDCO. The Applicant should also ensure that an appropriate mechanism is included within the dDCO for extending this consultation period should further issues arise or if insufficient information is made available to the consultee. Please see Section 2.10 of Written Representations
Further information, paragraph 36 (3)	Amendments to wording to allow for sufficient flexibility for neighbouring authorities to act as consultees.	Limits consultation on the discharge of DCO requirements to those consultees specified within a requirement itself. Please see Section 2.10 of Written Representations
Paragraph 39 (4) "specified local authority"	Buckinghamshire Council to be named as a specified local authority.	