

SLAE Written Representation - Climate Change - A summary

= Luton Rising, LBC = Luton Borough Council, LLOAL = London Luton Airport Operations Limited

The main document that SLAE have submitted looks at the global responsibility of LR, LBC and LLAOL regarding Climate Change, which appears to be lacking in the application documents.

SLAE advise LR to follow the non for profit and UN backed global Science-based targets award scheme, and avoid organisations that offer aviation climate emission accreditations.

A link to the latest Government paper *titled Jet Zero strategy: one year on*, update is provided.

Another link is to the Met Offices news *article <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2022/heatwave-threshold-changes>*, which redefined the heat wave classification for **Bedfordshire**, a good example of how the effects of Climate Change are coming closer to home.

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The article titled, 'The extreme summer weather that scorched and soaked the world' ^{cc1} by the BBC at <https://www.bbc.co.uk/news/resources/idt-8f0357f9-9013-4567-8407-be938c8c70cf> (accessed 02/09/23) both describes and pictorially covers the extreme weather events in the Northern Hemisphere this summer. Not all these events can be immediately linked to climate change as it can take a while for scientists to untangle what exactly is going on - plus, the planet's natural weather and climate systems are powerful and also affect the weather. Although by the end of the August, scientists with the World Weather Attribution group (<https://www.worldweatherattribution.org/> (accessed 02/09/23)) had analysed the data and concluded that the heat waves would have been "virtually impossible" without **human-induced** climate change.

A good number of the application documents cover Climate Change and associated weather events and SLAE would like the Planning Inspectorate to question LR from a different view point.

Important

SLAE believe that LR, LLOAL, LBC and the airlines all have a joint responsibility to reduce the impact of Climate Change and associated weather events globally, as their ambitions to increase and extend to both international and global destinations are plain to read. Any airport expansion is an enabler for flight operations (LLAOL and the airlines using Luton Airport), now and in the future inflicting emissions that contribute to Climate Change and associated weather events on other countries. Emissions that have initially been sourced and extracted from fossil fuels, a double whammy of damage. SLAE ask LR to work with LBC, LLAOL and the airlines on a compensation scheme that covers the cost of mitigating climate change impacts on other country destinations by all Luton Airport activities and enablers. SLAE feel that comparisons with the historic Slave Trade era can be made, inflicting Luton sourced misery on those unable to defend themselves.

SLAE ask LR why this is not covered in the application?

LR should submit such an undertaking in the application?

Even better a section in the Green Controlled Growth proposals, and covered by law? That would show true commitment as LR attempt to demonstrate in GCG.

In fact, LR are advised to follow the non for profit and UN backed global Science-based targets award scheme, which is independent from aviation schemes and provides companies with a clearly-defined path to reduce emissions in line with the Paris Agreement goals <https://sciencebasedtargets.org/how-it-works>. (accessed 07/09/2023) This would prove if GCG is worthy of the emphasis that LR place on environment protections.

SLAE ask LR to make a statement on the impact of their enabler activities to the rest of the world? Writing to each destinations Government explaining the 'growth' to Luton's economy is the cause.

This would show a true commitment and responsibility to deal with aviation emissions and would also fit nicely in with the Governments Jet Zero aspirations of an earlier target for UK domestic aviation to reach net zero by 2040, <https://www.gov.uk/government/publications/jet-zero-strategy-one-year-on>, accessed 02/09/2023.

The application includes statements in regards to Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), (example document 000833, paragraphs 3.4.26, 3.4.27, 3.4.28, 3.4.29) and International Civil Aviation Organization (ICAO), and the UK Emissions Trading Scheme (UK ETS), however the above paragraph (headed **Important**) stands alone and separate from any Government publications and CORSIA, ICAO and UK ETS) considerations on involvement as identified in the recent 'jet zero strategy one year on' publication, (<https://www.gov.uk/government/publications/jet-zero-strategy-one-year-on>, (accessed 02/09/2023)).

To support the (headed **Important**) paragraph, evidence can be found in the following.

In the many application document and responses to hearings and Written Representations, LR hide behind Government Policy and unproven future technology to address such concerns. Such as, Document 001117 3.4.6 *The Jet Zero Strategy makes clear that growth of airport capacity is supported and that the Government does not intend to introduce demand management measures and that it is the responsibility of Government to address carbon emissions from aircraft at the national level. Policy makes clear that growth, in principle, remains supported and that the focus is on addressing the impacts of aviation rather than constraining economically beneficial growth.*

Document 7.04 01117 discusses a *regional and sub-regional economic context*, using paragraphs such as 2.4.5 *The importance of the Arc is, ultimately, founded on its potential as an internationally focused area of economic activity*, 2.4.9 *Although there is a focus on the international competitiveness of the Arc, the need for 'levelling up' within it has also been recognised*, 2.4.51 *The airport's role as both a direct provider of employment and prosperity and as an enabler of the international economy in the regions around the airport is specifically recognised in a range of strategy and policy documents, amongst others.*

London Luton airport claim that *with over 145 destinations to choose from, why not start making memories and book a trip from London Luton Airport (<https://www.london-luton.co.uk/gettravelling> (accessed 02/09/23)) and London Luton Airport offers cheap holiday flights to more than 30 countries and 70 unique destinations across Europe, the Middle East and North Africa. <https://travel.london-luton.co.uk/destinations> (accessed 02/09/23)).*

Paragraph, 4.5.3 states, However, with growth in the future, the airport is also expected to provide connectivity to a range of long haul destinations notably to the Middle East hubs and the eastern seaboard of the USA. This would enable it to better support current and future investors from parts of Asia and the Americas. And in, 4.6.5 To the extent that future growth at the airport enables it to serve some key long haul markets, as will be explained in Section 6, there are potentially clear benefits in accessing key tourism markets for the East of England, such as the USA and China, albeit via convenient hub airports, which could be expected to increase tourist visits to the region materially.

In document 001097, the paragraphs 5.2.8 Giving passengers the opportunity to fly from the airport to a wider range of destinations will save time and money, amounting to around £512 million in journey time savings (discounted over a 60-year period) for air travellers to and from the Three Counties. and 5.4.1 The Proposed Development will enable the airport to increase its capacity in response to demand, which in turn will deliver benefits for the airlines that operate from it. In addition, airlines and other airport users will benefit from being able to operate at an airport from which passengers want to use (refer to Section 5.3, which sets out the benefits for future passengers).

cc1 [The extreme summer weather that scorched and soaked the world - BBC News](#) A summary below,

Heat. Wildfires. Torrential rain. Typhoons and hurricanes. Much of the northern hemisphere has been battered by extreme weather this summer.

Not all these events can be immediately linked to climate change. It can take a while for scientists to untangle what exactly is going on - plus, the planet's natural weather and climate systems are powerful and also affect the weather.

But in the past few weeks, significant meteorological records have been broken in quick succession, to the concern of climate change experts.

In the UK, the balmy days of early summer may feel like a distant memory after weeks of unsettled weather - but this year saw the UK's hottest June on record.

74% of areas in the UK broke heat records. The average mean temperature, counting both days and cooler nights, was 15.8C. That eclipsed the previous record by 0.9C and was a significant jump in climate terms. Record temperatures were reached in 72 of 97 areas of the UK where temperature data is collected. Scientists at the Met Office said climate change made the chance of surpassing the previous record at least twice as likely.

In the first week of July, the planet saw its hottest day ever recorded when the average mean global temperature hit 17.23C. This broke the previous 2016 record of 16.92C.

The extreme weather which has affected many millions of people in July is unfortunately the harsh reality of climate change and a foretaste of the future.

By the end of the month, scientists with the World Weather Attribution group - which looks at the role of climate change in specific extreme weather events - had analysed the data and concluded that the heatwaves would have been "virtually impossible" without **human-induced** climate change.

Warming the atmosphere by burning fossil fuels has made the heatwave in southern Europe 2.5C hotter, they said.

El Niño, which began in June, could contribute to make 2023 the hottest year ever, scientists believe. The powerful natural phenomenon is linked to higher temperatures, and occurs every two to seven years when warm water rises to the surface in the Pacific off the coast of South America.

Scientists expect that as global warming intensifies, wildfires will become more powerful.

The impact of extreme weather in different countries is a reminder that how **humans** respond is vital. This summer the UN and leading climate scientists again urged governments to keep to their promises to urgently tackle climate change.

Scientists say this summer is a sign of things to come as climate change worsens. It's no longer something in the future; we are really seeing it now.

The article photos show the impact of extreme weather events in locations such as Japan, America, China, Greece, Rhodes, London, Mexico, British Columbia, Italy, Philippines, Algeria, Tunisia, Canada, Hawaii, South Korea, the Mediterranean and Southern Europe.

SLAE agree with the statement found in document 000840, the *EXECUTIVE SUMMARY for Green Controlled Growth*. *Airports do much that is good. They are gateways to the world for business and leisure. They are very important economic hubs. They can generate tens of thousands of jobs. Airports can also generate negative environmental effects that, unless controlled and managed, can impact on surrounding communities. Green Controlled Growth (GCG) is a key value of Luton Rising in its ambition to enable the sustainable expansion of Luton Airport.*

On Tue 29 Mar 2022 the Met Offices news article <https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2022/heatwave-threshold-changes>, redefined the heat wave classification for **Bedfordshire**, a good example of how the effects of Climate Change are coming closer to home.

The Government paper titled Jet Zero strategy: one year on, (<https://www.gov.uk/government/publications/jet-zero-strategy-one-year-on>, (accessed 02-09-23)) includes the following.

Transport remains the largest emitting sector in the UK, and by 2035, aviation is expected to be one of the largest emitting transport modes.

*This year, we have updated our scenarios to reflect the latest macroeconomic conditions, including updating inputs on oil prices, GDP and consumption growth, and foreign exchange rates. This has had **the impact of reducing forecast passenger demand growth** under our High Ambition scenario to 52% in 2050, relative to 2018 levels, compared to 70% in the published Jet Zero Strategy.*

We have committed to reviewing our Jet Zero Strategy every five years, with the first review in 2027.

SLAE comment that this is too late for LR's expansion application.

These measures are in line with those considered in our Jet Zero Strategy. Unsurprisingly, given the complexity of decarbonising the aviation sector and high levels of uncertainty, the contributions of individual measures do not align exactly with those implied by our modelling. **Reference (SLAE Relevant Representation paragraph 19.)**

Economics and Employment - Charities

Green Controlled Growth = GCG. Luton Rising = LR. Luton Borough Council = LBC.

Having read LR's responses to Relevant Representations it is disappointing to find in most cases that they are paraphrasing what is written in the application documents and not answering questions directly. This sums up the whole approach 'we know best' attitude to the consultation exercises since 2018, including accepting suggestions that made the application stronger in LR & LBC opinion.

SLAE have taken the time and care to read the letters of support, transcripts from the Open Floor Hearings and the application documents that refer to charities, community & volunteer groups, and parish and town councils.

The speaker at Open Floor Hearing 1 summed it up, *"If that money did not come in, the negative effect on our town, where Luton is probably one of the most deprived towns, it would be a lot more worse off. The impact firsthand, I've seen the difference with the support the airport, made too many community groups, many charities. It puts happiness in putting people into jobs. Seeing children fed, it hits, it hits you. I understand the pollution. I understand. There's some positives and some negatives. But for me the growth polluter means more aspirations for the young people in our town. More jobs for people in our community."* Document 001257.

SLAE 100% recognise the difference that airport funding makes to charities and the those in need of help. Not one of our group has not turned to a Charity for help at some stage in our lives. Each of us in our group either give our time or make financial contributions to charitable causes.

SLAE also support LR increasing the financial support to voluntary communities and charitable organisations to help make life-transforming changes for people.

SLAE feel that a lot of the good things that LR do for charities and the community can be achieved without the expansion

SLAE also recognise that there are charities that are both for and against expansion.

SLAE recognise that charities are expected to pick up the pieces when councils are unable to fund / provide services

SLAE understands that the most tax efficient way for councils to fund charities is by setting up private companies to provide donations

SLAE ask if charitable organisations will still support expansion if GCG is not legalised?

The airport expansion will be the enabler for further climate change, global warming, further health, noise, traffic and emissions issues. Is airport funding of health charities a circular investment, as aviation impacts people's health?

SLAE would like the following to be clarified,

If expansion is not approved will community or charitable financial support be reduced or taken away?

LR to be more specific on where the borrowed funds came from as mentioned in document 000609 paragraph 02 Background to the consultation? *'When the Covid-19 pandemic impacted operations and revenues, we borrowed funds to maintain our contribution levels to local charities, understanding the greater need within the community.'*

Where did the source of that funding come from (UK taxpayers, loans given by the Government or council)?

Do LR have to pay interest on the borrowed money and if so how much spread over how many years?

SLAE would like to ask if funding will be cut as a result of the debt / interest repayments?

If expansion is not approved will Luton Councils 2040 vision fail?

SLAE also ask for more clarity on the statements made in document 000833, 1.7.4, 1.7.5 and 1.7.6, document 000834 A1.1.8 and document 000835 B1.1.7 as it is not clear if LR or the operator is responsible for taking GCG through the legal process? Many of the charity RR's and OFH statements are based upon the GCG proposal.

Will a private operator company who is focused on profit, implement GCG when it's not beneficial for them to do so?

Would charities be satisfied that a private operator company will take forward and legalise GCG?

SLAE would like to see funding forecast projections for each phase, up to and beyond the last phase timelines? Charities would then be able to plan strategically and be more robust for susceptible aviation events.

SLAE do not accept the LR response made to our Relevant Representation suggestion that if 'Green Control Growth' (GCG) will be passed into law, a similar law be put in place to protect charitable financial benefits. *"The Applicant remains a private company and must operate within the laws governing such organisations, it would not therefore be appropriate to seek to make legally binding obligations beyond the scope of the growth being sought through*

this application to making minimum annual charitable contributions." Document 001527. Is 'growth' a dependent on LR's definition?

SLAE ask LR to provide year by year financial information on all funding given to charities, voluntary and community groups since 1998? The evidence found in many of the application documents (**highlighted in yellow**) is unwieldy, difficult to follow and doesn't appear to add up. Ideally in a table format. Similar to passenger, transport and noise layouts, easy to read, clear and transparent.

SLAE ask LR to clarify the sentences made in the following documents, as when read together they appear to be deliberately meant to obfuscate, confuse and not add up.
Document 001117 - 8.7.1& 000611, *Since **1998, £155 million** to support local community investment projects, organisations and charities*

Document 000611- *since 2002 we have provided more than **£150 million** to local charities and voluntary organisations*

Document 000611 - *In 2021, our unique community investment programme had an annual budget of around **£7.4 million***

Document 000624 - *Last year, just over **£9 million** was allocated to our Community Funding Programme. This amounted to **53 pence** per passenger in 2018/2019 being provided for community causes – **20 times** more than any other major UK airport.*

Document 000619 - *Over the last five years, this total has **topped £50m**. At **62p per passenger**, that's more **than 24 times** the scale of our nearest airport competitor.*

Document 000623 - *since 2002 we have provided over **£140 million** to local charities and voluntary organisations in Luton and beyond through our community funding programme, including just over **£9 million** last year.*

Document 001120 - 8.1.4 *Over the last 20 years, the Applicant has contributed more **than £175m** to local community groups and charities providing vital services across neighbouring communities.*

Fund availability

9.1.4 *To ensure that benefits of airport growth are shared across **the local area, 40% of the proceeds of Community First will be allocated to areas outside of the boundary of the Borough of Luton** and 60% allocated for use within the boundary of the Borough of Luton. This is in recognition of the relatively higher incidence of social deprivation in the town.*

10.1.1 *The Applicant will appoint a charitable body independent of the Applicant to administer Community First.*

10.1.2 *The independent administrator will establish an awards panel to determine applications for grant funding and make awards. The independent administrator will be required to demonstrate that membership of award panels includes knowledge and*

*understanding of matters of **local interest** and priority in the areas in which applications are being considered.*

SLAE are confused with meaning of **'of local interest'** as found in document 000623 paragraph 8.1.4 and (above) paragraph 10.1.2. Paragraph 9.1.4 implies that areas outside of Luton are included?

Can the **'local interest'** boundaries be clearly defined?

SLAE are confused with LR's response to our Relevant Representation statement regarding protecting of charitable financial benefits. LR state that this subject is ***outside of the scope of this application for development consent.*** Many supporters have championed airport expansion (letters of support, RR's and OFH's) based upon funding from Luton Airport. Why are there the many application documents on the subject if this is not part of the application?

If this is the case than SLAE ask the Examining Authority to instruct Luton Rising to redact all topics that are outside the scope of the application to avoid wasted volunteer time researching.

Should it be for the Examining Authority to decide which subjects are ***outside of the scope of this application for development consent?***

SLAE see this very much part of the Health and Community scope (document 001253).

A "good neighbour"

This summary provides a brief overview of the document xxx

It asks 21 questions based upon the evidence provided in the DCO application documents. It points out that LR use the term 28 times in 8 documents.

It finds that there is no definition of what constitutes a "good neighbour" in the National Planning Policy Framework (NPPF July 2021), and asks if the term is used as application filler.

It asks what is the definition of a good neighbour

Looks at the examples given by LR

Gives guidance to LR of what a good neighbour should be

Questions how towns and cities like Milton Keynes and Stevenage can be classed as 'local neighbours' and asks why / how these places will be impacted by construction activities.

It provides references and quotes from application documents for ease of access.

Health & Community - a "good neighbour"

Green Horizons Park = GHP. Luton Rising = LR. Luton Borough Council = LBC.

Having read LR's responses to Relevant Representations it is disappointing to find in most cases that they are paraphrasing what is written in the application documents and not answering questions directly. This sums up the whole approach 'we know best' attitude to the consultation exercises since 2018, including accepting suggestions that made the application stronger in LR & LBC opinion.

Luton Rising use the 'good neighbour' term 28 times in 8 documents ^{GN1}. Although this may appear to be a trivial term, it is in fact the building bricks to a caring sharing society and appears to be important to LR.

Why does LR use the phrase good neighbours 28 times?

Is it because LR are currently perceived as being bad neighbours or that they actually are bad neighbours?

Is it LBC or the airport Operator that are bad neighbours?

SLAE ask if being a "good neighbour" is part of the planning process or simply an 'application filler'?

LR are striving to be a good neighbour.

There appears to be no definition of what constitutes a "good neighbour" in the National Planning Policy Framework (NPPF July 2021)

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> (accessed 27/8/23). The 2020 Good Neighbour Guide report from Co-op Insurance and Neighbourhood Watch reveals that nearly all Brits think they're good neighbours. The third annual study reveals what really makes a good neighbour, <https://www.coop.co.uk/insurance/hub/good-neighbour-guide> (accessed 27/8/23). The headline statement reads, 'Be thoughtful, think about your neighbours and the impact you have on them in the way you act. Be friendly – but stay away from nosey tendencies. And be courteous when it comes to simple things like noise levels and parking spaces.' SLAE found no 'courtesy' shown in the LR documents.

These things are not simple when it comes to the airport although the airport ward neighbours wish they were.

In the document 000623 LLAL produced its vision for the airport, titled 'Vision for Sustainable Growth 2020-2050', to outline why LTN should make better use of its runway while being environmentally and socially responsible and a good neighbour to surrounding communities. The good neighbour theme continues throughout the document.

Why do LBC, LR and the Operator so often 'talk the talk' (Good PR and Greenwash speak) and not actually 'walk the walk'. Being a Good Neighbour is, on their terms only.

In the document 001123 - Framework Travel Plan, the Toolbox of interventions and measures tables 5.1 to 5.5 indicate how LR strive to be a 'good neighbour', on their terms only.

SLAE ask LR to clearly define what a 'good neighbour' means in the context of their application?

Please define the physical boundaries of a 'neighbour' as the following do not appear to be?

- *Work with operators to strengthen F70 and F77 bus service from Milton Keynes to the airport*
- *introduce new service from Stevenage to the airport and Leighton Buzzard to the airport*
- *Identify and subsidise new bus routes to areas that are not serviced by existing provision, such as Aylesbury, this will add capacity to the overall bus and coach network to benefit both passengers and staff*
- *Work with the bus operators to introduce more frequent bus services to drop-off and pick-up at offsite locations such as transit hubs at Hitchin and Stevenage etc*

The definition of a 'neighbour' is key when reading the construction 'good neighbour' statements because there is the implication that places such as Stevenage, Hitchin, Aylesbury and Milton Keynes will be so far away that they won't hear, see, feel or smell the expansion construction activities. Are these places seen by LR as 'local'?

If LR are providing benefits for airport staff, how is that being a good neighbour when promoting staff benefits?

How about the ward residents and Hertfordshire villages adjacent to the airport?

- *Discounted/free/season ticket Luton DART tickets for staff*
- *Explore employee-only bus services to poorly connected residential areas*
- *Bring forward a scheme to provide demand-responsive buses operating in the local area to transport employees to and from the airport. This scheme can supplement service buses and will be designed to plug gaps in geographic or temporal provision.*

How do the following statements tie in with being a good neighbour to those in South Luton, Crawley, Wigmore wards and those living in the adjacent Hertfordshire villages?

- *Upgrade buses that transfer passengers from car parks to Terminals to zero emission fleet?*
- *Work with operators to strengthen F70 and F77 bus service from Milton Keynes to the airport*
- *Introduce new service from Stevenage to the airport and Leighton Buzzard to the airport*
- *Identify and subsidise new bus routes to areas that are not serviced by existing provision, such as Aylesbury, this will add capacity to the overall bus and coach network to benefit both passengers and staff.*
- *Deliver the Airport Access Road which will improve connectivity and journey time reliability for buses accessing the airport*
- *Provide supporting infrastructure for the bus and coach station including high quality 'way-finding' signage and priority lanes for buses, coaches and other multiple occupancy vehicles on the access and egress roads with complementary restrictions on use by private cars.*

- *Installation of additional EV charging points for passengers. Work with the operator to conduct feasibility assessments and review of funding models for the provision of EV charging infrastructure, based on expected demand and charging*
- *Work with taxi and private hire operators to achieve efficient transition to zero emission vehicles serving the airport*
- *Provide Hackney cab rank at T2 forecourt*
- *Improve forecourt operations with ability to handle demand to limit queuing and antisocial drop-off*
- *Improve signage for vehicles between car parks, to limit circulation*
- *Carry out feasibility study/review on Restricted Parking Zones (RPZs)*

Will the opportunities and enhancements listed below include South Luton (east of the airport), Crawley, Wigmore ward residents and those living in the adjacent Hertfordshire villages (east of the airport)?

- *Explore opportunities associated with the ongoing A505 study considering public transport options including the feasibility of Bus Rapid Transit*
- *Explore bus enhancements, including subsidies for the east- west routes to improve service provision and passenger experience*

What if the airports neighbours are not going to the airport?

How's that benefit South Luton, Crawley, Wigmore ward residents and those living in the adjacent Hertfordshire villages?

- *Engage with bus operators to improve the existing routes and create new and extended routes, better connecting the airport to more places (especially east-west) and in particular urban areas and transport hubs*

In particular the following statements suggest that LR will **not be** good neighbours, and shift the responsibilities onto their owner LBC. There would be no need for these, if LR acted in the best interests of ward residents adjacent to the airport. LR can do this via their Councillor led board.

- *Support the expansion of the residents parking zone to the north of the airport*
- *Collaborate with local highway authorities to develop an approach to prevent airport related parking causing nuisance or inconvenience for people living in the residential areas to the north and west of the airport. The approach could also set out interventions to deter 'rat-running' through minor roads east of the airport, including routes within Hertfordshire.*

Coming back to the '2020 **Good Neighbour** Guide report' from Co-op Insurance and Neighbourhood Watch which reads, 'Be thoughtful, think about your neighbours and the impact you have on them in the way you act. Be friendly – but stay away from nosey tendencies. And be courteous when it comes to simple things like noise levels and parking spaces.'

SLAE suggest that a good neighbour would,

- not wake their neighbours up at all hours
- not pollute the ward areas around the airport
- not destroy the Wigmore Valley County Wildlife site

- want to help the residents around the airport
- not expand their annoyance to neighbours by doubling the noise and car parking disturbance
- offer more people sound proofing from aviation activities
- believe adjoining ward residents when they witness the flight paths changing, rather than denying anything has changed
- offer to pay for any inconvenience or damage to the ward communities
- pay for mobile noise monitoring that their airport enables, rather than charge
- be respectful and respond to each individual complaint in a meaningful, genuine and empathic manner, not pass onto others
- give the adjoining ward residents a day of rest, maybe once a week, on a Sunday? Allow those under the flight path to hold a normal conversation once in a while.
- clean up after themselves if they created mess on other neighbours properties. LR Should fund car washes for all those who's cars get dirty from aircraft discharges underneath the flight path
- go and speak to those who live nearby, not holding meetings in venues, expecting everyone to be technology wise or reading Luton newspapers
- conduct regular litter picks on their land and surrounding neighbouring areas which their customers (holiday makers leave their cars) and rubbish
- tow away holiday maker cars parked in neighbouring roads and store them in an airport compound and charge the holiday maker for storage
- get out and about and not rely on the postman to deliver letters
- not rely on lazy social media to communicate messages when SLAE can prove that not all ward residents use social media
- go out and speak to the residents on their doorstep, who will be impacted by the works, and not let their lead contractor only talk to the Council about a community engagement plan to tick the box that says to be a better neighbour
- not allow their visitors to park outside other peoples house whilst they went on holiday, they would ask first
- offer to pay for car parking schemes to adjoining ward residents impacted by their visitors actions (not allow the council to charge residents). Put the cost on a passengers ticket
- come around and clean up after themselves if their visitors left property behind
- not pollute their neighbours property with odours, particles and other unseen materials.
- not interfere and affect the air space up to 50 metres (lower stratum) above a landowner's property which impacts the residents reasonable enjoyment of the land and the structures upon it.
- show more accountability to improve their perceived 'bad neighbour image'
- 'provide the evidence' that they can improve their standing in the neighbourhood

- have realistic trusted performance targets that adjoining ward residents can contribute to
- provide portable air monitoring stations to those that request them, with no waiting lists and with online real time results. Monitors will be placed where they need to be and will give residents a true indication of the air pollution being breathed in.
- Being courteous and respond to letters from the Luton public as published in the Luton News (August 2021) regarding public money and the problems with the testing of DART.
- Respond to adjoining ward residents suggestions, such as publishing testing plans when the DART was under trial and provide real time results (defects and all), so the taxpayer funder of the DART could see value for money

*In document 000619 - Volume 6 Consultation Report LR state, "We are committed to minimising and mitigating as far as possible, the impacts of expansion. In this consultation we will show our assessments of the impacts, and ask for feedback on our proposals for mitigating them. Public engagement on these issues will be vital in making sure that the airport can be a **good neighbour** to surrounding residents."*

After 3 consultations, suggestions taken onboard, why then are there still an overwhelming number of Relevant Representations submitted to the PI that are opposed to the expansion?

The whole front load process is to identify and address these before LR submit the application for PI examination. The majority clearly say no to expansion. Why have LR not listened to or heard their good neighbours and surrounding residents prior to the application?

Who is a 'surrounding resident'?

If it's those who don't live in Breachwood Green, Wigmore, South Luton, and Crawley wards, then where are they as they don't surround the airport?

SLAE ask for a document that clearly defines the loose terms used, like surrounding, communities, local, neighbours, etc. Allow the Examining Authority and all others to know what applies to whom. Is Milton Keynes local? Where are the boundaries defined?

In document 000612 Volume 6 Consultation Report - 6.02 Appendix L 2019 Due Regard Tables Ref 16.1.23, 16.2.35 the LR response points to ref 16.1.4 and 16.1.5 ^{GN2}. When reading 16.1.4, the response is generic and not specific and advises to read the PEIR documents of which there are over 450. This is unreasonable.

Why are LR not being very helpful?

6.1.5 provides more details, however SLAE would see any contractor when involved with either drafting or applying the CoCP, speaking directly to residents (SLAE offer to be involved) and not just the Local Planning Authority.

SLAE are also confused as to what a 'Near Neighbour Fund' (document 001114 paragraph 8.2010), a 'best possible neighbour' (document 000941), 'neighbouring counties' (document 000831 paragraph 2.1.15), 'local neighbourhood area' (document 000815, paragraph 8.12.16), 'a number of other neighbouring airports' (document 001117, paragraph 6.3.31), 'local neighbourhood/Luton' (document 001108, paragraph 13.9.7), 'local businesses and neighbours' (document 001536, paragraph titled Demolition / construction conditions (07)), and finally the difference between 'neighbouring local authorities' (document 000815, paragraph 6.4.5) and 'neighbouring authorities' (document 000977, paragraph 4.3.7).

Please clearly define by what 'neighbour' means, either in a reference or the exact ward boundaries or locations?

References:

GN1. 14 times in document 001123 7.13. Framework Travel plan. 2 times in document 000612 Volume 6 Consultation Report 6.02 Appendix L 2019 Due Regard Tables. 2 times in document 000624 Volume 6 Consultation Report 6.02 Consultation Report Appendix E 2019 Statutory Consultation Material Part 2 of 2. 1 time in document 000928 TR020001 Volume 6 Consultation Report 6.01 Consultation Report. 2 times in document 000609 Volume 6 Consultation Report 6.02 Consultation Report Appendix J 2022 Statutory Consultation Materials Part 1 of 2. 5 times in document 000623 Volume 6 Consultation Report 6.02 Consultation Report Appendix E 2019 Statutory Consultation Material Part 1 of 2. 1 time in document 000618 Volume 6 Consultation Report, 6.01 Consultation Report. 1 time in document Volume 6 Consultation Report 6.02 Appendix A Non-Statutory Consultation Materials and Feedback Report.

GN2.

Ref	Comment	Response
16.1.23	Concern that the proposals to manage the construction works are of poor quality and/or do not enable the applicant to act as a 'good neighbour'.	Please see responses to refs 16.1.4 and 16.1.5.
16.2.35	Concern that the proposals to manage the construction works are of poor quality and/or do not enable the applicant to act as a 'good neighbour'. Specific concerns included; lack of confidence following management of current works, the scale of potential disruption, an increase in traffic congestion, proposed mitigations not going far enough to minimise impacts, and a lack of trust in mitigation enforcement.	Please see responses to refs 16.1.4 and 16.1.5.
16.1.4	Concern that the proposed phasing of the construction works will not be delivered as planned and/or is of insufficient quality.	We have incorporated flexibility into our design to allow incremental growth which responds to passenger demand, for example we have adjusted our second terminal to be modular. On a project of this scale and duration the construction plan needs to provide the flexibility to respond to changing demand. The passenger forecasts have been updated and used to inform the assessments for all relevant topics in the PEIR. The phased delivery of capacity is described and considered in the PEIR.
16.1.5	Concern regarding the pace, duration and/or cost of the proposed phasing.	Please see response to ref 16.1.4. The overall delivery period is 16 years running from 2025 to the end of 2040. The majority of work will take place between 2033 and 2040. Mitigation, including during construction, where required, is included within the PEIR. The Draft CoCP , in Appendix 4.2 of Volume 3 of the PEIR, contains a suite of mitigation and management measures to ensure that the environmental impacts of

		<p>construction, including earthworks and landscaping, are avoided where possible and otherwise minimised. It will be a legal requirement for the contractor to comply with the CoCP under the DCO. Further guidance on specific areas such as the management of earthworks and ground water control will be considered based on industry best practice guidance documents, as established in each environment topic section of the CoCP. The CoCP will also outline the approach for broader environmental commitments, community relations, working hours, good housekeeping, security and other measures. Currently, the estimated cost for the Proposed Development represents a significant reduction in the scheme costs since 2019. Funding is not expected to be provided by a single party but by multiple parties who are interested in different aspects of the proposal. We do not intend there to be any direct contribution from LBC or any impact upon local Council Taxpayers, as there are numerous models available for the funding, financing and procurement of the works which are likely to be spread over a period of up to 20 years. Given the attractiveness of the proposition and the range of delivery models available, we have every confidence that the Proposed Development is deliverable. Further details on the financial aspects of the Proposed Development will be set out in the Funding Statement, which will be submitted with the application for development consent.</p>
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Health & Community - Open Spaces WR D2 Summary

LR = Luton Rising, LBC = Luton Borough Council, FOI = Freedom of Information, GHP = Green Horizons Park,

To assist the Examining Authority, SLAE have identified the following areas in this Written Representation that require further inspection.

SLAE feel that the 'Open Spaces' topic and documents are severely lacking in any real depth and accuracy and ask the Examining Authority to ask LR to revisit or withdraw this evidence. As a result, unfortunately this Written Representation is a long read.

SLAE will also be submitting a separate Written Representation in regards to Wigmore Valley Park for a future Written Representation deadline.

SLAE reject LR's Relevant Representation response on the word 'local' and provide evidence that LR'd proposals clearly define in *Document 001108 paragraph 13.9.26. The replacement open space would be located to be accessible to the adjoining communities it serves.*

SLAE provide evidence that the Open Spaces proposals are unfit for purpose.

SLAE look at the Survey and Assessment carried out by LR and find it lacking.

SLAE question the use of the word 'tranquillity' and find that insulting to those who live with noise from the airport and flight paths.

SLAE find no thought has been given to the 16.5 million creatures living in the CWS sacrificed for increasing car parking spaces. If these were humans then there would be uproar.

SLAE think that the proposals discriminate against older and pregnant people.

Health & Community - Open Spaces WR D2.

LR = Luton Rising, LBC = Luton Borough Council, FOI = Freedom of Information, GHP = Green Horizons Park,

To assist the Examining Authority, SLAE have identified the following areas in this Written Representation that require further inspection.

SLAE feel that the 'Open Spaces' topic and documents are severely lacking in any real depth and accuracy and ask the Examining Authority to ask LR to revisit or withdraw this evidence. As a result, unfortunately this Written Representation is a long read.

SLAE note that the Open Spaces survey was undertaken to collect key information on open spaces to inform the health and community impact assessment and we submit evidence further in this document.

SLAE will also be submitting a separate Written Representation in regards to Wigmore Valley Park for a future Written Representation deadline.

SLAE reject LR's Relevant Representation response on the word 'local'. *The Applicant does not have control over how the term 'local' is used by third parties but is of the view that it has defined clear and robust study areas for the purposes of the assessments submitted in support of the application. On this basis, the Applicant does not agree to removing the word 'local' from the application documents.*

SLAE note in Document 001108 paragraph 13.9.26. *The replacement open space would be located to be accessible to the adjoining communities it serves.*

Adjoining communities is clearly understood in this paragraph as adjoining communities and will use this term across all Written Responses and other types of responses from now on.

SLAE ask LR to make to apply this clear explanation to all documents with a simple addition to the Glossaries.

SLAE now understands the word 'local' to represent the populations living in the wards adjoining the airport and the Hertfordshire villages closest to the airport, such as Breachwood Green and the houses in-between. The use of the word 'local', is prolific throughout the documents and appears to support the applicants narrative and locations of their choosing. Examples, document 000848 c7.1.3 and document 001108 paragraph 13.9.26. uses the word 'adjoining' which gives clear and understood meaning and sets the precedent for all other documents.

SLAE note that in document 000719 (table 2.1) the Wigmore Valley Park quality assessment record sheet concludes that the Overall significance is 'not significant' and when comparing against the (table 2.3) Raynham Way Recreation Ground quality assessment record sheet which has an Overall significance, of 'significant', then something is not quite right and amiss. SLAE think that the assessments have got muddled, can LR conform? The assessments are also not based upon a like for like.

For example look at the destruction that LBC and LR will do to the current Wigmore Valley Park but not Raynham Way. SLAE estimate at least 16.5 million living creatures reside on the County Wildlife Site (CWS) at Wigmore Valley park (WVP) alone, this includes at least 30 different species of trees (with each tree supporting between 21 to 284 insect species). LR quote a minor beneficial outcome as there is replacement parkland, whilst Raynham Way has a moderate adverse in-combination effect. Observe and maybe read the number of Environment Statement documents in section 5.02 to understand the scope of the destruction expansion will cause.

SLAE request the Examining Authority to throw out all Open Space documents if LR have not been able to appreciate and understand the difference.

This undermines the 'quality' statement and also has an impact on all the health documents that use Open Spaces as a justification.

SLAE insist that there should be three assessments to allow the Examining Authority to reach a proper outcome. One based on the current Wigmore Valley Park footprint which includes the CWS, one on the future Wigmore Valley park footprint and the existing Raynham Way footprint.

This makes more common sense and would not undermine the survey and document results. Adjoining ward residents could then see a logic and give those that know, use and love both Raynham Way and Wigmore Valley Parks more faith in the Open Space assessments.

In document 000719 SLAE note the Open Space Survey Results :-

- a) The surveys favoured school term time in a ratio of nearly 3:1 . This can skew the results, particularly if you are trying to gauge usage and talk to as many people as possible.
- b) Paragraph 2.1.36 Of the total 155 users surveyed, 72 reported they currently experience no impacts of the airport when using the park. Of those users who reported that they experience impacts of the airport when visiting Wigmore Valley Park: we would dispute this figure. According to our reckoning 97 experienced impact from the airport when visiting the site.
- c) SLAE ask that there appears to be no reference to the wind direction on the days the survey s were taken, or if planes were landing or taking off in the direction of the park? This can impact a visitors experience.
- d) There is no reference to what the flights during the survey, the plane types, or if it was quiet during the survey periods?
- e) Paragraph 2.1.39 Of the total 155 users surveyed, 29 stated that an increase in flight movements would result in them ceasing to visit Wigmore Valley Park. We would dispute this figure. According to our reckoning 68 would visit less.
- f) Paragraph 2.1.45 Ten users stated that Stockwood Park is a comparable open space to Wigmore Valley Park. Of these ten users, two stated that they use Stockwood Park

regularly; Note Stockwood Park is plagued with noise and is directly under the flight path. No health benefits and the Rugby club could be impacted (read in conjunction with 20039680 WR evidence - LTFC).

- g) In summary there are more positive comments about Wigmore Valley Park than there are negative comments as it stands at the moment. Moreover this is despite LBC allowing the park to run down with a lack of investment (11/09/2023, LBC unable to answer SLAE's FOI request for evidence, letter attached at the bottom of this WR). One only has to look at the current children's play equipment and the derelict changing rooms in the pavilion.

Document 000848 Open Space Assessment:-

- i) C.3.1.2 Paragraph 99 indicates that existing open space should not be built on unless "...the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location".

Do the new proposals meet this criteria as document 000848 C6.1.7 focuses on *the establishment of natural habitats*, not the *replacement*?

- ii) C.3.1.2 Paragraph 130 seeks to ensure that developments create places which "...promote health and well-being, with a high standard of amenity for existing and future users".

Is an increase in noise, aviation fuel and car emissions conducive in promoting health and well-being?

- iii) C4.1.3 connectivity to the existing parkland areas to be retained, and to reposition it closer to the community it serves.

This statement is untrue. The park is either equal to or further away from the community, SLAE suggest comparing current, GHP and after Phase 2 maps to visually see the difference.

- iv) Fig C5.1 The drawing does not show neither the car park for the park nor children's play ground (Covered in 20039680 WR - PSCP Evidence & Evidence v0.1).

C6.1.8 Vague reference to recreational facilities . Surely thought should be given at this stage and indicates an emphasis more on the airport expansion than new open space.

Document 001108 13.9.27 *It is envisaged that the replacement open space would deliver additional opportunities for unstructured Green Horizons Park Evidence or natural play and would also include some additional recreational facilities, the specific nature of which is still to be determined at detailed design stage but could potentially include additional picnicking facilities, play equipment, gym equipment or trim-trail measures.*

Document 000718 Open Space Survey Methodology :-

- i) Paragraph 2.3.8 SLAE note the large number of people that were not surveyed. SLAE question that the results are representative? Particularly when considering the number of people that quoted the park in their Relevant Representations.

- ii) The survey did not mention the value of the District or County Wildlife Site in questions and yet this is a key feature of the park.
- iii) With 155 surveys recorded over 18 half days. SLAE make that around 8.6 surveys a half day.
What else were they doing with their time?
How many survey consultants took part?
How many hours does a consultant AM and PM day consist of?

SLAE note that maps are not consistent, The Bridle path that goes to the footpath in the farmers field is not shown on 000810 Provision of Open Space map.

000848

C7.1.3 Due to the Replacement Open Space proposals, there is anticipated to be change to the character of the WVP. However, its accessibility and function will not change. The Park will continue to provide access to green space, recreation and physical activity for the local population. Therefore, ES Chapter 13 [TR020001/APP/5.01] concludes no impact on the health determinant of 'Access to open space, recreation and physical activity'. This is in line with ANPS policy 5.106 (Ref 3.1), NPPF paragraphs 96 and 98 (Ref 3.2) and NHDCLP policies NE5 and NE6 (Ref 3.4).

Please clarify why the anticipation about changing the character of the park, unless that is going to change after the DCO is granted?

SLAE note that the anticipated changes will impact the Health and community impact assessment and there is a health determinant.

SLAE understand that the replacement open space for Wigmore Valley Park will be larger as this expands onto agricultural land before Darley Lane and Winch Hill. However overall the countryside land size will be reduced as much of the current Wigmore Valley park and County Wildlife space will be taken away for car parks and an airport terminal. If LR were returning Brownfield land to countryside then LR could proudly boast that they are making more green / open / county land available. Statements otherwise, suggest 'Green washing'.

SLAE have the following questions, document 000669, Chapter 14 Landscape and Visual.

In paragraph 14.5.8, the assessment process comprises the following key stages:

d. considering the value, susceptibility and sensitivity of these receptors to the type of change proposed;

e. determining the magnitude of change that would be experienced by those or at those receptors; and

f. applying professional judgement to advise the significance that should be attributed that effect.

Was tranquillity was taken into account at each receptor?

Where residents living in each of those receptors were involved?

Who provided the professional judgements and did they liaise with the ward or village residents?

Can the evidence of the application of professional judgement be provided?

Likewise can LR identify the people that are likely to be affected by the Proposed Development as described in Document 000669 paragraph 14.5.12?

Document 000669 Paragraph 14.6.2 starts with an assumption, SLAE ask for this to be amended to 'will' and request that all ambiguous words are amended for the avoidance of doubt.

Do LR share the same view as CPRE as written in paragraph document 000669 14.7.44 *Tranquillity mapping prepared by the Council for the Protection of Rural England (CPRE) (Ref. 14.33) that the area immediately surrounding the airport to be amongst the least tranquil of places within the United Kingdom?*

Could LR identify those **exact** areas as considered by the assessors to be of a moderate tranquillity? This would help adjoining communities experience some tranquillity.

LR could help it's 'good neighbour' intentions by publishing the times and moderate tranquillity locations immediately to the east and south of the airport between aircraft movements?

It would be very useful if perhaps LR or the operator could design a web site that on a given day identifies the areas of tranquillity between flights (similar to the times of the sea tides).

SALE asked members of two adjoining ward resident Face book sites the following question, 'Have those of you that walk in the park and the surrounding footpaths read 5.01 Chapter 14: Landscape and Visual of the Expansion documents?'

'14.7.46 It is considered additionally that although areas beneath flight paths, in proximity to urban centres and in proximity to the M1 corridor do experience diminished levels of tranquillity, levels throughout the Study Area generally increase with distance from the airport and rise further within the more rural parts of the Chilterns AONB.'

Can we ask you if, 'diminished' is the right word that describes your level of tranquillity?

Geraldine Hogg, Are they joking??

Sue Stalham, That must be the updated version of when we were told to get in a car to visit a park. I'd say our tranquillity has been sold out for greed!

Linda Smith, I live in Strathmore avenue , directly under the flightpath and my level of tranquillity is already zero.

Caroline Clancy, I live in West Hill and definitely not tranquil can't have my bedroom windows open at night . Have to pause tv, have to stop conversation till the planes have passed over.

Jane Spendley, Is that supposed to encourage us to allow LLA to expand and 'diminish' our tranquillity. The airport is intrusive, polluting, invasive and greedy. It has never been tranquil here since COVID was over. It is insulting

Jan Ingham, An appalling use of language.

Maureen Gugerly, 'Tranquil' I don't think so! Very noisy at night. We have to stop conversations when outside and also when windows open. You also have to pause the television as planes go over. When we first moved into West Hill Road 42 years ago it was much quieter and most planes took off or landed flying over Capability Green (I worked there so I know) but it seems to me that the plane's flight path is now much lower and constantly over residential areas and parks.

SALE ask, what LR means by 'diminished'?

I'm not sure that residents of Breachwood Green and South Luton under the flight path would agree that diminished is the right word, would you?

How much was a 'Competent Expert' paid to write that?

SLAE ask the Competent Experts (or those that have provided professional judgement) to provide the evidence that supports the climate change impacts of document 000848 *Table 14.8: Landscape and visual in-combination climate change impacts*.

Also comment on the lack of the threat of fires caused by the changing climate, as recently experienced globally. Or is there an assumption it won't happen here?

Document 000718, Could LR define what a Community Resource' is?

In paragraph 2.1.1 or document 000718, SLAE ask what an informed judgement consists of and how can quality assessments be made via desk studies and not by engaging with ward residents directly with good expert knowledge of the areas assessed?

Could the evidence of the quality assessments from seven locations in document 000718 paragraph 2.1.4 be made available for comment?

In document 000848, paragraph C1.1.3 SLAE understand the word 'replace' to mean 'like for like' and that's not what this airport expansion is doing?

The statement in paragraph C4.1.1 is not correct, it is missing out the County Wildlife Site. This is shoddy work and insult to those passionate to keep the CWS.

C4.1.2 is again incorrect and SLAE have already pointed this out in previous Relevant and Written Representations. Now that Green Horizons Park has a reduced footprint there is no need to build it on Wigmore Valley Park and therefore the Airport Access Road is not needed and the expansion can be built on Brownfield land to the west. (Reference to 20039680 **Green Horizons Park Written Representation**). In May 2021, ex LR CEO Graham Olver said that the revised expansion plans would save a billion pounds, by moving Green

Horizons Park to Brownfield land west of the airport the proposal would save a further billion pounds and a shorter AAR.

C6.1.3 The design of the Proposed Development retains the existing entrance and eastern part of WVP and integrates it into a new area of Replacement Open Space, to be provided over a larger area to the east of the existing park

This paragraph proves that residents to the west of the park will be further way.

SLAE would like to ask why LR decided to use the *guidance and proposed methodology on the impact of noise on the setting and tranquillity of heritage and cultural receptors commissioned by English Heritage (now Historic England) (Ref. 16.66)*. as found in paragraph 16.5.77 of document 001060 when there are more recent and relevant references that could be used, such as the South Downs National Park Tranquillity Study of 2017 (<https://www.southdowns.gov.uk/wp-content/uploads/2017/03/13-04-17-South-Downs-National-Park-Tranquillity-Study.pdf> accessed 31/08/23).

Document 001114 Planning Statement, paragraph 8.12.21. *Overall, the impact of the closure and re-provision of Wigmore Valley Park represents a minor beneficial impact for users of the park. The Open Space Assessment in **Appendix C** provides a full discussion of this matter.* SLAE disagree and refer to the statements made in this written representation.

8.12.23 Key mitigation measures relevant to health and community effects are summarised in Section 13.8 of Chapter 13 of the ES [TR020001/APP/5.01]. These include measures to reduce noise impacts notably to establish a noise envelope (GCG Appendix C [TR020001/APP/7.08]), provision of replacement open space (Appendix C of this document), landscape management at Wigmore Valley Park and where practicable, the Proposed Development would be designed to avoid or reduce adverse effects on other road and public transport users through measures that are targeted at encouraging greater use of those modes of travel that have less environmental impact (e.g. extending the Luton DART).

SLAE are totally confused, there appears to be no 'provision of replacement open space' in either (GCG Appendix C [TR020001/APP/7.08] or (Appendix C of this document)). Another example of confusion, distraction and time wasting to the reader.

In document 001062 paragraph 4.1.1 *The objective of Assessment Phase 1 would be to maximise the capacity of the existing T1, provision of additional aircraft stands, undertake environmental mitigation and the re-provision of public open space. The first objective would be met by enhancing T1, increasing the number of aircraft stands and increasing the number of parking spaces. The second objective would be met by extending the existing Wigmore Valley Park.*

No thought to the 16.5 million creatures living in the CWS sacrificed for increasing car parking spaces.

In document 001122 the Executive statement states in the table directly under the 4th paragraph, that for the *Age group – Older People (65+), 3rd paragraph, 'No disproportionate or differential effects have been identified during construction for older people accessing*

public open space. Replacement Open Space at Wigmore Valley Park will result in beneficial differential effects on older people during operation.

Can LR explain or re-word this paragraph, the meaning is not clear? It appears to contradict itself, 'during construction' or 'during operation'?

Please explain the different impacts that apply to older people in paragraph 7.4.10 *Older people can be differentially impacted due to changes in access to open space.*

SLAE would like to bring the adequacy of the paragraphs relating to Pregnant people to the attention of the Examining Authority, and consider the *paragraph 1.3.1. An EqlA considers the impact of a proposal on relevant groups who share characteristics which are protected under the Act, and informs decision-making based on likely effects on these groups.* The protected characteristics within 1.3. *What is an Equality Impact Assessment?*

Although the document covers noise it doesn't cover other impacts like dust, odours, and other pollutants that could impact Pregnant individuals and SLAE do not agree with the 'neutral effect' outcome in paragraph 7.7.6, not that pregnant people only stick to PROWS whether they are pushing a wheel chair or not. *Replacement parkland will be provided* doesn't cut it in table 10.1 Summary and mitigation.

Paragraph 4.4.17 *Pregnant individuals can be more susceptible to experience negative effects associated with development and the built environment. For example, Pregnant women can be more susceptible to poor air quality, which can have a negative impact on birth weight.*

Paragraph 4.4.17 provides evidence that LR should have considered all impacts on pregnant individuals which SLAE find severely lacking.

13.9.27 It is envisaged that the replacement open space would deliver additional opportunities for unstructured or natural play and would also include some additional recreational facilities, the specific nature of which is still to be determined at detailed design stage but could potentially include additional picnicking facilities, play equipment, gym equipment or trim-trail measures.

Why wasn't *additional picnicking facilities, play equipment, gym equipment or trim-trail measures* done before, why wait for the DCO. Provides evidence that the council have not invested in the park.

Children and possibly older people already engage in unstructured or natural play activities, (example, hide and seek and variations, making camps and so the opportunities for unstructured or natural play already exists). This paragraph is a prime example of an application filler and wasting readers time!

13.12.3 The only ICCI relevant to the health and community assessment is the potential for increased heat risk amongst vulnerable members of the population and users of Wigmore Valley Park. This is due to the combination of a possible likely increase in high summer temperatures, humid weather and heat waves during the assessment phases, the closure of part of Wigmore Valley Park due to construction works required for the Proposed

Development, and the replacement open space as part of Wigmore Valley Park. This has been assessed to lead to a potential loss of shade provision and cooling effect from the existing mature trees and vegetation for users of the park. Vulnerable members of the population such as young children, elderly people and those with existing health conditions are more likely to be at risk. However, given the transient nature of users and the element of choice in using Wigmore Valley Park, it is considered that users requiring more shade will not use the park during those hottest periods or will seek out shadier spots within the park.

Simple, don't take the existing shade away from the park. Create more shade provision, put up signs warning the population, LR may consider, but that doesn't mean that people using the park requiring more shade won't use the park, so plant more trees. More application filler!

Document 000948 3.2 Provision of open space

3.2.1. A large area of open space is proposed to be created in the north east of the Main Application Site (as defined in Chapter 2 of the ES [TR020001/APP/5.01]), shown as Work No. 5b(01) including enhancement to the existing open space remaining in Wigmore Valley Park, and Work No. 5b(02) provision of replacement open space for that lost, on Figure 4.1 of the ES [TR020001/APP/5.03]. All of the open space would be created in assessment Phase 1 with additional provision of habitats and landscape restoration created within assessment Phase 2a and 2b, as shown on Figures 4.2 and 4.3 of the ES [TR020001/APP/5.03], and Figure 1, Appendix A to this report.

If the benefits are not realised and it's not worked out how it should after delivery of the Phase 1 Open Spaces, what happens? Carry on? or stop?

What happens if Phase 2a and 2b are not delivered, due to one reason or other?

Is the park left in limbo?

In that scenario SLAE ask the Examining Authority to add a clause in any DCO decision that makes LR, LBC to restore the park back as it was before Phase 1, as this DCO application covers three phases and it implies it's 'all or nothing'.

3.2.3 This provision of open space would contain a landscaped mosaic of woodland, both retained, enhanced and newly planted, retained and restored hedgerows, scrub, ornamental planting (within urban realm areas throughout the Proposed Development), neutral meadow mown grassland and amenity grassland.

Can LR explain what a mosaic of woodland is?

*Document 000848, C6.1.7 The Replacement Open Space would focus on the **establishment** of natural habitats, delivering areas of meadow grassland, native shrub planting, broadleaf woodland, and mixed-species hedgerows with hedgerow trees, as well as several surfaced footpaths to upgrade connections to the surrounding rights of way network. The Replacement Open Space will be delivered entirely within the road network and nearer to the existing communities it serves; to minimise earthworks activities near the more frequently used parts of the replacement area of parkland; to*

protect more of the existing scrub and woodland vegetation on Winch Hill; and to ensure valued archaeological and habitat features are not impacted by construction activities.

LR need to also document the migration, not establishment.

SLAE note that there is insufficient car parking provision around the replacement park road network, and this is not covered in any documents. This will encourage parking wherever possible along restricted lanes not able to cope. It will also encourage taxi services and people picking up passengers to avoid drop off fees and those holiday makers leaving their cars for a week or two in any available space. Are LR compensating the Hertfordshire councils for the additional overhead this will create?

LBC response to an FOI request to find out the investment spent on Luton Parks and if equal expenditure spent on Wigmore Valley Park. Note, the misspelt address and the generic signature on the bottom of the letter. Why was the Parks department responsible for replying when this was a financial request, as clearly evidenced.



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LU1 2BQ

Parks@luton.gov.uk
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Chris Haden

**Re: Our Ref: LU10576 –
Your Environmental Information Regulations request**

Dear Chris Haden

I write in response to your Environmental Information Regulations (EIR) request dated [insert date].

Your Request
You have asked

“Please provide the following information. Financial information on the amount spent on Lewsey, Wardown, Wigmore Valley, Stockwood, Stopsley Parks for each year since 2016. By cost of assets, maintenance and upkeep, rental of and other costs”.

We have considered your request under the Environmental Information Regulations 2004.

Response

I can confirm we do not hold or collate this information in a manner that enables us to respond within the scope of your request.

Regulation 12(4)(a) states that we must issue a formal refusal notice when this is the case.

Next Steps

If you are not satisfied with my response you can ask for an internal review by contacting us at the address above or by email at FOI@luton.gov.uk within 40 working days of the date on this letter.

Please set out any specific concerns you have. Please quote the reference number provided

Luton

above when contacting us.

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You are free to use the information provided for your own purposes, including any non-commercial research you are doing and for the purposes of news reporting. Any other re-use, for example commercial publication, requires the permission of the copyright holder. You may apply for permission to re-use this information by submitting a request to FOI@luton.gov.uk.

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Please note that under the Privacy and Electronic Communications (EC Directive) Regulations 2003 Luton Council asks not to receive unsolicited marketing communications.

Yours sincerely,

Parks@luton

Parks and Countryside Services

Traffic and Transport - 7.13 Framework Travel Plan -

SLAE = Stop Luton Airport Expansion, LR = Luton Rising, LBC Luton Borough Council. LLAOL = London Luton Airport Operations Limited.

To assist the Examining Authority, SLAE have identified the following areas in this Written Representation that require further inspection.

SLAE have the following observations and questions

document 001123

The Executive Summary contains a number of paragraphs, SLAE have picked out a couple.

*Interventions and measures for improving access by bus and coach include maximising the new facilities provided as part of the Proposed Development. An improved and expanded network of routes **could be** developed by working with partners on a combination of new bus and coach routes, including new express bus routes and the strengthening of existing services. These services will be complemented by measures such as promotion of discounted staff travel and improved information for passengers.*

SLAE comment that there appears to be an overwhelming amount of 'could', and number of aspirations, within the paragraphs of the Framework Travel Plan document. This suggests a 'wish list' and should be identified as such. SLAE say these should be excluded from the DCO.

If DCO consent is granted, would the statements in this document become enforceable and if not, then those statements are nothing more than a wish list.

*TPs will build on the work already undertaken by the operator as part of the ongoing existing Airport Surface Access Strategy with increased monitoring and engagements with stakeholders. **Luton Borough Council, as the relevant planning authority,** will have final approval of each TP and the proposed Targets over its five-year duration.*

Comments regarding the impartiality of Luton borough Council have already been made in a number of previous RR's, OFH's and WR's. Evidence Anne Donelans letter already previously presented.

*1.3.2 It is the Applicant's **intention** that the body that operates the airport over the **short and longer term** must do so having **full regard** to all of the obligations that the DCO places on them in regard to the implementation of future growth, including those related to this FTP. The **intention** therefore is that the obligation to produce and implement the TPs from the DCO will be transferred from Luton Rising to LLAOL through a legal agreement.*

What happens if the 'intention' doesn't occur for any reason?

What is meant by 'full regard'?

The short and long term is mentioned, what happens in the medium term?

What is a shorter, medium and longer term?

1.3.3 At the end of the current concession, the restrictions, liabilities and obligations will revert from LLAOL to Luton Rising. They will remain with Luton Rising until a new transfer agreement is made with an appointed operator. In this way, the requirement to periodically produce TPs every five years as a result of the DCO will always be in place (whether with the operator or the Applicant) and can also be transferred to any new future operator.

What happens if Luton Rising (London Luton Airport Limited) folds, goes insolvent?

What if Luton Rising are insolvent and Luton Borough Council also goes insolvent?

1.4.1 The Vision and Objectives set out below underpin and guide the intended outcomes of the five-yearly TPs. They have been developed to reflect the ongoing importance of the airport as a regional transport hub and therefore provide a range of socio-economic benefits to Luton and the three Counties (Bedfordshire, Buckinghamshire and Hertfordshire), as well as the wider region and nationally. As the airport delivers significant socio-economic benefits, the operator also recognises that without considered management and intervention, surface access can result in effects that impact local communities and authorities.

Can the Examining Authority clarify as SLAE are a bit confused as the above paragraph mentions regionally and specifically Luton and the three counties, and then goes on to mention the local communities and authorities. SLAE ask if these are the same or are they the adjoining communities of South Luton, Wigmore and the adjoining Hertfordshire Villages?

Figure 1.1. The SAS's Vision, Objectives and Priority Areas

The Applicant and Operator will :

-work with partners to contribute towards high quality, efficient, reliable and sustainable surface access for all airport users, and to provide for growth while supporting the needs of local communities.

How can a surface access strategy (SAS) and a sustainable surface access, provide for growth and support the adjoining local communities?

One of the Intervention / Measures in Tables 5.1 to 5.5 is 'Strive to be the best possible neighbour' to communities & authorities? SLAE have submitted a Written Representation based on the airport as a neighbour. We ask the Examining Authority if adjoining ward residents Relevant Representations indicated that the airport are a good neighbour?

SLAE ask LR to prove or withdraw the intervention / measure.

2.1.2 DfT's Aviation Policy Framework (2013) (Ref 1.1) advises that all airports in England and Wales with more than 1,000 passenger air transport movements a year should set up an Airport Transport Forum (ATF)¹. The primary purpose of ATFs is to encourage partnership between airport operators, local authorities, transport operators, **local people** and businesses, and other relevant parties, to improve public transport access to airports, and reduce reliance on private, road-based transport, congestion, and pollution on nearby roads.

Again the word local is used with no proper definition, used in this context, it would appear to mean the whole of Luton, although in other documents it means adjoining residents and communities?

4.1.4 To determine the appropriate magnitude of each Target, the following must be considered:

a. the relevant surface access limits set out by the Green Controlled Growth (GCG) Framework [TRO20001/APP/7.08], and future growth plans (where the level of passenger throughput at which the limits change might be reached). **Targets should** strive to achieve higher levels of sustainable transport mode share than the Limits, which correspond with the 'reasonable worst case' assumptions of the TA [TRO20001/APP/7.02], to reflect the additional level of ambition of the Applicant and the operator as the airport grows;

What happens if targets are not met?

'Targets should' means nothing, 'Targets will' is the correct words to use.

c. due regard to recent five-year CAA passenger survey/staff surveys and trends over the duration of the previous ASAS/TP;

How do we know that surveys won't be tampered with to suit the required outcome? SLAE have been informed that when passengers go through airport security and it is very busy, the survey machines are taken away, whilst when quiet they are made available for customers. As stated in our Relevant Representation 'trust' is a big issue.

4.2.2 At the end of the five-year cycle, TPs will undergo a detailed evaluation, undertaken by a TPC who will be appointed by the operator (more details on their role and responsibilities are set out in Section 7).

If the Operator wants to make money, what's the point of all of this and they will they bother if they can't make money.

4.3.4 Where Targets are not achieved, a review should be undertaken to determine the underlying causes for the lack of progress. Revised interventions must then be proposed within the following TP period and the Targets updated.

Can LR explain the sanctions that will apply?

Table 5.3: Toolbox of interventions and measures: walking and cycling

Ensure that high quality and appropriate wayfinding is in place to guide pedestrians to transport links and key destinations, ensure walkways are well-lit at night to ensure safe movement throughout the airport site (and vicinity) and consider colour coded paving

Will the lighting be invasive to residents?

If adjoining ward residents complain about the well-lit lighting, will these be taken down?

Table 7.1: Surveying and data collection methods, CAA passenger survey data

The staff travel survey must be undertaken in a period avoiding the summer and Christmas school holidays. The airport operator should use best endeavours to ensure the survey is completed at the same time of year in subsequent years.

Why not Easter as well as this is one of the most busiest times for the airport?

Traffic & Transport & Economics & Employment - Holiday parking in residential streets

Luton Rising = LR. Luton Borough Council = LBC.

On the 27th July SLAE carried out an exercise to see how far away from the airport holiday makers could park their cars in residential streets to make it worthwhile whilst they went away on holiday. It was assumed that the holiday maker would book a taxi to take them from where they had left their car to the airport. Based upon a return journey, a week's stay, and two dates (in August & November), a return journey.

SLAE used two web-sites to work this out.

<https://www.london-luton.co.uk/parking-prices> (accessed 27/07/23)

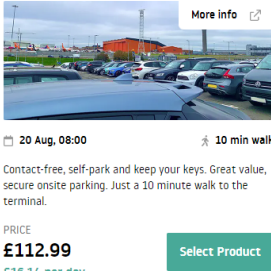
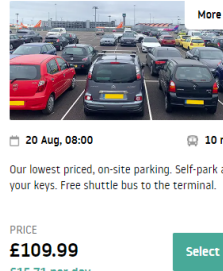
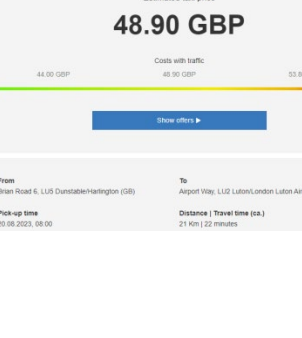
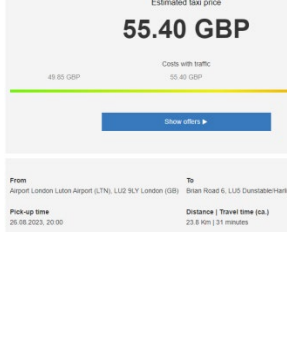
<https://www.bettertaxi.com/taxi-fare-calculator/luton/> (accessed 27/07/23)

In August it cost £109.99 to park in the cheapest Luton Airport official car park. For just under that a holiday maker could park in the village of Harlington and taxi to the airport.


In November it would cost £44.99 for the for the same car park and the holiday maker could leave their car in Kenilworth Road Luton (football ground) and taxi into the airport.

If expansion is granted SLAE ask LR to fund resident car parking schemes in the whole of Luton during the summer, and up to the present LTFC football ground in the winter months and add the cost to the airlines. This would be a very good 'Good Neighbour' scheme.

SLAE ask the LR Board Directors who are also councillors to promote this idea to the council there would be no cost to the council as the airport would pay.

<p>https://www.london-luton.co.uk/parking-prices (accessed 27/07/23)</p>	<p>https://www.bettertaxi.com/taxi-fare-calculator/luton/ (accessed 27/7/23)</p>		
 <p>Mid Stay Car Park</p> <p>20 Aug, 08:00 10 min walk</p> <p>PRICE £112.99 £16.14 per day</p> <p>Select Product</p>	 <p>Long Stay Car Park</p> <p>20 Aug, 08:00 10 min walk</p> <p>PRICE £109.99 £15.71 per day</p> <p>Select Product</p>	 <p>Estimated taxi price 48.90 GBP</p> <p>From: Brian Road 6, LU5 Dunstable/Harlington (GB) To: Airport Way, LU2 Luton/London Luton Airport (GB)</p> <p>Distance Travel time (ca.) 21 Km 22 minutes</p>	 <p>Estimated taxi price 55.40 GBP</p> <p>From: Airport London Luton Airport (LTN), LU2 SLY London (GB) To: Brian Road 6, LU5 Dunstable/Harlington (GB)</p> <p>Distance Travel time (ca.) 23.8 Km 31 minutes</p>

Mid Stay Car Park




19 Nov, 08:00 10 min walk

Contact-free, self-park and keep your keys. Great value, secure onsite parking. Just a 10 minute walk to the terminal.

PRICE
£52.99
 £7.57 per day

Select Product

Long Stay Car Park



19 Nov, 08:00 10 min walk

Our lowest priced, on-site parking. Self-park and keep your keys. Free shuttle bus to the terminal.

PRICE
£44.99
 £6.43 per day

Select Product

Estimated taxi price

12.00 GBP

10.80 GBP Costs with traffic 12.00 GBP 13.20 GBP

Show offers

From: Hemelworth Road 1, LU17 Luton (GB) To: Airport Way, LU2 Luton, London Luton Airport

Pick-up time: 19.11.2023, 20:00 Distance | Travel time (ca.): 6.3 Km | 10 minutes

Estimated taxi price

18.50 GBP

16.65 GBP Costs with traffic 18.50 GBP 20.35 GBP

Show offers

From: Airport Luton Luton Airport (LTN), LU2 8LJ Luton (GB) To: Hemelworth Road 1, LU17 Luton (GB)

Pick-up time: 25.11.2023, 20:30 Distance | Travel time (ca.): 6.6 Km | 19 minutes

In August this year SLAE submitted a Freedom of Information (FOI) request to the Highways agency as a result of a concern over roads in both Hertfordshire and Bedfordshire being over-whelmed with traffic if as a result of the M1 motorway being impacted by an accident that closed parts of or the whole motorway.

The title of the FOI request was, **M1 Accidents Northbound Junction 9 to 10 and Southbound Junction 11 to 10 for the past five years**

On the 18th August the Highways Agency replied, *Dear Chris Haden*
Thank you for your request relating to M1 Accidents Northbound Junction 9 to 10 and Southbound Junction 11 to 10 for the past five years received on 17 August 2023.
*The due date for issuing a response is **15 September 2023**.*
*Please feel free to contact our team if you have any queries quoting **FOI/6269** in any future communications*

On the 8th September the Highways agency responded to the FOI with the following.

*Thank you for your information request dated 17/08/2023 regarding M1 Accidents Northbound Junction 9 to 10 and Southbound Junction 11 to 10 for the past five years. We have dealt with your request under the provisions of the Freedom of Information Act 2000. Reference number **FOI/6269**.*

As a result of the response from the Highways Agency, SLAE will respond once we have had time to digest this information with evidence relating to the impact of the M1 on Hertfordshire and Bedfordshire roads by deadline 3