



## HERTFORDSHIRE HOST AUTHORITIES' PRINCIPAL AREAS OF DISAGREEMENT SUMMARY STATEMENT

This Principal Areas of Disagreement Summary Statement (PADSS) has been produced for the three Hertfordshire Host Authorities (Hertfordshire County Council, Dacorum Borough Council, and North Herts Council), in collaboration with their technical consultants, for the London Luton Airport Expansion Project (the Proposed Development). It identifies those areas where there is disagreement in addition to outstanding issues in relation to the project. It is expected that this PADSS will be updated as issues are discussed and agreement reached with the Applicant. For each issue, the Host Authority(ies), to which the issue relates to, has been identified in the final column of the table.

**Table 1 – Hertfordshire Host Authorities Principal Areas of Disagreement Summary Statement**

| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                               | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                       | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| <b>Cultural Heritage</b>           |                                                                                                                                                                                                   |                                                                                                                                                                                             |                                                                 |                                                           |
| <b>Built Heritage</b>              |                                                                                                                                                                                                   |                                                                                                                                                                                             |                                                                 |                                                           |
| Setting of heritage assets         | Concerns in relation to the methodology and approach to the settings assessment as follows: <ul style="list-style-type: none"> <li>ES chapter 10 on the issue of quietness and setting</li> </ul> | The following actions are recommended:<br>The issue of quietness needs to be re-assessed in line with Historic England's The Setting of Heritage Assets: Historic Environment Good Practice | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                    | <ul style="list-style-type: none"> <li>• Scoping out of assets at appendix 10.2 designated heritage assets gazetteer on the grounds that <i>“The setting of this asset does not extend into the Site.”</i></li> <li>• Scoping out of assets at appendix 10.2 non-designated heritage assets gazetteer</li> <li>• Clarification re: appendix 14.7 visualisations. Some visualisations use wirelines and others use block forms</li> </ul> | <p>Advice in Planning Note 3 (GPA3) which notes: <i>“significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting”</i></p> <p>There is no fixed distance to setting. This needs to be re-assessed in line with GPA3 which states: <i>“Contextual relationships apply irrespective of distance, sometimes extending well beyond what might be considered an asset’s setting and can include the</i></p> |                                                                 |                                                           |



| <b>Principal issue in question</b>                                  | <b>Concern held</b>                                                                                                                                                                                  | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                               | <b>Likelihood of concern being addressed during Examination</b>                                                                                          | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                                     |                                                                                                                                                                                                      | <p><i>relationship of one heritage asset to another of the same period or function, or with the same designer or architect.”</i></p> <p>The scoping out of non-designated heritage assets needs to be clarified.</p> <p>The Applicant should consider providing block forms where wirelines have been provided.</p> |                                                                                                                                                          |                                                           |
| <b>Archaeology</b>                                                  |                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                          |                                                           |
| Unreported environmental effects on possible archaeological assets. | The ES Chapter has not sufficiently reported on potential adverse effects on a possible Roman building (HER ref. 7358); Winch Hill Farm, a 17th century farmstead with medieval origins (HER 11016); | The Applicant should establish with greater certainty whether these assets or possible previously unrecorded remains lie within the Proposed Development Site or not. The Applicant should                                                                                                                          | It is unlikely this will need to be addressed at examination. Archaeology concerns will be addressed in the SoCG as discussed on a call on 3 August 2023 | North Herts Council;<br>Hertfordshire County Council      |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                                                                                                                             | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                        | <b>Likelihood of concern being addressed during Examination</b>                                                                                                                                                                                                       | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                    | and possible, previously unrecorded archaeological remains in the as yet unevaluated areas of the Proposed Development (the assessment of such potential is provided in TR020001-000708-5.02 ES Appendix 10.1 Cultural Heritage Desk-based Assessment but is not considered in the ES Chapter). | carry out further evaluation to enable a suitable mitigation strategy.                                                       | with AECOM and the County Archaeological Officer. There are no outstanding principal areas of disagreement in respect of archaeology for the Host Authorities. However, until we have a completed and agreed SoCG these concerns have been retained in this document. |                                                           |
| Site archaeological evaluation     | The ES should provide information on the nature of the development proposals that might have an archaeological impact., and                                                                                                                                                                     | The Applicant ES should present the details of the enabling works and construction works proposed and how this might have an | It is unlikely this will need to be addressed at examination. Archaeology concerns will be addressed in the                                                                                                                                                           | North Herts Council;<br>Hertfordshire County Council      |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                           | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                                                                                                                      | <b>Likelihood of concern being addressed during Examination</b>                                                                                                                                                                                                                                                           | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                    | <p>also clarify that part of the Proposed Development that has not yet been evaluated, and state this as a clear limitation in the assessment of effects.</p> | <p>archaeological impact e.g., preliminary topsoil strip, landscaping, planting, services and utilities, temporary works areas and temporary access. The Applicant should include a figure in the ES Chapter showing areas that have been evaluated to date and areas that are to be evaluated post-determination. Areas to be evaluated post-determination should be secured by a requirement in the Development Consent Order (DCO).</p> | <p>SoCG as discussed on a call on 3 August 2023 with AECOM and the County Archaeological Officer. There are no outstanding principal areas of disagreement in respect of archaeology for the Host Authorities. However, until we have a completed and agreed SoCG these concerns have been retained in this document.</p> |                                                           |



| <b>Principal issue in question</b>            | <b>Concern held</b>                                                                                                                                                                                                                                               | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                           | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| <b>Health and Community</b>                   |                                                                                                                                                                                                                                                                   |                                                                                                                                                                 |                                                                 |                                                           |
| Consideration of vulnerable population groups | Reporting on the ‘wider study area’ at a county level presents a risk that vulnerable groups within the districts and wards situated in close proximity to London Luton Airport have not been identified, and potential impacts on these groups have been missed. | The Applicant should provide evidence of consideration of vulnerable groups within the districts and wards situated in close proximity to London Luton Airport. | TBC                                                             | All Hertfordshire Host Authorities                        |
| <b>Greenhouse Gases (GHG)</b>                 |                                                                                                                                                                                                                                                                   |                                                                                                                                                                 |                                                                 |                                                           |
| GHG emission boundary                         | Potential underestimate of GHG emissions from aviation                                                                                                                                                                                                            | Clarity is required on the compatibility of the GHG emissions accounting approach used (ES Chapter 12 – GHG) [PINS Ref: APP-038] that only accounts for         | Likely                                                          | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b> | <b>Concern held</b> | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                    |                     | <p>one way aviation trips above 3000 feet with Institute of Environmental Management &amp; Assessment (IEMA) GHG guidance. For instance, Section 5.2 of the IEMA Guidance states: <i>“The assessment should seek to quantify the difference in GHG emissions between the proposed project and the baseline scenario (the alternative project / solution in place of the proposed project). Assessment results should reflect the difference in whole life net GHG emissions between the two options”</i>.</p> |                                                                 |                                                           |



| <b>Principal issue in question</b>               | <b>Concern held</b>                              | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| GHG: determination of significance within the ES | Potential reassessment of significance required. | Clarity is required on the determination of a Minor Adverse effect rather than Moderate Adverse, with specific reference to the latest IEMA GHG guidance and given the predicted magnitude of carbon emission <u>increase</u> resulting from the Proposed Development. For instance, in Section 6.3 of the IEMA guidance, for an effect to be minor adverse (not significant), the project must be <i>“doing enough to align with and contribute to the relevant transition scenario, keeping the UK on track towards net zero by 2050 with at least a</i> | Likely                                                          | All Hertfordshire Host Authorities                        |





| <b>Principal issue in question</b>                                 | <b>Concern held</b>                                                                                                                                                                                                                                                                                                | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                                    |                                                                                                                                                                                                                                                                                                                    | <i>78% reduction by 2035 and thereby potentially avoiding significant adverse effects".</i>                                                                                                                                                                                                                                          |                                                                 |                                                           |
| <b>Traffic and Transportation / Surface Access</b>                 |                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                      |                                                                 |                                                           |
| Future year VISSIM modelling related to Traffic and Transportation | <p>The Hertfordshire Host Authorities have the following concerns about the future year VISSIM modelling:</p> <ul style="list-style-type: none"> <li>• Inconsistent with strategic modelling; and</li> <li>• Unconventional method of applying growth – therefore lack of confidence in forecast models</li> </ul> | <p>The Applicant should confirm whether the VISSIM models have been developed using outputs from the strategic model.</p> <p>The Applicant should share the associated results and assumptions for the junction capacity assessments.</p> <p>The Applicant’s consultants have verbally confirmed that the VISSIM models will use</p> | TBC                                                             | All Hertfordshire Host Authorities                        |



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|                                    |                                                                                       | the data from the strategic model for the assessment purposes of the updated modelling. A confirmed programme for this is unknown. The Applicant should provide clarity on when this will be done and provide the outcome. |                                                                 |                                                           |
| Sustainable Transport Fund (STF)   | It is unclear how the STF will be used to deliver sustainable transport improvements. | The Applicant should provide clear details on how the STF will be used to deliver sustainable transport improvements and how this will be secured.                                                                         | TBC                                                             | All Hertfordshire Host Authorities                        |
| Covid-19 and baseline traffic      | There is insufficient baseline information incorporating any impacts of the Covid-19  | Evidence of how traffic flows and public transport usage have changed between 2016                                                                                                                                         | TBC                                                             | All Hertfordshire                                         |



| <b>Principal issue in question</b>                        | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                  | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                                         | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                           | <p>Pandemic. The basis for the traffic forecasts and mode share targets is not based on the post-pandemic situation and the Base model is 7 years old.</p>                                                                                                                                                                                                           | <p>and 2022 / 2023 should be provided.</p>                                                                                                                                                                                                                                                                                                                    |                                                                 | <p>Host Authorities</p>                                   |
| <p>Core scenario for traffic modelling and assessment</p> | <p>The Hertfordshire Host Authorities are concerned that the Core Scenario includes highway improvements which are not committed, namely the M1 junction 9-10 hard shoulder running. This scheme is not in the National Highways Road Investment Strategy programme. Removing this scheme from the modelling could have an impact on congestion levels and wider</p> | <p>The Core Scenario for the transport modelling should be refined to remove the assumed hard shoulder running improvement scheme. A Scenario test has been run in the model but insufficient data analysis is provided in the current documents. More detailed data and assessment of the revised Core Scenario that excludes this improvement should be</p> | <p>TBC</p>                                                      | <p>All Hertfordshire Host Authorities</p>                 |



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|                                                                   | traffic routing which is not currently reflected in the assessments. The mitigation response could be different to that currently presented. The host authorities need further detail to be able to fully understand the impacts within their networks.         | provided to understand the impacts and mitigation in the wider local road network.                                                                                                                                                                                                |                                                                 |                                                           |
| Geographic distribution of London Luton Airport trips (all modes) | The assumptions around the geographic distribution of London Luton Airport trips (all modes) are not adequately represented. In particular, it is not possible to fully appreciate the share that travels through Hertfordshire, the forecasts and the impacts. | Additional detail on the geographic distribution of London Luton Airport trips (all modes) including the detail through Hertfordshire. The additional plots provided to date have no numbers attached to the bandwidths and it continues to be very difficult to assess potential | TBC                                                             | All Hertfordshire Host Authorities                        |



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|                                    |                                                                                                                                                                                                         | impacts on specific Hertfordshire rural roads.                                                                                                                                                                                                                 |                                                                 |                                                           |
| The Transport Assessment (TA)      | The Scenario test without the M1 hard shoulder running scheme should now form the core scenario on which the TA is based, insufficient detail is provided on the modelling outcomes from this Scenario. | The TA does not provide full details of the modelling sensitivity test scenario results as part of the TA to demonstrate the mitigation requirements are adequate and appropriate. Applicant to provide full output results for the sensitivity test scenario. | TBC                                                             | All Hertfordshire Host Authorities                        |
| Traffic impacts in Hertfordshire   | Insufficient information about how the traffic impacts in Hertfordshire would be mitigated, monitored and managed. The Host Authorities would like the Applicant to explore more                        | Additional detail should be provided by the Applicant in the TA and from the modelling about the traffic impacts in Hertfordshire, particularly for the Scenario test without the hard shoulder running which is                                               | TBC                                                             | All Hertfordshire Host Authorities                        |



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|                                                                                                                  | holistic ways to mitigate impacts, e.g. measures that will mode-shift non-airport related car trips in order to free up road capacity for the expected increase in airport-related car trips (e.g. enhanced bus services and priority). | the most realistic traffic scenario and is insufficiently detailed in the TA.                                                                                                                                                                                                         |                                                                 |                                                           |
| The proposed highway mitigation schemes are in conflict with local policy for improving sustainable modal choice | The mitigations proposed in Hitchin provide increased capacity for vehicular traffic which is in conflict with local plans and policies to enable and support active travel.                                                            | The Applicant should provide further detail on the need for the mitigation and potential to incorporate active and sustainable travel measures within the design. North Herts Council would like to see interventions which make access to London Luton Airport by sustainable modes, | TBC                                                             | Hertfordshire County Council / North Herts Council        |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                                       | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                 | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                    |                                                                                                                                                                                                                                                                                                                                                                                           | including public transport, more attractive.                                                                                          |                                                                 |                                                           |
| Mitigation in rural areas          | The current approach assumes that all impacts can be mitigated with localised interventions. This is unlikely to be true for rural areas, where there is little opportunity to mode-shift trips from car to public transport or active travel. Interventions are most likely to displace traffic from one village to another. An area-based strategy is therefore likely to be necessary. | Applicant to consider alternative mitigations for potentially significant growth in airport-bound traffic growth through rural areas. | TBC                                                             | North Herts Council & Hertfordshire County Council        |



| <b>Principal issue in question</b>                     | <b>Concern held</b>                                                                                                                                                                                                                                                                      | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                          | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| Public transport investment in new / improved services | Insufficient detail is provided on the level of investment and responsibility for providing support for additional public transport services, this is mentioned in the application material but there is no commitment towards implementation.                                           | Details of who is the responsible party for securing, providing and funding additional public transport from the east of London Luton Airport. Expected programme for their introduction and where the funding will come from. | TBC                                                             | All Hertfordshire Host Authorities                        |
| Rail capacity                                          | Hertfordshire is concerned that the original assessment was based on pre-Covid levels of service and forecasts for increases in network capacity. The effects of Covid -19 on patronage and forecast service levels have not been accounted for. Demand may not have fully recovered and | The Applicant should demonstrate that the worst-case forecast rail capacity has been assessed to show that the background growth in rail passenger trips and the growth of London Luton Airport can be accommodated.           | TBC                                                             | Hertfordshire County Council                              |





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|                                                                               | train companies may not see their plans come to fruition due to cost-cutting. Unclear whether there is capacity on the existing and forecast networks and impacts on current passengers at stations in Hertfordshire.                                        |                                                                                                                                                                        |                                                                 |                                                           |
| Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) | The TRIMMA is not considered sufficiently binding on the Applicant to give the Host Authorities certainty that any additional unforeseen impacts in the Hertfordshire highway network will be included adequately in the monitoring or mitigated and funded. | Provide a clear indication of the funding available for the TRIMMA. The Host Authorities would also welcome further input into the monitoring sites and methodologies. | TBC                                                             | All Hertfordshire Host Authorities                        |



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| <b>Noise</b>                       |                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                  |                                                                 |                                                           |
| Baseline                           | The incorrect baseline has been used, where assessments are based on a year when London Luton Airport was in breach of a noise-related planning condition during the day and night, which is biasing the assessment conclusions. | 2019 'compliant' or 2022 baseline should be used and the assessment updated accordingly.                                                                                                                                         | TBC                                                             | All Hertfordshire Host Authorities                        |
| Policy compliance                  | There is a concern as to whether the UK aviation noise policy overall objective to limit and where possible reduce the number of people significantly affected by aircraft noise is complied with.                               | The Applicant should revise their assessment to comply with UK aviation noise policy, by basing future contour area limits from the core assessment case (not the faster growth sensitivity study) and by committing to an equal | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b>                                                | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                    | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                         | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                                                   | There is a concern as to whether the UK aviation noise policy for a balance between growth and noise reduction is appropriately weighted.                                                                                                                                                                                                              | share of noise reduction benefits between the local community and the airport.                                                                                                                                                                                                                                                                |                                                                 |                                                           |
| <b>Landscape and Visual</b>                                                       |                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                               |                                                                 |                                                           |
| Visual impact of large scale-built development in a relatively elevated location. | The introduction of large-scale buildings and structures into the rural landscape to the east of the existing London Luton Airport will result in adverse visual effects. Built development will be introduced into some views which are predominantly characterised by soft landscape elements. In some longer distance views, the expansion of built | The Applicant should provide an explanation of how the architecture (building design), masterplan and landscape design work together to provide an appropriate design response to the location of built development on this sensitive elevated plateau landform. Particularly, provide an explanation of how the design response is compliant | TBC                                                             | North Herts Council / Hertfordshire County Council        |



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|                                                                                                                                                                          | development will be apparent increasing visual prominence.                                                                                                                                                                                                                                                | with objectives DQ.01 and DQ.02 as set out in volume 7.09 Design Principles (REF: TR020001/APP/7.09). The illustration of some key views with fully rendered images of the Proposed Development would aid understanding of this issue.                                                             |                                                                 |                                                           |
| The Landscape and Visual Impact Assessment (LVIA) does not specifically assess the effects of the Proposed Development on the Special Qualities of the Chilterns Area of | Additional flight movements across the AONB and the presence of additional large scale-built development, potentially with associated glint and glare, is anticipated to result in a deterioration of the Special Qualities of the AONB. Specific concerns relate to the following two Special Qualities: | It is proposed that the LVIA be updated to specifically assess the effects on the Special Qualities of the Chilterns AONB. This process should include a description of how the baseline situation has been determined particularly with respect to tranquillity, the range of receptors affected, | TBC                                                             | All Hertfordshire Host Authorities                        |



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| Outstanding Natural Beauty (AONB)  | 1) long distance views and 2) tranquillity as defined in the Chilterns AONB Management Plan 2019–2024:<br><br><i>“Panoramic Views from and across the escarpment interwoven with intimate dipslope valleys and rolling fields; and<br/>Relative tranquillity and peace on the doorstep of ten million people, one of the most accessible protected landscapes in Europe; relatively dark skies, of great value to human and wildlife health; unspoilt countryside,</i> | the geographical area of influence and any potential mitigation measures.                             |                                                                 |                                                           |



| <b>Principal issue in question</b>                                                                          | <b>Concern held</b>                                                                                                                                                                                                                      | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                            | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                                                                             | <i>secret corners and a surprising sense of remoteness.”</i>                                                                                                                                                                             |                                                                                                                                                                  |                                                                 |                                                           |
| <b>Biodiversity</b>                                                                                         |                                                                                                                                                                                                                                          |                                                                                                                                                                  |                                                                 |                                                           |
| Embedded mitigation                                                                                         | The approach to embedded mitigation does not appear to be appropriate and in some cases refers to compensatory habitat provision for features that are lost. Therefore, the validity of the assessment in this regard can be questioned. | The Applicant should update the assessment to ensure embedded mitigation captures the appropriate design measures and not additional mitigation or compensation. | TBC                                                             | North Herts Council / Hertfordshire County Council        |
| Approach to identifying features requiring additional mitigation and why additional mitigation is required. | Several mitigation measures are proposed for receptors that have not been identified as experiencing significant effects in the assessment e.g. birds. The process of identifying the required additional mitigation                     | Several features are assessed in the mitigation and residual effect sections and not in the initial assessment (where embedded mitigation only is included).     | TBC                                                             | North Herts Council / Hertfordshire County Council        |



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|                                    | should be clarified. Therefore, the ES Chapter does not provide a clear narrative for these features.                                                                                                                                                                                                                                                                                      |                                                                                                                            |                                                                 |                                                           |
| <b>Aviation Forecasts</b>          |                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                            |                                                                 |                                                           |
| York Aviation Forecasts            | York’s approach to air traffic forecasting is generally reasonable. However, several of its econometric, pricing and elasticity input assumptions carry downside risks such that the outputs are likely to be over-estimates of future demand, and hence also lead to over-estimates of impacts (both beneficial and adverse). These forecasts are for the south of the UK and to forecast | Sensitivity required for Heathrow and Gatwick passenger numbers and Luton forecasts, to address potential over-estimating. | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b> | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                    | <p>traffic at London Luton they are then subject to the application of airport capacity constraints. The most important of these are the number of runways at Heathrow and at Gatwick, and the passenger traffic that could be handled at them. The Core Planning Case assumption of one extra runway at either Heathrow or Gatwick is agreed, but there is disagreement about how many passengers these runways could allow to be handled. This results in material differences in when London Luton might</p> |                                                                                                       |                                                                 |                                                           |





| <b>Principal issue in question</b>                  | <b>Concern held</b>                                                                                                                                                                                                        | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                              | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                     | reach 32 million passengers per annum.                                                                                                                                                                                     |                                                                                                                                                    |                                                                 |                                                           |
| <b>Unforeseen Forecasts</b>                         |                                                                                                                                                                                                                            |                                                                                                                                                    |                                                                 |                                                           |
| Unforeseen Local Impact Management Strategy (ULIMS) | The Hertfordshire Host Authorities believe that due to the longevity of the project, there needs to be provision for ULIMS to cover all significant environmental effects arising from the London Luton Airport expansion. | The ULIMS should cover all significant environmental effects arising from the London Luton Airport expansion.                                      | TBC                                                             | All Hertfordshire Host Authorities                        |
| <b>Draft Development Consent Order (DCO)</b>        |                                                                                                                                                                                                                            |                                                                                                                                                    |                                                                 |                                                           |
| Draft DCO drafting - general                        | There are a number of queries and concerns that the Host Authorities have identified in relation to the drafting of the DCO as it currently stands. Some of these points are                                               | The Applicant should further engage with the Host Authorities to ensure the concerns raised are sufficiently understood and addressed and outcomes | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b>     | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                      | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                             | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                        | expanded upon below, but this is not an exhaustive list (please see the relevant Written Representations/Local Impact Reports submitted for further information).                                                                                                                                                                                                        | secured, either through amendments to the DCO and related control documents or by way of explanation that provides adequate confidence.                                                                                                                                                           |                                                                 |                                                           |
| Time limits for consents and approvals | The DCO as currently drafted provides for various 'deemed consent' mechanisms, whereby should a response to an application for consent/approval not be received from an authority within a certain time limit, that consent/approval is deemed to be approved. Given resource constraints and the uncertainty of the programme, the Host Authorities consider there is a | The Applicant should seek to build in appropriate resourcing and flexibility to these mechanisms, to ensure consents and approvals are not 'waved through', where the Host Authorities have not wilfully or unreasonably not responded to an application for a consent or approval under the DCO. | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b>                        | <b>Concern held</b>                                                                                                                                                     | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                 | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                           | risk that consent/approvals could be deemed to be granted inappropriately, even where there has been no wilful or unreasonable inaction from the Host Authorities.      |                                                                                                                       |                                                                 |                                                           |
| Powers of compulsory acquisition and temporary possession | There are a number of land interests held by the Host Authorities which would be subject to powers of compulsory acquisition and/or temporary possession under the DCO. | Further engagement is needed with the Applicant to understand the necessity for and acceptability of these proposals. | TBC                                                             | North Herts Council / Hertfordshire County Council        |
| Drainage protective provisions                            | Certain drainage consents are disappplied in the DCO, but no equivalent protective provisions are contained in the DCO.                                                 | Protective provisions need to be included in the DCO to the satisfaction of the relevant drainage authorities.        | TBC                                                             | Hertfordshire County Council                              |



| <b>Principal issue in question</b>                                                 | <b>Concern held</b>                                                                                                                                                                                                                                                   | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b> | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| Treatment of the existing 'LLAOL Planning Permission' and other extant permissions | That the DCO appears to potentially introduce a regulatory 'gap' whereby controls under the existing planning permission fall away under article 44, prior to any DCO controls being triggered.                                                                       | Engagement with the Applicant to clarify this point, together with amendments to the DCO as required. | TBC                                                             | All Hertfordshire Host Authorities                        |
| DCO requirements – Parts 1, 2 and 4 of Schedule 2 to the DCO                       | The Host Authorities have a number of concerns in relation to the DCO requirements set out in Schedule 2 to the DCO. This is both in terms of specific drafting (e.g. requirement 8(1)) or more generally, in terms of the adequacy of the control documents secured. | Engagement with the Applicant together with amendments to the DCO as required.                        | TBC                                                             | All Hertfordshire Host Authorities                        |
| GCG DCO requirements – Part                                                        | Similarly to the points made elsewhere in this document                                                                                                                                                                                                               | Engagement with the Applicant together with                                                           | TBC                                                             | All Hertfordshire                                         |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b> | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| 3 of Schedule 2 to the DCO         | around the GCG generally, the Host Authorities have a number of concerns in relation to how the GCG is proposed to be secured in legal terms in the DCO requirements. This relates to, for example, the operation and make-up of the ESG, how monitoring reports are produced/approved, the actions and processes required where there is an exceedance of a threshold or limit and the robustness of relying on the Slot Regulations as a form of control. | amendments to the DCO as required.                                                                    |                                                                 | Host Authorities                                          |



| <b>Principal issue in question</b>               | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b> | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| <b>Green Controlled Growth</b>                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                       |                                                                 |                                                           |
| GCG – Limits and Thresholds<br>Level 1 Threshold | Under the current proposals, an exceedance of a Level 1 Threshold simply requires “commentary on the avoidance of the exceedance of a Limit” to be provided in the annual Monitoring Report. This is not precise and does not require any positive action or approvals – the Applicant’s position on this is noted (i.e. that such exceedances are expected to regularly occur), but this does not provide any incentive on the Operator to strive to meet the Level 1 threshold and generally to minimise environmental | There should be an incentive on the Operator to strive to meet the Level 1 threshold.                 | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b>                      | <b>Concern held</b>                                                                                                                                                                                                                                                                        | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                         | impacts associated with growth.                                                                                                                                                                                                                                                            |                                                                                                                      |                                                                 |                                                           |
| GCG – Limits and Thresholds<br>Level 2 Threshold Limits | The timeframes within which ESG has to consider a draft, and approve a final, Level 2 Plan and a Mitigation Plan are too short, having regard to the importance of these matters and practicalities of assembling ESG and obtaining advice and input from the relevant Technical Panel(s). | A longer timescale is needed for the ESG to consider a draft and approval a final Level 2 Plan and Mitigation Plan.  | TBC                                                             | All Hertfordshire Host Authorities                        |
| GCG – Limits and Thresholds<br>Level 2 Threshold Limits | The precise purpose and content of the Level 2 Plan and a Mitigation Plan needs further clarification                                                                                                                                                                                      | It should be made clear that a Level 2 Plan and a Mitigation Plan must relate to the specific exceedance identified. | TBC                                                             | All Hertfordshire Host Authorities                        |
| GCG – Limits and Thresholds                             | Approval of a Level 2 Plan and a Mitigation Plan can only be                                                                                                                                                                                                                               | The ESG should be able to refuse a Level 2 Plan and a                                                                | TBC                                                             | All Hertfordshire                                         |



| <b>Principal issue in question</b>                      | <b>Concern held</b>                                                                                                                                                                                    | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                 | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| Level 2 Threshold Limits                                | refused on specific grounds, which need to be further interrogated and justified.                                                                                                                      | Mitigation Plan on any relevant grounds.                                                                                                                                              |                                                                 | Host Authorities                                          |
| GCG – Limits and Thresholds<br>Level 2 Threshold Limits | A Level 2 Plan and a Mitigation Plan can be deemed to be approved.                                                                                                                                     | A Level 2 Plan and a Mitigation Plan should not be deemed to be approved given their vital role in ensuring that a Limit is not exceeded. The approval of the ESG should be required. | TBC                                                             | All Hertfordshire Host Authorities                        |
| GCG – Limits and Thresholds<br>Level 2 Threshold Limits | New slots will still be permitted to be allocated within the existing capacity declaration whilst an exceedance of a Level 2 Threshold is ongoing, perpetuating the breach of that Level Threshold and | New slots should not be permitted to be allocated (even within the existing capacity declaration) whilst an exceedance of a Level 2 Threshold is ongoing.                             | TBC                                                             | All Hertfordshire Host Authorities                        |





| <b>Principal issue in question</b>               | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                          | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                  | increasing the risk of the Limit also being breached.<br>Although no new slots will be permitted to be allocated and hourly runway capacity will not be allowed to be increased whilst an exceedance of a Limit is ongoing, the airport operator will still be able to operate within the existing capacity declaration and at the same level of capacity as the airport was operating at when the exceedance of the Limit occurred. | In the event of an exceedance of the Limit the airport operator should be required to reduce capacity immediately if necessary in order to remedy the exceedance of the Limit. |                                                                 |                                                           |
| GCG – Limits and Thresholds<br>Level 2 Threshold | The Level 2 Plan will need to consider whether continued operations at the declared level of airport capacity is                                                                                                                                                                                                                                                                                                                     | This should be a specific requirement for the first Level 2 Plan.                                                                                                              | TBC                                                             | All Hertfordshire Host Authorities                        |



| Principal issue in question                      | Concern held                                                                                                                                                                                                                                                                                                                                                   | What needs to change / be amended / be included in order to satisfactorily address the concern | Likelihood of concern being addressed during Examination | Host Authority to which the PAD / issue relates to |
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|                                                  | <p>expected to result in the effects increasing above the Limit, and that if this is the case it is stated that the Plan <b>should</b> include proposals for additional interventions or mitigation including timescales for delivery, to ensure that the Limit will not be exceeded. However, this is not expressed as a <b>requirement</b> for the Plan.</p> |                                                                                                |                                                          |                                                    |
| GCG – Limits and Thresholds<br>Level 2 Threshold | There is no sanction in the event of a breach or even a continued breach of a Level 2 Threshold, and as such no incentive to address any exceedances.                                                                                                                                                                                                          | There should be a sanction for a continued breach of a Level 2 Threshold.                      | TBC                                                      | All Hertfordshire Host Authorities                 |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                      | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                   | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| GCG – Limits and Thresholds Limits | It is only where a second Mitigation Plan has to be produced, after the original Mitigation Plan has not been effective in remedying the exceedance of the Limit within the timescales specified in the Mitigation Plan, that the Applicant would be required to consider whether implementation of a local rule would reduce, avoid or prevent exceedance of the Limit. | This should be required to be considered by the airport operator in the original Mitigation Plan, and not left to a second Mitigation Plan, and that the ESG should also have the power at the stage of the original. Mitigation Plan to require the airport operator to implement a local rule to address the exceedance of the Limit. | TBC                                                             | All Hertfordshire Host Authorities                        |
| GCG – Limits and Thresholds Limits | The proposals state that the airport operator may feel that the most appropriate way of addressing a breach of a Limit is through a planned capacity reduction.                                                                                                                                                                                                          | This should be required to be considered by the airport operator in the original Mitigation Plan, and that the ESG should also have the power at the stage of the                                                                                                                                                                       | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                                                                               | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                           | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                    |                                                                                                                                                                                                                                                   | original Mitigation Plan to require the airport operator to implement a planned capacity reduction to address the exceedance of the Limit.      |                                                                 |                                                           |
| GCG – Limits and Thresholds Limits | The right of appeal to the Secretary of State in respect of any decision made by the ESG, without specific grounds on which such appeal may be made, risks removing the local control and decision making that the ESG is designed to facilitate. | Any right of appeal should be limited to specific grounds. Any decision of the ESG should stand and be implemented, pending an appeal decision. | TBC                                                             | All Hertfordshire Host Authorities                        |
| GCG – Monitoring and Reporting     | The GCG proposals are for annual monitoring and reporting of environmental effects by the airport operator.                                                                                                                                       | Monitoring should be undertaken (with access provided to the Councils and ESG) on as close to a 'real                                           | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b>    | <b>Concern held</b>                                                                                                                                                                                                              | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                 | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                       | <p>This is not frequent enough to enable effective and adaptive oversight of the airport's operations.</p>                                                                                                                       | <p>time' basis as possible, and at a minimum reporting to the ESG on any exceedances should take place on a monthly basis or whenever such exceedances are measured as having occurred. An annual Monitoring Report should also be submitted and published as currently proposed.</p> |                                                                 |                                                           |
| <p>GCG – Monitoring and Reporting</p> | <p>It is stated that there would be a minimum two summer season lag between an exceedance of a Level 2 Threshold or a Limit and action being taken to manage future capacity where required, based on the timings for future</p> | <p>In the event of an exceedance the airport operator should immediately reduce activity in order to avoid continuing the exceedance and that it should then be required to take and report active steps it is taking to understand the cause of the</p>                              | <p>TBC</p>                                                      | <p>All Hertfordshire Host Authorities</p>                 |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                    | <p>slot allocation. This is too long a period for an exceedance of a Level 2 Threshold or a Limit to be perpetuated before action is taken to reduce capacity accordingly, particularly noting that this would see the airport operating in exceedance of the realistic worst case scenario reported in the EIA during this period. The controls around the exceedance of a Level 2 Threshold and/or a Limit as currently outlined are insufficient to facilitate effective adaptive environmental management and ensure that growth only takes place within</p> | <p>breach and put forward measures and steps it is putting in place to ensure that the same situation and any further exceedance does not occur.</p> <p>Where other monitoring of environmental impacts pursuant to the DCO is relevant to the outcomes and/or mitigation being reported or proposed in the Monitoring Report and/or any Level 2 Plan or Mitigation Plan, such monitoring should be provided to the Technical Panel and ESG along with the relevant Monitoring Report, Level 2 Plan or Mitigation</p> |                                                                 |                                                           |



| <b>Principal issue in question</b>    | <b>Concern held</b>                                                                             | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                                                                | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                       | appropriate parameters, and should be bolstered in line with the recommendations in this table. | Plan, to ensure transparency and ensure a complete and comprehensive consideration of the issues in the relevant Plan.                                                                                                                                                                                                                                               |                                                                 |                                                           |
| GCG – Independent Scrutiny and Review | Dacorum Borough Council is not proposed to be a member of ESG.                                  | Dacorum Borough Council should be a member of the ESG, given it is a host authority for the Development. In addition, discussion will be needed on the precise operation of the ESG, particularly in terms of all members having one vote, given (depending on the matter at hand) issues may affect different members (and, particularly the Councils) differently. | TBC                                                             | All Host Authorities                                      |



| <b>Principal issue in question</b>    | <b>Concern held</b>                                                                                                                                                                                                   | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                           | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| GCG – Independent Scrutiny and Review | There is no formal role of the ESG in approving a Monitoring Report, such as would allow ESG to have some say as to whether it agrees with the conclusions as to whether any Thresholds or Limits have been exceeded. | The ESG should have some form of approval role in respect of a Monitoring Report.                                                                                                                                                                                                               | TBC                                                             | All Hertfordshire Host Authorities                        |
| GCG – Independent Scrutiny and Review | The ongoing reasonable and properly incurred and evidenced costs of the ESG and Technical Panel will be funded by the airport operator.                                                                               | This should also include the resource and management costs of the Councils in relation to their participation in the ESG (and/or any Technical Panel), including reviewing, amending and approving minutes of meetings, management packs and reviewing, commenting and consulting internally on | TBC                                                             | All Hertfordshire Host Authorities                        |





| <b>Principal issue in question</b>    | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                     | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b> | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                       |                                                                                                                                                                                                                                                                                                                                                         | documents pursuant to the ESG.                                                                        |                                                                 |                                                           |
| GCG – Independent Scrutiny and Review | Timescales for participation in periodic reviews of the GCG Framework.                                                                                                                                                                                                                                                                                  | A longer period is required.                                                                          | TBC                                                             | All Hertfordshire Host Authorities                        |
| GCG – Slot Co-ordination              | It is not clear what mitigation measures can be used if a planned capacity reduction or local rule cannot be secured. The GCG proposals refer to a ‘toolbox’ of interventions that the airport operator can use to manage or mitigate environmental effects, but it is not clear from the proposals what effective interventions could be introduced in | Discussion is required with the Applicant.                                                            | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                             | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                                                                                                                               | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                    | circumstances where a planned capacity reduction or local rule cannot be achieved, or cannot be achieved in an appropriate timeframe.                           |                                                                                                                                                                                                                                                                                                                                     |                                                                 |                                                           |
| GCG – Compliance                   | Under current proposals it would only be a breach of the processes of the GCG framework that would constitute a breach of the legally binding terms of the DCO. | Discussion is required with the Applicant. See also our recommendations in this table. Under the supplemental process the airport operator should be required to report to Luton Borough Council as the relevant planning authority in the event of the ESG serving a notice on it that it considers that a breach has taken place. | TBC                                                             | All Hertfordshire Host Authorities                        |
| Green Controlled Growth (GCG)      | The GCG Limits and Thresholds for air quality do                                                                                                                | The Applicant should revisit the Air Quality Monitoring Plan                                                                                                                                                                                                                                                                        | TBC                                                             | All Hertfordshire                                         |



| <b>Principal issue in question</b> | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                                                           | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| Framework: Air Quality             | not address short-term pollution episodes which relate to acute health issues. Whilst there is no short-term legal limit for PM <sub>2.5</sub> concentrations, it would seem appropriate to set thresholds for 24-hour mean PM <sub>2.5</sub> concentrations based at least on the World Health Organisation (WHO) interim target 3, which is 37.5µg/m <sup>3</sup> not to be exceeded more than 3-4 days per year (the corresponding WHO interim target 3 for annual mean PM <sub>2.5</sub> is 15µg/m <sup>3</sup> - so it is reasonably in-line with the Government's interim annual mean target). | as proposed under the current GCG Framework so as to include 24-hour mean PM <sub>2.5</sub> thresholds to better address the matter of acute human health impacts and enable a more proactive approach to emissions management. |                                                                 | Host Authorities                                          |



| <b>Principal issue in question</b>       | <b>Concern held</b>                                                                                                                                                                                                                                                                    | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                                             | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| GCG surface access Thresholds and Limits | There could be a long time lag between detection of a breach in surface access controls and the halting of London Luton Airport growth. Localised impacts could be untenable for an extended period of time before any mitigating action is necessary.                                 | A clearer mechanism for detecting a breach and halting growth and implementing mitigation.                                                                                                        | TBC                                                             | All Hertfordshire Host Authorities                        |
| GCG surface access mode share targets    | The GCG mode share targets for non-sustainable mode share (based on passenger Civil Aviation Authority (CAA) annually collected data) will not reflect any local situation, London Luton Airport growth may continue while the Hertfordshire network deals with additional unmitigated | A commitment to more frequent monitoring is required (monthly) and the Applicant should demonstrate that the survey sample rate for passengers is statistically sufficient to base the decisions. | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b>                | <b>Concern held</b>                                                                                                                                                                                                                                                                                                                                                                                                 | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                                                 | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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|                                                   | traffic impacts that are not detected through the GCG monitoring.                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                       |                                                                 |                                                           |
| GCG surface access mechanisms for managing growth | Unclear relationship between GCG mode share, TRIMMA and Framework Travel Plan (FTP). If the GCG monitoring demonstrates that London Luton Airport is operating within the GCG Thresholds and Limits for surface access, we would expect the Airport Operator to still be committed to providing local mitigation improvements in relation to TRIMMA and the FTP, however the relationship and funding is not clear. | The Applicant should provide re-assurance that all three mechanisms for monitoring and mitigation will work together and the mechanism by which this will be managed. | TBC                                                             | All Hertfordshire Host Authorities                        |



| <b>Principal issue in question</b>             | <b>Concern held</b>                                                                                                                                                                                                          | <b>What needs to change / be amended / be included in order to satisfactorily address the concern</b>                                           | <b>Likelihood of concern being addressed during Examination</b> | <b>Host Authority to which the PAD / issue relates to</b> |
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| Noise aspects of green controlled growth (GCG) | The local authorities have raised concerns that the green controlled growth process has not been proven to be able to prevent future breaches of noise limits, nor that it offers anything additional to the extant process. | The Applicant needs to provide evidence that the noise aspect of GCG would be effective, such as how it would have prevented historic breaches. | TBC                                                             | All Hertfordshire Host Authorities                        |