

SLAE response to the applicants response to the SALE Relevant Representation - Document 001257

Interested Party and Examination Library Reference: Stop Luton Airport Expansion RR-1448

Topic: General

Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response	SLAE Response
<p>As a volunteer I represent the group Stop Luton Airport Expansion (SLAE) and as the name suggests the group are opposed to the airport's DCO application for expansion. For clarity, we are not opposed to the airport operating at up to 18 million passengers and we do not oppose the airport 'as it currently is' but we oppose any expansion that takes away the current Wigmore Valley Park footprint. Our group was founded to save the park following a meeting when representatives from Luton Borough Council told members of our group that the park would not be built over for airport expansion. Two months later they then announced their expansion plans and that has created mistrust. We have attended the Century Park, the airport operator's passenger expansion to 19 million applications, the non-statutory and the two statutory consultations and throughout our message has been the same, no expansion.</p>	<p>The Applicant acknowledges that airports, and increased airport activity, can generate negative environmental impacts, that unless controlled and managed, can impact on the communities around the airport. As such, it has developed Green Controlled Growth (GCG) proposals to ensure that growth can take place at the airport, but not at any cost. The GCG proposals mean that growth at the airport will only be delivered where limits on aircraft noise, air quality, greenhouse gas emissions and surface access are respected. A key part of the GCG proposals is that they become legally binding. Further information can be found in the GCG Explanatory Note [APP-217] submitted as part of this application for development consent.</p> <p>Regarding environmental impacts associated with the Proposed Development, the Environmental Statement submitted with this application for development consent, provides assessments of a wide range environmental effects, including benefits and disbenefits. It will be for the Planning Inspectorate to consider the balance between the costs and benefits of the Proposed Development in providing its recommendation to the Secretary of State, based on the evidence submitted with the application.</p> <p>The Applicant is fully aware importance of Wigmore Valley Park and the development of the design has minimised the area lost. The park has been extensively surveyed and characterised regarding its biodiversity as reported in Appendix 8.1 Ecology Baseline Report [AS-033 and AS-034].</p> <p>The Proposed Development includes replacement open space of 10% greater area, and at least equal quality and greater</p>	<p>GCG on LR's terms Please read SLAE's 'Good Neighbours' WR submitted for Deadline 2, as it identifies some enhancement to the GCG proposals. SLAE will submit a GCG WR for Deadline 3.</p> <p>Regarding environmental impacts associated with the Proposed Development, SLAE are happy that the Planning Inspectorate will consider the balance between the costs and benefits of the Proposed Development.</p> <p>SLAE are well aware of LR's proposals and find LR's response to go and find information in proposal documents dismissive and typical of the attitude shown throughout the whole of the consultation process. Great ideas to improve the proposal dismissed in with generic feedback text and grouped together. SLAE are well aware of where to look.</p> <p>SLAE ask once again to get rid of the duplication, the application filler, the ambiguous statements and words in a generic manner.</p>

	<p>accessibility and accords with applicable policy. In addition to biodiversity provision in the replacement open space, extensive habitat creation is provided to achieve at least 10% biodiversity new gain. Both open space and habitat will be placed in trust and managed as described in the Outline Landscape and Biodiversity Management Plan [AS-029].</p>	
<p>Although the applicant and Luton Borough Council (LBC) define a boundary between their Ltd company and Council, we do not believe this is clear cut. If it was, then Luton Rising (LR) would not be made up of council employees and the directors would not be councillors. The majority of the Luton Rising Directors are part of the Labour political party which has been the ruling party in Luton since 2007. Historically Labour have not had an elected Councillor representing the Wigmore Ward, which is the closest ward to the airport and so the party clearly do not represent Wigmore resident views. In January 2019 two Liberal Democrat councillors resigned their seats on the board of Luton Rising as they were not allowed to publicly disagree with and criticise the decisions with which they had a sincere and serious concern on, unless the Labour members of the board agree that they may do so. In March of this year, Anne Donelan (Labour Councillor) was not selected to represent Labour in Luton's Northwell ward and in her resignation letter from the Labour party she wrote, "Due to the incompetence and failure to follow rules and procedures which I observed on the planning committee." In August 2021 Luton Rising directors were invited by Friends of Wigmore Park (FOWP) / SLAE to visit Wigmore Valley Park to show what the impact of expansion would do to the park. One councillor did not know that the park existed whilst two others were not sure where the park was or how to get there without using SAT NAV. Of the current LR board, no Luton Councillor lives within the wards most closely impacted by the expansion. This asks the question as to whether if they are fit and proper to act as directors and as councillors and why are they making decisions that impact</p>	<p>The separation between The Applicant and Luton Borough Council is set out in Role and Responsibilities of Luton Borough Council [TR020001/APP/8.29]. The make-up of the Board of Directors reflects the majority position of the make-up of the Council with places available for representatives of each of the three main political parties forming Luton Borough Council. A place on the Board of Directors is designated for the Liberal Democrat Group in the expectation that it would be filled by a Councillor representing Wigmore Ward. Regarding the incident in January 2019, the facts are that the two Liberal Democrat directors of the company disclosed a conflict of interests between the company and those of the residents of Wigmore Ward. There is an established procedure within the Companies Act 2006 whereby a Board of Directors can authorise a conflict of interests. Had they chosen to follow the process and had the authorisation been forthcoming, the directors would have been able to make their views known without affecting their fiduciary duty to the company. However, they decided that a more appropriate course of action was to resign.</p>	<p>Noted.</p> <p>Places maybe places available for representatives of each of the three main political parties forming Luton Borough Council, however SLAE's evidence points to a historic dictatorship by the majority party make-up of the council. Reference, Annes Donelans letter of resignation.</p> <p>Can LR provide the evidence of the conflict of interest? Our understanding is the Liberal Democrats want the expansion, just not on Wigmore Valley Park.</p>

<p>the Wigmore ward.</p>		
<p>SLAE also asks that the majority councillor directorship of Luton Rising consist of councillors living within the adjoining wards closest to the airport. A good understanding of the issues directly associated to those living closest to the airport is paramount for councillors who sit on the Luton Rising board to truly understand the Wigmore Ward airport experience. Councillors living in the other Luton wards actually believe the economic solution to all their woes will be resolved by airport economic and job growth and push the debt out of sight.</p>	<p>This does not appear to be a matter for this application for development consent. Nevertheless, a place on the Board of Directors is designated for the Liberal Democrat Group in the expectation that it would be filled by a Councillor representing Wigmore Ward.</p>	<p>See answer as given above. It is a matter for the Examining Authority to determine, as the Board of Directors consist of Councillors making decisions on behalf of Wigmore residents, some who didn't know where the park was.</p> <p>SLAE suggest to ask Luton councillors from all areas what the airport brings and they will say, jobs, economic growth and charitable money with no understanding of what adjoining ward residents think.</p>
<p>Recently we wrote to the interim Luton Rising CEO asking for £65 million (the rumoured amount of funds set aside by Luton Council for the DCO application), to help us provide a balanced view of the airport expansion application. We felt it just, fair and appropriate to ask for equal funding to form a compelling case to counter application expansion and we could also fund competent experts to evidence why. Currently SLAE has around £700 in its account and we pay a £5.00 monthly subscription. We feel that the council should treat the airport and residents equally. Our request was turned down.</p>	<p>There have been multiple rounds of consultation on the proposals, and the respondent has provided feedback on each occasion. After each round of consultation, the Applicant has made changes to its proposals having given due consideration to all feedback received.</p> <p>It would be inappropriate for Luton Rising, or any other promoter of any form of planning application, to directly fund those objecting to its proposals.</p> <p>It is the role of the Examining Authority to test the robustness of the proposals, taking on board comments made by Interested Parties throughout the process. The Examining Authority, having heard and considered all sides of the debate will conclude whether or not the expected benefits of the proposals outweigh the expected disbenefits and recommend to the Secretary of State whether or not the application should be approved. The process is in place to ensure that all parties have a voice which is heard, regardless of the resources available to them, financial or otherwise.</p>	<p>SLAE propose that LR give the Examining Authority the funds (£65 million) to be able to neutrally and truly test the robustness of the proposals on an equal footing. With £65 million anyone could gain the expertise to counter the proposal documents and statements.</p> <p>SLAE do not believe that the Examining Authority will conclude the application based upon a debate, if that is LR's understanding then SLAE are disappointed that is LR's view and question that the proposal's focus and evidence is collated and presented to win a debate. The National Infrastructure Planning web site says, <i>Advice Note 8.2: How to register to participate in an Examination</i> <i>7. What not to include in a Relevant</i></p>

		<p><i>Representation</i> 7.1 <i>The Examining Authority may disregard a representation if it considers that it is vexatious or frivolous, or if it concerns the merits of national policy, contained in National Policy Statements. The role of the Examination is not to debate the merits of National Policy Statements that have already been consulted on, laid in Parliament and designated as Government policy.</i></p>
<p>Recently there has been the National Mental Health week and we feel that it is important to make provision for caring and welfare during the examination. SLAE would like to check with the Planning Inspectorate that the health and well being of all those involved (Applicants, Consultants, Planning Inspectorate and all 'Interested Parties') will be of prime consideration throughout the examination process. Can the Planning Inspectorate advise on what they would expect in reasonable hours for all of those involved to be? The wellbeing is of a concern as we know that there will be many people working outside of examination hours. There will be those paid, those unpaid, those working and those whose employers will not pay them wages or take kindly to any requests for holiday, or time off to attend the examination who will need to work late into the evening and early hours to catch up and respond, as well as perform their normal day jobs. In fact those living under the flight paths have more reason than those not to request this. Perhaps even a house swap is viable during the examination with those putting the case for airport expansion. It is suggested that health provision is made available and funded by the applicant.</p>	<p>The examination process is led by the Examining Authority and managed by the Planning Inspectorate.</p>	<p>SLAE note the response and it is Luton Borough Council and Luton Rising who have initiated this whole expansion idea. Who pays for the DCO tab?</p> <p>The difference between a good or an outstanding programme or project plan is demonstrated here by LR. A good example of being a 'poor neighbour' and a lack of project planning.</p>

<p>We ask if there will there be a report published with high level statistics on the numbers that have registered as an 'Interested Party', if they are in favour or not, the locations that they have registered from and general subject reasons?</p>	<p>This document 'The Applicant's Response to Relevant Representations' [TRO20001/APP/8.33] summarises the representations made by all those who have registered as an Interested Party.</p> <p>The respondent is also able to read all 1603 relevant representations which are available on the Luton Expansion project page of the Planning Inspectorate's website.</p>	<p>Noted</p>
<p>Moving onto the application, we note that at this stage you ask for comments and what we consider to be the main issues and impacts including anything that may affect our day-to-day lives. We have concerns that the application documentation is a long and difficult read by the majority population of Luton and this could put people off of registering. This is particularly so, as the applicant has documented that educational attainment is generally lower across Luton.</p> <p>We would also expect the applicant to name the audiences that the application is aimed at and expected educational attainment required to contribute. There are many repeated paragraphs in the application documents, paragraphs written that are impossible to understand without a clearer explanation. These documents are public documents and as such should all be created for and easily readable by the Luton public. There are also contradictions, incomplete sentences due to redactions and we ask how can a Luton resident be expected to understand technical jargon that is second nature to paid expert consultants?</p>	<p>The Application comprises a large number of documents, organised within seven volumes. The purpose and contents of these seven volumes are described in the Introduction to the Application [AS-002], with an accompanying Application Document Tracker [AS-138] listing each document and its Examination Library Reference Number.</p> <p>The Application documents were prepared in accordance with relevant requirements and guidance. Some draft documents were also shared with technical stakeholders, including local authorities and statutory undertakers, prior to submission in order to improve their accuracy and readability.</p> <p>A balance was sought in providing the necessary technical detail whilst also ensuring documents were written in a non-technical style and in plain English</p>	<p>SLAE accept that the Application documents were prepared in accordance with relevant requirements and guidance. Some draft documents were also shared with technical stakeholders, including local authorities and statutory undertakers, prior to submission in order to improve their accuracy and readability. Though SLAE question that if the application documents were prepared in accordance with relevant requirements and guidance, that these took into consideration that educational attainment is generally lower across Luton.</p>

<p>A lack of consistency is a general theme, with some documents having glossaries, others not, acronyms missing, some with references at the bottom, some throughout the documents and some a mixture. There are dated references over a decade old (discounting Government policy or laws). A resident should not need to sign up to websites and be expected to leave personal details when accessing a reference. There are even documents with the text "Error! Reference source not found". Documents obviously written in different styles, by different companies, some have competent experts listed and others don't. Does this mean those documents were not written by competent experts? Documents with no consistent titling depending on whether the source was written in Microsoft Word or other applications. Different formatting. Documents downloaded from the Planning Inspectorate then opening and showing different titles or different titles picked out from the file properties. No clear definition of what content is actual evidence or not. Some have a reference number with no reference found or not available when searching the reference material. It's a mess, and wastes time and suggests some of these documents were rushed. How come this has cost £60 odd million? I read all of the Statutory 2 documents and probably retained 1% memory of that reading. To recall the documentation from the SIFT exercise, all of the consultations, the DCO submission, the references and the Planning Inspectorate documents is probably beyond the educational attainment of a Luton resident.</p>	<p>As the respondent has acknowledged in the preceding comment the application submitted by the Applicant is, necessarily long and detailed for the reasons the Applicant explains above. As such, despite the best endeavours of the Applicant it is accepted by the Applicant that there will be errors in the application.</p> <p>Errors in Application documents that have been identified by the Applicant or brought to its attention by other parties are reported in The Errata Report [TR020001/APP/8.25].</p> <p>Additional submissions that have been permitted by the Examining Authority are also listed in the Application Library.</p> <p>The Examination period provides a further opportunity for Application documents to be considered and commented on.</p>	<p>Noted.</p>
<p>Due to the time span taken to get to this stage of the DCO application SLAE think it perfectly reasonable for another SIFT exercise to be carried out. We suggest that the DCO should be split by phases and after implementation of each phase another DCO application is applied for. This gives the applicant time to re-assess, re cost the development and be able to adapt to new laws both nationally, European and worldwide, particularly in this changing world of climate change we live in. If we look at the number of major revision changes from</p>	<p>Air traffic can be volatile to short term events, such as Covid-19 or volcanic as events but this does not necessarily reflect people's underlying demand to travel, which generally relate to underlying economic conditions.</p> <p>Although there are short term economic challenges, the evidence is that air passenger demand has virtually recovered to pre-pandemic levels and would in future be expected to grow in line with underlying economic growth.</p> <p>The demand forecasts for the application for consent were</p>	<p>Noted and there appears to be a lack of acknowledgement of the amount of change that's occurring in the world at the moment, and the not too far future may make the projections obsolete and passenger demand dwindle.</p> <p>The phrase, 'Fiddling while Rome burns' comes to mind.</p>

<p>Statutory consultation 1 and 2 and this DCO application then we could see the application improve after each phase, perhaps even realising that expansion is not a good thing and realising the need to save the park and County Wildlife Site. Although we have no evidence yet to submit on the topics of Brexit, Covid, Volcanic Ash events, current economic situation and inflation rises, worker strikes, local, national and International climate change, huge local council job losses, and the war in Ukraine. All have an impact on the aviation industry, with the majority of those being unexpected and unplanned events. Aviation is very susceptible to unplanned and rapidly changing national and international events and with slow recovery periods it therefore makes sense to split the phases or have good back out options (not decided by Luton Rising or the Council's planning mechanism). In fact, in response to all of these unplanned events, Luton Rising's continuously delayed DCO submission has proven how susceptible aviation is and the need to re-visit the SIFT options.</p>	<p>prepared based on the Government's economic projections in 2022, which took into account the effects of Brexit, and sensitivity tests were carried out to ensure that consideration was given to economic uncertainties.</p> <p>To the extent that there are uncertainties in the precise timing of demand growth, this would not have altered the SIFT outcomes in terms of the option selected.</p> <p>The projections are considered robust over the life of the Proposed Development but the precise phasing by which the development will be implemented will depend on economic outturns.</p>	
<p>SLAE note that the 'Green Control Growth' (GCG) application documents express that GCG will be passed into law. SLAE's take is that if GCG can be passed into law, so can Wigmore Valley Park amenities and protection, and not a later stage. The council has committed to progressing deed of dedication arrangements with the 'Fields in Trust' charity with the ultimate aim of protecting all Luton parks and green open spaces from development. The current Wigmore Valley Park must be top of the list and before the DCO application is decided.</p>	<p>The Applicant can only implement the Proposed Development if the Secretary of State consents to the application</p> <p>If consent is received, the Applicant proposes to deliver the vast majority of proposed landscape mitigation at the start of construction, in order to allow it several years to establish before most increases in aircraft movements occur from construction of the new terminal, and further detail can be found within Chapter 14 Landscape and Visual of the ES [AS-079].</p> <p>The loss and replacement of open space proposed by this application is subject to strict planning tests and is only proposed in this instance having exhausted other options. The Proposed Development has been carefully selected following a three stage Sift process which did consider options for Wigmore Valley Park. A scheme that sought to avoid Wigmore Valley Park in its entirety was developed and subsequently appraised at Sift 3 alongside the existing Sift 2 options. This option was however discounted as it proposed development in</p>	<p>SLAE ask what the strict planning tests are? There are no key word references to 'strict planning test' in any of the Sift documents, 000823, 000824, 000825, 000826, 000827 & 000828.</p> <p>SLAE believe that all other options have not been exhausted. This is evident with the smaller footprint on Green Horizons Park, which means GHP can now be built on Brownfield land and the cost of the AAR greatly reduced.</p> <p>The original Century Park is another option, where Century Park was going to be located to the east of the airport.</p>

	<p>the Green Belt and outside of the Luton Local Plan LLP6 Strategic Allocation boundary. It was also judged to perform poorly against other criterion, notably on the basis of operations, noise impacts, land ownership and landscape and visual impact considerations. Details of the sifting process can be found in the Design and Access Statement I [AS- 049]. Details of the Replacement Open Space to be provided at Wigmore Valley Park can be found in Appendix C. An associated assessment of policy compliance is given in Section 13.9 of ES Chapter 13 [AS-078]. Details of the sifting process can be found in the Design and Access Statement Appendix B [APP-209, APP-210, APP-211, APP-212].</p>	<p>The replacement Wigmore Valley Park is outside of the Luton Local Plan LLP6 Strategic Allocation boundary.</p>
<p>And as evident, SLAE have challenges to nearly all of the subject material in almost all of the applicants documents which we are happy to explore during the examination.</p>	<p>The Applicant will continue to review and respond to matters raised through the examination.</p>	<p>Noted</p>

Topic: Noise and Vibration

Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response	SLAE Response
<p>During the coming DCO examination, SLAE asks that all those involved from Luton Rising, the applicants consultants and the councillors of Luton Borough Council who think it such a acceptable idea to expand the airport to live under the flight path in the ward of South Luton in un-insulated accommodation for the six month period. They will be able to 'walk the walk' and also truly experience the up to 18 million passenger experience and get a taste for what it will be like if the airport reaches 32 million. This is an ideal time as the summer season is upon us and local climate change temperatures mean that they would also want to open their house windows.</p>	<p>The project team has spent considerable time in Luton and surrounding area to gain an understanding of how these areas are affected by aircraft noise and would be affected by the expansion proposals.</p> <p>The proposed insulation scheme provides a means for properties to be fitted with ventilation so windows can be kept closed to protect against noise. Refer to Draft Compensation Policies Measures and Community First [AS-128] for more information on the noise insulation eligibility criteria.</p>	<p>LR avoiding and ducking the point being made and playing deflection tactics by pointing SLAE and the Inspectorate to the compensation scheme.</p> <p>Spending considerable time in Luton and surrounding area is not the same experience as a 6month 24x7 experience. Surely this can't have been missed?</p> <p>A typical response that has been experienced by SLAE throughout the whole project, from the start until the DCO submission. 'Trust' is the key word, evidence document 000746 - <i>NB: the community group SLAE (Stop Luton Airport Expansion) declined to participate in the consultation due to their lack of trust in Luton Rising.</i></p>

<p>There are other missing sections that we would expect to see in a DCO application, perhaps they fall outside of Planning law, for example the Application quotes the National Planning Policy Framework (PPF) when it comes to home-based workers. There is no mention of home-based workers who work from home and suffer from the flight path noise interruptions. If you are a home worker with your own business then it would be difficult to be in a business that required conversation, listening and meetings. You would be exposed 24 hours each day. It could be this is covered in visits to homes by noise consultants determining insulation measures, though this subject is still not covered or recognised in the DCO application. With more people working from home than before Covid and unlikely to change, it's surprising that figures to demonstrate this are not shown. Working from home is now a key selling point in job ads when attracting applicants. Without adequate insulation from flight path noise an applicant would be hesitant to apply for a role with home working requirements and this could be seen as discrimination. It is evident that Desk-Based Assessments do not capture the ward knowledge that residents have and there are surprising omissions from the application. Those who live in the wards surrounding the airport know the issues and the times that they occur.</p>	<p>The assessment of noise effects from the Proposed Development considers both residential and non-residential receptors (which includes noise sensitive commercial properties, i.e. offices), see Table 16.7 of Chapter 16 of the Environmental Statement (ES) [AS-080]. The assessment criteria for residential properties are lower than those for offices. This can be seen by comparing Tables 16.13, 16.14 and 16.19 of Chapter 16 of the ES [AS-080]. This is because health effects from noise can occur at or above the Lowest Observed Adverse Effect Level (LOAEL) which are lower noise levels than those that could disrupt listening, conversation or meetings in an office or home working environment. The assessment of residential households is therefore a worst-case and would not be affected by the assumption that there is an increased proportion of home working. As the comment notes, the noise insulation scheme will benefit the internal noise conditions of eligible properties, regardless of whether they are used for home working or not.</p>	<p>SLAE ask the LR project team and all those councillors that think expansion is such a good idea, to 'walk the walk' and live under the flight path in South Luton for a period of six months, 24x7. Then make judgement and talk about the assessment of noise and working from home from personal experience.</p>
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Topic: Community First

Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response	SLAE Response
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<p>Reading the letters of support for the application SLAE are not sure that the difference between the current 18 million and proposed 32 million is clearly understood. Most of the letters of support identify the current financial benefits received. SLAE suggest that if 'Green Control Growth' (GCG) is going to be passed into law, then so can a similar law be put in place to protect charitable financial benefits. SLAE are concerned that if DCO approval is given that financial benefits may change and are surprised that protection is not included in the DCO application in detail. Are these supporters aware of the origins of where the funding comes from and if any of the organisations providing this funding to them are in debt? SLAE cannot understand why airport donations to charities has gone down over the past few years and the council continues to cuts support to services which pushes more people to ask for charitable help.</p>	<p>The application for development consent includes the creation of a new fund, Community First, within the Draft Compensation Policies, Measures and Community First [AS-128] document. This document provides detail about how the Community First fund will increase the level of funding provided by the Applicant to local communities. Community First commits to investing up to £14m per year in local communities. Community First, which is directly linked to growth, provides the security sought by the Stop Luton Airport Expansion to protect Community Investment. The Applicant has a long and proud history of providing significant funds to the local charity and voluntary sectors, providing circa £180M since 2002 and is committed to continuing this work, which is outside of the scope of this application for development consent. Indeed, Community First is additional to the Applicant's ongoing commitments. The Covid-19 pandemic had a devastating effect on the Applicant's income yet still throughout that time the Applicant continued to protect its investment in local good causes, naturally at a level slightly lower than had been the case in recent history, due to massively reduced revenue, though the proportionate decrease in charitable giving was significantly less than the total decrease in revenue, reflecting the commitment of the organisation to providing social benefit. Notwithstanding this, The Applicant remains a private company and must operate within the laws governing such organisations, it would not therefore be appropriate to seek to make legally binding obligations beyond the scope of the growth being sought through this application to making minimum annual charitable contributions.</p>	<p>Noted, SLAE have submitted a Charities WR for Deadline 2 that looks into this a little more.</p> <p>In the WR SLAE ask the Inspectorate to look at the amounts and question where 'circa £180m since 2002' has come from, as this amount is not detailed in any of the many DCO documents that cover charity and voluntary funding.</p> <p>SLAE are confused that LR consider that this subject is outside of the development consent when many supporters have championed airport expansion (letters of support, RR's and OFH's) based upon funding from Luton Airport. Why are there the many application documents on the subject if this is not part of the application. To save wasted effort SLAE ask the Examining Authority to instruct Luton Rising to redact all topics that fall outside of the scope of the application.</p> <p>Can the Examining Authority confirm to LR and all those who submitted RR's, OFH's and WR's, what is in and out of scope?</p>
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Topic: Planning

Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response	SLAE Response
<p>From my own reading two local road issues are not captured and the new park and playground have not been properly thought about. For example, let us look at Green Horizons Park, which was New Century Park, until it was decided that New Century Park was no longer viable. New Century Park planning permission was granted by Luton Borough Council and we now find in the DCO application its name has changed and also its footprint size. The amended footprint size</p>	<p>Green Horizons Park is an extant planning permission which the Applicant is intending to implement. The detailed layout of Green Horizons Park will be subject to future Reserved Matters applications, to Luton Planning Authority, pursuant to the extant permission and there will be consultation with statutory consultees, local interest groups and the</p>	<p>Green Horizons Park has changed since Century Park was approved.</p> <p>Please see evidence relating to Anne Donelan resignation and SLAE ask the Examining Authority to stop the majority Labour party that represent</p>

<p>means that Green Horizons Park could now be built on brown belt land to the South West of the airport. This would allow a greater area of Wigmore Valley park to be retained, and could even involve a redesign of the airport expansion to save the County Wildlife Site. Because the public were never consulted on the re naming and re-sizing of Green Horizons Park, we were unable to suggest improvements.</p>	<p>general public as part of that process.</p>	<p>the Luton planning Authority from determining planning matters relating to the airport and land that LR lease / own (?). If GHP is now a future matters application, what is it doing in the DCO?</p>
<p>SLAE understand that the Local Luton Plan is a legal document, however there are contradictions within and also the council seemly applies the plan when it wants to. All references to the Local Plan should be removed from the application. This raises the question over the word 'local' and what its true definition is in National Planning Law. Its use and meaning varies widely over what Luton Rising, Luton Borough Council, residents and groups such as ours want it to mean. For example a Ward resident may use the word 'local' to represent their Ward. LBC may use the word to mean the whole of the Borough and Luton Rising may use the word to mean all of the Bedfordshire and surrounding counties. Each referring to something different. A Wigmore ward resident would refute that by LBC using the word 'local' it also included Wigmore. SLAE ask that all references using the word 'local' be removed from the DCO application and all referenced material, or that the context of 'local' is explained and easily understandable in meaning.</p>	<p>Luton Borough Council is a host local authority for the Proposed Development as well as being the ultimate owner of London Luton Airport. The Applicant did consider the Local Plan to be an important and relevant consideration for the application for development consent and has provided a summary of how the Proposed Development complies with all relevant provisions in the Planning Statement [AS- 122]. The Applicant does not have control over how the term 'local' is used by third parties but is of the view that it has defined clear and robust study areas for the purposes of the assessments submitted in support of the application. On this basis, the Applicant does not agree to removing the word 'local' from the application documents.</p>	<p>SLAE ask the inspectorate to ask LR to publish what the defined clear and robust study areas are for the purposes of the assessments submitted in support of the application? As mentioned in other SLAE documents, the LR documents 000848 c7.1.3 and 001108 paragraph 13.9.26. uses the word 'adjoining' which gives clear and understood meaning and sets the precedent for all other documents. Clarity that the word 'local' means adjoining ward and village communities would be very beneficial when reading proposals and also when commenting in further WR's.</p>

Topic: Plans

Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response	SLAE Response
<p>Are the application maps consistent? It doesn't appear so. There are numerous references to the Lead Contractor, SLAE assume this will be Ryebidge and ask that the application documents are updated accordingly so that the Lead Contractor can complete all those statements left open and close the many holes where there is ambiguity and indecision.</p>	<p>If the respondent could advise on any specific inconsistencies, then these can be considered by the Applicant and amended if appropriate. The DCO application is seeking consent to allow the implementation of works. Selection of a Lead Contractor will follow a procurement process which will only be confirmed if consent is granted.</p>	<p>The Bridle path that goes to the footpath in the farmers field is not shown on 000810 Provision of Open Space map. SLAE will respond to Lead Contractor in further WR's.</p>

Topic: Needs Case

Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response	SLAE Response
<p>SLAE are also surprised to find that there is minimal provision found in the DCO application of how aviation susceptibility would impact the aviation economics benefits and impact on jobs. Many supporters of the airport expansion quote job creation as a key selling point, yet job loss is not covered. SLAE would expect greater detail included with and without Government intervention scenarios. SLAE do not see good options provided in the application if the minor, moderate or major significant scenarios end up in practice to be opposite to those documented and the true mitigation solution. It is noted that the documentation set is heavily biased towards 'minor'.</p>	<p>Any uncertainties in the rate of aviation demand growth are reflected in the Faster and Slower Growth Cases set out in Section 6 of the Need Case [AS-125]. The implications of these Faster and Slower Growth Cases on the assessment of economic benefits are set out in Appendix F to the Need Case [APP-214].</p>	<p>Job loss doesn't appear to be covered in the slower and Faster Growth cases.</p>

Topic: Wigmore Valley Park

Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response	SLAE Response

<p>Investment in, and upkeep of Wigmore Valley Park has been left by the council over the years to make the land more attractive to the expansion and park plans by Luton Rising. Let's look at the Pavilion and the children's play area. The plans in the DCO do not cover adequate provision for the Pavilion and children's play area. They read well and look exciting, but insufficient thought has gone into the planning of these, and any new plans look appealing when the council has deliberately ignored investment. This leads us to think that any local amenities offered to the residents will be cut back when it comes to local planning decisions made after the DCO application process has completed. The majority ruling political party of the Development Control Committee always passes airport plans, none are ever refused. Residents can see this committee cutting back on any Wigmore Valley Park amenities as a result of cut backs, economic benefits and jobs, as decisions always do.</p>	<p>The proposed park will provide an area of space that is at least as good in usefulness, attractiveness, quality, accessibility and at least 10% larger than the current provision.</p> <p>The Proposed Development makes available for public access land that is currently in use as farmland. The Replacement Open Space is at least 10% greater in size than that existing and further information can be found within Chapter 8 Biodiversity of the ES [AS-027]. Improvements to the northern part of the park including the children's play area will still be delivered as described and permitted by the Green Horizons Park planning permission.</p> <p>The Applicant recognises that Wigmore Valley Park is important to the public and is committed to providing open space for the public to enjoy that is more attractive and usable to a wider range of people than the current offer. The effect on Wigmore Valley Park as a community asset has been assessed and reported in Chapter 13 Health and Community of the Environmental Statement, [AS-078] concluding that with the delivery of replacement open space in Phase 1 and after it's established there will be a minor beneficial effect.</p> <p>An Open Space Assessment is provide as Appendix C [APP-197] to the Planning Statement.</p> <p>The Applicant has committed to long term management of the open space and habitats for 50 years as described in the Outline Landscape and Biodiversity Management Plan [AS-029], and funding this through establishing a community trust in perpetuity if Development Consent is granted. Measures for the establishment and long-term management of habitats is detailed within Chapter 8 Biodiversity of the ES [AS-027].</p>	<p>Ultimately land is being taken and the current park reduced in size. It's a great PR exercise that LR have relabelled farmland as a new Wigmore Valley Park and providing at least 10% more than the current park.</p> <p>Lack of deliberate investment in the current Wigmore Valley Park enables LR to say 'more attractive', however that sums up the lack of awareness of what the current park provides and the recent awards it has won.</p> <p>SLAE will respond to Chapter 13 Health and Community of the Environmental Statement, [AS-078] and the Open Space Assessment.</p> <p>SLAE are disappointed that the proposals have not recognised the two best park in Bedfordshire awards that Wigmore Valley park won in 2019 and 2022 and that the park was also a regional finalist for the East of England in both years. https://www.fieldsintrust.org/ArchivedNews/celebrating-the-east-of-englands-best-parks-2019 (accessed 10/09/23). https://www.fieldsintrust.org/favourite-parks/local-favourites#eastofengland (accessed 10/09/23).</p> <p>SLAE noted that LBC also did not recognise the award either and this adds to the lack of investment evidence in the park by LBC to make both the Century Park and Expansion more attractive.</p> <p>The three stage Sift process was predetermined, before a scheme that sought to avoid Wigmore Valley Park in its entirety was developed. Surely the project team would have thought to include the park in the initial Sift stage. The park was an afterthought following feedback for the non-statutory consultation.</p>
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