

London Luton Airport Expansion

Buckinghamshire Council Comments on Further Deadline 1 Submissions

PINS REFERENCE: TR020001

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Directorate for Planning, Growth & Sustainability

Planning & Environment

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1 Introduction

1.1. Terms of Reference

- 1.1.1. Buckinghamshire Council (the Council) is a neighbouring authority for the London Luton Airport Expansion Development Consent Order (DCO) referred to as 'the Scheme'.
- 1.1.2. This document provides the Council's overarching comments on the updated application documents submitted at Deadline 1. The primary focus is on the relevant parts of the submissions from the Applicant, as specified in REP1-001. However, where updated documents from other parties relate to the Council's position, these are referenced.
- 1.1.3. At Deadline 2, the Council also submits its Updated Principal Areas of Disagreement Summary Statements (PADSS), as well as inputting into the Initial Statements of Common Ground (SoCG) to be submitted by the Applicant.

1.2. Buckinghamshire Council's Position

- 1.2.1. The Council welcomes the Applicant's approach to continuing to supplement the information relating to the Proposed Development with additional submissions. Notwithstanding this, based on the review of the additional submissions supplied by the Applicant at Deadline 1, the Council maintains that its comments made to date have not been fully addressed.
- 1.2.2. The Council's latest position remains as per that expressed within its Written Representation (REP1-042) and Local Impact Report (REP1A-001) and is anticipated to evolve through the examination process and the continuing development of a Statement of Common Ground between the Council and the Applicant. The Council is receptive to continuing to engage with the Applicant and welcomes involvement in discussions on all matters raised in respect of its stated position.

2 Comments on Further Deadline 1 Submissions

2.1. REP1-002: Guide to the Application

2.1.1. The content of this submission is noted. The Council has no comments.

2.2. REP1-003: Environmental Statement Chapter 16: Noise and Vibration [TR020001/APP/5.01]

2.2.1. The content of this submission is noted. The Council has no additional comments. The Council's position remains as expressed within its Local Impact Report (REP1A-001) and Written Representation (REP1-042).

2.3. REP1-004: Environmental Statement Appendix 20.3 Hydrogeological Characterisation Report

2.3.1. The content of this submission is noted. The Council has no comments.

2.4. REP1-005: Green Horizons Park Additional Information [TR020001/APP/8.23]

2.4.1. The content of this submission is noted. The Council has no comments.

2.5. REP1-006: Green Horizons Park Additional Information – Appendix A Committee Reports

2.5.1. The content of this submission is noted. The Council has no comments.

2.6. REP1-007: Green Horizons Park Additional Information – Appendix B Decision Notice

2.6.1. The content of this submission is noted. The Council has no comments.

2.7. REP1-008: Green Horizons Park Additional Information – Appendix C S106 Agreement

2.7.1. The content of this submission is noted. The Council has no comments.

2.8. REP1-009: Green Horizons Park Additional Information – Appendix C S106 Agreement – Plans Part 1

2.8.1. The content of this submission is noted. The Council has no comments.

2.9. REP1-010: Green Horizons Park Additional Information – Appendix C S106 Agreement – Plans Part 2

2.9.1. The content of this submission is noted. The Council has no comments.

2.10. REP1-011: Green Horizons Park Additional Information – Appendix D Plans

2.10.1. The content of this submission is noted. The Council has no comments.

2.11. REP1-012: Commentary on the Overarching Aviation Noise Policy Statement (OANPS) [TR020001/APP/8.24]

2.11.1. Para 3.1.8 of REP1-012 states:

The Proposed Development and the controls in the Noise Envelope secured by the Green Controlled Growth Framework, combined with the noise insulation scheme secured by the compensation commitments, meet the overall policy on aviation noise in the OANPS by providing an appropriate balance between the economic and consumer benefits of the Proposed Development against its social and health implications in line with the ICAO Balanced Approach.

2.11.2. The Noise Envelope was not secured by the Green Controlled Growth (GCG) Framework but is a requirement of policy. From the Airports NPS, published 5 June 2018:

1.12 The Airports NPS provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and will be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England. Other NPSs may also be relevant to decisions on airport capacity in this geographical area.

2.11.3. Further:

5.60 The applicant should put forward plans for a noise envelope. Such an envelope should be tailored to local priorities and include clear noise performance targets. As such, the design of the envelope should be defined in consultation with local communities and relevant stakeholders, and take account of any independent guidance such as from the Independent Commission on Civil Aviation Noise. The benefits of future technological improvements should be shared between the applicant and its local communities, hence helping to achieve a balance between growth and noise reduction. Suitable review periods should be set in consultation with the parties mentioned above to ensure the noise envelope's framework remains relevant.

2.11.4. The Council asserts that the Noise Envelope should be kept integral to GCG but remain independent. It is noted that the applicant has not taken forward all the recommendations of the Noise Envelope Design Group.

2.11.5. In respect to the connection to human health, the Council notes the Applicant's assertion at para. 3.1.8 repeated above.

- 2.11.6. The Council raises broader reservations about the application of the GCG Framework within its Local Impact Report (REP1A-001) and Written Representation (REP1-042), which provide the current position of the Council. The Council will await the Applicant's response to those documents and will comment further in due course. The matters raised in relation to the GCG Framework need to be resolved before the Council can accept that the attendant health implications are suitably addressed by the Applicant.
- 2.11.7. The Council would also draw the Examining Authority's (ExA) attention to the Initial SoCG between the Applicant and the Council, which will be submitted at Deadline 2. The SoCG reflects the current progression of discussions in relation to the issues raised. The ExA will note that most of the issues raised are ongoing, including the application of the Green Controlled Growth Framework.
- 2.12. [REP1-013: Applicant's Post Hearing Submission – Preliminary Meeting](#)
- 2.12.1. The content of this submission is noted. Use of the Guide to the Application document to signpost changes to documents and plans, at the ExA's suggestion, is welcome.
- 2.12.2. Confirmation that the Applicant is on track to deliver transport modelling outputs by December 2023 is noted. The Council reserves its position in relation to the assertion of the Applicant at para. 4.1 that it 'does not expect the updated traffic modelling to result in any materially new or different environmental effects' – the Council's position on this matter is set out in the Written Representation (REP1-042) and Local Impact Report (REP1A-001).
- 2.12.3. The Council notes that the Applicant is not opposed to an additional issue specific hearing after the updated traffic modelling is available, for instance, in the second half of January. It is also noted that the Applicant acknowledges that there will be new information to consider. The Council would wish to be involved in any such additional hearing.
- 2.13. [REP1-014: Applicant's Post Hearing Submission – Open Floor Hearing 1 and 2](#)
- 2.13.1. The content of this submission is noted. The Council has no comments.
- 2.14. [REP1-015: Errata Report](#)
- 2.14.1. The content of this submission is noted. The Council has no comments.
- 2.15. [REP1-016: Flight and Passenger Information \[TR020001/APP/8.27\]](#)
- 2.15.1. This document has been reviewed by the Council. It is assumed to be an informative to assumptions around trip generation and no comment is raised.

2.16. REP1-017: Environmental Improvement Plan Interim Target for PM_{2.5} Commentary [TR020001/APP/8.28]

- 2.16.1. The Council has reviewed this document. Commentary on how the interim targets for PM_{2.5} as outlined with the Environmental Improvement Plan (EIP) will impact upon the Green Controlled Growth (GCG) limits and thresholds for air quality and the conclusions of the air quality impact assessment has been supplied. This is in response to a request for further information by the ExA in its Rule 6 letter.
- 2.16.2. The Council agrees that the air quality assessment (AS-076) has shown that the interim target for PM_{2.5} of 12µg/m³ by 2028 will not be exceeded at any of the modelled human receptor locations. However, as outlined within the Council's Relevant Representation (RR-0166), Written Representation (REP1-042) and Local Impact Report (REP1A -001) there is some uncertainty around the traffic data used within the Applicant's Transport Assessment. This is because the ExA has requested that the traffic data used within the transport modelling is reviewed; and the Council is also seeking validation of the Applicant's traffic modelling for use on the Buckinghamshire network.
- 2.16.3. The Applicant has provided a response in a letter dated 27 June 2023 (AS-064) stating it proposes to review the data with the work commencing in July and concluding in December 2023. This traffic data is used for the air quality assessment (AS-076) and therefore a review of any updated data may have an impact on the results of this assessment.
- 2.16.4. The Council awaits the conclusions from this review before accepting the conclusions of Environmental Improvement Plan Interim Target for PM_{2.5} Commentary (REP1-017) in relation to the impact upon the air quality assessment completed.
- 2.16.5. It is acknowledged that the Applicant will now include the interim target for PM_{2.5} of 12µg/m³ from the EIP into the GCG limits and thresholds and the Council welcomes this commitment.
- 2.16.6. The Applicant states that due to the introduction of the EIP interim target it is likely that increased levels of accuracy in monitoring concentrations of PM_{2.5} will be required prior to 2040. The Council supports this statement and would recommend that modifications are made to the overall monitoring approach, including equipment and any subsequent analysis (as set out in the GCG Framework Appendix D – Air Quality Monitoring Plan (APP-222)) to enable this.

2.17. REP1-018: Roles and Responsibilities of Luton Borough Council

- 2.17.1. The content of this submission is noted. The clarification is welcome. The Council's Written Representation (REP1-042) and Local Impact Report (REP1A-001) both include queries relating to the way in which Luton Borough Council will act in relation to the Environmental Scrutiny Group and Green Controlled Growth

Framework – this additional information should be provided within the relevant DCO documents to ensure clarity on this matter.

2.18. REP1-019: Trip Distribution Plans [TR020001/APP/8.30]

- 2.18.1. The Trip Distribution plans have been supplied in response to requests for further information in paragraph 13 of Annex F, of the Rule 6 letter. This request was made by the ExA, seeking consolidation and simplification of the information.
- 2.18.2. These plans have been reviewed by the Council as supplied to the ExA, and the information contained within the document is considered deficient - it does not provide a quantitative assessment of the trips that the development is expected to produce.
- 2.18.3. The plans show average Daily Traffic plots, with a low resolution key. It is therefore not possible to quantify the numbers of vehicles using specific routes from the information provided.
- 2.18.4. Section 3 of the document shows within the wider area plots, that the route of principal concern to the Council, which is the B489 and B488 through the villages of Ivinghoe, Pitstone and Marsworth, is currently used for access to the airport (in the 2016 base used by the Applicant for air passengers).
- 2.18.5. The Trip Distribution plans show that with the expansion of the airport, greater numbers of air passengers shall use the B488/B489 route. This is evidenced by the thickening of the difference plot line; however no numerical data has been supplied to quantify this impact.
- 2.18.6. The Council has requested within its Written Representation (REP1-042) and through direct engagement with the Applicant, information showing the calibration of the strategic modelling within Buckinghamshire and validation for use in relation to the Buckinghamshire network. This Trip Distribution Plan document shows an impact on the Buckinghamshire network, notably at the B488/B489 route, but does not quantify that impact.
- 2.18.7. The Council therefore considers that this document is deficient in the information that it presents to the ExA. The data legibility is poor and does not allow the Council to quantify the impacts on its network.
- 2.18.8. The Council remains of the position that it requires the validation information to be provided for the Buckinghamshire network. The Council also requires the trip generation and total flow numbers that are associated with the difference plots. These issues are expressed within the Council's Local Impact Report (REP1A-001) and Written Representation (REP1-042) which also highlight the interconnected nature of this issue with the dependent assessments, including air quality, noise and health.

2.19. [REP1-020: Applicant's Response to Relevant Representations – Part 1 of 4 \[TR020001/APP/8.31\]](#)

2.19.1. The content of this submission is noted. The Council has no comments.

2.20. [REP1-021 Applicant's Response to Relevant Representations – Part 2A of 4 \(Local Authorities\) \[TR020001/APP/8.31\]](#)

2.20.1. The Council notes the content of this document, which includes the Applicant's response to the relevant representation made by the Council (RR-0166). However, the Council's position has been further developed since the submission of this document by the Applicant. The Council's Local Impact Report (REP1A-001) and Written Representation (REP1-042) provide the current position of the Council.

2.20.2. The Council will await the Applicant's response to those documents and will comment further in due course. The Council would also draw the ExA's attention to the Initial SoCG between the Applicant and the Council, which will be submitted at Deadline 2. The SoCG reflects the current progression of discussions in relation to the issues raised through the Relevant Representation. The ExA will note that most of the issues raised are ongoing.

2.21. [REP1-022: Applicant's Response to Relevant Representations – Part 2B of 4 \(Members of the Public\) \[TR020001/APP/8.31\]](#)

2.21.1. The content of this submission is noted. The Council has no comments.

2.22. [REP1-023: Applicant's Response to Relevant Representations – Part 2C of 4 \(Non-Statutory Organisations\) \[TR020001/APP/8.31\]](#)

2.22.1. The content of this submission is noted. The Council has no comments.

2.23. [REP1-024: Applicant's Response to Relevant Representations – Part 2D of 4 \(Other Statutory Organisations\) \[TR020001/APP/8.31\]](#)

2.23.1. The content of this submission is noted. The Council has no comments.

2.24. [REP1-025: Applicant's Response to Relevant Representations – Part 2E of 4 \(Parish Councils\) \[TR020001/APP/8.31\]](#)

2.24.1. The content of this submission is noted. The Council has no comments.

2.25. [REP1-026: Applicant's Response to Relevant Representations – Part 3 of 4 \(Affected Persons\) \[TR020001/APP/8.31\]](#)

2.25.1. The content of this submission is noted. The Council has no comments.

2.26. [REP1-027: Applicant's Response to Relevant Representations – Part 4 of 4 \(SoCGs and Additional Submissions\) \[TR020001/APP/8.31\]](#)

2.26.1. The content of this submission is noted. The Council particularly notes that the UK Health Security Agency (UKHSA) has raised a number of matters within its relevant representation (RR-1546) regarding the way in which air quality and noise assessment findings are used to inform the assessment of health impacts, which are responded to in this document (REP1-027). UKHSA is seeking changes to the methodology adopted and some additional clarifications of Applicant proposals.

2.26.2. The UKHSA relevant representation (RR-1546) echoes matters raised within the Council's Written Representation (REP1-042) and Local Impact Report (REP1A-001). The Council wishes to be kept informed of any actions taken by the Applicant to address the UKHSA concerns, particularly regarding the assessment of health impacts, noting the Applicant's responses to the comments made that are set out in this document (REP1-027).

2.27. [REP1-028 Relationship between the Development Consent Order Process and the Airspace Change Process \[TR020001/APP/8.32\]](#)

2.27.1. The Council has reviewed this document and notes the Applicant's reference to changes in airspace not being a factor leading to the refusal of other airport proposals since 2017. The Council notes the uncertainty embedded within the sensitivity testing and qualitative conclusions drawn.

2.27.2. The Council's position is that there is sufficient uncertainty regarding airspace change and the consequential implications for changes in the noise climate that the Applicant should continue to address this within the Proposed Development. It is a relevant consideration in the assessment of cumulative effects and the Council does not consider it to be adequately addressed by the Applicant. The Council's Local Impact Report (REP1A-001) and Written Representation (REP1-042) reference the same issue.

2.28. [REP1-069 Hertfordshire County Council \(HCC\), Dacorum Borough Council \(DBC\) and North Herts Council \(NHC\) Written Representation](#)

2.28.1. HCC, DBC and NHC include requests for further discussions to minimise potential adverse impacts relating to noise, sleep disturbances and air quality. This is presented in the context of an absence of mitigation proposed by the Applicant to address the significant impacts identified on the mental health of residents once the Proposed Development is operational. The Council endorses this as a reflection of good practice in health assessment and has noted the need for fuller consideration of mental health impacts within its Local Impact Report (REP1A-001) and Written Representation (REP1-042).

2.29. REP1-125 Pitstone Parish Council Written Representation

- 2.29.1. Pitstone Parish Council states opposition to the changes in flight numbers and patterns due to the Proposed Development, asserting that there will be unacceptable noise and pollution issues for the parish residents. The Parish Council references existing noise issues at night and is seeking an expansion of the Applicant's mitigation policies to include additional communities further from the airport. The Council concurs with the need for the Applicant to provide fuller consideration of the noise impacts and, using updated assessment evidence, secure appropriate mitigation – this is expressed within the Council's Written Representation (REP1-042).

2.30. REP1A-002 Central Bedfordshire Council Deadline 1A submission – Local Impact Reports (LIR)

- 2.30.1. Central Bedfordshire Council cites the importance of accurately assessing the impacts of aircraft noise, which it considers to be most prevalent under the flight paths. This requirement for accurate assessment is a view shared by the Council and links to the comments made by the Council in relation to the Applicant's position set out in REP1-028.
- 2.30.2. Central Bedfordshire Council is seeking inclusion of the Joint Spatial Needs Assessment (JSNA) for all relevant authorities to be included within the health assessment workstream. The Council supports this and asserts that the Council is one such relevant authority.

3 Summary of Comments on Updated Application Documents

3.1.1. The section provides a summary of the comments of the Council in relation to the updated application documents submitted by the Applicant, where matters of concern to the Council are included.

Table 3-1 Summary of comments on updated Application documents submitted by the Applicant at Deadline 1

Document	Summary of Comments
REP1-001: Cover Letter	This forms the Applicant's covering letter – no comments from the Council.
REP1-002: Guide to the Application	This has been reviewed. No comments from the Council.
REP1-003: Environmental Statement (ES) Chapter 16: Noise and Vibration	The Council has no additional comments. The Council's position remains as expressed within the Local Impact Report (REP1A-001) and Written Representation (REP1-042).
REP1-004: ES Appendix 21.3 Hydrogeological Characterisation Report	This has been reviewed. No comments from the Council.
REP1-005 – REP1-011 inclusive: Green Horizons Park Additional Information	These have been reviewed. No comments from the Council
REP1-012: commentary on overarching Aviation Noise Policy Statement	The Noise Envelope was not secured by the GCG Framework but is a requirement of policy, contrary to the Applicant's assertion at 3.1.8. The Council reiterates that the Noise Envelope should be kept integral to the GCG Framework but remain independent. The Council is not yet able to agree to the Applicant's assertion that social and health implications are suitably addressed. The issue relates to unresolved reservations on the application of the GCG Framework, as expressed in the Council's Written Representation (REP1-042) and Local Impact Report (REP1A-001).
REP1-013: Applicant's Post Hearing Submission – Preliminary Meeting	Confirmation that the Applicant is on track to deliver transport modelling outputs by December 2023 is noted. The Council reserves its position in relation to the assertion of the Applicant at 4.1 that it 'does not expect the updated traffic modelling to result in any materially new or different environmental effects' – the Council's position on this matter is set out in the Written Representation (REP1-042) and Local Impact Report (REP1A-001).

Document	Summary of Comments
	Should an issue specific hearing be convened relating to the updated traffic modelling, the Council would wish to be involved.
REP1-014: Applicant's Post Hearing Submission – Open Floor Hearing 1 and 2	This has been reviewed. No comments from the Council.
REP1-015: Errata Report	This has been reviewed. No comments from the Council.
REP1-016: 8.27 Flight and Passenger Information	This has been reviewed. No comments from the Council.
REP1-017: 8.28 Environmental Improvement Plan Interim Target for PM2.5 commentary	Conclusions not accepted by The Council. Findings require review following analysis of updated traffic data. The Council welcomes the Applicant's commitment to include the interim target for PM2.5 of 12µg/m ³ from the EIP into the GCG limits and thresholds.
REP1-018: 8.29 Role and Responsibilities of Luton Borough Council	The Council welcomes the clarification provided in this document. The Council Written Representation (REP1-042) and Local Impact Report (REP1A-001) both include queries relating to the way in which Luton Borough Council will act in relation to the Environmental Scrutiny Group and Green Controlled Growth Framework – this additional information should be provided within the relevant DCO documents to ensure clarity on this matter.
REP1-019: 8.30 Trip Distribution Plans	Plans indicate impacts on the Buckinghamshire network, notably the B488/B489 access route. The Council is seeking mitigation of these Proposed Development impacts at the B488/B489. The Council requires quantitative data on flows across Buckinghamshire, based on updated traffic model validated for application to the Buckinghamshire network, to the satisfaction of the Council's technical officers.
REP1-020: 8.31 Applicant's response to Relevant Representations Part 1 of 4	This has been reviewed. No comments from the Council.
REP1-021: 8.31 Applicant's response to Relevant Representations Part 2A of 4	The Council notes the content of this document. It is not accepted by the Council. The Council's position has been further developed since the submission of this document by the Applicant. The Council's Local Impact Report (REP1A-001) and Written Representation (REP1-042) provide the current position of the Council. The ExA is advised to refer to the SoCG between the Council and the Applicant for the latest expression of issues relating to the

Document	Summary of Comments
	Council's Relevant Representation and PADSS (1 st iteration) – the majority remain ongoing.
REP1-022: 8.31 Applicant's response to Relevant Representations Part 2B of 4	This has been reviewed. No comments from the Council.
REP1-023: 8.31 Applicant's response to Relevant Representations Part 2C of 4	This has been reviewed. No comments from the Council.
REP1-024: 8.31 Applicant's response to Relevant Representations Part 2D of 4	This has been reviewed. No comments from the Council.
REP1-025: 8.31 Applicant's response to Relevant Representations Part 2E of 4	This has been reviewed. No comments from the Council.
REP1-026: 8.31 Applicant's response to Relevant Representations Part 3 of 4	This has been reviewed. No comments from the Council.
REP1-027: 8.31 Applicant's response to Relevant Representations Part 4 of 4	The content of this submission is noted. The Council has a particular interest in the way in which the Applicant fulfils its intentions, as stated in this document, in relation to the matters raised by the UKHSA (within its relevant representation (RR-1546)) regarding the way in which air quality and noise assessment findings are used to inform the assessment of health impacts. This is on the basis that the UKHSA relevant representation (RR-1546) echoes matters raised within the Council's Written Representation (REP1-042) and Local Impact Report (REP1A-001). The Council wishes to be kept informed of any actions taken by the Applicant to address the UKHSA concerns, particularly regarding the assessment of health impacts, noting the Applicant responses to the comments made that are set out in this document (REP1-027).
REP1-028: Relationship between the DCO	The Council notes the content of this document. The Council's position is that there is sufficient uncertainty regarding airspace change and the consequential implications for

Document	Summary of Comments
Process and the Airspace Change Process	changes in the noise climate that the Applicant should continue address this within the Proposed Development. It is a relevant consideration in the assessment of cumulative effects.