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## London Luton Airport Expansion

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8.39 Applicant's response to Written Representations Part 1a members of the public and businesses (Thematic)

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.39



#### **The Planning Act 2008**

The Infrastructure Planning (Examination Procedure) Rules 2010

## London Luton Airport Expansion Development Consent Order 202x

# 8.39 APPLICANT'S RESPONSE TO WRITTEN REPRESENTATIONS – PART 1A MEMBERS OF THE PUBLIC AND BUSINESSES (THEMATIC)

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#### 1 INTRODUCTION

#### 1.1 Purpose of this document

- 1.1.1 This document has been prepared by Luton Rising (a trading name of London Luton Airport Limited) ('the Applicant') for submission to the Examining Authority (ExA). It provides the Applicant's response to the Written Representations submitted to the ExA by Interested Parties following the notification of acceptance of the London Luton Airport Expansion Development Consent Order (DCO) Application.
- 1.1.2 In total, 91 Written Representations (including additional submissions accepted by the ExA) were submitted to the ExA and were published by the ExA on the National Infrastructure Planning Project Webpage.

#### 1.2 Structure of this document

- 1.2.1 The Applicant has reviewed the Written Representations and has identified topics that have regularly been raised by Interested Parties regarding the Proposed Development.
- 1.2.2 An Interested Party is any member of the public who has made a Relevant Representation, and all Interested Parties were invited to make further Written Representations and can take part in the Examination at hearings. Under section 102 of the Planning Act 2008, an Interested Party includes: persons with an interest in relevant land who have been notified of the acceptance of the application under section 56(2)(d); the local authorities where the land for development is located; persons who have made Relevant Representations about the application to the ExA (as explained above); and, if they notify the ExA, local authorities adjacent to the authority in which the development is located, other statutory parties (Ref 1) and other persons who have requested and have been granted by the ExA, Interested Party status.
- 1.2.3 The Applicant has not provided direct responses to each individual Written Representation, rather Table 2.1 (in section 2) identify key issues on a thematic basis and provide a response to these issues, while also identifying the Interested Parties who have raised them. Where specific matters are considered to have been previously addressed in the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020], the Applicant has signposted the reader to the relevant response.
- 1.2.4 It is recognised by the Applicant that some Interested Parties have raised matters that are more specific in nature, particularly amongst those submitted by Affected Persons or Statutory Parties, or by other Interested Parties with which the Applicant is already engaged in discussions, such as through a Statement of Common Ground (SoCG). As a result, the Applicant has set out detailed responses to individual issues raised through the Written Representations made by such Interested Parties in Part 1b to Part 5 of the Applicant's response to Written Representations made at Deadline 1.
- 1.2.5 One additional representation has been accepted by the Planning Inspectorate and the Applicant's response can be found in Table 7.1 of section 7 (in **The**

### Applicant's Response to Written Representations – Part 5 of 5 [TR020001/APP/8.39]).

- 1.2.6 **Appendix A** comprises of a comprehensive response to the Written Representation made by the New Economics Foundation [REP1-115].
- 1.2.7 This document is structured as follows:
  - a. Section 1 Introduction.
  - Section 2 Response to issues raised by members of the public/businesses based on common topics raised in Written Representations.
  - c. Section 3 Responses to issues raised by members of the public/businesses, presented as verbatim text taken from the Written Representations on a topic-by-topic basis.
  - d. Section 4 Responses to issues raised by Interested Parties subject to a Statement of Common Ground, presented as verbatim text taken from the Written Representations on a topic-by-topic basis.
  - Section 5 Responses to issues raised by Affected Persons, presented as verbatim text taken from the Written Representations on a topic-bytopic basis.
  - f. Section 6 Responses to issues raised by Non-statutory Organisations, presented as verbatim text taken from the Written Representations on a topic-by-topic basis.
  - g. Section 7 Responses to issues raised by Other Statutory Organisations presented as verbatim text taken from the Written Representations on a topic-by-topic basis.
  - h. Section 8 responses to additional submissions accepted at the discretion of the Examining Authority.

## 2 RESPONSE TO WRITTEN REPRESENTATIONS MADE BY MEMBERS OF THE PUBLIC AND BUSINESSES

Table 2.1: Response to Written Representations made by members of the public/businesses

Examination Library Reference	Summary Sentence	Luton Rising's Response
Air Quality		
REP1-087 REP1-049 REP1-052 REP1-056 REP1-139 REP1-033 REP1-137	Concern that the Proposed Development will result in increased levels of air pollution, which will have a detrimental impact on the health and wellbeing of local communities. Some respondents were concerned that the Proposed Development will lead to worsening of exposure to aviation fuel.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 8-10, in response to RR-0277 and others.
REP1-135 REP1-139 REP1-104 REP1-141 REP1-055 REP1-138 REP1-124 REP1-065 REP1-082 REP1-037 REP1-033	Concern that the Proposed Development will lead to increased levels of air pollution and an overall degradation of air quality.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 5-8, in response to RR-1441 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-137 REP1-169 REP1-050 REP1-080		
REP1-061	Suggest that more should be done to mitigate air pollution impacts from the Proposed Development and improve overall air quality.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 18-20, in response to RR-0949.
REP1-074	Concern that the Proposed Development will lead to increased air pollution with adverse impacts on local habitats and wildlife. Some respondents particularly noted the negative impacts of Kerosene pollution.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 14-15, in response to RR-0815 and others.
		The Applicant considers that the issue raised regarding the odour impacts (including kerosine smells), was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 9, in response to RR-06277 and others. No significant impacts have been predicted in relation to odour effects.
		Volatile Organic Compounds (VOCs) monitoring was carried out by the project to determine the baseline for pollutants such as kerosene. All concentrations as well below the relevant objectives.
REP1-130	Concern that air quality monitoring is not currently being undertaken or is not being undertaken to a satisfactory standard covering all relevant pollutants across a wider geographical area.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 12-14, in response to RR-0090 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-059 REP1-033	Concern that the Proposed Development will result in more road traffic accessing the airport and increased congestion in neighbouring towns/villages, which will increase air pollution locally.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 17-18, in response to RR-0794 and others.
REP1-052 REP1-108 REP1-077 REP1-107	Concern that the current operation of the Airport already has negative impacts on air quality, and that the Proposed Development would further worsen this.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 4-5, in response to RR-1441 and others.
REP1-133	Concern that the negative impacts to air quality from the Proposed Development outweigh the benefits identified.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 18, in response to RR-0465 and others.
Biodiversity		
REP1-079 REP1-033 REP1-108 REP1-141 REP1-055 REP1-138 REP1-124 REP1-082 REP1-120 REP1-169	Concern that the Proposed Development will have negative impacts on natural habitats and wildlife. Some respondents raised concern about the length of time that it will take for the natural environment to recover from these impacts.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 21-22, in response to RR-0634 and others.
REP1-079	Suggest that greater steps should be taken to protect existing habitats and eco-systems.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant</b>

Examination Library Reference	Summary Sentence	Luton Rising's Response
		Representations Part 1 of 4 [REP1-020] page 22, in response to RR-1422.
Climate Chang	ge	
REP1-134 REP1-104 REP1-103 REP1-126 REP1-079 REP1-055 REP1-138 REP1-133 REP1-137 REP1-169 REP1-050	Respondents are concerned that the following agreements, targets and legislation will not be met; UK Carbon Budget, Net-Zero goals, carbon neutral policies, green policies, COP26 agreements, Climate Change Committee advice, LBC obligations, and declarations of government and Local Authority Climate Emergencies.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 28-30, in response to RR-0803 and others.
REP1-139 REP1-056	Concern that the Applicant will not be able to meet emissions targets as they only have limited control over its carbon emissions, the majority of which comes from planes operated by airlines.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 22, in response to RR-1422.
REP1-139 REP1-087 REP1-130 REP1-140 REP1-080 REP1-054 REP1-121 REP1-124	Concern that air travel is unsustainable and that aviation growth is irresponsible in light of the climate crisis and the sector's lack of social, economic and environmental integrity.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 23-25, in response to RR-0520 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-082 REP1-037 REP1-107		
REP1-141	Concern that the Proposed Development will accelerate global extinction events and have a negative impact on wildlife worldwide.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 26-27, in response to RR-0277 and others.
REP1-059 REP1-108	General concern that the Proposed Development, throughout its construction and operation, will increase the volume of emissions produced by the airport.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 32-33, in response to RR-0160 and others.
REP1-150 REP1-056 REP1-117	Concern that the Proposed Development will prevent or slow the Applicant, as well as society more broadly, in meeting climate change reduction targets set at a national and international scale.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 22, in response to RR-1422.
REP1-150 REP1-140	General concern that the Proposed Development is accelerating environmental degradation and will cause irreparable negative impacts beyond the local area.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 31, in response to RR-0550 and others.
REP1-055 REP1-108 REP1-077 REP1-140 REP1-133 REP1-033 REP1-080	Concern that the Proposed Development, at the construction and operational phase, will contribute towards climate change, cause damage to the environment and move society closer to a climate emergency by exacerbating global warming.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 30, in response to RR-0508 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-140	Suggest the Applicant reduces the carbon footprint of the airport and its operations. Some respondents noted initiatives such as bans on short haul flights in France.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 33-36, in response to RR-0833 and others.
REP1-050	Concern that the Proposed Development goes against the advice of the Intergovernmental Panel on Climate Change to combat the progression of climate change.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 37-38, in response to RR-0815 and others.
Compensation	n	
REP1-087 REP1-086 REP1-102 REP1-140 REP1-138 REP1-124 REP1-033	Concern that compensation schemes cover both an insufficient area and insufficient impacts.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 41-42, in response to RR-0839 and others.
REP1-087 REP1-074 REP1-081 REP1-033	Concern that the noise insulation schemes are only effective when indoors with windows shut, and is ineffective when windows are open, when in the garden or outside.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 46-47, in response to RR-0608 and others.
REP1-126 REP1-108 REP1-086 REP1-052 REP1-138 REP1-035	Concern that the compensation schemes are inadequate or ineffective in mitigating the impacts felt by the local community as a result of the Proposed Development.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 41, in response to RR-0833 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-102	Concern that compensation proposals do not include enough detail or are unclear.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 46, in response to RR-0962 and others.
REP1-102	Concern that the noise insulation schemes provide insufficient funds to cover the full cost of insulating homes.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 42-43, in response to RR-0845 and others.
REP1-102	Suggest that the property and land acquisition proposals, compensation proposals and noise insulation scheme should cover a wider area and wider impacts.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 45, in response to RR-0839 and others.
REP1-102 REP1-052 REP1-107	Residents living close to the airport are concerned that the Proposed Development will result in a loss of value to their properties, particularly due to noise and disturbance from aircraft.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 43-44, in response to RR-1142 and others.
REP1-035	Concerns with the eligibility of the noise insulation schemes.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 45, in response to RR-0102 and others.
Construction		
REP1-138	Concern that the construction of the Proposed Development will have adverse impacts on local communities, impact local roads, the environment and ecology, as well as causing significant disruption to local residents and businesses over a long period of time.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 51-53, in response to RR-0118 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
Consultation	and Stakeholder Engagement	
REP1-075 REP1-032	Concern regarding the consultation carried out on AD6 airspace change.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 61, in response to RR-0263 and others.
REP1-150 REP1-032 REP1-082	Concern regarding the lack of consultation and engagement with previous comments on the Proposed Development being ignored.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 59, in response to RR-1442 and others.
REP1-045 REP1-044	Concern that the DCO application documents are excessive and too technical.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 59-60, in response to RR-0103 and others.
Design		
REP1-054	Concern that proposals do not address existing negative aspects of passenger experience at the airport, including long queues, overcrowding and lack of seating and this will get worse as a result of the Proposed Development.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 63-64, in response to RR-0104 and others.
Fleetmix		
REP1-130 REP1-126 REP1-117 REP1-133 REP1-082 REP1-033	Concern that the transition to a quieter/fuel-efficient fleet and use of Sustainable Aviation Fuel will not occur fast enough and/or the technology does not yet exist. Some respondents felt that the new technology would be ineffective.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 70, in response to RR-0135 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-035 REP1-137 REP1-150 REP1-108 REP1-045 REP1-055		
REP1-126 REP1-150 REP1-077 REP1-140	Suggest that expansion should not take place until new and/or fuel-efficient aircraft technology is available.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 70, in response to RR-0135, RR-0094 and others.
REP1-055	Concern that there is a lack of commitment and/or financial investment in new sustainable aircraft technology.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 72, in response to RR-0148 and others
REP1-124 REP1-033 REP1-035 REP1-050	Concern that the Applicant has no control over the transition to a quieter/fuel-efficient fleet mix and/or no measures are being taken to ensure the uptake of quieter/fuel-efficient fleet mix. Some respondents raised concern regarding the uptake of the new A321neo aircraft and it failing to reduce noise pollution.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 72, in response to RR-0148 and others.  Some variants of the A321Neo are slightly noisier than expected, but not more than older generation aircraft. This is considered in the noise assessments, which are discussed further in Chapter 16 Noise and Vibration of the ES [AS-080].
Flightpath		
REP1-136	Concern about the impact of flight paths over towns and villages.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant</b>

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-140 REP1-080 REP1-104		Representations Part 1 of 4 [REP1-020] page 75-76, in response to RR-0133 and others.
REP1-031 REP1-150 REP1-082 REP1-050	Concern about the continuing impact of concentrated flight paths.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 74-75, in response to RR-0101 and others.
REP1-104 REP1-130	Concern that there is a lack of information on flight paths.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 80, in response to RR-0628 and others.
REP1-130 REP1-150 REP1-075 REP1-052	Concern that aircraft altitude is too low, particularly on landing and/or take-off.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 76, in response to RR-1208 and others.
REP1-150	Concern about an increase in concentrated flights in the early mornings and late evenings.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 74, in response to RR-0196 and others.
REP1-136 REP1-045	Concern that future flight paths are unknown as airspace redesign is underway and the Applicant has no control over airspace redesign.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 78, in response to RR-0934 and others.
REP1-032	Concern regarding impact of flightpaths as a result of airspace changes.	This concern is noted. Any changes to future flight paths is the subject of a future airspace change process being

Examination Library Reference	Summary Sentence	Luton Rising's Response
		sponsored by Government and which will be subject to a separate consultation exercise by LLAOL in accordance with CAA procedure as set out in CAP1616, in due course.
REP1-032	Suggest a comparison of projected air traffic volume with the known impact of AD6 airspace change.	The changes due to AD6 were taken into account in the assessment of the expected future noise levels based on the number of aircraft movements projected.
REP1-045	Support airspace redesign and/or current flightpath changes. With some respondents citing that this will allow steeper climb and reduce noise.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 79, in response to RR-1004 and others.
REP1-136	Suggest there should be no expansion until airspace change has been approved and steeper climb rates are introduced.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 80, in response to RR-1260 and others.
REP1-075 REP1-150	Suggest a change in flight paths.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 79, in response to RR-0770 and others.
REP1-117	Concern that airlines do not adhere to flight paths.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 78, in response to RR-0932 and others.
REP1-117 REP1-140	Concern that the Proposed Development will result in more air traffic as there will be an increase in turn rounds.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 78-79, in response to RR-0793 and others.

8.39 Applicant's Response to Written Representation made at Deadline 1

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-082	Concern about the impact of flightpaths over the Chilterns AONB and protected landscapes.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 77-78, in response to RR-1021 and others.
REP1-082 REP1-104	Concern that there will be an increase in flights, including night flights.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 76-77, in response to RR-0196 and others.
General		
REP1-139 REP1-104 REP1-031 REP1-130 REP1-141 REP1-059 REP1-087 REP1-074 REP1-075 REP1-075 REP1-121 REP1-121 REP1-121 REP1-124 REP1-065 REP1-082 REP1-083	General opposition to the Proposed Development.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 81-83, in response to RR-0277 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-120		
REP1-108		
REP1-077		
REP1-086		
REP1-102		
REP1-140		
REP1-056		
REP1-033		
REP1-137		
REP1-050		
REP1-080		
REP1-062	General support for the Proposed Development.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 83-84, in response to RR-0504 and others.
<b>Green Contro</b>	lled Growth	
REP1-130	Concern that Green Controlled Growth limits will	The Applicant considers that the issue raised was
REP1-117	amount to greenwashing as it cannot control or	answered within the Applicant's Response to Relevant
REP1-054	mitigate carbon emissions associated with aircraft use.	<b>Representations Part 1 of 4 [REP1-020]</b> page 83-84, in response to RR-0504 and others.
REP1-050	Concern that GCG noise levels will not be met as the Applicant has failed to adhere to previous/existing noise levels.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 85-86, in response to RR-0908 and others.
Light Pollution	n	

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-074 REP1-140 REP1-117	Concern that the Proposed Development will create more light pollution.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 108-109, in response to RR-0558 and others.
Local Environ	ment	
REP1-141 REP1-124	Concern that proposals to protect the environment are inadequate.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 101, in response to RR-1060 and others.
REP1-079	Concern that the Proposed Development will lead to the destruction of a designated County Wildlife Site.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 124-125, in response to RR-1097 and others.
REP1-079	Concern that the Proposed Development will result in the loss of green space in the local area, with adverse impacts on natural habitats, species and biodiversity. Some respondents raised concern over the length of time to establish sufficient replacement green space.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 126-128, in response to RR-0767 and others.
REP1-033	Concern that the proposals to mitigate impacts to the environment will not be properly implemented or managed.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 102, in response to RR-1200 and others.
Waste		
REP1-059	Concern raised over the waste management measures of the Proposed Development, with queries on where waste material, including excavated materials, will be disposed of.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant</b>

Examination Library Reference	Summary Sentence	Luton Rising's Response
		Representations Part 1 of 4 [REP1-020] page 116-117, in response to RR-0755 and others.
Wigmore Valle	ey Park, Green Belt and Open Space	
REP1-135 REP1-082 REP1-107	Objection to the Proposed Development resulting in the loss of the existing park.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 117-118, in response to RR-0092 and others.
REP1-079	Concerns that Wigmore Valley Park is located on an old landfill site, which contains contaminated land, and has the potential to be hazardous.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 118-120, in response to RR-0634 and others.
REP1-079 REP1-140	The existing Wigmore Valley Park provides a buffer between residential areas and the Proposed Development will destroy this buffer, impacting the local community through air quality, noise, and pollution.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 118, in response to RR-1201 and others.
REP1-033	Concerns that Wigmore Valley Park is being relocated to agricultural land, which should be preserved for food production due to current pressures on food resources and food security.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 123-124, in response to RR-0558 and others.
REP1-138	Concern that the open space and landscaping proposals are greenwashing.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 120-121, in response to RR-0557 and others
Water Resources and Flood Risk		
REP1-079	Concern regarding the disruption of important chalk aquifers which feed into the River Mimram.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant</b>

Examination Library Reference	Summary Sentence	Luton Rising's Response
		Representations Part 1 of 4 [REP1-020] page 115, in response to RR-0062 and others.
REP1-117	Concern that the Proposed Development will increase the risk of flooding in the local area which is already prone to floods.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 124-125, in response to RR-1097 and others.
REP1-056	Concern that the Proposed Development will have overall negative impacts on the environment, regardless of mitigation plans.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 100-101, in response to RR-0505 and others.
Local Commu	nities	
REP1-044 REP1-049 REP1-122 REP1-140 REP1-052 REP1-032 REP1-050	Concern that the Proposed Development will cause harm to the physical and mental health of residents living near to the Airport, leading to a reduced quality of life. Particular reference was made to the impact on children under 16, older people, babies, pregnant women and foetuses, and ethnic groups.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 109-111, in response to RR-0470 and others.  Chapter 13 Health and Community of the Environmental Statement (ES) [APP-039] considers the potential for an inequitable distribution of effects on 'vulnerable groups'. Vulnerable groups are identified in Section 13.7 and disproportionate or differential effects on vulnerable groups are considered within the assessment in Section 13.9 of Chapter 13.
REP1-104 REP1-033 REP1-108	The economic benefits of the Proposed Development are significantly outweighed by the negative social and environmental impacts that will be caused to the local community.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 108, in response to RR-0122 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-104 REP1-130 REP1-059 REP1-055 REP1-121 REP1-124 REP1-045 REP1-108 REP1-102 REP1-169	Concern that the Proposed Development would be at the expense of the local communities living near to the Airport. Their quality of life, businesses and enjoyment of the local area will be negatively affected by the proposals, including through noise pollution and traffic disturbance. Some were also concerned that the construction of the Proposed Development will have adverse impacts on local communities, the environment and ecology, as well as causing significant disruption.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 104-106, in response to RR-0533 and others.
Need Case		
REP1-134 REP1-126 REP1-108	Concern that climate change awareness will remove or reduce the demand for air travel. Respondents believe that more people will choose to fly less for environmental reasons.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 129, in response to RR-0511 and others.
REP1-134 REP1-074	Concern that passenger demand for air travel will reduce due to alternate means of travel.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 129-130, in response to RR-0076 and others.
REP1-031 REP1-124	Concern that the scale of the Proposed Development is too large.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 135, in response to RR-0615 and others.
REP1-103 REP1-056	Concern that capacity for growth is already covered by expansion at other airports in the south of England and beyond. Some are concerned that	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant</b>

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-050	other airports are better placed to accommodate growth.	Representations Part 1 of 4 [REP1-020] page 129, in response to RR-0568 and others.
REP1-103 REP1-150 REP1-108 REP1-117	Concern that the Proposed Development is profit driven.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 134, in response to RR-1469 and others.
REP1-135 REP1-121 REP1-124 REP1-037 REP1-080	Respondents suggest that there needs to be a reduction in air travel to reduce environmental harm.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 140, in response to RR-1351 and others.
REP1-074 REP1-049	Concern that Luton is an unsuitable location for an airport expansion. Respondents are concerned that the application site is too close to residential areas.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 130, in response to RR-0562 and others.
REP1-074 REP1-120 REP1-137 REP1-169 REP1-050	Concern that the general impacts of the Proposed Development will outweigh the forecasted economic benefits.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 137, in response to RR-0914 and others.
REP1-107	Concern that the new jobs created by the Proposed Development will not serve the needs of the unemployed in Luton.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 138-139, in response to RR-0772 and others.
REP1-126 REP1-138	Concern that there are no economic benefits from the Proposed Development with regards to jobs	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant</b>

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-033 REP1-137	and/or the economy, or that any benefits are limited or overstated.	Representations Part 1 of 4 [REP1-020] page 139-140, in response to RR-1020 and others.
REP1-126	Concern that the need case for expansion is incompatible with the Government's levelling up agenda.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 137, in response to RR-0743.
REP1-150	Concern regarding the poor financial track record of LBC, which respondents believe should result in the Proposed Development not going ahead.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 136, in response to RR-0932 and others.
REP1-150 REP1-124 REP1-056 REP1-054	Concern that the demand forecasts are inaccurate, uncertain, out-of-date, based on pre-pandemic data, based on a lack of evidence or have been overestimated or manufactured by the Applicant – which does not justify the development going ahead. Some are concerned that the demand forecast has not taken account of the cumulative impacts of Brexit, the Covid-19 pandemic, war in Europe, the cost of living crisis, the increased use of digital technology and video-conferencing and increasing concerns about climate change – factors which will remove or reduce the demand for air travel.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 132-134, in response to RR-0511 and others.
REP1-124 REP1-108	Concern that the Proposed Development is unnecessary.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 134-135, in response to RR-0550 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-124	Consider that money should be better spent to serve local communities.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 130-131, in response to RR-0550 and others.
REP1-133	Support towards the benefits that the Proposed Development will bring to the local community.	Noted.
REP1-133 REP1-082	Support the Proposed Development's contribution to the economy and the creation of more jobs.	Noted.
REP1-133 REP1-033	Suggestion that the economic benefits of the Proposed Development could be realised without expanding the airport.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 140-141, in response to RR-1469 and others.
REP1-120 REP1-044 REP1-102	Suggest that there should be a ban on night flights.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 140, in response to RR-0611 and others.
REP1-086	Concern that a large proportion of flights are private jets and by nature are net exporters of wealth overseas and therefore question the wider economic benefits to the domestic economy.	Business aviation flights are mainly for company business or by high net worth individuals. The availability of such flights is important to ensure that such business and high net worth individuals continue to live, invest in and visit the UK. As such they make a substantial contribution to the economy of the UK. No increase in such flights is proposed as part of the Proposed Development.
REP1-054	Concern that the Proposed Development will primarily provide low-skilled and low-paid jobs.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant</b>

Examination Library Reference	Summary Sentence	Luton Rising's Response
		Representations Part 1 of 4 [REP1-020] page 139, in response to RR-1255 and others.
Noise and Vib	ration	
REP1-139 REP1-104 REP1-059 REP1-075 REP1-075 REP1-138 REP1-124 REP1-065 REP1-045 REP1-044 REP1-033 REP1-122 REP1-140 REP1-137 REP1-030	Concern about the impact of future increases in levels of noise as a result of the Proposed Development.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 147-150, in response to RR-0520 and others.
REP1-139 REP1-104 REP1-130 REP1-141 REP1-129 REP1-074	Concern about the impact of increased noise on health and well-being. With some respondents concerned about the detrimental impact of noise on quality of sleep and health due to night flights.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 150-153, in response to RR-1140 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-075		
REP1-138		
REP1-117		
REP1-124		
REP1-065		
REP1-082		
REP1-044		
REP1-140		
REP1-056		
REP1-033		
REP1-137		
REP1-169		
REP1-050		
REP1-031	Consider existing noise pollution and/or vibration	The Applicant considers that the issue raised was
REP1-059		answered within the Applicant's Response to Relevant
REP1-136	caused by aircrafts (day and highl).	
		in response to KK-0400 and others.
REP1-077 REP1-108 REP1-086 REP1-102 REP1-140 REP1-056 REP1-033 REP1-137 REP1-169 REP1-050 REP1-050	Consider existing noise pollution and/or vibration from the airport to be too high, including noise caused by aircrafts (day and night).	

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-075 REP1-107		
REP1-031 REP1-082	Concern about the impact of noise on habitats and/or wildlife. Some respondents cited specific concerns about the impact of noise on the tranquillity of areas such as Chilterns AONB, SSSIs and SACs.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 153, in response to RR-1140 and others.
REP1-141 REP1-136 REP1-074 REP1-126 REP1-075 REP1-150 REP1-117 REP1-082 REP1-137 REP1-050	Concern about the impact of noise on local communities and/or residential areas and the surrounding countryside.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 154, in response to RR-1073 and others.
REP1-075 REP1-032	Concern regarding increase noise as a result of the AD6 airspace change.	The changes due to AD6 were taken into account in the assessment of the expected future noise levels based on the number of aircraft movements projected.
REP1-075 REP1-150 REP1-045	Concern about the cumulative noise impact of flights from Heathrow, Stansted and Luton.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 170, in response to RR-1231 and others.
REP1-103 REP1-136	Concern that the noise monitoring and modelling is inaccurate and/or not comprehensive.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant</b>

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-074 REP1-075 REP1-150 REP1-082 REP1-045 REP1-140 REP1-035 REP1-032 REP1-056		Representations Part 1 of 4 [REP1-020] page 162, in response to RR-0511 and others.
REP1-136 REP1-045 REP1-056	Consider the noise envelope to be an ineffective method of mitigating against the impact of noise.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 170, in response to RR-0422 and others.
REP1-141	Suggest noise mitigation. Such as the erection of noise barriers around the Airport.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 162-163 in response to RR-1140 and others.  The Proposed Development includes an acoustic barrier at the airport perimeter to mitigate the effects of aircraft noise on the ground.
REP1-141 REP1-150	Suggest that the Applicant demonstrates reduction in noise prior to expanding.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 165, in response to RR-0960 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-136	Suggest reducing current noise levels and abiding by existing noise limits rather than minimising increases in noise.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 165-166, in response to RR-1496 and others.
REP1-150	Concern that the Applicant continues to ignore complaints and/or denies that there is an impact of noise from the Airport.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 155-156, in response to RR-0785 and others.
REP1-117 REP1-124 REP1-045 REP1-140 REP1-050	Concern that the Applicant continues to breach noise conditions/limits without enforcement action being taken.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 155, in response to RR-0551 and others.
REP1-045 REP1-044 REP1-033	Concern that proposed noise mitigation will be ineffective.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 160-162, in response to RR-0931 and others.
REP1-032 REP1-056	Suggest more noise monitoring, particularly at night and covering wider geographical area.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 164-165, in response to RR-1093 and others.
REP1-050	Suggest that an independent body monitors noise from the Airport.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 171, in response to RR-1259.
Planning		

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-134 REP1-169	Concern that there will be a negative impact from the population growth resulting from the Proposed Development.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 173-174, in response to RR-0128.
REP1-141 REP1-059 REP1-150 REP1-117 REP1-045 REP1-056 REP1-050	Concern that the Applicant has historically not delivered on previous commitments made, including those in planning conditions and/or there is a lack of trust in the Applicant.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 175-177, in response to RR-0011.
REP1-150 REP1-117 REP1-124 REP1-056 REP1-050	Concern that there is a conflict of interest between LBC's ownership role and role as the Local Planning Authority. Some respondents cite that LBC would not oppose the Proposed Development as they receive economic benefits from the Airport's operation and/or do not take enforcement action due to the revenue the Airport brings.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 171, in response to RR-1259.
REP1-117	Concern that complaints continue to not be addressed by the Applicant and/or airport operator.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 175, in response to RR-0207 and others.
Surface Acces	ss	
REP1-134 REP1-130 REP1-138 REP1-117	Concern regarding the surface access proposals, including those related to the highways network. Some are concerned that the Proposed Development will impact local people through increased congestion, traffic accidents, parking	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 181-184, in response to RR-0512 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-120 REP1-108 REP1-077 REP1-140 REP1-052 REP1-054 REP1-050 REP1-102 REP1-083 REP1-059 REP1-052	issues for residents, impact on schools and safety, longer journey times because of traffic light proposals and rat running through residential areas. Others are concerned that accessing the Airport via car will remain the preferable mode due to its convenience.	
REP1-128	Concern that the Transport Strategy would not be delivered.	The Applicant considers that the issue raised was answered within the Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020] page 195-196, in response to RR-0103.
REP1-121	Suggestions of improvements to rail networks, including through prioritising rail in accessing the Airport.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 203, in response to RR-1020 and others.
REP1-117 REP1-140 REP1-107	Consider existing traffic and congestion to be too high without the Proposed Development.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 190-192, in response to RR-1106 and others.
REP1-124 REP1-169 REP1-080	Concerns that construction of the Proposed Development will create additional traffic and congestion, exacerbating existing problems.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 186-188, in response to RR-0093 and others.

Examination Library Reference	Summary Sentence	Luton Rising's Response
REP1-083	General concerns with car parking proposals. Concerns that car parking proposals will increase Airport users parking on residential streets, through high cost and lack of spaces.	The Applicant considers that the issue raised was answered within the <b>Applicant's Response to Relevant Representations Part 1 of 4 [REP1-020]</b> page 185-186, in response to RR-1028 and others.

#### **REFERENCES**

Ref 1 Department for Communities and Local Government, 2015, Planning Act 2008: Guidance for the examination of applications for development consent.