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London Luton Airport Expansion

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8.37 Applicant's Comments on Local Impact Reports (Buckinghamshire Council)

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.37

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

**London Luton Airport Expansion Development Consent
Order 202x**

**8.37 APPLICANT'S COMMENTS ON LOCAL IMPACT REPORTS
(BUCKINGHAMSHIRE COUNCIL)**

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1 INTRODUCTION

1.1 Purpose of this document

1.1.1 This document sets out the comments of Luton Rising (a trading name of London Luton Airport Limited) ('the Applicant') on the Local Impact Report (LIR) submitted by Buckinghamshire Council (hereafter referred to as 'the Council') to the Examination of the London Luton Airport Expansion application for development consent. The following LIRs were submitted to the Examining Authority (ExA) at Deadline 1A of the Examination on 25 August 2023:

- a. Buckinghamshire Council **[REP1A-001]**
- b. Central Bedfordshire Council **[REP1A-002]**
- c. Hertfordshire County Council, Dacorum Council, North Hertfordshire Council **[REP1A-003]**
- d. Luton Borough Council **[REP1A-004]**

1.1.2 This document does not seek to respond to every element of the LIR submitted by the Council, but rather to focus on the pertinent points cited and respond to any important and relevant matters raised. It also seeks to comment on any matters that may require clarification or correction where it may assist the ExA and Interested Parties.

1.2 Structure of this document

1.2.1 For ease of reference, this document is structured in a tabular format which replicates the topic headings within the LIR.

1.2.2 The background to each section provides an overview, detailing the sections of the LIR that the Applicant has commented on, which is followed by the Applicant's comments concerning the details contained within the LIR for each topic.

2 BUCKINGHAMSHIRE COUNCIL

2.1 Background

2.1.1 This section sets out the Applicant's comments on the background provided by the Council which is set out in paragraphs 1.1.1 – 2.3.5 of the LIR **[REP1A-001]**.

2.1.2 In Section 1 (Introduction/Terms of Reference), the Applicant notes the following points made by the Council:

- a. The LIR presents a broad view of the impacts on the local area. In producing the LIR, the Council has not sought the views of local interest groups as to any particular matters that should be reflected in the report.
- b. While the LIR mentions the key issues, it does not provide the detail of the Council's positions on the merits of the application. This detail is presented in the Council's Written Representation (WR).

2.1.3 In Section 2 (The Scheme Context), the Applicant notes the following points made by the Council:

- a. The Council notes that agricultural field margins both to the north-east and south of the Main Application Site are proposed for off-site mitigation planting, and that this land is located within the administrative areas of North Hertfordshire District Council and Central Bedfordshire Council.
- b. No development is proposed within the administrative area of Buckinghamshire Council; however, the Council has identified that the DCO documents acknowledge in a number of locations that there is potential for impacts associated with the Proposed Development within Buckinghamshire including: construction activities; changes in traffic flows and composition; employment opportunities; and from aircraft using flight paths associated with the airport. The Council also identifies that the potential for cumulative impacts to be experienced in Buckinghamshire is also acknowledged by the Applicant.

2.1.4 The Applicant notes Buckinghamshire Council's comments on the need for the scheme and these are addressed in Table 2.1 below.

2.2 Assessment of Local Impacts

2.2.1 The responses to Section 3 (Review of Impacts) are set out in Table 2.1 below. The Applicant has provided a response to the key matters raised under each of the topics within the LIR. These can be found on the following pages:

- a. Climate change and greenhouse gases – pg. 4
- b. Transport and highways – pg. 10
- c. Noise and vibration – pg. 28
- d. Air quality – pg. 36
- e. Economy, Tourism and Employment – pg. 41
- f. Landscape and visual – pg. 47
- g. Heritage – pg. 50
- h. Health and community – pg. 51
- i. Cumulative effects assessment – pg. 67
- j. Draft Development Consent Order – pg. 71

Table 2.1: Response to Buckinghamshire Council's Local Impact Report

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
2.2 Need for the Scheme			
2.2.1-2.3.4	Need Case	<p>There is expected to be strong growth in demand for air travel, with the market recovering to 2019 (pre-COVID 19) levels by around 2024. This growth is expected to continue, and the airport is expected to reach 32 million passengers per annum (mppa) at some point between the years 2042 and 2049. Additional capacity will be required at London Luton Airport if it is to keep pace with this level of projected demand.</p> <p>There is clear government policy support for aviation growth and for airports making best use of their runways, as set out in various national aviation policy documents.</p> <p>The Scheme seeks to expand the current operational airport on a phased basis, including the construction of a new passenger terminal and additional aircraft stands to the north-east of the runway. This will take the overall passenger capacity to 32 million passengers per annum (mppa). In addition to the above and to support the initial increase in demand, the existing infrastructure and supporting facilities will be improved in line with incremental growth in capacity of the airport.</p>	<p>The in principle support for the Need Case [AS-125] is noted, including the demand forecasts. It is accepted that Buckinghamshire has raised areas of concern, and these are responded to below.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>The Council understands Government policy on aviation in the context of the need case for the Scheme. The general principle of the Scheme is understood, and the Council can see some benefits for Buckinghamshire, particularly in respect of economic development and growth. Notwithstanding this, the Council has some concerns about the conclusions drawn relating to the assessment of the potential environmental, sustainability and social impacts of the Scheme on Buckinghamshire. These concerns are set out in this LIR, supported by the Council's WR.</p>	
<p>3.2 Climate Change and Greenhouse Gases</p>			
<p>3.2.3</p>	<p>Greenhouse Gases</p>	<p>The Council is keen to ensure that the inherent uncertainty associated with technological development in the aerospace sector is correctly factored into the assessment of impacts on Climate Change. As described in detail within the WR, the Council believes the Applicant's Greenhouse Gas (GHG) Assessment to be inadequate in relation to this matter. It is reasonable that the Applicant has based its core planning case upon established Government policy as outlined in the Jet Zero Strategy (JZS) (2022). However, the Applicant has failed to reflect the inherent uncertainty of the technological development outlined within the JZS by failing to conduct appropriate sensitivity analyses with respect to the resulting GHG emissions from different air</p>	<p>The Applicant acknowledges the uncertainty associated with the implementation of any future policy, such as the mitigation measures described within the Jet Zero Strategy, transport mitigation measures from the Transport Decarbonisation Plan, or the future decarbonisation trajectory of the UK power grid. These are, however, the stated policies and projections of the UK Government, which bears the ultimate legal responsibility for delivering the UK's 2050 net zero target and interim carbon budgets.</p> <p>Regarding the uncertainty of key technological development of aviation mitigation measures described in the UK Government's Jet Zero</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>traffic movement (ATM) scenarios, even though it has conducted such sensitivity analyses elsewhere within the Application to assess their effect upon other quantities.</p>	<p>Strategy, Inset 12.4 within Section 11 of Chapter 12 Greenhouse Gases of the Environmental Statement [APP-038] presents a graphical summary of how each measure is expected to reduce aviation emissions from the Proposed Development. This inset therefore also shows quantified emissions associated with each of the key technical developments included in the Jet Zero Strategy not being delivered. This is assumed to be the 'sensitivity test' referred to in the comment. Therefore, further sensitivity testing on this issue is not required, it is reported as part of the assessment in this chapter.</p> <p>The chapter also discusses how these assumptions are backed up and controlled by a range of mechanisms, such as the UK Emissions Trading Scheme (UK ETS) and the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) which will control the majority of aviation emissions, and the Green Controlled Growth (GCG) Framework which will control emissions from airport operations and surface access.</p> <p>Regarding sensitivity testing consider as described in Chapter 5 Approach to the Assessment of the Environmental Statement [AS-075], a qualitative approach has been taken and this is described in Table 12.23 within Section 12.9 of Chapter 12 Greenhouse</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			<p>Gasses of the Environmental Statement [APP-038].</p> <p>Inset 12.3, which considers the passenger numbers for the Core Planning Case, Faster Growth and Slower Growth Cases from 2025 to 2050, does not show a quantified GHG trajectory, however, the text in Table 12.23 states that the change in operational GHG emissions would be in line with the passenger number projections demonstrated and small relative to trajectory and budgets. Therefore, quantification of the Faster Growth Case is not required, and the overall conclusion of the assessment would not change.</p>
3.2.4	Planning	<p>The enforcement arrangements proposed by the Applicant would involve the Environmental Scrutiny Group (ESG), which includes Luton Borough Council, recommending the undertaking of enforcement action by the relevant planning authority – also Luton Borough Council. It is observed that Luton Borough Council is also the airport owner, and it is unclear that this potential conflict of interest has been adequately addressed.</p>	<p>At present, the airport is operating under a planning consent granted under the Town and Country Planning Act 1990 (TCPA), with planning reference 12/01400/FUL, as amended by 15/00950/VARCON. Under the TCPA, only the local planning authority can bring enforcement action against the airport operator for breach of a condition in planning permission and there are limited requirements for transparency around the enforcement process.</p> <p>As set out in Section 2.4 of the Green Controlled Growth (GCG) Explanatory Note [APP-217] it is proposed that governance of GCG will be through a new body established through the DCO, the Environmental Scrutiny</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			<p>Group (ESG). Section 2.4 sets out the proposed functions and membership of the ESG, enshrined through Terms of Reference included at Appendix A of the Green Controlled Growth Framework [APP-219]. The ESG will be chaired independently and include independent experts.</p> <p>The GCG process is designed to be self-enforcing in respect of mitigating environmental effects above Limits, with the process designed to require action by the airport operator to address any exceedances of the Limits. However, it is acknowledged that circumstances where the processes set out in the GCG Framework are not followed also need to be considered, and this is set out in Section 2.7 of the GCG Explanatory Note.</p> <p>In addition to the GCG process, and as outlined in Section 2.7, the statutory enforcement regime for DCOs is set out in the Planning Act 2008. This defines the 'relevant planning authority' for the purposes of enforcement action as the planning authority for the area in which the development is situated. This means the 'relevant planning authority' for most of the Proposed Development must be Luton Borough Council. However, Section 2.7 also sets out ways in which other local authorities could bring action under the Planning Act 2008.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			<p>In summary therefore, the GGC proposals are considered to include independent and transparent oversight and scrutiny in response to concerns around the potential conflict of interest of LBC and represent a significant improvement from current processes.</p>
3.2.7	Greenhouse Gases	<p>There is a need to account for uncertainty in the assessment of impacts of technological change in the aerospace sector on GHG emissions. This requires two core sets of actions by the Applicant:</p> <ul style="list-style-type: none"> • The Applicant should quantitatively assess the effect upon GHG emissions of the “Faster Growth Scenario” as set out in the JZS 	<p>The Applicant's response to this issue is provided under 3.2.3 above.</p>
3.2.7	Greenhouse Gases	<p>The Applicant should conduct sensitivity analyses with respect to the effects of the different technological development trajectories that are recognised within the JZS. This should include, as a minimum:</p> <ol style="list-style-type: none"> a) What would be the effect upon cumulative emissions of annualised efficiency improvements that still meet the 2% over the whole period, but where the initial improvements are lower and made up for with accelerated development in the 2040s? b) What if sufficient feedstock is not available to supply the required levels of Sustainable Aviation Fuel (SAF)? 	<p>The Applicant's response to this issue is provided under 3.2.3 above.</p> <p>The total aviation emissions associated with each of the technological developments not being implemented is shown in Inset 12.4 in Chapter 12 of the Environmental Statement [APP-038]. This shows the efficacy of the measures included in the Jet Zero Strategy and no further combination of events or scenarios is required.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		c) What would the impact upon cumulative emissions if the zero emission aircraft do not develop at the anticipated rate?	
3.2.8	Greenhouse Gases	The above are all uncertainties that are recognised as challenges within the JZS and a sensitivity analysis leading to quantitative assessment is therefore appropriate.	The Applicant's response to this issue is provided under 3.2.3 above.
3.2.9	Green Controlled Growth	There is a need for independent scrutiny of the assessment work undertaken within the environmental workstreams. It is acknowledged that the ESG has been established to provide this oversight and this is welcomed. The Council has reviewed the current membership of the ESG and given its role in relation to enforcement, wishes to be part of the ESG to aid in ensuring its independence. The Council would also support the ESG being given a right of appeal to the relevant Secretary of State (SoS), on the same basis of the equivalent right conveyed to the airport operator.	<p>The Applicant considers that the issue raised regarding membership of the ESG was answered within the Applicant's Response to Relevant Representations Part 2A [REP1-021] pages 298 to 300, in response to RR-0166.</p> <p>It is not clear why it would be necessary for the ESG to have a right of appeal to the SoS, as the ESG is the only decision-making body in the GCG process. Section 2.7 of the Green Controlled Growth Explanatory Note [APP-217] sets out the possible enforcement approaches where the GCG Framework has not been complied with. This includes the option for any local authority to take enforcement action pursuant to Section 161 of the Planning Act 2008, including those where land under the application for development consent is not within their jurisdiction.</p>
3.2.10	Green Controlled Growth	The Council also wishes to have representation of suitably qualified and experienced technical officers on each of the	The Applicant considers that the issue raised regarding membership of Technical Panels was answered within the Applicant's Response to

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		four Technical Panels being proposed, which relate to Air Quality, GHG, Noise and Surface Access – the GHG Technical Panel is the one relevant to this topic.	Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.
3.2.12	Draft DCO	The Council should be added to the ESG and all four Technical Panels – see Requirement paragraph 20 of the dDCO (AS-067).	The Applicant considers that the issue raised regarding membership of ESG and Technical Panels was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.
3.2.13	Draft DCO	<p>Within the GCG Framework the ESG Terms of Reference (paragraph A2.3.3) (APP219) and the dDCO (AS-067) has identified that Airport Operator has a right of appeal to the SoS for Transport. The Council recommends that, in addition to the Council being admitted to the ESG, each of the (then) five Local Authorities sitting within the ESG are additionally given a right of appeal to the SoS.</p> <p>It is noted that de-commissioning of the Scheme has been scoped out (para 9.3.18 of Chapter 9 –Climate Change Resilience of the Environmental Statement (APP-035)). The Council recommends a requirement of the DCO to ensure that a separate assessment is required for future de-commissioning.</p>	<p>Please see response to LIR reference 3.2.9 regarding appeals to the Secretary of State.</p> <p>The requirement for statutory environmental assessment for any development, including demolition, is decided through application of the relevant legislation at the time of application for permission, a further requirement is not considered necessary.</p>
3.3 Transport and Highways			

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.3.10	Transport Modelling	<p>The Council is unable to conclude its position regarding the highways impacts within Buckinghamshire, until such time as the Applicant has completed the additional work required by the ExA to update the strategic modelling as set out in the letter from the Applicant to the Examining Authority dated 27th June 2023 (AS-064). In addition to addressing these matters, the Council does not consider that the strategic model is suitable for use in relation to the Buckinghamshire highway network in its current form. The suitability of the traffic model is a fundamental issue affecting the robustness of the conclusions drawn by the Applicant in respect of the Buckinghamshire highway network.</p>	<p>In response to the Rule 9 letter, the Applicant is undertaking further work referred to as: 'accounting for COVID-19 in transport modelling', which responds to the ExA request to consider the Department for Transport Guidance on the treatment of COVID-19, which was published (on 31st May 2023) after the modelling for the DCO application had been completed and after the DCO application had been submitted.</p> <p>The 'Rule 9 work' should enable the local authorities and the ExA to consider whether the package of mitigation measures set out in the DCO application documents continue to mitigate the impacts of the Airport Expansion. The methodology and timescales for this work have been submitted and the Applicant is currently progressing this work.</p> <p>As such, the submitted documents and associated mitigation strategy remain as the main application documents for consideration.</p> <p>The Applicant does consider the strategic model to be a suitable tool to assess the level of traffic impact on the highway network in Buckinghamshire for the following reasons.</p> <ul style="list-style-type: none"> • The model has been calibrated and validated as per the DfT's TAG guidance and is considered fit for purpose by all Host

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			<p>Authorities and National Highways, as is referenced in the statements of common ground with these parties.</p> <ul style="list-style-type: none"> • The model includes Buckinghamshire within its modelled simulation, with the fully modelled area covering much of the county. This is shown in the Transport Assessment Appendices - Part 1 of 3 Appendix E1: Highway LMVR (LMVR), Figure 4.1 CBLTM-LTN Fully Modelled Area and in the LMVR Figure 7.1 Luton Airport and Non-Airport CBLTM-LTN Zones. • The mobile phone demand data, upon which the model travel demands have been built, includes the whole of Buckinghamshire, as shown in the LMVR Figure 5.7 CBLTM-LTN Mobile Network Cordon. • The model has also been calibrated / validated to screenlines for demands to/from the county, as shown in LMVR Figure 11.2 'Initial Assignment Calibration' Screenline Classification (Calibration=blue Validation=Red) – Overview. • The level of existing and future forecast airport traffic travelling to/from Buckinghamshire is observed and forecast to remain relatively low, when compared to other areas as shown in the Volume 8 Additional Submissions (Examination) 8.30 Trip

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			<p>Distribution Plans, which were submitted on 25th August 2023.</p> <ul style="list-style-type: none"> The level of traffic impact within Buckinghamshire is forecast to be relatively low, as shown in the Transport Assessment Appendices - Part 2 of 3 Appendix F: Strategic Modelling Forecasting Report [APP-201].
<p>3.3.12 – 3.3.13</p>	<p>Transport Modelling</p>	<p>Issue 1- Technical Concerns with Strategic Model</p> <p>The Council does not consider that the validation and calibration of the strategic model is of an adequate standard within Buckinghamshire to provide certainty of the traffic impacts within the county.</p> <p>Without the certainty of the quality of the modelling as an assessment tool, the exact nature of the impacts within Buckinghamshire cannot be quantified by the Applicants or the Council, and the Council is unable to agree that the assessment methodology is suitable or appropriate in this location.</p>	<p>The Strategic Model CBLTM-LTN has been calibrated and validated as per the DfT's TAG guidance. Moreover, the model was considered fit for purpose by all Host Authorities and National Highways. The level of detail in the model's geographical coverage was agreed with Host Authorities and National Highways, and was informed by observed Civil Aviation Authority (CAA) data on the distribution of airport passengers / staff.</p> <p>As set out within the Strategic Modelling- Model Specification Report, Appendix B of the Transport Assessment [APP-203 to APP-206], the model is originally based on the CBLTM, following which a more enhanced version was developed to add more network and zoning details within the core area of influence. Areas within Buckinghamshire were included within the model simulation area, although the level of detail decreases the further the distance from the airport. Several routing validation analyses were</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			reported in the model LMVR, including east-west routes.
3.3.14 – 3.3.16	Surface Access	<p>Issue 2 – Impact of Scheme trip generation within Buckinghamshire</p> <p>The primary link between Aylesbury and the Main Application Site takes the A41 and the B489 before leaving the county on the B488 heading east towards the airport.</p> <p>The Council is aware that sections of this primary link, particularly on the B489, already experience issues due to traffic flows that are poorly suited to the narrow sections that pass through historic villages including Ivinghoe, Marsworth and Pitstone.</p> <p>The Ivinghoe Neighbourhood sets out local policies regarding local highway matters, TRA2 is the most relevant to this proposal. The supporting text explains the existing issues with traffic volumes on the constrained routes through the village, with HGVs being a particular concern, and highway safety and the lack of suitable crossing points.</p>	<p>The trip distribution of the airport traffic was based on observed CAA data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included. The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority. The distribution shows relatively low volumes via the mentioned route corridor.</p> <p>The forecast airport HGV generation is also considered low, and very minimal levels travelling through the Buckinghamshire local road network. The Applicant notes the issue within Ivinghoe but does not agree that the proposed airport expansion would have any material impact at this location.</p>
3.3.17 – 3.3.18	Surface Access	<p>The route is already subject to a number of measures to protect it from excessive and inappropriate use. Traffic calming measures within the villages, and shuttle working traffic signals on narrow and historic bridges have</p>	<p>The forecast airport HGV generation within the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201] is considered low, with minimal volumes of</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>also been implemented. Within the Council's Freight Strategy Objective 1 (and sub-policies) is to ensure appropriate road use for HGVs and other freight vehicles. This includes mitigation of freight travelling along unsuitable roads. The Council has implemented a 7.5 tonne weight restriction zone in and around Ivinghoe.</p> <p>Accommodating additional traffic flow along this section of the B489/B488 route raises concerns that these pre-existing issues will be exacerbated and existing mitigation measures may be insufficient to appropriately address impacts. The Council has articulated the concerns regarding the level of confidence that can be applied to the assessment of this route by the Applicant within its WR.</p>	<p>airport related traffic travelling through the Buckinghamshire local road network.</p> <p>The Applicant notes the existing issues within Ivinghoe, however does not agree that the proposed airport expansion would have any material impact at this location.</p>
3.3.19	Surface Access	<p>The Council's objective is to secure mitigation against that pre-existing issue to ensure that the conditions that are currently experienced on this route do not suffer from a deterioration as a result of intensification of use by long distance commuting to the airport as a result of airport expansion.</p>	<p>The trip distribution of the airport traffic was based on observed CAA passenger survey data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included. The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority. The distribution shows relatively low volumes via the mentioned route corridor.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.3.20	Transport Modelling	<p>The Local Model Validation Report (LMVR) for the strategic modelling identifies this as a long-distance commuting route and therefore intensification of use of the route is to be expected. It is also noted that based on the information that has been presented to the Council to date, the Applicant is indicating that in the region</p> <p>of an additional 30 movements are expected within the peak hour periods. This would indicate to the Council that this route requires further assessment in order to fully understand the impacts of the Scheme, noting the Council does not consider the strategic model to be fit for assessment purposes within Buckinghamshire at present. The Council at present cannot consider this figure to be reliable due to the outstanding work required to demonstrate that the strategic model can be relied upon</p>	<p>The Strategic Model CBLTM-LTN has been calibrated and validated as per the DfT's TAG guidance. Moreover, the model is considered fit for purpose by all Host Authorities and National Highways.</p> <p>Within Appendix E of the LMVR, several route choice validation analyses were reported, including to and from the airport, and "long distance".</p> <p>The Applicant will continue to liaise with Buckinghamshire County Council on any concerns. However, it is advised that the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201] should be considered, as it includes an extensive level of outputs such as traffic flows, link volume to capacity ratios, nodes delays and routing analysis.</p> <p>This should help provide Buckinghamshire County Council with a more detailed insight into the areas of interest.</p>
3.3.21 – 3.3.22	Surface Access	<p>The B488 provides an alternative route between the junction with the B489 and the A41, which the Council considers to be more suitable for through traffic, including that which would be generated by the Scheme and the long-distance commuting route.</p>	<p>It is the Applicant's position that the volume of additional trips generated by the proposed Airport expansion is not of a sufficient magnitude to justify the inclusion of highway mitigation measures at these locations.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>This is supported by the findings of the Council's review of the accident record on this route, which indicates that there were a greater number of accidents within the past 5 years on the B489 than the B488. The Council does not consider the B489 to be a safe and suitable or preferential route for accommodating additional trips due to the Scheme.</p>	<p>Existing issues relating to highway accidents are the responsibility of the local highway authority.</p>
3.3.23	Surface Access	<p>The Council considers it necessary to have continued engagement with the Applicant in order to address the concerns regarding the assessment within the Transport Assessment (APP-203, AS-123, APP-205 and APP-206) and reach an agreement for mitigation on this route to protect the sensitive locations on the B489. The Council reserves its position on the final mitigation measures that may be required to address the impacts on traffic within Buckinghamshire.</p>	<p>Whilst the Applicant is willing to continue engagement with Buckinghamshire County Council, the Applicant does not consider the generated traffic associated with the Airport expansion sufficient to justify additional mitigation.</p>
3.3.24	Surface Access	<p>Issue 3 – Inadequate Public Transport provision</p> <p>The Council's LTP5 will place greater emphasis on the prioritisation of public transport over the use of the private car as part of achieving 'Quantifiable Carbon Reduction'. It is against this emerging policy context and the existing policy background that the Council considers that the existing public transport</p>	<p>The Applicant considers that the issue raised regarding public transport commitments was answered within the Applicant's Response to Relevant Representations Part 2A [REP1-021] pages 291-293, in response to RR-0166.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		commitments by the Applicant (Framework Travel Plan AS-131) are inadequate to address sustainable surface access requirements from the Buckinghamshire area and west of the airport.	
3.3.25	Surface Access	The Council has been informed that there is to be a Sustainable Transport Fund created, however, there are currently no clearly defined parameters set for establishing the value of that fund. If the Sustainable Transport Fund is not sufficient to support the services across all parts of the highway network needed to support sustainable transport to serve the Scheme it shall not be able to make the provisions necessary to make the application acceptable. On this basis, the Council considers that there is no certainty that any public transport provision can be secured, nor is there clarity around the process for assessing need and benefit.	<p>Following the submission of the application for development consent, the Applicant has further developed proposals for a Sustainable Transport Fund (STF), to be used to fund measures identified within the Framework Travel Plan [AS-131].</p> <p>The Applicant will continue to engage with the Council as the proposals are developed, including the size of the fund, the parameters for prioritising measures to be funded by the STF and the legal mechanisms for securing the fund.</p>
3.3.26	Surface Access	The Council considers it necessary for the Sustainable Transport Fund to be established on the basis of a robust and locationally specific assessment of Luton Airport and its surrounding areas, rather than benchmarking from other airports within the UK, as has been presented as Applicant's proposed approach.	Benchmarking was one component of the approach taken. The Applicant has been progressing and developing more detail around bus and coach routes to demonstrate the range of potential opportunities for improving bus and coach access to and from the airport, mapping gaps in current service provision and frequencies.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			<p>These improvements are being developed in tandem with a Sustainable Transport Fund that will set the framework around how these types of improvements, alongside the others listed out within the toolbox of measures within the Framework Travel Plan [AS-131], would be funded. The Applicant will continue to engage with the Council as the proposals are developed.</p>
<p>3.3.27 – 3.3.30</p>	<p>Surface Access</p>	<p>The Council considers it necessary for key provisions to be established prior to the setting of the Sustainable Transport Fund's value to ensure that strategic needs are clearly defined and secured through the DCO process.</p> <p>It is also the Council's position that the governance of the Sustainable Transport Fund has not been adequately presented, and therefore it is unclear what structure is to be and if it provides the interested parties and transport authorities with a strong enough voice to ensure that key strategic provisions shall be delivered.</p> <p>Public Transport provision to the airport from the western approaches is an essential provision that is required to provide adequate opportunities for sustainable transport choices for both staff and customers of the airport. Without this provision Buckinghamshire residents shall be reliant on the private car for all journeys to and from the airport.</p>	<p>Following the submission of the application for development consent, the Applicant has been progressing and developing more detail around bus and coach routes to demonstrate the range of potential opportunities for improving bus and coach access to and from the airport, mapping gaps in current service provision and frequencies.</p> <p>These improvements are being developed in tandem with a Sustainable Transport Fund that will set the framework around how these types of improvements, alongside the others listed out within the toolbox of measures within the Framework Travel Plan AS-131], would be funded.</p> <p>The routes indicated as being a priority for Buckinghamshire Council will be considered alongside other east-west routes that may need to be provided to improve connectivity to the airport from surrounding areas. The prioritised routes that will be funded by the Sustainable</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>Therefore, the Council considers it necessary that both a high-speed bus is provided from Aylesbury to the airport and the number 61 local service is reinstated to the airport (the PADSS (AS-053) and Relevant Representation (RR-0166) introduce these matters) to provide employee commuting and passenger access from the Buckinghamshire area. The high speed bus will provide a real alternative to the private car on the basis of it offering a high quality, high frequency, high speed service from Aylesbury. The number 61 local service will incorporate a greater number of stops and offer a lower cost alternative to the private car and high speed bus service for local trips and staff commuting to the airport.</p>	<p>Transport Fund will be agreed through governance structure that is clearly set out within the Framework Travel Plan [AS-131].</p>
3.3.31	Construction Traffic Management Plan	<p>Issue 4 – Certainty of the impact of Construction Traffic on the Buckinghamshire highway network</p> <p>The code of construction practice (APP-049) and the outline Construction Traffic Management Plan (CTMP) (APP-130) uses the M1 motorway to the west of Luton Airport and routes to the east into Bedfordshire and Hertfordshire during the construction period. However, it does not identify last mile locations, especially for</p>	<p>Detailed measures to manage construction traffic impacts would be set out in the Construction Traffic Management Plan (CTMP) (as secured by Requirement 14 of the draft Development Consent Order [AS-067]), which would be developed in detail by the appointed contractor during the detailed design stage, and must be substantially in accordance with the Outline Construction Traffic Management Plan [APP-130].</p> <p>It is expected that origin of these movements would be from existing freight and materials</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>groundworks movements and Buckinghamshire is already heavily impacted by High Speed 2 (HS2) and East West Rail (EWR) construction HGV movements. The CTMP is silent on protections for the Buckinghamshire network from freight operations and lack detail on freight routing strategy. Councillors and residents are already expressing concerns about the impacts from extensive movements from HGVs through the county from other national infrastructure projects, as set out in the health and communities issues within this LIR.</p>	<p>suppliers who would have existing permissions to utilise the network for their purposes.</p>
3.3.32	Construction Traffic Management Plan	<p>Without strong provision within the CTMP, the Council does not have confidence that there will be suitable control of potential impacts from freight operations in respect of the Buckinghamshire transport network. The Council seeks to secure consultation on these documents where they affect Buckinghamshire's network and residents, and the ability to require changes and/or clarifications and controls within the management strategies be included within the documents.</p>	<p>Detailed measures to manage construction traffic impacts would be set out in the Construction Traffic Management Plan (CTMP), which would be developed in detail by the appointed contractor during the detailed design stage, and must be substantially in accordance with the Outline Construction Traffic Management Plan [APP-130].</p> <p>It is expected that origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p> <p>The Construction Traffic Management Plan (CTMP) outlines the formation of a traffic management working group (TMWG) as a forum</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			for stakeholder engagement prior to the commencement of the Proposed Development. The TMWG would seek representation from the lead contractor, Luton Borough Council (LBC), highways authorities and National Highways.
3.3.34 – 3.3.35	Surface Access	<p>The Council's position is that the B489 does not appropriately meet the requirement for safe and suitable access for through traffic due to the alignment of the road, width of the carriageway, the presence of signal-controlled bridges, and modal conflict with pedestrians within the villages of Ivinghoe, Pitstone and Marsworth.</p> <p>Alternative routes along the B488 are therefore required to be considered to be the primary access route for traffic commuting on the long-distance route to the airport. It should also be noted that this route would be considered wholly inappropriate for any HGV movements associated with construction of the airport expansion and so should feature as an excluded route within the Code of Construction Practice (APP-049). This would accord with the Council's Freight Strategy.</p>	<p>Detailed measures to manage construction traffic impacts would be set out in the Construction Traffic Management Plan (CTMP), which would be developed in detail by the appointed contractor during the detailed design stage, and must be substantially in accordance with the Outline Construction Traffic Management Plan [APP-130].</p> <p>It is not intended by the Applicant to utilise the local road network for material supplies however it is expected that the origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p>
3.3.36	Surface Access	The analysis of the key transport and highways issues by the Council enables the identification of the impacts that are considered relevant to this topic. These impacts are summarised in	The Applicant considers the strategic model to be a suitable tool to assess the level of traffic impact on the highway network in Buckinghamshire, for reasons outlined in Matter 3.3.10.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>the list below, followed by a fuller explanation of the way in which the Council would wish to see them addressed by the Applicant:</p> <ol style="list-style-type: none"> 1. Certainty of the traffic impacts within the County, which requires a validated and correctly calibrated strategic traffic model to underpin all aspects of the technical assessment. 2. Detailed consideration of traffic impacts due to Scheme trip generation along the A41, B489, B488 route, with a specific focus on Ivinghoe, Pitstone and Marsworth. 3. Impacts on modal shift due to the proposals for the provision of public transport to support the Scheme in construction and operation. 4. Impacts of construction traffic on the Buckinghamshire Highway Network. 	<p>The Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201], has an extensive level of outputs reported.</p> <p>Based on the forecast and impact assessment, the impact on the mentioned areas were considered not significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p> <p>As per previous responses, it is not intended by the applicant to utilise the local road network for material supplies, however it is expected that origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p>
3.3.37	Surface Access	<p>The Council requires the following to address impact 1 and therefore enable the Council to have confidence in the nature of the traffic impacts of the Scheme within the county:</p> <ul style="list-style-type: none"> • Journey time data to confirm the model's appropriateness for the purposes of assessing development proposals within Buckinghamshire. • Calibration and validation data to confirm the model's appropriateness for the purposes of 	<p>The Strategic model CBLTM-LTN has been calibrated and validated as per the DfT's TAG guidance. Moreover, the model was considered fit for purpose by all Host Authorities and National Highways. While the model does not cover detailed calibration / validation within Buckinghamshire, it is still considered to be robust tool to assess the impact of the proposed airport expansion. Moreover, the airport trip distribution information, which was based on observed CAA passenger survey data, shows</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>assessing development proposals within Buckinghamshire.</p> <ul style="list-style-type: none"> • Confirmation that long stay survey data was included in the Civil Aviation Authority trip rate data. • A Forecasting Report that confirms how growth has been calculated and applied within the model to ensure that growth within Buckinghamshire has been taken into account appropriately. • An updated Local Model Validation Report (LMVR) that addresses the above. 	<p>relatively low level of travel demands to/from Buckinghamshire.</p> <p>An extensive Strategic Modelling Forecasting Report is included as Appendix F of the Transport Assessment [APP-201]. This explains the forecasting method in accordance with the DfT's TAG guidance.</p> <p>The Applicant notes Buckinghamshire Council's concerns in relation to the level of calibration/validation within its local road network, but due to the reasons mentioned above, the Applicant does not agree on the need of an updated base model or its calibration / validation.</p>
3.3.38	Surface Access	<p>Impact 2 relates to the level of confidence that can be applied to the assessment of the of the Scheme on the principal access route to the airport through Buckinghamshire – the A41, B489, B488. The Council requires the following:</p> <ul style="list-style-type: none"> • Details of link flows for the base year and future years with and without development for the B489, B488 and A41. • Select link analysis of development traffic only for the B489, B488 and A41 links. 	<p>The Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201] has an extensive level of outputs reported such as traffic flows, link volume to capacity ratios, nodes delays, select link and routing analysis. Moreover, the recently submitted daily airport passenger and staff trip distribution, which was requested by the Examining Authority, adds to the list of outputs.</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.3.39	Surface Access	<p>The Council anticipates that the updated modelling information will support the case for some form of traffic intervention at Ivinghoe. Matters that the Council considers will need to be explored include junction re-prioritisation at the B488/B489 junction, modal conflict, traffic speeds and safety for all users. The Council wishes to be consulted on the findings of the updated modelling work and discussions regarding mitigation and/or enhancement works along the whole of this route.</p>	<p>Whilst the Applicant is willing to continue engagement with Buckinghamshire County Council, the Applicant does not consider the volumes of generated traffic associated with the airport expansion sufficient to justify mitigation measures.</p>
3.3.40	Surface Access	<p>The Council is seeking efficient, effective and reliable public transport connections to the airport for residents of Buckinghamshire and communities to the west of the London Luton Airport, in order to support modal shift away from the private car and support sustainable transport behaviours. Addressing impact 3 is also seen as an essential means of realising the full economic benefits of the Scheme to the County, by securing connectivity for a greater proportion of the population. The Council requires the following:</p> <ul style="list-style-type: none"> • The provision of a high speed, high quality, high frequency bus service between Aylesbury and the airport. • The reinstatement of the number 61 local service to the airport, on at least an hourly service frequency. 	<p>Following the submission of the application for development consent, the Applicant has been developing more detail around bus and coach routes to demonstrate the range of potential opportunities for improving bus and coach access to and from the airport, mapping gaps in current service provision and frequencies.</p> <p>These improvements are being developed in tandem with a Sustainable Transport Fund that will set the framework around how these types of improvements, alongside the others listed out within the toolbox of measures within the Framework Travel Plan [AS-131], would be funded.</p> <p>The routes indicated as being a priority for Buckinghamshire Council will be considered</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<ul style="list-style-type: none"> • Certainty of an appropriate Sustainable Transport Fund. • Clarity of how the Sustainable Transport Fund will be calculated. • Certainty of mode shift, linked to specific targets and hold points and embedded in the Sustainable Transport Fund. • The Framework Travel Plan (APP-229, superseded by AS-131) is required to be updated to provide certainty of governance of the Sustainable Transport Fund. Further details on the review by the Council of the Framework Travel Plan can be found in the Council's WR. 	<p>alongside other east-west routes that may need to be provided to improve connectivity to the airport from surrounding areas. The prioritised routes that will be funded by the Sustainable Transport Fund will be agreed through a governance structure that aligns with the processes set out in the Framework Travel Plan [AS-131] (Section 7.4 Paragraph 7.4.4).</p>
3.3.41	Surface Access	<p>It is acknowledged that the proposals for construction traffic movement do not currently include the Buckinghamshire highway network. However, the CTMP is in outline form only (AP-130) and the full details of use of the wider highway network, including by construction workers, are unlikely to be clear until this is further developed. The Council therefore requires the following:</p> <ul style="list-style-type: none"> • Consultation on the further development of the CTMP, which should incorporate specific targets for each mode to expand on the current division between sustainable and unsustainable modes. • Consultation on freight routing and suitable controls to be included within the CTMP. 	<p>Detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP) (as secured by Requirement 14 of the draft Development Consent Order [AS-067]), which would be developed in detail by the appointed contractor during the detailed design stage and must be substantially in accordance with the Outline Construction Traffic Management Plan [APP-130].</p> <p>It is expected that origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<ul style="list-style-type: none"> • The Outline Construction Workers Travel Plan (APP-131) is required to be updated to show how the Buckinghamshire network is to be affected; and this should be tested within the updated traffic modelling as appropriate. Further details on the review by the Council of this Travel Plan can be found in the Council's WR. 	
3.3.42	Draft DCO	<p>The dDCO (AS-067) has been reviewed from the perspective of transport and highways. There are three items that the Council considers relevant:</p> <ul style="list-style-type: none"> • The Council should be included within the Airport Transport Forum as Highway Authority and secured through the dDCO (AS-067) • The dDCO Schedule 2 Part 3, paragraph 24 should set out the maximum timescales for delivery of any actions. • A list should be included to indicate which bodies are responsible for monitoring the findings of the GCG Framework and the FTP, including the data collection and authorisation of changes to in order to address any failures to meet targets. 	<p>The Applicant is currently considering the future make-up of the Airport Transport Forum, including its role in relation to the proposed Sustainable Transport Fund. The Applicant will continue to engage with the Council on this matter.</p> <p>Due to the diversity of potential future circumstances that might materialise and require mitigation, the proposed requirement for actions in the Mitigation Plan to “avoid or prevent exceedances of the Limit as soon as reasonably practicable” is considered more appropriate to reflect this uncertainty. The determination of whether the proposed actions would meet this threshold would be determined by the independent Environmental Scrutiny Group when approving or refusing a Mitigation Plan.</p> <p>Proposals for monitoring surface access performance under the GCG Framework are set out in Green Controlled Growth Framework</p>

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			Appendix F – Surface Access Monitoring Plan [APP-224]. Governance arrangements for the Framework Travel Plan [AS-131] are set out in Section 7.4 of that document, compliance with which is secured through Requirement 30 of the DCO. The requirements within the FTP do not therefore need to be transposed in the DCO itself.
3.4 Noise and Vibration			
3.4.3	Noise and Vibration	Within Buckinghamshire, the areas most likely to be affected by changes to aircraft noise along existing flightpaths are Dagnall, Pitstone and an area east of Aylesbury, including Wendover, which is also overflowed by low level northbound traffic from Heathrow. Edlesborough Parish Council is voicing concern in its relevant representation (RR-0404) about what it describes as potential “noise impacts” from expansion.	<p>The Applicant considers that the issue raised regarding aircraft noise in the named areas was answered within the Applicant's Response to Relevant Representations Part 2A [REP1-021] pages 296-297, in response to RR-0166.</p> <p>RR-0404 from Edlesborough Parish Council is responded to within the Applicant's Response to Relevant Representations Part 2E [REP1-025] pages 20-21.</p>
3.4.5	Noise and Vibration	Given the increasing importance of such areas to community health and wellbeing the Council encourages the Applicant to place particular emphasis on protection of the Chilterns AONB. Currently the Chilterns AONB is somewhat overflowed but radical changes in airspace management could lead to the area being substantially overflowed. The Council would like to see overflight of the Chilterns AONB formally reviewed by the Noise Envelope Design Group	<p>The Applicant considers that the issue raised regarding noise and tranquillity in the Chilterns AONB was answered within the Applicant's Response to Relevant Representations Part 2A [REP1-021] page 300, in response to RR-0166.</p> <p>The work of the Noise Envelope Design (NEDG) group has concluded and the NEDG issued their final report in October 2022. The purpose of the NEDG was to provide advice and</p>

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		<p>(NEDG). The NEDG themselves recommended that the Noise Envelope should be reviewed if there were to be any significant changes to the airport's operations. Especially as such a change will result from the anticipated modernisation of airspace known as Future Airspace Strategy Implementation South (FASI-S).</p>	<p>recommendations of the design of the Noise Envelope, with no intention that the NEDG would have an ongoing role post consent. See the NEDG terms of reference appended to the NEDG Final Report in Annex A of Appendix 16.2 of the Environmental Statement [APP-111].</p> <p>Ongoing oversight and technical review of Green Controlled Growth and the Noise Envelope will be undertaken by the Noise Technical Panel and Environmental Scrutiny Group. See Green Controlled Growth Explanatory Note [APP-217].</p> <p>In line with the NEDG recommendations, the Noise Envelope contains a defined framework to review the Noise Envelope Limits in response to airspace change (see paragraph 3.2.27 onwards of Green Controlled Growth Explanatory Note [APP-217]).</p> <p>Assessment of changes to airspace and flightpaths (and their impacts on the Chilterns AONB) are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment (which explicitly requires the consideration of overflight of AONBs) and consultation exercise</p>

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			by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616).
3.4.6	Noise and Vibration	<p>The noise and vibration assessment in Section 16.9 of the ES (16 Noise and vibration Chapter) (APP-042 superseded by AS-080) demonstrates how the Applicant proposes to mitigate and reduce to a minimum potential adverse impact resulting from noise from the Scheme and avoid noise giving rise to significant adverse effects on health and the quality of life (Noise Policy Statement for England (NPSE) March 20109). The Council understands the arguments presented by the Applicant, that there will be no observed adverse significant effect with Buckinghamshire and therefore no specific Buckinghamshire mitigation is necessary. However, to protect this position the Applicant relies on the mechanism Green Controlled Growth Framework (APP-218) to prevent/mitigate impacts. The Council is concerned that this mechanism is not clear or transparent.</p>	<p>The acknowledgement that there will be no observed adverse significant effect within Buckinghamshire and therefore no specific Buckinghamshire mitigation is necessary is noted.</p> <p>The Green Controlled Growth Framework [APP-218] transparently sets out the necessary processes required for the functioning of the GCG approach, as well as the values of the Limits and Thresholds used to manage the impacts of growth. The Framework is supported by an Explanatory Note [APP-217] and a number of appendices, including Terms of Reference for the proposed Environmental Scrutiny Group (ESG) [APP-219] and Technical Panels [APP-220] as well as by a Noise Monitoring Plan [APP-221].</p>
3.4.8	Green Controlled Growth	<p>Although broadly in agreement with the role of the ESG, the Council is further concerned that the ESG may not be fully independent. This is because (according to The Green Controlled Growth Framework Explanatory Note (APP-217)) the independent chair will initially be</p>	<p>Whilst the airport operator will identify the proposed chairperson of the ESG, ultimately the appointment of that Chairperson is decided by an independent third party (the Secretary of State).</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		nominated by the airport operator, following consultation with the London Luton Airport operator. The Council suggests the initial appointment be reviewed by all ESG members within the first year of operation and this continues on a rolling basis.	<p>As set out in the ESG Terms of Reference included as Appendix A of the Green Controlled Growth Framework [APP-218], it is proposed that the independent chairperson serves a three-year term. Any subsequent appointments of a chairperson would be subject to consultation with all members of the ESG.</p> <p>As set out in Section 2.3 of the Green Controlled Growth Framework [APP-218], it is also proposed that the airport operator carries out a review of all GCG processes within 12 months of the end of the Transition Period. The findings of this review will be submitted to the ESG for comment. Subsequently, a similar review will be carried out every five years.</p>
3.4.9	Noise and Vibration	Due to the Council's concerns regarding the robustness of the traffic modelling that underpins the noise assessment (see Transport and Highways sub-section), it is felt to be appropriate that the Council reserves its final position in respect of related noise impacts.	Noted. See responses on the surface access points in this document (LIR Reference 3.3.10).
3.4.12	Noise and Vibration	The analysis of the key noise issues by the Council enables the identification of the impacts that are considered relevant to the noise topic. These impacts are summarised in the list below, followed by a fuller explanation	See responses below.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>of the way in which the Council would wish to see them addressed by the Applicant:</p> <ul style="list-style-type: none"> • The Noise Envelope has a fundamental role to play in the ongoing management and future mitigation of adverse noise effects that could arise from noise impacts associated particularly with any changes in airspace usage, arising from FASI-S. • Due to the incremental growth proposed by the Scheme, the noise impacts and their consequential effects are anticipated to evolve. There is a need for the implications of these changes to be robustly analysed, including within Buckinghamshire. • Impacts of increases in noise disturbance to the Chilterns AONB. • Adherence of noise levels to WHO Environmental Noise Guidelines. • Confirmation of the noise impacts of Scheme construction on receptors within Buckinghamshire. 	
3.4.13	Noise Envelope	<p>In order to ensure the correct application and efficacy of the Noise Envelope, the Council is seeking reassurance that the Noise Envelope will be subject to timely review at such time as changes in airspace are proposed (i.e. through FASI-S). In addition to this, the Council wishes to see a review one year after operation and a mechanism to trigger intervening reviews more</p>	<p>In line with the NEDG recommendations, the Noise Envelope contains a defined framework to review the Noise Envelope Limits in response to either the ICAO publishing a new 'noise chapter' for the Next-Gen, low carbon, aircraft (i.e. the next 'Chapter' following on from the current 'Chapter 14') or the approval of an Airspace Change Proposal such as FASI-S (see</p>

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		frequently than the five years currently proposed within the Terms of Reference for the NEDG, secured appropriately through the DCO.	<p>paragraph 3.2.27 onwards of Green Controlled Growth Explanatory Note [APP-217]).</p> <p>This mechanism would be triggered by these operational changes, rather than being time limited as suggested.</p> <p>See response to paragraph 3.4.8 on timing of the review cycle.</p>
3.4.14	Noise Envelope	The NEDG, which includes representation from the Council, should be in a position to check all of the parameters and ensure that these are adopted as appropriate targets within the GCGF, on a rolling basis. In addition, the NEDG should continue to operate as an independent entity from the ESG, with this independence secured through appropriate means as part of the DCO.	See response to paragraph 3.4.5 on the completed role of the NEDG.
3.4.15	Noise and Vibration	There is understood to be an intention to form an Aircraft Noise Technical Panel in relation to noise impacts of the Scheme. The Council is seeking representation from suitably qualified and experienced technical officers from the Council on this Panel.	The Applicant considers that the issue raised regarding membership of the Noise Technical Panel was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.
3.4.16	Green Controlled Growth	The ESG is intended to provide oversight and scrutiny of the ongoing development of the Scheme, and then the environmental	The Applicant considers that the issue raised regarding membership of ESG was answered within the Applicant's Response to Relevant

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		performance of the Scheme. The Council is seeking representation from suitably qualified and experienced technical officers from the Council on the ESG.	Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.
3.4.17	Noise Envelope	The Council wishes to see overflight of the Chilterns AONB included within the Terms of Reference for the NEDG, and secured appropriately through the DCO, as the Noise Envelope is developed further. In addition, the Council is seeking a guarantee that the Noise Envelope review process will provide certainty that any future airspace changes will ensure that noise impacts are no greater than those relied upon should the DCO be granted.	<p>See response to paragraph 3.4.5 on overflight of the Chilterns AONB and the completed role of the NEDG.</p> <p>The Noise Limit Review process (see paragraph 3.2.27 onwards of Green Controlled Growth Explanatory Note [APP-217]) sets out the process through which the Noise Limits will be reviewed, and where possible reduced, following an approved airspace change.</p> <p>Paragraph 2.3.4 of the Green Controlled Growth Framework [APP-218] states <i>“There will be no ability to change any of the Level 1, Level 2 Thresholds or Limits to permit materially worse environmental effects than those identified in the Environmental Statement (ES).”</i></p>
3.4.18	Noise and Vibration	To protect residents from local impacts, as far as reasonably practicable, the Council asks that the Scheme should be compliant with “WHO Environmental Noise Guidelines 2018 (as they relate to aircraft noise) for the European Region”.	The Government response on the WHO Environmental Noise Guidelines 2018 (Ref 2.1) is as follows: <i>“The government is considering the recent new environmental noise guidelines for the European region published by the World Health Organization (WHO). It agrees with the ambition to reduce noise and to minimise adverse health effects, but it wants policy to be</i>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			<p><i>underpinned by the most robust evidence on these effects, including the total cost of action and recent UK specific evidence which the WHO report did not assess.” (Ref 2.2).</i></p> <p>Although the dose-response relationship in the new WHO Guidelines is not currently adopted in UK policy, sensitivity testing using the relevant updated relationships in the WHO guidelines has been undertaken and is presented in Chapter 13 Health and Community of the Environmental Statement [AS-078].</p>
3.4.19	Construction Traffic Management Plan	The Council is seeking additional clarity on the controls that will be incorporated within the CTMP as it is developed. Ideally this will include controls preventing mass haul and lorry routes and construction compounds or other sites supporting construction (e.g. spoil disposal) being sited within Buckinghamshire.	<p>Detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP) (as secured by Requirement 14 of the draft Development Consent Order [AS-067]), which would be developed in detail by the appointed contractor during the detailed design stage.</p> <p>It is expected that origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p> <p>The Construction Traffic Management Plan (CTMP) outlines the formation of a traffic management working group (TMWG) as a forum for stakeholder engagement prior to the</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			commencement of the Proposed Development. The TMWG would seek representation from the lead contractor, Luton Borough Council (LBC) and local councils, highways authorities and National Highways.
3.4.20	Draft DCO	The relationship between GCGF, Noise Envelope and the ESG are not yet fully defined, and the Council is concerned that the Noise Envelope, which is national policy, is not referenced in the dDCO whilst the GCGF and ESG which are not policy feature prominently. Additionally, references are made to legal frameworks that are not explained – this explanation should be included.	<p>As set out in Section 3.1 of the Green Controlled Growth Framework [APP-218], the Noise Envelope and the GCG Framework have similar principles and functions and hence the noise section of GCG is being defined as the Noise Envelope for the Proposed Development, so there is single control process for aircraft noise and this is integrated with the wider control processes which form GCG.</p> <p>It is unclear which references to legal frameworks Buckinghamshire Council consider are not explained, and clarification is requested on this matter.</p>
3.4.21	Draft DCO	To protect the interests of Buckinghamshire residents, the Council wishes to become a member of the ESG. The Council is currently missing from the ESG member authorities listed in the dDCO Requirement paragraph 20 of Part 2, Schedule 2 (AS-067)	The Applicant considers that the issue raised regarding membership of ESG was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.
3.5 Air Quality			
3.5.5	Air Quality	There are nine air quality management areas (AQMAs) present within the Buckinghamshire Council area. However, only three of the	The air quality assessment (Chapter 7 [AS-076]) has provided an assessment of air quality following the methodology and study area agreed

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>AQMAs are located on routes where the Council anticipates there to be increases or changes in traffic due to the DCO Application. There are the Stoke Road AQMA, Friarage Road AQMA and Tring Road AQMA all located within Aylesbury. The Councils' Strategic Environmental Protection Team would seek to ensure that these AQMAs are not negatively impacted by the DCO Application. This is especially as air quality monitoring data collected by the council in 2022 found exceedances of the National Air Quality Objectives within the Friarage Road AQMA. The results of the air quality monitoring can be found within the 2023 Annual Status Report.</p>	<p>with the local Councils, including Buckinghamshire Council.</p> <p>This matter is addressed in the Statement of Common Ground submitted at Deadline 2 [TR020001/APP/8.18] item no 3.5.6. The study area is considered appropriate and takes into account the affected road network using the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) guidance.</p> <p>The three mentioned AQMAs (Stoke Road AQMA, Friarage Road AQMA, and Tring Road AQMA) located on routes that the Council anticipates will experience increases or changes in traffic, are all over 19km from the affected road network. No significant impacts are predicted to occur within the study area. No significant air quality effects would occur outside of the study area, which would include the above-mentioned Buckinghamshire AQMAs.</p>
3.5.6	Air Quality	<p>The Council's Highways Officers report that the preferential route to access Luton Airport through Buckinghamshire is the A41, B488, B489. This route passes through a number of villages with some properties fronting the highway. On the basis that the Council has concerns about the validity of the transport modelling undertaken by the Applicant to date,</p>	<p>This matter is addressed in the Statement of Common Ground submitted at Deadline 2 [TR020001/APP/8.18] item no 3.5.8.</p> <p>The Strategic Model CBLTM-LTN used for the transport modelling has been calibrated and validated as per the DfT's TAG guidance.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>there are also concerns that the air quality modelling will be based on inaccurate transport information in respect of the Buckinghamshire highway network. This gives rise to an issue around the accuracy of the air quality assessment findings relating to receptors along the preferential airport access route.</p>	<p>Moreover, the model is considered fit for purpose by all Host Authorities and National Highways.</p> <p>The trip distribution of the airport traffic was based on observed CAA passenger survey data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included. The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority. The distribution shows relatively low traffic volumes using the mentioned route corridor.</p>
3.5.8	Air Quality	<p>the Council has concerns about the traffic modelling that has been used to underpin the assessment, and this has implications for the conclusions drawn regarding the air quality impacts of the Scheme, which are set out in this sub-section.</p>	<p>Concerns raised regarding the approach to traffic modelling has been addressed in LIR references 3.3.12-3.3.18 and its impacts on air quality in LIR references 3.5.9.</p>
3.5.9	Air Quality	<p>The principal impacts on air quality are associated with traffic emissions during construction and operation of the Scheme. The Council has stated within the relevant representations (RR-0166) that the highway network in Aylesbury acts as a route hub for all directions and is therefore very sensitive to congestion and small changes in traffic have a significant impact on the performance of the network. The Council can see no reference to Aylesbury within the impact assessment. The</p>	<p>As mentioned above in reference 3.5.5, the air quality assessment (Chapter 7 [AS-076]) has provided an assessment of air quality following the methodology and study area agreed with the local Councils. The study area is considered appropriate and takes into account the affected road network using the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) guidance. It is noted that Aylesbury is not within the study area. Aylesbury is located over 19km from the study area, no air</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>Council would therefore wish to see the evidence underpinning the conclusion that this location is not going to experience adverse impacts, noting also that as yet the construction traffic management plan is yet to be defined, and this could have implications in terms of HGV movements.</p>	<p>quality effects would occur outside of the study area.</p> <p>The trip distribution of the airport traffic was based on observed CAA passenger survey data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included. The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority. The distribution shows relatively low volumes of traffic heading towards Aylesbury.</p> <p>Access routes for construction traffic will be limited, as far as reasonably practicable, to the trunk road network and main roads on the local road network. It is not intended by the Applicant to utilise the local road network for material supplies however it is expected that the origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p>
3.5.10	Air Quality	<p>The Council's Highways team has also highlighted that there is the potential for the villages within the north of Buckinghamshire to be negatively impacted by changes in traffic from the Scheme. If the revised traffic data</p>	<p>This matter is addressed in the Statement of Common Ground submitted at Deadline 2 [TR020001/APP/8.18] item no 3.5.3.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>shows that the screening thresholds, as outlined within the Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance document 'Guidance on land-use planning and development control: Planning for air quality', are exceeded in any area within Buckinghamshire then there may be a requirement to conduct an additional air quality assessment.</p>	
3.5.11	Transport Modelling	<p>In order to address the two impacts referenced above, the Council requests updated traffic modelling, in accordance with the requirements set out in the Transport and Highways sub-section above; updated CTMP to include either details of HGV routing through Buckinghamshire or clauses to prevent such movements; and updated air quality modelling that makes use of this updated traffic information. The Council is seeking quantitative data, particularly in relation to impacts on Aylesbury and relevant receptors along the A41, B489, B488 route through the county.</p>	<p>As per previous responses, detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP) (as secured by Requirement 14 of the draft Development Consent Order [AS-067]), which would be developed in detail by the appointed contractor during the detailed design stage.</p> <p>It is not possible to provide quantitative detail on HGV routing at this stage, and this would be developed further at detailed design stage.</p>
3.5.12	Surface Access	<p>It is recognised that public transport options for residents seeking to access Luton Airport from towns and villages within Buckinghamshire could be significantly improved. Any improvement in the form of additional public transport options would also have a positive impact on local air quality generally through</p>	<p>Please see previous response to LIR reference 3.3.30 regarding future consideration of the reinstatement of the 61 bus service.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>enabling a modal shift to a more sustainable form of transport. This is because there would be less reliance on private cars for all journeys to and from the airport for both staff and customers. Therefore, the Council's Strategic Environmental Protection team supports the comments made by the Council as the Highway Authority in relation to this – the Council requests the provision of an express bus service between Aylesbury and Luton Airport; and the reinstatement of service 61 to provide a reliable, frequent and effective connection between Buckinghamshire villages and the airport along the preferential access roads.</p>	
<p>3.6 Economy, Tourism and Employment</p>			
	<p>Employment and Economics</p>	<p>The Council recognises the potential positive benefits of the Scheme for the Buckinghamshire economy and seeks to maximise any economic opportunities available to residents and businesses of Buckinghamshire as a result of the Scheme. 3.6.7. The Council's comments on this topic are predicated on the assumption that the forecast employment and Gross Domestic Product (GDP) figures provided by the Applicant are reasonable and accurate as set out in the Environmental Statement (APP-037). This has not been investigated by the Council, which does not intend to explore</p>	<p>Buckinghamshire Council's position on the benefits of the scheme are noted.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		this further unless a reason arises for such examination to be undertaken.	
3.6.8	Surface Access	<p>Whilst the Council welcomes the activities outlined in the Employment and Training Strategy (APP-215) and supports a focus on some of the more deprived areas within Buckinghamshire, it is vital that accessibility is addressed. As noted above in relation to surface access transport (see Transport and Highways sub-section), at present there are no effective public transport connections between Buckinghamshire and Luton Airport that could be utilised by potential employees of the airport. Without significant improvements in accessibility, the prospect of Buckinghamshire residents taking up employment at London Luton Airport are limited and will undermine the aims of the Employment and Training Strategy. Note also that the airport is to continue operating throughout the expansion, so it is just as relevant for the immediacy of this issue to be noted – it is already disadvantaging the opportunities of people with limited mobility to access employment.</p>	<p>This matter is addressed in the Statement of Common Ground submitted at Deadline 2 [TR020001/APP/8.18] Item number 3.7.1.</p>
3.6.9	Employment and Training Strategy	<p>Where the Employment and Training Strategy includes an initiative to encourage local employment and local businesses as part of the construction and operation phases of the expansion, the Council would welcome initiatives to support local procurement and</p>	<p>The Applicant will seek to regularly engage with relevant local government partners to coordinate on how the growth plans at the airport align with the employment, skills and training strategies in the ETS Study Area.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		look forward to discussions with Luton Rising on this.	This topic will be discussed with the Council and reported as part of the Statement of Common Ground [TR020001/APP/8.18] .
3.6.10	Employment and Training Strategy	The Employment and Training Strategy makes several references to the importance of ongoing engagement with local government, including Goal 1 “Maximise the impact of the Proposed Development through engagement with local government partners who can coordinate with their skills and growth strategies” and the creation of a Local Economic Development Working Group (LEDWG) that includes representation from relevant local authority teams, e.g. economic development. The Council would welcome involvement in this working group, to ensure alignment with local employment and skills strategies and to help facilitate links with other appropriate stakeholders (including, but not limited to, the Bucks Skills Hub, Buckinghamshire College Group, Buckinghamshire New University). The Council would also seek to be part of the working group to help identify and encourage activities that maximise the benefits for Buckinghamshire’s residents and businesses and support the overarching aim of the Employment and Training Strategy (ETS) “to ensure that, as many of the jobs and economic opportunities generated by the Proposed Development as	The Council’s request to be included as part of the Local Economic Development Working Group has been noted. The working group will include relevant attendees from local authorities across the ETS Study Area.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		possible, go to the residents of Luton and the "ETS Study Area".	
3.6.12	Employment and Training Strategy	According to the Employment and Training Strategy, 623 FTE jobs are expected to be created in the construction period. It needs to be recognised that with other major infrastructure projects ongoing in Buckinghamshire, including HS2 and EWR, the availability of an adequate construction workforce locally is a challenge.	This has been noted.
3.6.16	Employment and Training Strategy	Whilst the claimant count rate has been falling in Buckinghamshire and remains below national rates, there are variations across the county, with some persistent pockets of higher unemployment and deprivation. The importance of 'levelling up' has been recognised by the Council in the Opportunity Bucks programme which has identified ten priority wards on which to target activity. The programme includes a focus on jobs, careers, skills and learning. In line with references made to inclusivity within the Employment and Training Strategy, the Council would welcome opportunities for Employment and Training interventions targeted at the ten priority wards.	As outlined in Goal 2 of the ETS the Applicant and airport operator aim to run a programme of engagement aimed at getting ETS Study Area residents into work at the airport.
3.6.17	Employment and Training Strategy	The Employment and Training Strategy makes reference to career progression and above average wages, as well as to apprenticeships. The Council would welcome opportunities, through engagement with the LEDWG, to	The Council's request to be included as part of the Local Economic Development Working Group has been noted. The working group will include relevant attendees from local authorities across the ETS Study Area.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>promote such opportunities to young people and residents across the county.</p>	
3.6.19	Employment and Training Strategy	<p>Based on the above, the Council's expression of economy, tourism and employment impacts and requests for ways in which the Applicant could seek to address them are summarised as follows:</p> <ul style="list-style-type: none"> • Maximising beneficial economic impacts for Buckinghamshire residents through securing accessibility to job opportunities – the Council considers the provision of sustainable transport modes to access the airport to be key to addressing this impact. As set out in the Highways and Transport sub-section, an express bus connection between Aylesbury and the Airport is sought, together with the reinstatement of an at least hourly bus service along line 61. 	<p>Please see previous response to LIR reference 3.3.30 regarding future consideration of the reinstatement of the 61 bus service.</p>
3.6.19	Employment and Training Strategy	<p>Realising the beneficial economic impacts of procurement for local businesses – the Council is keen to work with the Applicant to develop specific initiatives for inclusion in the further development of the Employment and Training Strategy, which should also target the ten priority wards listed in the 'Opportunity Bucks' programme.</p>	<p>The expression of interest to develop the Employment and Training Strategy (ETS) [APP-215] further is noted. As outlined within the ETS the airport operator will continue to prioritise the utilisation of local businesses within the supply chain and measure within existing frameworks will be implemented to help ensure opportunities are more accessible for small to medium sized enterprises.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.6.19	Employment and Training Strategy	Tackling adverse impacts of out-migration of skills from Buckinghamshire – the Council is keen to work with the Applicant as part of the LEDWG to exert influence on the way in which employment opportunities are developed. In particular, the Council will look to promote opportunities to young people within the Buckinghamshire communities.	The Council's request to be included as part of the Local Economic Development Working Group has been noted. The working group will include relevant attendees from local authorities across the ETS Study Area.
3.6.19	Employment and Training Strategy	Maximising beneficial economic impacts and developing transferable legacy skills within the supply chain – the Council wishes to partner with appropriate organisations, such as Bucks Business First, to work with the Applicant on supply chain readiness and accessibility of local businesses to suitable supply chain opportunities.	As outlined in the Employment and Training Strategy [APP-215] during the construction phase, the existing procurement process will support, the development of standard procurement materials, easy-to-understand requirements, and provide support to ensure procurement opportunities are inclusive and accessible to various types and sizes of businesses.
3.6.20	Draft DCO	The dDCO (AS-067) does not include any specific reference to ensuring how the economic benefits associated with expansion will be secured. It is to be assumed that this detail will emerge through further development of, and discussions around, the Employment and Training Strategy. The Employment and Training Strategy includes a commitment to engaging with local authorities so to reiterate, the Council would be seeking a place on the LEDWG to ensure collaborative efforts to maximise economic benefits across the county.	The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		This should be reflected in the dDCO (AS-067) as appropriate.	
3.7 Landscape and Visual			
3.7.5 – 3.7.6	Landscape and Visual	<p>The submitted Environmental Statement Chapter 14 Landscape and Visual Revision 1 (AS-079) identifies significant adverse effects on the Chilterns AONB as a result of ‘a noticeable deterioration to the aesthetic and perceptual characteristics of the AONB’ during both the construction and operation of Phase 2b of the Scheme, as a result of increased aircraft movements.</p> <p>The Environmental Statement is unclear as to the extent of these effects with considerable ambiguity between the submitted elements of the Environmental Statement. For example, despite identifying that there would be significant effects in the Chilterns AONB, the assessment does not appear to identify any significant effects in the Landscape Character Areas (LCAs) that fall within Chilterns AONB in the Study Area.</p>	<p>The study area defined in Chapter 14 Landscape and Visual of the ES ([AS-079]) is considered to be large enough to assess all of the likely significant landscape and visual effects of the Proposed Development.</p> <p>Considering potential landscape or visual effects within an overly large study area (for example considering all landscape character areas within 15km of the Main Application Site) would make understanding the key landscape and visual effects of the Proposed Development more difficult by including extraneous baseline information and receptors which are unlikely to be significantly affected by the Proposed Development (such as the landscape of (Buckinghamshire).</p> <p>Accordingly effects on the landscape in Buckinghamshire are considered in relation to tranquillity and specifically land within the Chilterns AONB where aircraft would be below 7,000 ft above mean sea level (AMSL).</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.7.7	Landscape and Visual	<p>There also seems to be a discrepancy between the extent of the study area and the areas identified as being overflowed by increased flight numbers (the potential source of adverse effects). The Study Area stops at approx. 5km whilst flights below 7,000ft are shown to extend out to approx. 35km. As a result, the Environmental Statement is unclear whether the identified significant adverse effects extend beyond the Study Area and into Buckinghamshire. The Council requires additional clarification of the assessment, to confirm whether the conclusions drawn are applicable to the parts of the Chilterns AONB that are within Buckinghamshire.</p>	<p>The study area is defined in Chapter 14 Landscape and Visual of the ES (AS-079) and presented on Figures 14.1 and 14.17 of the ES. Figure 14.17 shows, amongst other things, the maximum extent of the area within the AONB where the number of overflights per day up to 7,000ft (including part of Buckinghamshire).</p> <p>The conclusions drawn in Chapter 14 of the ES, in terms of the landscape and visual effects of the Proposed Development on Buckinghamshire, related solely to effects on tranquillity within the Chilterns AONB where aircraft would be below 7,000 ft above mean sea level (AMSL).</p>
3.7.8	Landscape and Visual	<p>In addition to over flights, it also appears that there is potential for highway works and increased traffic on rural roads (particularly in the Chilterns AONB) in the Buckinghamshire area that have not been explored within the Environmental Statement. There is the potential that further development of the CTMP, which is currently in outline form (APP-130) will identify aspects of the Scheme that could introduce additional landscape and visual impacts within Buckinghamshire. This will particularly be the case should HGV routes or construction activities be sited close to the Chilterns AONB or the more rural villages of</p>	<p>The Affected Road Network (ARN) is determined by the strategic model and includes the roads from which likely significant effects may potentially occur and is therefore the study area for traffic related environmental effects. The ARN is shown in Figure 7.1 [AS-098] and [Figure 16.1 [AS-103] for air quality and noise respectively. Receptors within the ARN determined study areas are included in the assessments and effects assessed and reported in the Environmental Statement. Roads and receptors outside of the ARN, which includes most of Buckinghamshire and the rural roads mentioned, are not likely to experience significant environmental effects and are therefore not</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>the County. In the absence of the resolution of these ambiguities and the provision of clearer information, the Council reserves its position on the potential adverse impacts of the Scheme on the Buckinghamshire area. The Council is seeking additional clarity on the controls that will be incorporated within the CTMP as it is developed. Ideally this will include controls preventing mass haul and lorry routes and construction compounds or other sites supporting construction (e.g. spoil disposal) being sited within Buckinghamshire.</p>	<p>assessed. This approach is widely accepted, included in relevant guidance, and best practice for assessment of environmental effects from highway related impacts.</p> <p>The Outline Construction Traffic Management Plan (CTMP) [APP-130] provides the principles to and measures to be developed in the full CTMP by the appointed contractor which, as secured by Requirement 14 of the draft DCO [AS-067] must be substantially in accordance with the Outline CTMP. As described in Section 4.2 of the Outline CTMP “<i>A principal consideration when identifying designated routes will be the minimisation of travel along any road that does not form part of the Primary Route Network (PRN)</i>” and “<i>it is envisaged the great majority of construction vehicles will approach the Site using the M1 and the A1081 (New Airport Way)</i>”.</p> <p>Given that the areas of concern raised are the west of the M1 very little construction traffic is expected on that part of the network. Requirement 14 of the draft DCO [AS-067] states that construction will not commence until the full CTMP is “<i>approved in writing by the relevant planning authority, following consultation with the relevant highway authority on matters related to its function.</i>”.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			There are no construction activities or compounds proposed in Buckinghamshire.
3.8 Heritage			
3.8.6	Cultural Heritage	due to the Council's concerns regarding the robustness of the traffic modelling that underpins the noise assessment (see Transport and Highways sub-section) it is felt to be appropriate that the Council reserves its final position in respect of related noise impacts to heritage assets.	Noted.
3.8.7	Cultural Heritage	In addition, it is unclear whether there may be further implications to heritage assets in Buckinghamshire as the Scheme is further defined. For example, in relation to construction traffic routes in proximity to sensitive assets or passing through historic landscapes and villages, which could arise following further development of the detail in the CTMP (APP-130). Potential impacts to setting could also arise if off-Site Highways works sought by the Council are developed, for example, at Ivinghoe.	<p>Noted.</p> <p>The Proposed Development as defined in Chapter 4 The Proposed Development of the Environmental Statement [AS-074] has been assessed appropriately and effects reported in the Environmental Statement.</p> <p>The Construction Traffic Management Plan will be developed by the contractor and will be substantially in accordance with the Outline Construction Traffic Management Plan [APP-130] which outlines appropriate measures to manage impacts from construction traffic. No further assessment is required.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.8.8	Cultural Heritage	<p>The analysis of the key issues within Buckinghamshire enables the identification of the following impacts that are considered relevant to the heritage topic. These impacts are associated with an explanation of the way in which the Council would wish to see them addressed by the Applicant:</p> <ul style="list-style-type: none"> • Potential for new heritage impacts to be identified following update to the noise modelling and subsequent analysis – the Council has set out how it wishes the Applicant to address the updates to the traffic modelling. Once this is completed, the Council wishes to receive updated noise modelling and analysis of consequential impacts for the heritage topic. • Potential for additional heritage impacts to be identified following further development of the CTMP (APP-130) – the Council is keen to be in a position to influence the further development of the CTMP (APP-130), as set out in the Highways and Transport sub-section. 	<p>Noted.</p> <p>The Applicant considers the traffic modelling and the environmental assessments that employ traffic data, or outcomes of assessments that employ traffic data, submitted with the application to be robust. No further assessment is required.</p>
3.9 Health and Community			
3.9.28	Health and Community	<p>Impacts from HGV traffic movements: contributing to noise effects, severance and reduction of amenity. Relevant to construction and operation.</p>	<p>It is expected that the great majority of construction HGVs will use only motorways and 'A' roads, the Construction Traffic Management Plan (CTMP) will be developed by the appointed contractor and must be substantially in accordance with the Outline CTMP [APP-130] ,</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			<p>as secured by Requirement 14 of the draft Development Consent Order [AS-067].</p> <p>The impacts of construction and operational traffic (including HGVs) have been assessed in Chapter 18: Traffic and Transportation of the ES [AS-030] and associated noise and air quality effects have been assessed in Chapter 16: Noise and Vibration of the ES [REP1-003] and Chapter 7: Air Quality of the ES [AS-076]. Based on these assessments, the magnitude of traffic impacts (including severance effects on drivers and pedestrian/cyclists), noise and air quality impacts do not give rise to significant adverse health effects and therefore no effects are reported in Chapter 13: Health and Community of the ES [AS-039]. The sensitivity of receptor populations has been taken into account in the health assessment.</p>
3.9.28	Health and Community	Impacts from increasing Luton Airport traffic demand using the Buckinghamshire highway network, as a preferential route at the county and sub-regional scale: contributing to noise effects, severance, visual intrusion, reduction of environmental quality (particularly where routes are unsuitable for traffic flows and/or vehicle composition) and reduction of amenity. Relevant to operation and meriting consideration of the timing of these increased flows, which may be earlier than typical peaks.	The Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201] has an extensive level of outputs reported such as traffic flows, link volume to capacity ratios, nodes delays, select link and routing analysis. Moreover, the recently submitted daily airport passenger and staff trip distribution, which was requested by the Examining Authority, adds to the list of outputs.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			<p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p> <p>The impact of road traffic noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. No significant adverse effects have been identified for Buckinghamshire. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>
3.9.28	Health and Community	Impacts from increased vehicular traffic within Aylesbury, including the three AQMAs: contributing to congestion and driver delay/stress, reduced air quality from traffic derived pollutants, severance, reduction of environmental quality, modal conflict and reduction of amenity. Relevant to construction and operation.	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p> <p>Regarding air quality impact see previous response to 3.5.5.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.9.28	Health and Community	Impacts from increased vehicular traffic within the villages of Pitstone, Marsworth and Ivinghoe: contributing to noise effects, severance, visual intrusion, reduction of environmental quality (particularly where routes are unsuitable for traffic flows and/or vehicle composition), modal conflict, increased risks to safety of all modes and reduction of amenity. Relevant to construction and operation.	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>
3.9.28	Health and Community	Impacts from increased travel demand from south Buckinghamshire including Chesham, Amersham and High Wycombe: contributing to noise effects, severance, visual intrusion, modal conflict, increased risks to safety of all modes and reduction of amenity. Relevant to operation.	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>
3.9.28	Health and Community	Impacts on the ability of rural communities to access employment opportunities: contributing to effects on rural connectivity (including to healthcare and community assets that support physical health), social cohesion and mental well-being. Relevant to construction and operation.	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			travelling to and from Buckinghamshire and/or using its local road network.
3.9.28	Health and Community	Impacts from increased noise (construction and operational traffic and aircraft) on areas valued for tranquillity and/or environmental quality: contributing to effects on tranquillity, reduced amenity, environmental quality and neighbourhood characteristics, and mental health and well-being. Relevant to construction and operation.	<p>The impact of noise (construction and operation) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>The approach to the assessment of noise and tranquillity in line with the National Planning Policy Framework (Ref 2.3) is set out in Section 16.5 of Chapter 16 of the Environmental Statement (ES) [REP1-003].</p> <p>An assessment of the landscape and visual effects, including consideration of noise and tranquillity (amongst other factors including overflight below 7,000 ft) on the Chilterns AONB is presented in Chapter 14 of the Environmental Statement [AS-079].</p>
3.9.28	Health and Community	Impacts from increased employment opportunities for Buckinghamshire residents: contributing to mental well-being and social cohesion.	Noted.
3.9.29	Health and Community	The Health and Community Assessment (AS-078) acknowledges that increased traffic generated from the expanded airport and changes to the highway network will result in	The Health and Community assessment [AS-078] has not identified significant adverse impacts on social capital and access to services due to increased traffic. Any potential impacts

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>adverse impacts on social capital and access to services. Consideration is also given to the direct relationship between air pollutants and mortality rate, leading to a reported minor adverse health effect. However, the analysis of impacts derived from traffic modelling, such as changes in air quality and noise, are focused on the local neighbourhood study area. Detailed consideration of traffic derived impacts on receptors within the wider study area, which is the category that Buckinghamshire County is placed in, is not provided.</p>	<p>would be mitigated by proposed off-site highways intervention works, as described in ES Chapter 4: The Proposed Development [AS-074] and the Outline Construction Traffic Management Plan [APP130].</p> <p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned area to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>
3.9.30	Health and Community	<p>The potential for changes in traffic to affect health determinants is acknowledged in the Environmental Statement in the context of health effects associated with pollution, changes in traffic flows and disruptions to access resulting in uncertainty and negative perceptions about potential negative impacts during construction and operation, which may give rise to stress, worry / negative impact on mental wellbeing, citing that this was raised during public consultation. The Environmental Statement does report a moderate adverse temporary effect on mental wellbeing which is significant (for the local neighbourhood of the</p>	<p>The Environmental Statement (ES) at Chapter 13 Health and Community [AS-078] identifies effects on mental wellbeing arising from public concern and uncertainty during the planning and construction stages about the construction and operational effects of the Proposed Development (see Table 13.20). This effect is identified as temporary since it will not continue once the project is operational and the effects are known (see paras 13.9.6 and 13.11.2). (Note that paragraph 13.9.3 of Chapter 13 incorrectly identifies a significant effect during all assessment phases where only the planning and construction stages should have been referred to.</p>

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		<p>area and the Wider Area), but in the absence of underlying detail, there is limited scope to propose effective mitigation, and this is considered a weakness of the assessment. It relates directly to the impacts listed above at nos. 1, 2, 3, 4, 5, 6 and 7.</p>	<p>This correction has been captured in the Errata Document submitted at Deadline 1).</p> <p>Embedded mitigation is described in Section 13.8, including measures to reduce traffic effects and associated environmental effects.</p> <p>Good practice mitigation set out in Section 13.8 states that the lead contractor will prepare a construction-specific community engagement plan for the construction of the Proposed Development, as detailed in the Code of Construction Practice [APP-049]. Ongoing engagement will provide information which may help to reduce uncertainty and stress.</p> <p>The Health assessment has made a reasonable worst-case judgement that stress related to the actual and perceived effects of the Proposed Development will persist despite any mitigation measures proposed, and therefore a residual effect has been identified in the ES.</p>
3.9.30	Health and Community	<p>The Council wishes to see this addressed in the following ways:</p> <ul style="list-style-type: none"> • Expansion of the study area for traffic related health and community impacts to include Buckinghamshire County highway network. 	<p>The trip distribution of the airport traffic was based on observed CAA data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included. The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority at Deadline 1 which</p>

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			<p>showed relatively low volumes of traffic through Buckinghamshire [REP1-016].</p> <p>The traffic data used in the health assessment, Chapter 13 Health and Community [APP-039], was provided by the Strategic Model CBLTM-LTN which has been calibrated and validated as per the DfT's TAG guidance. Moreover, the model was considered fit for purpose by all Host Authorities and National Highways. The level of detail in the model's geographical coverage was agreed with Host Authorities and National Highways, and was informed by observed CAA data on the distribution of airport passengers / staff.</p> <p>As such, and taking into account the low volumes of airport-related traffic passing through Buckinghamshire, it is not considered necessary to undertake any further assessment of the impacts within Buckinghamshire.</p> <p>As there are no significant traffic effects in Buckinghamshire, it is not considered necessary to undertake a health assessment of traffic increases in this area.</p>
3.9.30	Surface Access	<ul style="list-style-type: none"> • Application of traffic modelling for the Buckinghamshire County highway network, to the satisfaction of technical officers in relation to relevant third-party developments and 	See above response to LIR 3.9.30 'Health and Community'.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		validation, in accordance with the requirements presented in the Transport and Highways sub-section of this LIR.	
3.9.30	Surface Access Noise	<ul style="list-style-type: none"> Use of updated traffic modelling, addressing the concerns raised earlier in this LIR regarding validation of the modelling for use in Buckinghamshire, to enable a greater confidence to be assigned to downstream topic analysis. In particular, the noise and air quality assessment will need to be updated, in accordance with the requirements presented in the relevant sub-sections of this LIR. This should include qualitative analysis of potential health implications of all changes of greater than 1dB in noise, to reflect the increasing scrutiny of this matter within health assessment. 	<p>See above responses.</p> <p>As there are no significant traffic effects in Buckinghamshire, it is not considered necessary to undertake a health assessment of traffic increases in this area.</p>
3.9.30	Construction Traffic Modelling	<ul style="list-style-type: none"> Further development of the detail within the Construction Traffic Management Plan (APP-130), sufficient to allow identification of relevant receptors for health and community impacts from changes to traffic flows within Buckinghamshire. For example, clarifying the longer-distance haul routes; and proposals for the disposal of spoil – this could either be through early contractor engagement, or adopt the approach of restrictions preventing certain activities within Buckinghamshire. 	<p>Detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP), which would be developed in detail by the appointed contractor during the detailed design stage, The CTMP is required to be substantially in accordance with the Outline CTMP [APP-130], as secured by Requirement 14 of the draft Development Consent Order [AS-067].</p> <p>The CTMP outlines the formation of a traffic management working group (TMWG) as a forum for stakeholder engagement prior to the</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
			commencement of the Proposed Development. The TMWG would seek representation from the lead contractor, Luton Borough Council (LBC) and local councils, highways authorities and National Highways.
3.9.30	Surface Access	<ul style="list-style-type: none"> • Further development of the detail within the Surface Access Strategy (APP-228), sufficient to allow identification of relevant receptors for health and community impacts from changes to traffic flows within Buckinghamshire. 	As set out in the above response, the traffic modelling results identified low volumes of airport-related traffic passing through Buckinghamshire, and it is therefore not considered necessary to undertake any further assessment of the impacts with Buckinghamshire.
3.9.30	Health and Community	<ul style="list-style-type: none"> • Updated downstream topic analysis, using modelling as appropriate, to ensure that receptor identification (i.e. the study area may need to be reviewed), sensitivity and impact magnitude is updated and the analysis of significance of effects is robust for Buckinghamshire health and community receptors. 	See above responses. As there are no significant traffic effects in Buckinghamshire, it is not considered necessary to undertake a health assessment of traffic increases in this area.
3.9.30	Health and Community	<ul style="list-style-type: none"> • Review of suitable mitigation to address significant effects that may be identified following the updated analysis (see further detail to follow); including any relevant environmental appraisal of interventions that might be proposed 	See above response. As there are no significant traffic effects in Buckinghamshire, it is not considered necessary to undertake a health assessment of traffic increases in this area, or to provide mitigation measures.
3.9.30	Mitigation and control mechanism	<ul style="list-style-type: none"> • Development of suitable delivery mechanisms and assurances for the delivery of mitigation. 	See above response.

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3.9.31	Health and Community Construction	The Outline Traffic Management Plan (APP-130) does not preclude any works traffic/spoil deliveries in the vicinity of the airport passing through Buckinghamshire. The uncertainty that this presents in relation to understanding potential impacts on the communities of Buckinghamshire has been raised as an issue in the Buckinghamshire PADSS (AS-053). This clarity is key to addressing impact no.1 regarding HGV movement; and may subsequently be linked to the need to explore disturbance related impacts on additional communities in Buckinghamshire, depending on whether there are relevant works locations proposed in the County.	<p>Detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP), which would be developed in detail by the appointed contractor during the detailed design stage.</p> <p>It is likely that the origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes. Notably however, the cut / fill balance within the Proposed Development has been designed to minimise the movement of earth to / from the site during construction.</p> <p>The Construction Traffic Management Plan (CTMP) outlines the formation of a traffic management working group (TMWG) as a forum for stakeholder engagement prior to the commencement of the Proposed Development. The TMWG would seek representation from the lead contractor, Luton Borough Council (LBC) and local councils, highways authorities and National Highways.</p>
3.9.32	Health and Community	In addition to the above list of actions, the Council requires consideration of the impacts of the Scheme on Aylesbury, which relates to impact no. 3. This relates both to the proposals for traffic movement on the highway network in and around Aylesbury and specifically in	The change in traffic flows as a result of the Proposed Development were reviewed for the road links in the strategic model, including those in the south of Buckinghamshire, to identify those links that met the magnitude of impact thresholds in Environmental Impact Assessment (EIA)

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>relation to the impacts on the AQMAs, which are not reported within the health and communities chapter of the Environmental Statement (AS-078). An update to the assessment is sought and should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.</p>	<p>terms. The impacts on road links in this area did not meet the thresholds that triggered consideration of significant effects.</p> <p>Any significant effects have been identified through detailed modelled assessments and mitigation proposed. More details are provided in the Transport Assessment [APP-203 to APP-206].</p>
3.9.33	Health and Community	<p>Impact 4 relates to the rural villages on the preferential route to the Airport. For the villages of Pitstone, Marsworth and Ivinghoe, it is acknowledged that the projected peak hour traffic is expected to be low (AS-078). However, as noted in the transport and highway sub-section of this LIR, the Council has concerns about the level of confidence that can be assigned to the traffic modelling in the county due to reservations about the validity and transferability of the strategic modelling to local issues. The Council asserts that traffic movements through these villages will merit a high level of impact control, noting that they are situated on a direct route to the airport. This should also be reflected within the sensitivity assigned within the health and communities assessment, which the Council would wish to be elevated in recognition of the local transport context.</p>	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.9.34	Health and Community	In order to fully address impact nos. 5 and 6, the Council requires completion of the items listed above in addition to specific trip profiling for the communities within the south of the county; and potential commuting demand for employment associated with the Scheme. It is considered imperative to understand the potential additional trip generation from the Scheme and how people may seek to use the network in order to inform the identification of the potential for impacts, appropriate levels of sensitivity to change and to complete the assessment. Should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities	The Applicant considers that the issue raised regarding trip generation within the south of the county was answered within the Applicant's Response to Relevant Representations Part 2A of 4 [REP1-021] page 293-294, in response to RR-0166.
3.9.35	Health and Community Noise	Impact 7 relates both to traffic derived disruption, but also aircraft noise. In order to address this issue and impact, the Council requires completion of the items listed above such that the potentially sensitive receptors can be accurately identified – this will inform the assessment of traffic derived impacts on the Chilterns AONB and other relevant sensitive locations (at present the Environmental Statement (AS-078) only considers the community recreational assets of Wigmore Valley Park and Prospect House Day Nursery in relation to aircraft noise, both of which are in Luton). In addition, there is a need	See response to paragraph 3.9.28 for impact 7 relating to aircraft noise and tranquillity.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		for the noise baseline concerns to be overcome and additional information supplied and modelled in relation to aircraft noise, including potential changes to flight paths (as set out in the Noise sub-section of this LIR).	
3.9.36	Health and Community	The health and communities chapter of the Environmental Statement (AS-078) reports increased aircraft movements and changes in aircraft noise exposure in the population as a moderate adverse permanent effect on health outcomes across the study population. This is considered very generalised and the health and community assessment should be expanded to assess the impacts on tranquillity of affected parts of the Chilterns AONB, as well as any sensitive community receptors that are scoped in following the updates. Should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.	<p>See response to paragraph 3.9.28 for impact 7 relating to aircraft noise, tranquillity and the Chilterns AONB.</p> <p>The impact of noise from the Proposed Development on health and quality of life for residential and sensitive community receptors has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>An assessment of the impact of noise on health and communities has been undertaken and reported in Chapter 13 Health and Community of the Environmental Statement [APP-039]. This assessment inherently considers impacts and results of the assessment in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003]</p>
3.9.37	Health and Community	Impact 8 relates to the potential effects from the implementation of the ETS (APP-215), which are currently reported in the Environmental Statement (AS-078) as	The Employment Training and Skills Strategy [APP-215] outlines a study area for the ETS which encompasses Buckinghamshire. The ETS outlines that opportunities presented from the

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
	Employment and Training Strategy	<p>contributing, generally (not specifically to any section of the population) to a moderate beneficial temporary effect on mental and physical health associated with increased income, skills and job security. The Council is keen to ensure that actions are secured to deliver benefits at the local scale, meeting specific areas of need. In order to correctly assess and underpin such actions, the Council is seeking clarity on the implementation of the LETS, such that impact magnitude can be understood and assessment reviewed. The Council is also seeking involvement in the Economic Development Working Group, particularly in order to be able to express the local priorities and shape the mitigation and enhancement proposals.</p>	<p>Proposed Development can benefit residents of the ETS study area and the ETS explores the potential impact of the Proposed Development on employment and training in the whole study area. The Employment and Training Strategy [APP-215] sets out a series of goals and initiatives which will help ensure that benefits are realised in the study area.</p> <p>The Applicant notes the interest to join the Local Economic Development Working Group and will engage further with the Council when the group is being established.</p> <p>The Applicant highlights that the ETS is a strategy and does not make an assessment. The ETS outlines how the Applicant, and its strategic partners can maximise employment benefits through good practice approaches to employment and training.</p>
3.9.39	Draft DCO	<p>Schedule 2, Part 2 (1) references 'the' relevant planning authority (singular entity). However, some of the matters to be considered have trans-boundary implications. It is suggested that this should be broadened to state 'all relevant authorities' (plural) so, for example, the CoCP is scrutinised by all authorities that may experience impacts. There would be consequential changes to (2) and (3) as well, to change to authorities (plural), The CoCP is considered an important mechanism for controlling the magnitude of impacts, particularly those linked to construction</p>	<p>See the response to 3.11.2 (row 1) below.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		pollution and nuisance, on the physical and mental health of community members.	
3.9.40	Draft DCO	Schedule 2, Part 2 (8). As per the point above, the CoCP has trans-boundary implications that mean that there could be impacts across more than one highway authority. Consequently, it is considered that the approval should be sought from all relevant authorities, linked to where the impacts will occur (geographically).	See the response to 3.11.2 (row 1) below.
3.9.41	Draft DCO	Schedule 2, Part 2, 8 (2) - the Council agrees that these plans need to be developed pre-commencement, but there should also be reference in the requirement to them being 'implemented' pre-commencement. In the context of the health and community assessment, the specific rationale here is 8 (2) (e) Community Engagement Plan, which the Council would expect to include pre-commencement activities, for example, to ensure that affected communities are fully aware of the impacts and potential effects that they will experience and able to feel supported and heard, should any adverse effects arise once construction is underway.	The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.
3.9.42	Draft DCO	It is noted that the requirements currently listed in Schedule 2 principally have a spatial dimension in terms of their implementation. However, the Council is keen to understand whether there is potential for the Employment and Training Strategy (APP-215) to be	It is not appropriate for the Employment and Training Strategy (ETS) to be secured through a requirement in the Development Consent Order. It is proposed that commitment to the ETS will be secured through the s106 agreement to be entered into between the parties.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		included within the Schedule 2 list of documents that need to be approved (and implemented, as per earlier comment) in advance of construction. Or to receive clarification of alternative proposed means for ensuring that this strategy is developed and implemented pre-construction; and monitored thereafter.	
3.9.43	Draft DCO	Schedule 2 – Environmental Scrutiny Group 20 (2) and Technical Panels - does not include representation from the Council. The Council is requesting inclusion within the ESG and this would then need to be updated here.	The Applicant considers that the issue raised regarding membership of ESG was answered within the Applicant's Response to Relevant Representations Part 2A [REP1-021] pages 298 to 300, in response to RR-0166.
3.10 Cumulative effects assessment			
3.10.5	Cumulative Impact Assessment	The cumulative effects assessment does not consider the cumulative interactions from the expansion of airspace on residents in Buckinghamshire. The relevant representation (RR -0166) raises concerns that there is no consideration of the potential cumulative impacts of aircraft noise for residents under Heathrow, Stansted and Luton flight paths. The Council PADSS (AS-053) also raises concerns surrounding the change required to allocate more airspace for safe departures and arrivals across the south-east of England airports to allow expansion. There is a need for the ES to consider how these changes will impact residents and review whether there are	Changes to airspace and flightpaths and their cumulative effects are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment and consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course. A note explaining the relationship between the two processes was submitted at Deadline 1 [REP1-028] .

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		potentially significant cumulative effects that would then require mitigation.	
3.10.6	Cumulative Impact Assessment	It is recognised that that the assessment includes proposed development at Stansted, Heathrow, Gatwick and London City airports. However, it has been identified that would be no overlap with the core Zone of Influences (ZOI) for the Scheme and therefore the cumulative effects with other airport expansions are not considered further. The Council considers this conclusion to be premature and wish it to be kept under review pending further clarification of how airspace and flight paths may be altered in order to accommodate planned expansion.	<p>The cumulative effects assessment follows the methodology agreed through EIA Scoping [APP-166 to APP-168] and the engagement with consultees described in Section 21.3 of Chapter 21 of the Environmental Statement [AS-032], and considered other developments based on the environmental information available at the time of writing.</p> <p>Changes to airspace and flightpaths and their cumulative effects are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment and consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course.</p>
3.10.7	Cumulative Impact Assessment	These are manifesting as issues of disturbance, anxiety, mental health and, for residents with pre-existing conditions, some instances of physical health impacts. The potential addition of similar impacts due to the Scheme raises issues around cumulative impacts. The relevant representation (AS-053) cites the need to check last mile locations for groundworks such that this issue and the	<p>The first part of this comment is noted as a continuation of the issue raised above.</p> <p>The second part referring to AS-53 and 'last mile' or 'groundworks' is not fully understood however the Applicant believes this response is related to construction traffic and is addressed in 7.7.8 above. The Applicant will engage with the</p>

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		cumulative interactions are correctly articulated and addressed.	Council to understand the issue that is being raised.
3.10.8	Cumulative Impact Assessment	<p>The Council notes that the relevant representation from BMKALC (RR-0165) asserts that cumulative impacts on ecological connectivity have not been accurately portrayed – it claims that the sum of numerous 'minor adverse effects' (not significant) are not commented on. The Council is of the view that this is an essential requirement of the cumulative effect assessment and would wish to see further justification of this approach by the Applicant. The Council notes that explanation offered presently – that ecology has not been assessed further in the in-combination effects assessment as interactions of different aspect effects upon these receptors are provided in relevant Environmental Statement chapter (interactions between AQ, noise upon ecological receptors). The Cumulative Effects Assessment chapter of the Environmental Statement considers the combined impact on different ecological receptors. The Council would like to see confirmation that this combined impact assessment considers all impacts on ecological receptors, rather than narrowing scope to those that only record significant effects from single impacts.</p>	<p>The comments in RR-0165 are not clear on which part of the Environmental Statement (ES) BCC are directly referring to and they have been directed to the assessment of effects on biodiversity reported in Chapter 8 of the ES [AS-027] and the cumulative effects assessed and reported in Chapter 21 of the ES [AS-032]. The assessed effects of other relevant environmental aspects such as noise, air quality and agricultural land use changes are considered in the assessment of effects on biodiversity in-combination within Chapter 8 of the ES [AS-027].</p> <p>In terms of combined ecological effects for the Proposed Development within chapter 8, effects are considered in totality rather than in isolation. For example the loss of different sections of hedgerows across the site are considered as whole. The chapter follows the methods set out for assessment, as approved by statutory stakeholders, and considers both mitigation and enhancement as part of the assessment of effect. The Proposed Development will deliver an overall net gain in biodiversity..</p> <p>Habitat creation is provided as part of the design of the robust scheme with adequate embedded mitigation through the provision of open space</p>

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			<p>and landscape restoration areas. Additional areas of mitigation are also provided within the Habitat Creation Areas and off-site hedgerow restoration which will conserve and enhance ecological connectivity. These are detailed within the Outline Landscape and Biodiversity Management Plan (OLBMP) which forms Appendix 8.2 of the ES [AS -029] (secured by Requirement 10 in the Draft DCO [AS-067]) and the Biodiversity Net Gain Report which forms Appendix 8.5 of the ES [APP-067]. These will ensure appropriate management of the habitats for 50 years with monitoring included to identify the need for adjustments to the management as required.</p>
3.10.11	Draft DCO	<p>Schedule 2, Part 2 (1) references 'the' relevant planning authority (singular entity). However, some of the matters to be considered have trans-boundary implications. It is suggested that this should be broadened to state 'all relevant authorities' (plural) so, for example, the CoCP is scrutinised by all authorities that may experience impacts. There would be consequential changes to (2) and (3) as well, to change to authorities (plural), The CoCP is considered an important mechanism for controlling the magnitude of multiple intra-Scheme impacts acting in combination, particularly those linked to construction pollution and nuisance.</p>	<p>See the response to 3.11.2 (row 1) below</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.10.12	Draft DCO	<p>Schedule 2, Part 2 (8). As per the point above, the CoCP has trans-boundary implications that mean that there could be impacts across more than one highway authority. Consequently, it is considered that the approval should be sought from all relevant authorities, linked to where the impacts will occur (geographically).</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p> <p>The Applicant has amended Requirement 8(1) Code of Construction Practice deleting reference to the tail piece. This is unnecessary because paragraph 2 of Schedule 2 already makes provision to amend approved plans, details and schemes under Schedule 2, provided certain conditions are met and necessary further approvals obtained.</p> <p>See also the response to 3.11.2 (row 1) below.</p>
3.11 Draft Development Consent Order			
3.11.2	Draft DCO	<p>DCO wording: Part 1 Paragraph 2, Interpretation "Relevant highway authority" "Relevant planning authority"</p> <p>Suggested changes: "To which the provision relates" is insufficient to capture all circumstances.</p> <p>Comments:</p>	<p>The Applicant considers that the definition of the relevant planning and relevant highway authority is appropriate as the definition refers to '<i>... the area to which the provision relates.</i>' so already refers to the part of the Authorised Development.</p> <p>However, the Applicant is happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		Amend to "provision of the Order, part of development or relevant effects of the development relate" To allow for Buckinghamshire Council Planning Authority/ Highway Authority to be consulted, if required.	.
3.11.2	Draft DCO	<p>DCO wording: Amendments to approved details, Sch.2, paragraph 2</p> <p>Suggested changes: As above, amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments: 'Relevant Planning Authority' definition to be expanded to include consultation of neighbouring authorities, such as Buckinghamshire Council, where appropriate; and standard consultation period to apply. Please see Section 2.10 of Written Representations</p>	<p>The Applicant considers that the relevant local planning authority is competent to approve such variations and does not need to consult on any proposed changes.</p> <p>However, the Applicant is happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>
3.11.2	Draft DCO	<p>DCO wording: Parameters of authorised development, Sch.2, paragraph 6</p> <p>Suggested changes:</p>	Please see the Applicant's response to 3.11.2 (row 2) above.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>Make provision for the relevant planning authority to undertake consultation on any changes to the parameters specified.</p> <p>Comments: Absence of consultee specification to inform paragraph 2(4) of Part 1 of Schedule 2 of the dDCO. Please see Section 2.10 of Written Representations.</p>	
3.11.2	Draft DCO	<p>DCO wording: Code of construction practice, paragraph 8</p> <p>Suggested changes: As above, amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.</p> <p>Implementation Trigger required.</p> <p>Comments: To include consultation Buckinghamshire Highways, who would like to be party to details relating to construction matters.</p> <p>The construction of the development must be carried out in accordance with The Code of Construction Practice Please see Sections 2.2 and 2.10 of Written Representations.</p>	<p>See the response to 3.11.2 (row 1) above. The Applicant considers that the relevant local planning authority is competent to approve such variations to the Code of Construction Practice and its associated management plans and does not need to consult on all proposed changes save where specifically identified in the requirement.</p> <p>The Applicant is, however, happy to engage further with the Council to understand and progress this matter where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.11.2	Draft DCO	<p>DCO wording: Construction workers, paragraph 15</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient insulation period with consultees.</p> <p>Comments: 'Relevant Planning Authority' to include, consultation with Buckinghamshire Highways, who would like to be party to details relating to construction matters. Please see Section 2.2 Transport and Highways of Written Representations.</p>	Please see the Applicant's response to 3.11.2 (row 2) above.
3.11.2	Draft DCO	<p>DCO Wording: Landscaping design, paragraph 9</p> <p>Suggested changes: Implementation Trigger required.</p> <p>Comments: Landscaping to be carried out prior to first use of the development. Please see Section 2.10 of Written Representations.</p>	The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.11.2	Draft DCO	<p>DCO wording: Landscape and biodiversity management plan, paragraph 10</p> <p>Suggested changes: Implementation Trigger required.</p> <p>Comments: To be carried out prior to construction/ occupation, which ever is most appropriate.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>
3.11.2	Draft DCO	<p>DCO wording: Landscape and biodiversity management plan, paragraph 10</p> <p>Suggested changes: Amendment to allow consultation with Natural England.</p> <p>Comments: Given the implications of the management plan for protected species Buckinghamshire Council would suggest that paragraph 10, sub paragraph 1 makes provision for the relevant planning authority to undertake consultation on the landscape and biodiversity management plan with Natural England. Please see Section 2.10 of Written Representations</p>	<p>The Applicant considers that the issue raised regarding approval of the LBMP by NE was answered within the Applicant's Response to Relevant Representations Part 2A of 4 (REP1-021) page 315, in response to RR-0166.</p> <p>The Applicant considers that the relevant local planning authority is competent to approve such management plans and does not need to consult Natural England.</p> <p>The Applicant is, however, happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.11.2	Draft DCO	<p>DCO wording: Construction traffic management, paragraph 14</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments: Relevant Planning Authority' to include consultation with Buckinghamshire Highways, who would like to be party to details relating to construction traffic matters. Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>The Applicant considers that the relevant local planning authority is competent to make such decisions and does not need to consult save where specifically identified in the requirement.</p> <p>The Applicant is, however, happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>
3.11.2	Draft DCO	<p>DCO wording: Construction workers, 15</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees</p> <p>Comments:</p>	<p>The Applicant considers that the relevant local planning authority is competent to make such decisions and does not need to consult save where specifically identified in the requirement.</p> <p>The Applicant is, however, happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>Relevant Planning Authority' to include consultation with Buckinghamshire Highways, who would like to be party to details relating to construction worker travel plan matters. Please see Section 2.2 Transport and Highways of Written Representations.</p>	
3.11.2	Draft DCO	<p>DCO wording: ESG, paragraph 20 (2)</p> <p>Suggested changes: Suggested wording changes to Paragraph 20 to include Buckinghamshire Council in the ESG.</p> <p>Comments: Please see Section 2.10 of Written Representation.</p>	<p>The Applicant considers that the issue raised regarding local authority membership of ESG was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.</p>
3.11.2	Draft DCO	<p>DCO wording: ESG, paragraph 20 (2)</p> <p>Suggested changes: The 'representation from an airline industry body' must not be the airport owner/ Luton Rising.</p> <p>Comments: The ESG must remain an independent body, this will be assisted with Buckinghamshire</p>	<p>The 'representation from an airline industry body' will not be the airport owner/ Luton Rising. A fundamental principle of the Green Controlled Growth Framework [APP-218] is that the scrutiny provided by the ESG should be independent and impartial, and that airport representatives (including representatives of airlines operating at the airport) should not have a role on ESG. The purpose of an airline industry representative is to provide guidance on how growth at the airport can be managed via the slot</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		Council being on the panel. Please see Sections 2.1, 2.2 and 2.3 of Written Representations.	allocation process. Changes to drafting are being considered to clarify this point.
3.11.2	Draft DCO	<p>DCO wording: Technical Panel, Paragraph 20 (8 -9)</p> <p>Suggested changes: Tighter definition to name the individuals and bodies.</p> <p>Comments: Buckinghamshire Council would like to be a named body on the Technical Panel. Please see Section 2.10 of Written Representations Highways rep.</p>	<p>Named individuals and bodies are included in the draft Technical Panels Terms of Reference included at Appendix B to the Green Controlled Growth Framework [APP-220].</p> <p>The Applicant considers that the issue raised regarding membership of Technical Panels was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.</p>
3.11.2	Draft DCO	<p>DCO wording: Exceedance of Limit. Paragraph 24</p> <p>Suggested changes: An implementation timeframe for the Mitigation Plan, once approved, needs to be provided.</p> <p>Comments: To ensure that mitigation is carried out in a timely manner. Sub para (4) insert new (b) must "include a timetable for implementation" Please see Section 2.2 Transport and Highways of Written Representations.</p>	The definition given for a Mitigation Plan in Paragraph 18 of Schedule 3 of the draft Development Consent Order [AS-0067] states that it must include a proposed programme for implementation of mitigation.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.11.2	Draft DCO	<p>DCO wording: Review of implementation of this Part, Paragraph 25</p> <p>Suggested changes: Review of implementation should be undertaken annually. Amend sub para (1) from 5 to 1 year.</p> <p>Comments: To ensure mitigation is quickly applied, when required. Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>The review of implementation of this part relates to a review of the overall GCG process and is not related to the implementation of mitigation. It is not considered necessary to carry out an annual review of the GCG process.</p>
3.11.2	Draft DCO	<p>DCO wording: Passenger cap for the authorised development, paragraph 26</p> <p>Suggested changes: Amended to address the inconsistency with the Green Controlled Growth Framework (GCGF).</p> <p>Comments: As currently drafted, the Council is of the opinion that these requirements do not adequately deal with the phased approach to increasing passenger numbers to the cap. This places the Requirements at odds with the GCGF. Please see Section 2.10 of Written Representations</p>	<p>Please see response to Section 2.10.18 (page 176) of the Applicant's Response to Written Representations made by Interested Parties subject to an SoCG at Deadline 1 (Part 2) [TR020001/APP/8.39].</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.11.2	Draft DCO	<p>Night quota cap, paragraph 27</p> <p>Suggested changes: Amend paragraph 20 for Buckinghamshire Council, and other neighbouring authorities, to form part of the ESG.</p> <p>Comments: makes provision for the relevant planning authority to approve a variation to the night quota cap, in consultation with the ESG. Buckinghamshire Council is concerned that its absence from the ESG would prevent it, and other neighbouring authorities, from representing the best interests of their communities on this matter. Please see Section 2.10 of Written Representations</p>	<p>The Applicant considers that the issue raised regarding membership of ESG was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.</p>
3.11.2	Draft DCO	<p>DCO wording: Offsite highways works paragraph 29</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments: Relevant Planning Authority' to include, Buckinghamshire Highways, if off-site highway</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		works fall within Buckinghamshire Council. Or to allow consultation with Buckinghamshire Council, where required; who would like to be party to the transport related impacts monitoring and mitigation approach.	
3.11.2	Draft DCO	<p>DCO wording: Offsite highways works paragraph 29</p> <p>Suggested changes: Trigger required for implementation of mitigation scheme.</p> <p>Comments: Within X period. – to ensure timely implementation of mitigation. Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>The Applicant has amended the draft DCO, submitted at Deadline 2, to clarify the trigger for the implementation of the mitigation scheme. This amendment clarifies that, the airport is not to be operated above the passenger cap permitted by the LLAOL planning permission until a transport related impacts monitoring and mitigation approach for the operation of the airport above that cap has been submitted to and approved in writing by the relevant planning authority.</p>
3.11.2	Draft DCO	<p>DCO wording: Travel Plans paragraph 30</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments:</p>	<p>The Applicant considers that the relevant local planning authority is competent to make such decisions and does not need to consult save where specifically identified in the requirement.</p> <p>The Applicant is, however, happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>Relevant Planning Authority' to include consultation with Buckinghamshire Highways, who would like to be party to the travel plans. Please see Section 2.2 Transport and Highways of Written Representations.</p>	
3.11.2	Draft DCO	<p>DCO wording: Travel Plans paragraph 30</p> <p>Suggested changes: (3) Updating of travel plans should take place annually.</p> <p>Comments: To ensure mitigation/intervention is quickly applied, when required.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>
3.11.2	Draft DCO	<p>DCO wording: Travel Plans paragraph 30</p> <p>Suggested changes: Mitigation/ successful implementation strategy/ review required.</p> <p>Comments: To ensure targeted intervention should travel plan targets not be met. Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>CAA data will be analysed and progress towards modal share Targets will be reported on an annual basis as set out within the Framework Travel Plan [AS-131] Section 4 Paragraph 4.1.2.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
3.11.2	Draft DCO	<p>DCO wording: Operational air quality plan paragraph 31</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments: Relevant Planning Authority' to include consultation with Buckinghamshire Environmental Health, who would like to be party to air quality matters. Please see Section 2.10 and 2.4 of Written Representations.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>
3.11.2	Draft DCO	<p>DCO wording: Greenhouse gas action plan, paragraph 32</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments: Relevant Planning Authority' to include consultation with Buckinghamshire Climate Change Officers, who would like to be party to the Greenhouse gas action plan. Please see</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		Section 2.10 and 2.1 of Written Representations.	
3.11.2	Draft DCO	<p>DCO wording: Operational waste management plan, paragraph 33</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments: Relevant Planning Authority' to include consultation with Buckinghamshire Council, who would like to be party to the water management plan. Please see Section 2.10 of Written Representations.</p>	The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.
3.11.2	Draft DCO	<p>DCO wording: Applications made under requirements, paragraph 35</p> <p>Suggested changes: Amendment to allow for statutory 21 day consultation period for consultees and further extension of this period, should it be required.</p> <p>Comments:</p>	The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		<p>To make provision for a minimum consultation period for applications made under requirements, akin to the 21 days defined in Paragraph 18, of Part 3, of Schedule 2 of the dDCO. The Applicant should also ensure that an appropriate mechanism is included within the dDCO for extending this consultation period should further issues arise or if insufficient information is made available to the consultee. Please see Section 2.10 of Written Representations.</p>	
3.11.2	Draft DCO	<p>DCO wording: Further information, paragraph 36 (3)</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility for neighbouring authorities to act as consultees.</p> <p>Comments: Limits consultation on the discharge of DCO requirements to those consultees specified within a requirement itself. Please see Section 2.10 of Written Representations.</p>	<p>The Applicant notes the comments made and is considering these further.</p> <p>The Applicant notes the Council's concerns on the procedure for discharge of requirements. It notes that the list provided is not exhaustive but an initial response to the identified requirements is set out below.</p> <p>The Applicant remains happy to continue its dialogue with the Council to better understand and progress these matters where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>
3.11.2	Draft DCO	<p>DCO wording: Paragraph 39 (4) "specified local authority"</p> <p>Suggested wording:</p>	<p>The Applicant's current position is that it is only the host authorities that should be specified as a local authority.</p>

LIR Reference	Topic	LIR Extract (verbatim)	Luton Rising's Response
		Buckinghamshire Council to be named as a specified local authority.	The Applicant remains happy to continue its dialogue with the Council to better understand and progress these matters where possible.

REFERENCES

Ref 2.1 World Health Organisation (2018), Environmental Noise Guidelines for the European Region.

Ref 2.2 Department for Transport (2018), Aviation 2050 – the future of UK aviation.

Ref 2.3 Ministry of House, Communities and Local Government (2021), National Planning Policy Framework