



**LONDON LUTON AIRPORT EXPANSION DEVELOPMENT CONSENT ORDER  
APPLICATION**

**ISSUE SPECIFIC HEARING 6 DEALING WITH MATTERS RELATING TO  
BIODIVERSITY, WATER, LAND-USE, LANDSCAPE AND VISUAL, DESIGN AND  
HERITAGE.**

**POST HEARING SUBMISSION FOR CENTRAL BEDFORDSHIRE COUNCIL**

**1. Introduction**

This document sets out the post hearing submissions and summary of oral submissions made by Central Bedfordshire Council (CBC) at Issue Specific Hearing 6 (ISH6) held on Friday 29 September 2023 in relation to the Development Consent Order for the proposed expansion of London Luton Airport by Luton Rising.

ISH6 was attended by the Examining Authority (ExA), the Applicant, the Host Authorities and other Interested Parties.

This report summarises the position of Central Bedfordshire Council only, focusing on Agenda items 5 and 7. Responses to action points arising from the hearings are set out in Appendix 1.

<b>5. Landscape and Visual</b>	
Approach to methodology of the LVIA	The ExA advised that questions on this would be dealt with in the first round of written questions. CBC will provide comments at Deadline 4, where applicable.
Appropriateness of the photomontages/visualisations	<p>The Applicant advised that typographical errors have been noticed on the visuals in Appendix 14.7 Accurate Visual Representations and this will be addressed at Deadline 3.</p> <p>Within CBCs LIR (REP1A-002) Para 5.7.20 it specifies the need for a consistent approach to visuals as there is currently lack of consistency with the use of wireframes and blocks for others. The Applicant has responded (REP2A-005) and indicates that wireframes are used for long distance views and block photomontages are used for short and middle distance views.</p> <p>The ExA asked CBC whether this is sufficient to address the points raised or whether block views are required for some of the key viewpoints such as from Luton Hoo or Someries Castle. The CBC Officer confirmed that this would be dealt with in writing and is captured by Action Point 20 (see Appendix 1).</p> <p>The ExA sought clarification on the need for additional viewpoints to the north, north-west and west of Luton. The CBC Officer confirmed that this would be dealt with in writing at Deadline 3 and is noted as Action Point 22 (see Appendix 1).</p>
Assessment finding in respect of landscape and visual receptors	<p>The ExA asked whether CBC were satisfied with the mitigation proposed to reduce the identified significant landscape visual effects from the development.</p> <p>The CBC Officer indicated that as set out in the CBC LIR (REP1A-002), a number of concerns have been raised regarding the suitability of the mitigation. The Council's Conservation Officer provided further submission setting out concerns relating to the impact on Luton Hoo Registered Park and Garden (RPG), notably in respect to multi storey car park P1 as shown on Viewpoint 18 (AS-039) and highlighted the significance of the RPG as a result of work by Capability Brown. Particular reference was made to Hog Trough Valley and the visual impact as a result of car park P1 breaking the treeline. It is considered that further assessment of the impact of views from Hog Trough Valley is required and further information is set out in Appendix 1.</p> <p>The Council's Conservation Officer highlighted that the material finish and lighting configuration needs careful consideration. This is reflected in paragraph 5.7.12 of the CBC LIR (REP1A-002).</p> <p>Reference was made to the need to consider day and night impacts in terms of impacts on tranquillity and the landscape. <a href="#">CBC Tranquillity Study (dated August 2023)</a> provides detailed guidance on assessing tranquillity and is referenced in CBCs LIR. It is noted that the Applicant has referred to Campaign to Save Rural England's Tranquillity Mapping which is acceptable. However, query if they could also use Tranquillity Strategy SPD?</p>

	<p>The Council's Conservation Officer also highlighted concern about the relocated Fire Training Ground, which is in close proximity to the Someries Castle Scheduled Monument. The points raised are captured in the CBC LIR paragraphs 5.4.10, 5.4.11 and 5.4.30 (REP1A-002).</p>
Chilterns AONB and assessment of Special Qualities	<p>CBCs LIR (REP1A-002) and WR (REP1-046) raised concerns regarding the proposal on the Chilterns AONB, notably paragraph 2.9 of CBCs WR and Paragraph 5.7.16 of the LIR.</p> <p>Action Point 25 requires the Applicant to liaise with Chilterns Conservation Board and local authorities on the content of further assessment being undertaken on the Chilterns AONB. CBC welcome the opportunity to be involved in this.</p>
Effects of lighting	<p>Within CBCs LIR (para. 5.7.21) (REP1A-002) states, <i>a <b>Lighting Obtrusion Assessment</b> (APP-052 and APP-053) has been undertaken (as set out in Appendix 5.2 of the ES), which concludes that the lighting from the development on views from the surrounding area would be negligible. This has been assessed by the Council's Landscape Officer. The conclusions regarding lighting impact are accepted but there is concern that due to the elevated position of the airport, the extensive scale of development there would be an impact on the sensitive Luton Hoo RPG.</i></p> <p>It is useful to clarify that CBC accept the assessment but due to lack of detail at this stage these aspects need to be dealt with through a requirement to ensure the lighting is appropriate given the characteristics of the surrounding area. It is welcomed that the Applicant is considering this, as per the Applicant's Comments on CBCs LIR (Ref. REP2A-005).</p>
Suitability of mitigation measures, the strategic landscape masterplan and the adequacy of Requirement 9 of the DCO	<p>The ExA asked CBC whether they consider the additional details relating to Hyde footpath 4, as set out in paragraph 5.7.13 of CBCs LIR (REP1A-002) could be included in Requirement 9. CBC confirmed that this was acceptable and note that the Applicant is going to consider this, as required by Action Point 28.</p> <p>Accurate Visual 20 (Fire Training Ground (FTG)) was shared during the hearing session. CBC were invited to confirm whether following receipt of the updated visual there was enough information to understand the visual impact of the FTG or is more information sought. CBC confirmed that sufficient information is available to undertake an assessment of the impacts and this would be dealt with at Deadline 4.</p> <p>The ExA asked the Host Authorities to confirm whether the approach to mitigation is satisfactory in terms of the approach to new hedgerows and the means to mitigate landscape visual effects. CBC confirmed that a number of issues have been raised in the CBC LIR (REP1A-002) regarding the proposed mitigation and further clarity was provided by the Council's Conservation Officer who stated that concerns raised on the impact on Luton Hoo RPG, particularly resulting from the multi-storey car park P1, which would be visible from Luton Drive (Viewpoint 18 in the LVIA -(AS-039)). Capability Brown's work is most evident at this point, particularly the sweep of the Hog Trough Valley and the lakes that were created. There is concern that car park P1 would break the treeline and mitigation measures are sought. This would partly be the use of materials and how lighting is considered. There is also a need to consider day and night impacts, in terms of visual impact and tranquillity.</p> <p>Relocation of the FTG is a concern due to its close proximity to the Scheduled Monument of Someries Castle, a point that has been raised throughout the process with the Applicant. Further clarification is sought about the visual and</p>

	<p>environmental impacts of the FTG use. The presentations relate to the installation of the FTG but not to its use. It is understood that there would be frequent use of the FTG during the day and night. Clarification has been asked as to what that means in landscape terms and how the designated heritage assets are experienced. CBC are engaging with the Applicant on this.</p>
7. Cultural Heritage	
<p>Assessment of effects and harm on designated heritage assets with a focus on the assets where disagreement exists between parties</p>	<p>The Applicant displayed viewpoints 17, 17a, 18 and 19 from Appendix 14.7 of the ES (AS-141 and AS-142).</p> <p>In response to a query from the ExA asking CBC to talk through concerns regarding lack of clarity in the visuals from Luton Hoo, the Council's Conservation Officer confirmed that clarity is sought in respect to the use of wirelines and blocks in the visuals, along with clarity with annotations to show the landscape features and the elements of the proposed development. This information has been provided by the Applicant and assist in assessing the proposal in terms of the wider landscape.</p> <p>The Council's Conservation Officer provided a detailed summary of Viewpoint 17A from the upper floors of Luton Hoo mansion, explaining that the historic landscape goes beyond the boundaries of the Registered Park and Garden. The effectiveness of mitigation to screen the development was discussed and needs to be carefully considered so that it does not affect the historic openness. For example, the use of screen planting would compromise the elements of openness that are part of the historic landscape.</p> <p>The EXA asked CBC to confirm if screen planting to the front of the FTG would be an unsuitable form of mitigation because it would not relate to the traditional form of the landscape. CBC's Conservation Officer confirmed that this would compromise the historic openness and counterpoised with the plantations of George Wood and Bush Pasture. CBC confirmed that potentially a lesser form of planting could maintain that sense of openness without compromising the landscape. This would need to be considered.</p> <p>The ExA sought clarification as to whether the information/assessment on the use of the Fire Training Ground was sufficient and whether the Cultural Heritage Management Plan provides suitable monitoring. In response, the CBC Officer confirmed that internal discussions between the Conservation Officer and Public Protection are still taking place. A meeting has taken place with the Applicant, who has advised that information is available in Chapter 7 of the ES relating to air quality. The Council's Conservation Officer added that the proximity of the fire training ground, its frequency of use and nature of its use causes concern in respect to the delicate brick fabric of Someries Castle. The CBC Conservation Officer highlighted that decay of the building has accelerated in the last 40 years and this provides an opportunity to understand whether this is related to the increased operational activity at the airport. Monitoring is welcomed, which would form part of the Cultural Heritage Management Plan, but it is unclear what mitigation could be used if the monitoring results show airborne pollutants are causing brick fabric decay. This is not documented in the Applicant's submission. Positive steps have been taken forward by the Applicant, but further work is required.</p>
<p>Designated and non-designated heritage assets raised by parties</p>	<p>No comment to make.</p>

<p>where assessments of effects and harm are required.</p>	
<p>The assessment approach undertaken to impacts on setting of designated heritage assets from noise and whether this is sufficient.</p>	<p>Para 5.4.20 of CBC LIR (REP1A-002) - Additionally, the proposed development, particularly due to operational impacts could impact on the tranquillity of the RPG. It is recognised that the levels of tranquillity are already influenced by the existing airport operations and there are other external noise sources including background road and rail noise. However, increased aircraft movements, which generally follow a flight path that passes over the northern section of the RPG could impact tranquillity.</p>
<p>Suitability of mitigation measures and the adequacy of Requirement 16 of the draft DCO in securing this.</p>	<p>No further comments to make.</p>

## Appendix 1 – Response to ISH6 Action Points

### **Action Point 20 – Confirm whether block views from some of the key viewpoints, such as from Luton Hoo and Someries Castle are required.**

The table below confirms the viewpoints, which need to show the development in block form. Whilst undertaking the assessment to fulfil action point 20, it has come to CBCs attention that there are some inaccuracies within the viewpoints, which are also summarised in the table.

Viewpoint No.	Details
5 Warren Drive (ref. AS-149)	Car Park P1 incorrectly shown
18 The Luton Drive (ref. AS-141)	Proposed car park P1 to be shown as 'rendered' block form.
19 Luton Hoo Parkland (ref. AS-141)	Several hatched boxes on the visual have no annotation.
20 Footpath (Hyde 5a) (ref. AS-141)	Block is acceptable. Request a visual to show the hedgerow mitigation planting.
23 Someries Castle 1 (AS-141)	Can be accepted as wirelines as this relates to work 2b IRVR.
24 Someries Castle 2 (AS-141)	Hatched box does not have any annotations.
24 Someries Castle 2 (showing Someries Farmhouse) (AS-141)	FTG should be shown in block.
25 Someries Castle 3 (AS-141)	There are missing annotations.
25 Someries Castle 3 (AS-141)	FTG should be shown in block.
44 Stopsley Wood, Luton Hoo (Assessment Viewpoint ref. AS-094)	Incorrectly annotated – this is Stockings Wood

Additionally, the Council's Conservation Officer has requested that further viewpoints from within Luton Hoo RPG are assessed, ensuring that the signature elements of the RPG highlighted by the Council's Conservation Officer, as summarised under agenda items 5 and 7 within this report, are captured. A detailed summary of the justification and proposed viewpoints is set out below. It is acknowledged that this request is at the discretion of the ExA.

The Luton Hoo Historic Landscape - the RPG parkland and land beyond to the northeast.

#### Context:

The designated RPG and the land beyond to the east, beyond the Lower Harpenden Road (the B653) is the survival of a designed landscape by Lancelot 'Capability' Brown (1716-1783).

'Signature' elements of Brown's approach to landscape design - rolling green slopes, lawns, tree clumps, lakes as a focal point in the landscape, and boundaries defined by thick belt planting, can be seen at Luton Hoo on a grand scale, in particular in the north section of the

designated historic parkland, facing the application site, incorporating the dramatic sweep of 'Hog Trough' valley and the drop to the 'centrepiece' lakes he created, with the created plantations of Bush Pasture and George Wood reinforcing the landscape backdrop beyond. The development of Luton, and the Airport, has impinged upon the quality of this landscape backdrop (see Fig.1, below) but something of its original, designed, contribution can remarkably still be experienced within the designated historic parkland at the foot of Hog Trough valley (see Fig.2 below).

This survival, amidst so much change, is therefore both precious and vulnerable, and the potential impacts of the proposed development need to be:

- i) fully understood
- ii) fully taken account of in:
  - measures of impact mitigation
  - Development Design Principles

Central Bedfordshire Council considers that Accurate Visual Representation (AVR) Viewpoint 19 (Luton Hoo Parkland) [AS-142] is insufficient to understand the potential impacts of the proposed development.

Two further AVR viewpoints are put forward (referenced as N1 and N2 on Fig. 3 below), and it is requested that Assessment Viewpoint Location No.44 (Stockings Wood), as shown on Fig.14.8 in ES Statement Chapter 14 - document TR020001-001084-5.03 (Revision 01), but mislabelled as 'Stopsley Wood', is included as an AVR photo montage, for complete clarity.



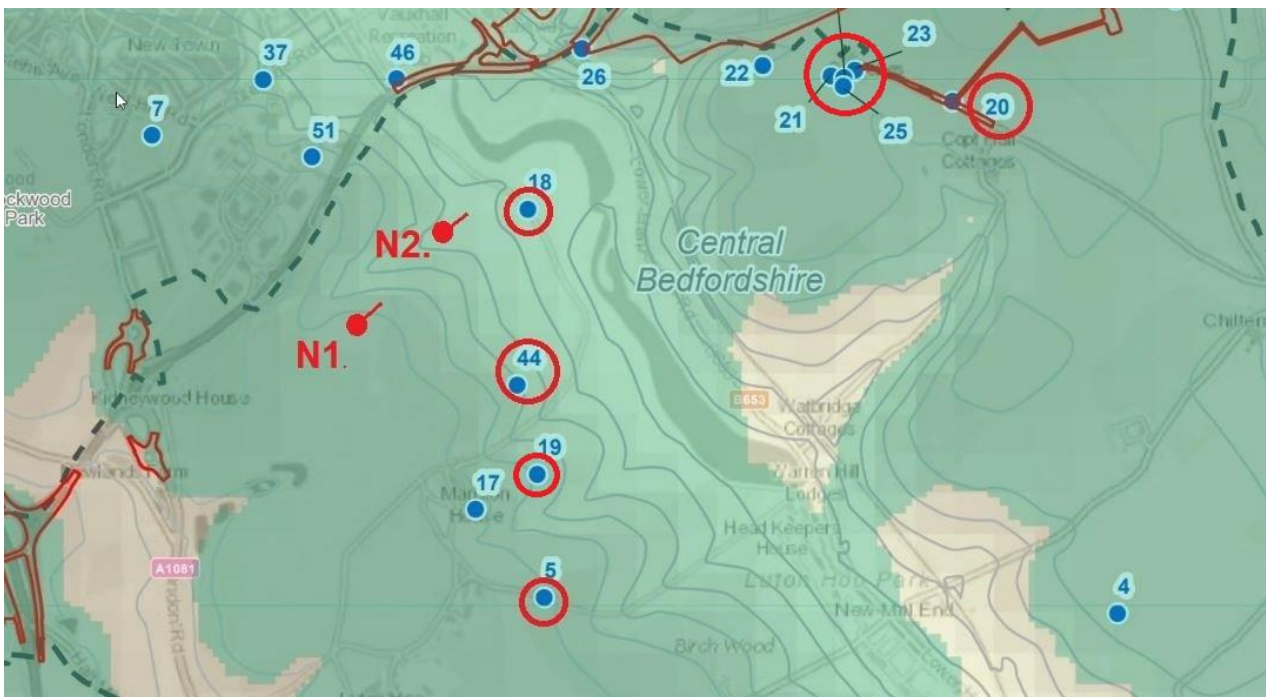
**Fig.1. View northeast to application site from land to the side of, and above, Hog Trough valley within the parkland of Luton Hoo (approximately corresponding to N1 in Fig.3 below).**

*Source – CBC Conservation Officer photo*



**Fig.2. View northeast to application site from within, and at the foot of, Hog Trough valley within the parkland of Luton Hoo (approximately corresponding to N2 in Fig.3 below).**

Source – CBC Conservation Officer photo



**Fig.3. Central Bedfordshire Council Notes (N) on ES Statement Chapter 14 Fig.14.8 Viewpoints in respect of Someries Castle, Luton Hoo RPG parkland and land beyond to the northeast. Notes (N): N1 and N2: Additional requested AVR Viewpoints towards application site, Hog Trough valley.**



**Action point 22 - Paragraph 5.7.19 of your LIR [REP1A-002] requests further viewpoints in the north, north-west and west of Luton to be assessed. Explain what locations you consider are required and why.**

On reflection, it is considered that the information is sufficient, and no further viewpoint assessment is required.