

SLAE's response to Volume 8 Additional Submissions (Examination)8.39 Applicant's response to Written Representations made by Non-statutory Organisations at Deadline 1 (Part 4)

General observations

In many responses LR don't actually answer the question asked and make reference to documents that don't answer the questions, and that's why SLAE have asked them.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

Stop Luton airport Expansion have a number of challenges over the statements on the subject of Green Horizons Park.

We suggested in our Relevant Representation the size of the amended footprint size now means that it can be built on previously-developed or 'brownfield' belt land to the West of the airport. Allowing Wigmore Valley park to be retained, and possibly a redesign of the expansion to save the County Wildlife Park. The public were never consulted on the re naming and re-sizing exercise.

Application document 01114, Luton Rising Planning Statement:

Green Horizons Park (GHP), formerly New Century Park (planning application LBC ref: 17/02300/EIA), is a proposed high quality mixed-use business park to the east of the airport, which includes the construction of a new access road (referred to in the planning application as Century Park Access Road (CPAR)) connected to Airport Way to the west of the airport. It comprises of office space (Class B1), warehouse and industrial space (Class B2 and B8), mixed employment space (Class B1/B2/B8), a hotel (Class C1), café space (Class A3); energy recovery centre (sui generis), internal access roads, car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection.

Evidence RR paragraph SLAE believe that GHP can be accommodated elsewhere in the town, as it's footprint is now smaller than New Century Park. Document 000812 Table 2.1. States that the land use, Non-agricultural fields (set aside for GHP (formerly known as New Century Park), and other habitat has an approximate area of 47ha, which is larger than identified for Wigmore Valley Park (41.6ha (District Urban Park and Garden and Natural and Semi-Natural Green space).

SLAE were unable to find the land sizing of GHP in the application documents and would appreciate if Luton Rising can identify where this information can be found or make this information available. Broken down by the business park (by each phase), excluding the airport access road (AAR), and the green / open space. In document 000678 the construction compound is identified at approximately 1,000sqm.

Luton Rising's Response,

Green Horizons Park benefits from an extant planning permission which will be implemented as set out in the Applicant's Deadline 1 Submission – **Green Horizons Park Additional Information [REP1-005]**.

SLAE Response

LR's response does not answer the questions asked.

Green Horizons Park Additional Information [REP1-005] does not answer the questions asked, that is why SLAE asked them. Why?

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

Evidence GHP a & b. SLAE believe that the business park can be located to the west of the airport on previously- developed or 'brownfield' land. This previously-developed or 'brownfield' land was identified in the SIFTs, but not considered for New Century Park and can now be for the smaller GHP footprint.

Evidence GHP c & d. GHP business park could also be built at Butterfield Green (05/01653/VARCON) which was originally (85-acre, 340,000 m2) a mixed use development including an innovation centre technology village, park and ride, university campus, hotel, relocated petrol filling station, cemetery extension and is now a Business & Technology Park and when completed offer up to one million square feet of office space in a parkland setting. London Luton Airport is situated approximately 4 miles to the south of the park and less than a ten minute drive.

[see Written Representation for referenced evidence]

Luton Rising's Response,

Green Horizons Park benefits from an extant planning permission which will be implemented as set out in the Applicant's Deadline 1 Submission – **Green Horizons Park Additional Information [REP1-005]**.

SLAE Response

SLAE are sure that LR's responses is the same as before, why?

Green Horizons Park Additional Information [REP1-005] does not answer the question. Why?

Repeating previous answers, duplication content and a prime example of how the whole consultation process has been from start until now.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

SLAE ask the inspectorate to visit the Butterfield Green industrial area (if not already visited) to determine this space. Evidence GHP e. Although SLAE prefer any development to be built on previously- developed or 'brownfield' land, we also believe that GHP could also be built on other park land in Luton, such as Leagrave, Wardown, Lewsey Parks, Dallow Downs, Stockwood Park, and the land at Stopsley (old Luton Regional Rec Ground). Having read and listened to those supporting the expansion speak about jobs at the Open Floor Hearing 1/2, we think that Leagrave, Wardown, Lewsey parks and Leagrave Common would be better suited to deliver the estimated 3,200 GHP jobs and due to their locations provide better opportunities for those wards associated with deprivation and low skilled workers.

If not already done so, we ask the Inspectorate to visit Leagrave, Wardown and Lewsey parks to determine if GHP is better suited there.

[see Written Representation for referenced evidence]

Luton Rising's Response,

Green Horizons Park benefits from an extant planning permission which will be implemented as set out in the Applicant's Deadline 1 Submission – **Green Horizons Park Additional Information [REP1-005]**.

The Applicant has submitted the **Draft Itinerary for the Accompanied Site Inspection (ASI)** at Deadline 2 **[TR020001/APP/8.35]**.

GHP is subject to a separate consent, therefore the request for the Inspectorate to visit alternative locations for GHP is not relevant to the Proposed Development and does not form part of the draft itinerary for the ASI.

SLAE Response

LR's response does not answer the questions asked.

Green Horizons Park Additional Information [REP1-005] does not answer the question. Why?

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Need Case Economics and Employment Surface Access

Written Representation (Verbatim)

Document 000831

2.1.3 Overall, Luton suffers from higher rates of deprivation than other parts of the ETS Study Area. According to the Index of Multiple Deprivation 2019, Luton was the 52nd most deprived local authority out of 317 in England. For measures of education deprivation and income deprivation, it ranked even lower at 45th and 49th respectively. Within Luton there are pockets of deprivation. 27% of Luton's neighbourhoods (defined by Lower Super Output Areas, a standard statistical area used by the Office of National Statistics) are within the 20% most deprived LSOAs in the country (Ref 2.vi), and 28% within the 20% most deprived for income. Some pockets of deprivation can be seen across the ETS Study Area. Specifically, there are higher levels of deprivation in urban areas such as Stevenage, Hemel Hempstead, Hatfield, Bletchley, Bedford and Letchworth, including employment deprivation as well as education, skills and training. Many of these areas have high transport costs for accessing areas with quality jobs, compounding the issue.

Despite high quality FE colleges and universities in the area, there are still communities without access to the skills and training support they need to access good work. However, on the whole, the wider study area sees relatively lower levels of deprivation.

Evidence GHP f, g, j In the 2019 indices of multiple deprivation in Luton the wards of Dallow, Northwell and Biscot are particularly mentioned. Section two of document 000831 also covers this topic and SLAE cannot understand why the council and Luton Rising are placing so much emphasis on the airport and expansion to create jobs and improve the standard of living for Luton residents, by one company (Luton Rising), one area (South, i.e. the airport,) the proposed developments on the land by Junction 10 of the motorway, when other areas of Luton need economic benefits more. For example if I was out of work or low-skilled living in central, northern, eastern areas of Luton I'd want my ward areas to provide employment, so that I could work, shop and live locally in my ward. Getting to the airport involves private and public transport all of which comes with a cost.

Taking and parking a car costs money or risks the wrath of residents surrounding the airport if parked on streets (Raynham Way). Able to park up in a street and then walk to the DART increases the distance a car can be parked away from the airport.

Jobs in the workers ward area more often than not enables walking and cycling, saving on costs and also providing health benefits, reducing long term health costs and reliance on the NHS. Shops (lunch etc) at the airport tend to be more expensive than shops in the workers ward area, another saving. Is it just SLAE that can see a common sense approach to jobs and economic benefits nearer to a workers home? 3,200 jobs elsewhere in Luton is just a 'no brainer' and in these days of 'work from home' will suit more. SLAE touched upon the susceptibility of aviation in our Relevant Representation and support the 3,200 Green jobs, but not at Wigmore Valley Park.

[see Written Representation for referenced evidence]

Luton Rising's Response,

Employment generated by the airport benefits the whole of Luton and the surrounding areas. Employees at the Airport do not solely live in wards adjacent to the Airport. The benefits of additional employment are spread across the whole Borough including the potential for additional employment supported through the supply chain and secondary rounds of spending by those employed at or associated with the airport. The **Employment Training Strategy [APP-215]** outlines how employment opportunities will be made available to all groups.

Notably, it is proposed to provide a number of on-site staff parking facilities which would seek to minimise off-site parking which may occur in the vicinity of the airport. As set out in the **Transport Assessment [APP-203, AS-123, APP-205 to APP-206]** and **Surface Access Strategy [APP-228]**, the Applicant proposes to undertake monitoring to enable the impacts of the Proposed Development to be considered during implementation, such as parking in residential areas.

The Applicant and operator are currently developing a suitable and effective funding mechanism that best responds to the vision and objectives of the Surface Access Strategy and realizing Sustainable Transport Opportunities. Further details will be shared during the course of the examination, following further consultation with relevant stakeholders on the details of the Sustainable Transport Fund.

SLAE Response

Agreed, employees at the Airport do not solely live in wards adjacent to the Airport, has LR read the SLAE WR properly.

Agreed, these statements still apply if there was no expansion.

Agreed, as above.

123, APP-205 to APP-206] and Surface Access Strategy [APP-228],

LR's response deflects and doesn't answer the question.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

Green Horizons Park 2, Document 000974, 001109 and others.

3.172 This article clarifies the application of planning permissions granted under Town and Country Act 1990 (1990 Act) and the powers and rights exercised under the Order and the authorised development approved under the Order. With the exception of paragraph (1), the drafting of this article is bespoke to the Order to address particular existing planning permissions which are relevant to the Proposed Development and to address any potential uncertainty that may result from the Supreme Court's recent decision in Hillside Parks Ltd v Snowdonia National Park Authority [2022] UKSC 30. That judgment relates to planning permissions

granted under the Town and Country

Planning Act 1990. It holds that, unless there is a express provision otherwise,195udgm development has taken place under one permission, whether another planning permission may lawfully be implemented depends upon whether it remains physically possible to carry out the development authorised by the second permission in light of what has already been done under the first permission. And 3.172. The draft Development Consent Order [TR020001/APP/2.01], submitted with the application, makes provision for managing the interface for the implementation of Green Horizons Park and the Proposed Development. Following the decision of the Supreme Court in the195udgmentt of Hillside Parks Ltd v Snowdonia National Park Authority [2022] UKSC 30 specific drafting has been included in the draft DCO to deal with any inconsistency between the Green Horizons Park permission and the Proposed Development to ensure that the Green Horizons Park planning permission does not become unimplementable.

SLAE understands that this judgment is for residential properties and the developer appears to have submitted planning permission for all changes, which appears to us that LR have applied a different application of the ruling comprising of office space (Class B1), warehouse and industrial space (Class B2 and B8), mixed employment space (Class B1/B2/B8), a hotel (Class C1), café space (Class A3); energy recovery centre (sui generis), internal access roads, car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection. There are no houses being built as part of GHP.

Luton Rising's Response

The principles of the Hillside judgement could be relevant to any situation where there are potentially overlapping consents, irrespective of land use. The judgement does not just apply to residential developments.

SLAE Response

'Could' suggests ambiguity and that LR are not sure.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Surface Access

Written Representation (Verbatim)

Document 000941, 18.6.7 Because the Green Horizons Park development is dependent on the Airport Access Road (AAR) for access, it has not been appropriate to include the traffic associated with that development in the 'Do Minimum' scenario; however, this does distort the 'Do Something' scenario because the changes include the Green Horizons Park traffic as well as the additional airport related traffic, thereby exaggerating the increase in traffic on the highway network. Furthermore, the Proposed Development will include some of the land that was assumed to form part of the Green Horizons Park development, therefore the scale of development that will be delivered in practice is likely to be less than the total consented.

SLAE are unable to comment on the following paragraph in document 000941 as its meaning is not clear. Please can LR re-write in clear understandable English and we will comment?

Luton Rising's Response,

The forecast trip generation and distribution is described in the **Transport Assessment [APP-206]** section 9.5.

Whilst Green Horizons Park is an existing committed development, the impact of traffic associated with the development has only been considered in the do-something (with Airport expansion) scenarios. This is because access to Green Horizons Park would be from the proposed Airport Access Road.

As such, the traffic associated with Green Horizons Park has only been included in the with Airport expansion scenarios. This results in an over-estimate of the impact of the Airport expansion alone and therefore provides a robust assessment.

SLAE Response

Noted and SLAE may revisit in a future Written Representation, thank you.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Energy Demand

Written Representation (Verbatim)

Document 000680. 1.1.2 The Energy Statement has two functions: a. To inform the size and scale of assets (such as the grid connection, on and off-site generation) included in the Proposed Development, and which will serve the wider airport development, (including Luton DART and Green Horizons Business Park) which whilst outside this application, may be supplied by assets within the application boundary.

b. To inform the scenario assessment of 'with' and 'without' development within the ES. The impact assessment explores only those loads and forms of generation that are within the Order Limits (the red line boundary of the application) and which are additional to current loads, and which are the subject of this application,

Does any part of the a & b points in paragraph in 1.1.2. in document 000680 draw power from the grid? Will the application impact the surrounding ward residents? During construction and each the operation of each phase? Will ward residents experience power black outs?

Luton Rising's Response,

The Proposed Development will draw power from the grid to supplement onsite or near to site generation in meeting demand. UK Power Networks (UKPN) are the statutory undertaker for electricity supply in London, the South East and the East of England and are responsible for the provision of power in the Luton area. The Applicant has liaised extensively with UKPN and will be submitting a formal application in due course to support the proposed increase in demand as described in section 4.3 of the Energy Statement. UKPN will then advise on any grid reinforcement necessary to maintain a stable network and meet all the known demands (including the airport) and the timeline for these works.

This is against the backdrop of a general increase in demand across the entirety of the Southeast. The Proposed Development therefore includes additional energy network infrastructure and assets within the airport boundary and on-site energy generation and battery storage to reduce reliance on the grid and better manage peaks in demand on the airport.

The construction works associated with the energy demand included a substation north of the airport (Work No. 4w) and associated connections and further works within the airport boundary (Work No. 4x). These are described within the **Construction Method Statement and Programme Report [AS- 082]** and shown on the **Work Plans Part 4 of 6 [AS-015]**.

SLAE Response

LR response only partially answers the questions SLAE ask around the impact on ward residents.

Doesn't answer the "during construction question"

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

Document 000987. 4.7.2 Since the 2019 statutory consultation, several changes have been made to the Proposed Development, due to a range of factors including Brexit, Covid-19 and responses to the consultation. The key changes to the fully built-out scheme are: a. inclusion of AAR – The AAR, is included as part of the application. Uncertainty as to if and when this road could be delivered through Luton Rising's New Century Park (now Green Horizons Park) planning permission, because of the changed economic situation caused by the Covid-19 pandemic, led to the decision to include a slightly modified version of the road within the application proposals. This provides the certainty required that the road can be delivered ahead of time. This is important as it will be relied upon for access to the expansion area east of the existing airport.

We don't think that paragraph is correct and that Covid-19 was not the cause of not delivering the AAR, we understand it's because the Council could not secure the funding for the road. **[see Written Representation for referenced evidence]**

Luton Rising's Response,

The Applicant confirms that the paragraph is correct. Economic uncertainty as a result of the Covid-19 pandemic had a direct impact on the Applicant's ability to bring forward the Green Horizons Park development to its original timetable. A number of options were investigated for delivery of parts of the road to help unlock development, including options which would have seen the Council taking over delivery of that part of the wider Green Horizons Park development, but ultimately no fundable option for early delivery was identified. As a consequence, to provide the certainty required for the airport growth proposals, the road was included in its entirety in the application for development consent.

SLAE Response

Again we don't believe this is correct. The road was part of the Century Park application which was before COVID-19. Green Horizons Park was not even planned at that stage it was New Century Park.

SLAE understand that the council didn't have funding could be rewritten to " Economic uncertainty"

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Need Case

Written Representation (Verbatim)

Document 001116. 5.12.2 As the volume of passengers and flights using the airport grows, there will be a need for additional hotel accommodation within the vicinity of the airport. An additional 125 bedroom hotel is planned as part of the Green Horizons Business Park and there are other new hotels planned in the vicinity of the airport, providing of the order of 570 additional bedrooms.

Document 000827 5.12.2 An additional 125 bedroom hotel, Document 001117 7.5.39 An additional 145 bedroom hotel

125 or 145 beds, please clarify?

[see **Written Representation for referenced evidence**]

Luton Rising's Response,

The Applicant is unable to identify the referenced documents. However the Applicant does not consider that, to the extent there is any discrepancy in bedroom numbers, this is a material point.

SLAE Response

"001116 - Volume 7 Other Documents, 7.03 Design and Access Statement Volume II. Application Document Ref: TR020001/APP/7.03, APFP Regulation: 5(2)(q)

000827 - TR020001 Volume 7 Other Documents, 7.03 Design and Access Statement Volume II, Application Document Ref: TR020001/APP/7.03, APFP Regulation: 5(2)(q)

001117 - Volume 7 Other Documents, 7.04 Need Case, Application Document Ref: TR020001/APP/7.04, APFP Regulation: 5(2)(q)

Material point or not, if these numbers are not correct, what other numbers are not correct?

LR may consider this to be a material point, but if LR don't understand the difference of 20 beds, what else in the proposal documentation is incorrect?

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning Open Space

Written Representation (Verbatim)

Document 001114

5.8.7 The Green Horizons Park development would not be implemented in full as per that planning permission (see Section 6.7 below). Funding for other related projects in Luton will be provided. Replacement pitches were being delivered through the Green Horizons Park permission.

Where will the replacement pitches be? Why is this statement in the DCO? Is this statement just application filler?

Luton Rising's Response,

Green Horizons Park benefits from an extant planning permission which will be implemented as set out in the Applicant's Deadline 1 Submission – **Green Horizons Park Additional Information [REP1-005]**.

The Green Horizons Park S106 Agreement secures a requirement for replacement pitches and indicates potentially suitable locations for these. It is anticipated that the DCO S106 Agreement will mirror this requirement to ensure that the contribution towards replacement pitches is protected.

SLAE Response

As LR are aware, SLAE are already familiar with the Green Horizons Park documentation.

Noted and SLAE may revisit in a future Written Representation, Thank you

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

Document 00111. 4 8.3.20 LLP3 on the Luton Town Centre Strategy Part A(iii) adds “hotels, and leisure uses to maintain and enhance the (retail) regional role of the town centre”. To complement this, the Luton Hotel Study (July 2015) provides evidence that “there is a need for an extra hotel room requirement of potentially 1,830 rooms by 2030 predominantly related to aviation and business travel in the vicinity of the airport”. LLP3ii refers to Century Park (now Green Horizons Park) development as a mixed aviation related B1b-c, B2 and B8, small scale ancillary service uses and hotel use.

Why does the DCO application have many references to the facilities that GHP will offer under the local planning agreement? Is this just padding out the application?

Luton Rising’s Response,

Paragraph 8.3.20 of the **Planning Statement [AS-122]** references Luton Local Plan Policy LLP3 which forms part of the socio-economic policy context.

SLAE Response

Question not answered by LR.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Land Contamination

Written Representation (Verbatim)

Document 000748 Airport Access Road. 6.9.2 The section of the Airport Access Road (AAR) from Airport Way to Percival Way was part of a planning application submitted for Green Horizons Park. This area was subject to two previous site investigations, (Ref. 49) and (Ref. 54) the soil analysis results from which have never been formally assessed. An indication of the likely significant impacts was included in the Chapter 17 of the Environmental Statement [TR020001/APP/5.01] for Green Horizons Park (Ref. 61) which indicated there were localised asbestos contamination within the Made Ground and substantial Made Ground deposits encountered in the vicinity of Airport Way. The ES concluded following suitable mitigation there would be no significant effects but indicated additional ground investigation was required.

Why when the DCO application has cost £65 million has the soil analysis results never been formally assessed? An indication is cannot be good enough when there are so many facts and figures used in other parts of this application? Has the analysis been overlooked?

Luton Rising's Response,

Ground investigation data from the Airport Access Road area was assessed alongside other ground investigation data in Section 9 of the **Appendix 17.2** to the Environmental Statement (Land Contamination **Generic Quantitative Risk Assessment (GQRA)**) [APP-121 and 122]. Further ground investigation across the Proposed Development will be required for detailed design.

SLAE Response

Noted and SLAE may revisit in a future Written Representation.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Land Contamination

Written Representation (Verbatim)

10.1.21 Leachate and groundwater monitoring results from the recent GI require further detailed assessment to confirm the initial findings from the Arup Green Horizons Park QRA.

Was a further detailed assessment ever done? If not, why not?

Luton Rising's Response,

All leachate and groundwater monitoring results from across the landfill were assessed within **Appendix 17.4** of the ES (**Detailed Quantitative Risk Assessment Report: Controlled Waters**) [APP-124].

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Surface Access Construction Traffic

Written Representation (Verbatim)

Green Horizons Park 3. Document 000678 4.3.3.d. Construction Compound 4 (Green Horizons Warehouse): A self-contained site compound located within car parking area of the proposed NCP warehouse (Area 12). Compound area would be approximately 1,000sqm and would provide welfare facilities for site operatives, materials receiving and equipment storage and operative car parking;

Before the AAR is built, how will traffic get to this site?

Luton Rising's Response,

The area highlighted as Construction Compound 4 is intended to be used as a construction compound, during the construction of the proposed car parks and AAR works.

It is likely that construction traffic accessing this site would travel via President Way, however detailed construction impacts, including temporary access arrangements, are set out in the **Outline Construction Traffic Management Plan (OCTMP)**, which would be developed in detail by the appointed contractor during the detailed design stage.

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

Evidence GHP s. Luton Borough Council Local Plan 2011-2031, November 2017 (Ref. 11.20) The development of, and improved access to, the London Luton Airport Strategic Allocation, which includes Green Horizons Park (formerly New Century Park), are needed to serve aviation engineering, business and logistics related growth and some small scale B2 accommodation for local businesses.

We are not sure if we have seen logistics related growth attributed to GHP elsewhere in the application documents?

Luton Rising's Response,

Luton Local Plan (Ref 14) paragraph 5.7 sets out as a key issue that “the development of, and improved access to, the London Luton Airport Strategic Allocation, which includes Century Park, is needed to serve aviation engineering, business and logistics related growth and some small scale B2 accommodation for local businesses”.

The Proposed Development will help to meet that need and address that key issue.

SLAE Response

SLAE agree that the Luton Local Plan includes logistics, however can LR point to where in the proposed development documents "logistics" are mentioned as part of GHP?

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

Document 000816 - Existing Site New Century Park (NCP), now known as Green Horizons Park (GHP), is located to the east of the airport. GHP is a mixed-use business park which includes the construction of a new access road(referred to in the planning application as Century Park Access Road (CPAR)).

In other documents GHP is classed as a high quality mixed-use business park, can you explain in more detail what a high quality warehouse is? The same for industrial space (Class B2 and B8)?

Luton Rising's Response,

High-quality refers to the anticipated functionality and flexibility of these buildings to meet modern business requirements.

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

Document 000812 2.4.36. c. Area C - The GHP Light industrial quarter (this area is safeguarded for Green Horizons Park development and not directly affected by the Proposed Development).

What is a light industrial area, I thought it was a high quality industrial space?

Luton Rising's Response,

The term light industrial refers to the nature of use as opposed to the quality of the space provided. These terms are mutually exclusive.

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Economics and Employment

Written Representation (Verbatim)

8.3.40 The following embedded mitigation measures have been incorporated into the design of the Proposed Development: d. The Green Horizons Park development (formerly New Century Park) for which planning permission was approved in June 2021 (LBC ref. 17/02300/EIA) included employment creation estimated at 3,200 jobs. The Proposed Development will affect the Green Horizons Park area and is reported under the displacement effects below. The design of the Proposed Development has sought to keep adverse effects to a minimum.

3,200 jobs are estimated and we ask LR to document the mitigation if these jobs don't materialise? SLAE cannot find the evidence in this DCO as to how they got to these numbers? Again, is this just DCO application filler?

Luton Rising's Response,

Please note this text should not have featured in the embedded mitigation measures section. The text is related to a development that would be part of the future baseline. The assessment of the impact of the scheme on this development is covered in the assessment section of this chapter.

The 3,200 jobs estimated to be created at Green Horizons Park is derived from Chapter 7 of the Environmental Statement for that planning application (ref. 17/02300/EIA) (Ref 1).

Section 11.9.10-11.9.15 of **Chapter 11** of the ES **[AS-078]** describes the displacement of employment that will take place at Green Horizons Park as a result of the construction of the Proposed Development. This identifies that 593 of those jobs would not be realised. The employment displaced has been derived from the breakdown of jobs created against the land-take for the Proposed Development. Whilst these jobs are theoretically displaced, it is envisaged that the jobs would be relocated in the economy including some potentially within the Proposed Development.

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Need Case Economics and Employment

Written Representation (Verbatim)

8.3.42 The ETS [TR020001/APP/7.05]

includes goals for the construction assessment phase in apprenticeships, local employment, and tendering contract opportunities to local companies, for example, small and medium sized enterprises. Tendered contracts can stipulate targets for appointed lead contractor firms. Liaison will be undertaken with existing education bodies in advance of the construction programme to advise on future skills requirements that can tailor with the construction skills forecast. A number of existing operators have bespoke training programmes – such as easyJet Academy. It is anticipated that a Workplace Charter for employers, defined in the ETS [TR020001/APP/7.05], will be developed to work towards a set of agreed objectives that will include a focus on local employment and training initiatives

Will the easyjet Academy advise on future skills requirements that can tailor with the construction skills forecast? Could LR please advise where on the easyjet web site the Academy relating to construction jobs can be found?

Luton Rising's Response,

The easyjet Academy was an example of existing programmes that are currently in place. As outlined in the **Employment and Training Strategy [APP-215]** the Airport Employers Community Forum (AECF) will set a benchmark for training good practice in collaboration with human resources leaders from businesses across the airport.

The airport operator, as part of the AECF, will encourage organisations working across the airport to advertise their jobs on the Working at Luton Airport website. The website advertises jobs across the airport and can be leveraged to advertise jobs created during construction and operation of the Proposed Development.

SLAE Response

SALE ask LR to list all the other existing programmes that are in place.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Surface Access

Written Representation (Verbatim)

8.3.46 The proposed hotel would promote airport-related guests to use public transport including Luton DART, facilitate improved service for passengers taking early morning and late evening peak departures and arrivals, increase four-star options for potential guests, reduce private vehicles and shuttle buses on nearby roads, increase the airport's profile with conferencing facilities and provide several employment opportunities.

Can LR provide more detailed information,

i.e. the number of private vehicles and shuttle buses that will be reduced?

Luton Rising's Response,

It is noted that whilst in isolation the numbers are likely to be small, the proposed hotel would contribute incrementally to a reduction in private vehicle trips. Given their scale it is not possible to provide the information requested.

SLAE Response

Question not answered. If the numbers are likely to be small, why not include in the proposal?

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning Open Space

Written Representation (Verbatim)

In paragraph 8.12.21 As part of the Proposed Development, an area of Wigmore Valley Park would be lost and open space of a greater area would be provided to the east of the existing green space at Wigmore Valley Park, south of Darley Road (as shown on Figure 14.11 of the ES [TR020001/APP/5.03]). Key

facilities built as part of the extant Green Horizons Park planning consent to the north would be retained in this area and would remain fully accessible to the public throughout the construction period.

Overall, the impact of the closure and re- provision of Wigmore Valley Park represents a minor beneficial impact for users of the park. The Open Space Assessment in Appendix C provides a full discussion of this matter.

Can LR explain in detail how a reduction in the current Wigmore Valley Park open / green space available leads to a greater area of open / green space? SLAE cannot work out the maths, unless an area greater than the loss, is returned from brownfield land to open / green space. A new Wigmore Park can be greater when it purchases adjoining existing open / green / farming land in Hertfordshire, however excluding a name, overall it's a loss. SLAE would like to know how during construction activities that the car parking spaces will remain available only for users of the park?

Luton Rising's Response,

Overall, the proposed Wigmore Valley Park will be larger than the existing Wigmore Valley Park which represents an improvement as set out in the Open Space Assessment at Appendix C to the **Planning Statement [APP-197]**. Paragraph C6.1.5 explains the size of the existing Wigmore Valley Park and the size it will be following the completion of the enhancements to open space and the creation of new Replacement Open Space provided as part of the Proposed Development.

The Applicant has no plans to use the existing car park for anything other than its current use and it is outside of the limits of this application for development consent. Any request from construction contractors for use of parts of the car park during construction activity will need to be considered in detail at the appropriate time and be subject to separate agreement

SLAE Response

LR not answered question and deflect.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning Open Space

Written Representation (Verbatim)

Evidence GHP k 8.12.22 This Open Space Assessment also considers the legal tests set out in sections 131 and 132 of the Planning Act (2008) which make provision for special parliamentary procedure to apply where a development consent order authorises the compulsory acquisition of land, or rights over land, forming part of open space. The assessment of the replacement open space proposals demonstrate section 132

(3) applies, therefore, the special parliamentary process referenced in section 132 (2) is not engaged. Furthermore, section 131 is not engaged.

SLAE seek clarification on this paragraph? When reading sections 131 and 132 of the planning Act (2008), it does not refer to agricultural land (documents 000781, 000658, which is clearly classified.

Luton Rising's Response,

This paragraph is confirming, for the avoidance of doubt, that Sections 131 and 132 of the Planning Act 2008 are not engaged.

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Surface Access

Written Representation (Verbatim)

8.12.23 Key mitigation measures relevant to health and community effects are summarised in Section 13.8 of Chapter 13 of the ES [TR020001/APP/5.01]. These include measures to reduce noise impacts notably to establish a noise envelope (GCG Appendix C [TR020001/APP/7.08]), provision of replacement open space (Appendix C of this document), landscape management at Wigmore Valley Park and where practicable, the Proposed Development would be designed to avoid or reduce adverse effects on other road and public transport users through measures that are targeted at encouraging greater use of those modes of travel that have less environmental impact (e.g. extending the Luton DART). Embedded and good practice mitigation measures of particular relevance to the health and community assessment identified in the following topics have also been taken into account for the assessment: Chapter 7 Air Quality, Chapter 11 Economics and Employment, Chapter 14 Landscape and Visual, Chapter 16 Noise and Vibration, Chapter 18 Traffic and Transport of the ES [TR020001/APP/5.01], and Appendix 5.2 Light Obtrusion Assessment, and Appendix 4.2 CoCP of the ES [TR020001/APP/5.02].

Please explain as we struggle to understand why visitors to the park would use the Dart to get to the Park? Also we cover in our Pavilion, Skate Park and children's Play park Written Representation the parking issues that will be faced by non airport, GHP or employees visiting those facilities.

Luton Rising's Response,

Section 13.8 of **Chapter 13** of the ES [**AS- 078**] notes that *“where practicable, the Proposed Development would be designed to avoid or reduce adverse effects on other road and public transport users through measures that are targeted at encouraging greater use of those modes of travel that have less environmental impact e.g. extending the Luton DART”*, yet does not mention Wigmore Park in the same paragraph.

The Luton DART is not intended to benefit users of Wigmore Valley Park, it is simply listed within the ES as a mode of travel which has a reduced environmental impact.

The Applicant notes that the respondent has covered parking issues elsewhere in its Written Representation and has provided a response to such matters below.

SLAE Response

Disappointing that LR feel it's right to use non relevant examples or references in the proposal.

As covered in SLAE's RR, that there is a lack of a consistency within the proposal and therefore a challenge to understand what is accurate and what is not.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Luton Rising

Written Representation (Verbatim)

Green Horizons Park 4

Document 000657 Public Open Space land subject to acquisition 12.1.6 The land currently designated as public open space is within the eastern part of the Main Application Site. This land is principally arable but includes also WVP, a designated District Park and area of public open space. WVP is recognised to form part of the Luton Green Infrastructure Network (Ref 12.1), is used for dog walking and recreation, and includes mown open grassland, scrub grassland, woodland, allotments, a play park, skate park, car park and a pavilion building. The Pavilion has been disused for a number of years. The total existing area of open space within the Order limits subject to permanent acquisition covers an area of 35.9ha.

Document 001114 4.8.7 Improvements to Wigmore Valley Park as part of the Green Horizons Park proposals include refurbishment and extension to the Wigmore Valley Park Pavilion building as well as replacement children's play areas and skate park.

SLAE suggest that these improvements could have been made years ago and have submitted a Freedom of Information request to LBC which is expected to be returned on the 18th September to find out why, and evidence will be submitted shortly after that date. SLAE believe this to be a deliberate lack of investment and *maintenance with WVP, Pavilion and children's play area.*

Luton Rising's Response,

The delivery of projects authorised by other planning permissions is not relevant to this application for development consent.

Notwithstanding this position, the extant planning permission which provides for the improvement of facilities within Wigmore Valley Park forms part of the wider Green Horizons Park project. For a number of reasons, including the effects of the Covid-19 pandemic and the interface with this application for development consent, that project has not yet been implemented.

Nevertheless, the Applicant remains keen on bringing forward some elements of the improvements to the retained area of Wigmore Valley Park at the earliest opportunity, subject to availability of funding and successful applications to satisfy relevant planning conditions.

Further detail can be found in the Applicant's Deadline 1 Submission – **Green Horizons Park Additional Information [REP1-005]**.

SLAE Response

If LR plan to take the park by Compulsory Acquisition then the whole plan changes, and should undergo further consultation.

SLAE still make the same statement, that the facilities have deliberately run down over the years to allow the expansion proposal to be more attractive. The council were unable to satisfy the FOI request.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Open Space

Written Representation (Verbatim)

Document 001114 5.8.8 The DCO proposals include establishing a Community Trust to run and maintain Wigmore Valley Park and funding may be provided to the Trust through the section 106 obligation(s). This may also include the habitat creation land beyond the park.

SLAE ask LR to change the "may be" into a "will" to indicate LR commitment, otherwise it means nothing and would be viewed as an application filler. This would also be seen as being a genuine "Good Neighbour".

Luton Rising's Response,

The establishment of a Community Trust for the future management of public open space east of the airport delivered through its various projects is a longstanding commitment from the Applicant.

The Applicant is similarly committed to providing funding for the Community Trust once established. It is currently envisaged that the mechanism for funding the Trust would be via an obligation to be included in the draft s106 agreement to be provided at a date later in the examination.

Inclusion of habitat creation areas beyond the replacement open space within the demise of the proposed Community Trust is a matter of detail to be considered with the Trust once it is established.

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Planning

Written Representation (Verbatim)

5.9.9 However, it is anticipated that some elements of Green Horizons Park will still be implemented under that planning permission, and these will be subject to future Reserved Matters / approval of details submissions to LBC. It may also be necessary for some elements of Green Horizons Park to be amended having regard to the Proposed Development, and these would be subject to separate applications under S73 / S96a of the Town and Country Planning Act 1990 (ref 5.2) as appropriate

As asked for in our OFH1 verbal statement, we ask the inspectorate / government that Luton Development Management Committee not be able to make planning decisions on airport expansion. Evidence RR c Anne Donelans statement evidences how decisions are made, and that all airport planning applications are approved suggests that the works that fall under paragraph 5.9.9 are already pre-approved.

Luton Rising's Response,

Luton Borough Council is the local planning authority responsible for determining any planning applications submitted under the Town and Country Planning Act 1990 (Ref 15). Section 2.5 of the Applicant's Deadline 1 Submission **Roles and Responsibilities of Luton Borough Council [REP1-018]** sets out the measures that have been put in place to ensure the due and proper demarcation of roles and responsibilities of Luton Borough Council, including the independence and objectivity of the Council's Planning functions.

SLAE Response

LR have not answered the SLAE's concerns. SLAE would like to bring to the Inspectorates notice two pieces of evidence, the first, is Anne Donelans statement (already submitted) and then a recent report into members of the Council's Development Management Committee and a Complaint alleged that the Subject Members should have disclosed a personal and prejudicial interest in a planning application. How would we know that interests have not played a part in previous airport & aviation and Wigmore Valley Park planning applications?

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Land Contamination Human Health

Written Representation (Verbatim)

Green Horizons Park 5

[see page 12 of Written Representation for Table 2.1]

SLAE believe that further and satisfactory DQRA must be carried out before the inspectors come to a decision on the DCO application. How can they make a decision when those working at GHP could be gassed, inhale vapours, breath in contaminants, dust/ asbestos fibres and microorganisms, and be exposed to a the risk of explosion, despite the qualitative assessment of risk. SLAE suggest that the council offices are re-located to GHP and let them sample what they propose on others. Walk the walk, not talk the talk.

What happens if people die as a result of working at GHP, it's a bit late to then state that the application said 'low risk'?

Luton Rising's Response,

The information in Table 2.1 is taken forward from the assessment made in Table 13.1 in **Appendix 17.2** to the ES (**Land Contamination Generic Quantitative Risk Assessment (GQRA)**) [APP-121], and shows what PCLs (Potential Contaminant Linkage) were being assessed further within **Appendix 17.3** of the ES (**Detailed Quantitative Risk Assessment (DQRA) Report: Human Health**) [APP-123]. The outcome of the assessment undertaken is presented in the DQRA, in Table 7.1.

Therefore, a DQRA has already been undertaken with risks to future users assessed and reported as part of the application.

The information contained in the application documents is sufficient to allow a planning decision to be made. These documents include further requirements for the design and installation of mitigation measures an ongoing monitoring regarding work in and over the landfill including the **Code of Construction Practice [APP-049]**, **Outline Remediation Strategy [APP-125]**, and **Monitoring Strategy [APP-127]**.

Similar requirements are set out in the extant planning permission for Green Horizons Park (available on the Luton Planning Portal) including Conditions 12 to 15 requiring the preparation of remediation strategy, verification report, and monitoring and **maintenance plan. There is also infrastructure already located over the landfill. This shows that risks can and will be appropriately managed for infrastructure proposed over historic landfill.**

SLAE Response

SLAE note that the infrastructure as highlighted in LR's response, is not the same infrastructure as planned to be located over the landfill.
SLAE ask LR to itemise the differences.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Land Contamination Human Health

Written Representation (Verbatim)

[see page 13 of Written Representation for Table 2.2]

Same questions as those asked on Table 2.1.

Luton Rising's Response,

Table 2.2 is taken from **Appendix 17.5** of the ES (Outline Remediation Strategy) **[APP- 125]**. This table shows PCLs which do not require specific remediation activities, but should be considered during design and how the construction is managed. Measures to protect workers and neighbours during construction, with suitable controls are secured by the **Code of Construction Practice (CoCP) [APP-049]** and detailed remediation strategy, documents secured by Requirements 8 and 17 of the **draft DCO [AS-067]**.

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Green Horizons Park), REP1-160

Response Topic Land Contamination Human Health

Written Representation (Verbatim)

[see page 14 of Written Representation for Table 7.1]

Same questions for table 7.1 as for table 2.1.

Inconsistencies: Where GHP is mentioned in documents and an acronym is used, the meaning of the acronym is not found in all Glossary's.

Luton Rising's Response,

Table 7.1 is taken from **Appendix 17.4** of the ES (**Detailed Quantitative Risk Assessment (DQRA) Report: Controlled Waters**) [APP-124]. It shows the outcome of the assessment undertaken, and any further measures required. This assessment is taken forward to **Appendix 17.5** of the ES (**Outline Remediation Strategy**) [APP-125].

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Luton Town Football Club Training Ground), REP1-160

Response Topic Planning Air Quality Noise and Vibration

Written Representation (Verbatim)

Stop Luton Airport Expansion (SLAE) would like to suggest a visit to Luton Town Football Clubs training ground at the Brache, Gypsy Lane, Luton. We don't think that this has been a site visit yet. The visit might need to be accompanied and with permission from the football club. We are happy to contact the club to ask for permission.

We have not found anywhere in the applicant documents any consideration of the impact of their expansion proposals on the football club or their athletes. Can LR provide document references?

Luton Rising's Response,

The Applicant considers that the issue raised regarding the negative impacts on air quality was answered within the Applicant's Response to Relevant Representations Part 2C of 4 (Non-Statutory Organisations) **[REP1- 023]** page 83, in response to RR-04724 and others.

The training ground at Gypsy lane is within the study areas for some assessments reported in the Environmental Statement, including **air quality [AS-076]** and **noise [REP1-003]** and has therefore been considered appropriately. However, sports facilities are not considered sensitive receptors in the best practice methodology employed in these assessment as agreed with technical stakeholder including the councils. This is a result of them only being used temporarily for short periods of time rather than permanently occupied. Therefore, they have not been specifically mentioned or discussed as receptors in the assessment.

Residential properties in the area have been considered and provide representative understanding of the existing and predicted environment where applicable. No further specific assessment for the training ground is required.

SLAE Response

LR may have generalised that sports facilities are not considered sensitive receptors, and appear to have looked at this from a public leisure and health perspective, not as a professional sports facility where football is the only activity focus. The Luton Town Football Club Training Ground is a place of work and not a recreational or amateur sports club.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Luton Town Football Club Training Ground), REP1-160

Response Topic Flightpaths Air Quality Noise and Vibration

Written Representation (Verbatim)

We are concerned that the Luton Town Football Club training ground is under the flight path and that the athletes will be exposed to increased pollution, noise and other impacts of aviation and aircraft taking off from and landing at the airport. Why is the not covered in the application?

Luton Rising's Response,

The Applicant considers that the issue raised regarding the negative impacts on air quality was answered within the **Applicant's Response to Relevant Representations Part 2C of 4 (Non-Statutory Organisations) [REP1-023]** page 83, in response to RR- 04724 and others. It should be noted that sports facilities are not considered sensitive receptors in relation to long term noise or air quality effects as they are not permanently occupied or used, in line with best practice guidance, agreed with the local authorities, and Luton Town Football Club have not raised any concerns regarding the proposals.

SLAE Response

SLAE are sure that LR's response is repeated as answers before. SLAE won't repeat themselves in response and point LR to SLAE's response before. SLAE question LR's understanding of the difference between recreational and professional sport.

SLAE ask if LR has approach LTFC to understand the impact of aviation and quality of health on professional footballers whos place of work is under the flight path. If not, then why not?

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Luton Town Football Club Training Ground)), REP1-160

Response Topic Flightpaths Air Quality Noise and Vibration

Written Representation (Verbatim)

The football club are also planning to relocate from their present ground in Kenilworth Road to a planned new stadium in Power Court, which is on the airport side of the town centre and at the bottom of the valley. They and visiting teams will be prone to aircraft and aviation pollution there as well. SLAE could not find references to pollution from the airport at Power Court?

Luton Rising's Response,

The Applicant considers that the issue raised regarding the negative impacts on air quality was answered within the **Applicant's Response to Relevant Representations Part 2C of 4 (Non-Statutory Organisations) [REP1-023]** page 83, in response to RR- 04724 and others. It should be noted that sports facilities are not considered sensitive receptors in relation to long term noise or air quality effects as they are not permanently occupied or used, in line with best practice guidance, agreed with the local authorities

SLAE Response

SLAE are sure that LR must have a deal on cut 'n' paste, as the response repeats previous responses without answering the questions SLAE ask? This suggests behaviors SLAE have experienced before and are not appropriate. SLAE suggest that LR to re-read the question and answer appropriately.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Luton Town Football Club Training Ground), REP1-160

Response Topic Community and Stakeholder Engagement Air Quality Noise and Vibration

Written Representation (Verbatim)

With a consultation costing up to £65 million, we are surprised that after 5 years of airport planning for the consultation that this item has not been picked up at all by Luton Borough Council or Luton Rising.

Do LR and LBC not have the competent experts with the expertise to understand this subject and the health of professional elite athletes when performing at their maximum? Tiny margins matter when top athletes compete and aviation pollution may just make the difference between winning or losing.

They can be forgiven as this is a very specialised subject and we are not aware of any UK organisation researching into this.

Evidence taken from researchers and available on the internet.

[see Written Representation for referenced evidence].

Luton Rising's Response,

The Applicant considers that the issue raised regarding the negative impacts on air quality was answered within the **Applicant's Response to Relevant Representations Part 2C of 4 (Non-Statutory Organisations) [REP1-023]** page 83, in response to RR- 04724 and others.

The Applicant considers that the issue raised regarding the health impacts of air pollution and short term effects, was answered within the **Applicant's Response to Relevant Representations Part 2A of 4 (Local Authorities) [REP1-021]** page 24-25, in response to RR-0558 and others.

It should be noted that sports facilities are not considered sensitive receptors in relation to long term noise or air quality effects as they are not permanently occupied or used, in line with best practice guidance, agreed with the local authorities.

SLAE Response

SLAE won't repeat themselves in response and point LR to SLAE's response before on the club being a professional club.

SLAE can see LR have yet again used another cut 'n' paste answer

Interested Party and Examination Library Reference Stop Luton Airport Expansion (Luton Town Football Club Training Ground), REP1-160

Response Topic Surface Access

Written Representation (Verbatim)

We have also not seen any football crowd / traffic modeling in the expansion consultation documents for when the new stadium is built, which will also use the same road network as airport traffic. Please provide where in the application this information can be found? Document 000966, drawings LLADCO-3C-ARP-SFA- HWM-DR-CE-0002, LLADCO-3C-ARP- SFA-HWM-DR-CE-0003, LLADCO3C- ARP-SFA-HWM-DR-CE-0004, LLADCO- 3C-ARP-SFA-HWM-DR-CE-0005, LLADCO-3C-ARP-SFA-HWMDR-CE- 0006, LLADCO-3C-ARP-SFA-HWM-DR- CE-0015.

The new stadium at Power Court is due to hold a crowd of 19,500 initially and expanding to 23,000. Outline planning permission was given in 2019. This will generate additional traffic.

Luton Rising's Response,

The **Transport Assessment [APP-203, AS- 123, APP-205 to APP-206]** provides a significant amount of detail on surface access, including the proposed mitigation measures which are designed to accommodate airport-related traffic growth, together with growth associated with background traffic and consented developments including the Power Court submission.

However, the modeling exercise focuses on the typical weekday AM and PM peak periods, which would not include activity associated with the football club. In addition, the planning permission associated with Luton Town FC includes various forms of highway improvements, which the football club would be required to provide in order to mitigate the effects of traffic associated with the stadium relocation.

SLAE Response

Noted and SLAE may revisit in a future Written Representation.

Interested Party and Examination Library Reference Stop Luton Airport Expansion Planning Open Space The Pavilion, Skate Park and Children's Playground at Wigmore Valley Park), REP1-162

Response Topic Planning Open Space

Written Representation (Verbatim)

Stop Luton Airport Expansion have not been able to find out what the plans are for the current Wigmore Valley car park. It is not clear from the applicants DCO submission and Luton Borough Councils Evidence PSCP a 17/02300/EIA Airport Way - Century Park permission granted on 29 June 2021 on what is planned for this car park.

The Applicant has no plans for this car park other than for its continued use to serve Wigmore Valley Park.

[see Written Representation for referenced evidence].

Luton Rising's Response,

The existing Wigmore Valley Park car park does not form part of this application for development consent.

SLAE Response

Noted and SLAE may revisit in a future Written Representation

Interested Party and Examination Library Reference Stop Luton Airport Expansion (The Pavilion, Skate Park and Children's Playground at Wigmore Valley Park), REP1-162

Response Topic Planning Open Space

Written Representation (Verbatim)

Under the 17/02300/EIA Airport Way planning permission the Wigmore Pavilion will include a new cafe, a Skate board area and next to it a new play park.

Evidence PSCP c. This will attract visitors to the facilities and not all will be Wigmore residents and car park provision will need to be required for them. Evidence PSCP d. From the approved plans, the play park looks particularly exciting and we have not seen anything like this in Luton and it will certainly bring in Luton residents from all over the Borough.

[see Written Representation for referenced evidence].

Luton Rising's Response,

This is a matter for the Green Horizons Park planning permission. The Applicant does not consider it a relevant matter in this application for development consent.

Nevertheless, the Applicant remains keen on bringing forward elements of the improvements to the retained area of Wigmore Valley Park at the earliest opportunity, subject to availability of funding and successful applications to satisfy relevant planning conditions.

SLAE Response

If GHP falls under the scope of the DCO as a result of compulsory acquisition then SLAE would expect to see those plans in the DCO application.

Interested Party and Examination Library Reference Stop Luton Airport Expansion Expansion (The Pavilion, Skate Park and Children's Playground at Wigmore Valley Park), REP1-162

Response Topic Surface Access

Written Representation (Verbatim)

SLAE are concerned that with the car park so close to the proposed new terminal, it will become crowded with cars picking up and dropping off passengers going to the airport or those holiday makers with money to burn and not concerned about the fines. There will be some who may abandon cars if they have a one way ticket, and those who live in countries where parking fines will not be chased (social media is a good communications tool). Who wouldn't like to park there and enjoy a cup of coffee whilst waiting to pick up passengers, especially delayed flights. There will be waiting cars to pick up workers from the airport and Green Horizons Park (if ever built). Evidence PSCP a & PSCP b. The current car parking limits allow xxx hours free parking, enough time to drop off and collect passengers. Cars will be parked on verges and the road entrance and will the road be wide enough if cars are parked either side, for cars to travel on both sides of the road with allowances for vehicles such as Fire Engines to get through unimpeded.

Luton Rising's Response,

The Applicant and operator will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as set out within the **Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA)** (Appendix I of the **Transport Assessment [APP-202]**). There are opportunities through this process to identify any impacts that are being realised in future and seek to investigate the potential implementation parking control measures and/or traffic management in local areas.

SLAE Response

Why was this missed in the application?

If GHP falls under the scope of the DCO as a result of compulsory acquisition then SLAE would expect to see those plans in the DCO application.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (The Pavilion, Skate Park and Children's Playground at Wigmore Valley Park), REP1-162

Response Topic Surface Access

Written Representation (Verbatim)

How will groups that have mobility needs be able to park? How will residents be able to park, as not every trip can be made by the DART, public transport, bike or walking? And then there will be visitors with children from surrounding towns taking a day out to plane spot, play in the park and have a coffee whilst doing so.

What parking enforcement will be in place?

SLAE cannot see how this will work and think that this has been missed from 17/02300/EIA Airport Way permission and the DCO application, has it?

Luton Rising's Response,

Parking controls within the Wigmore Park area would be subject to local authority monitoring and enforcement, however as previously noted, the Applicant and operator will continue to work with local authorities to understand the impacts of the airport through ongoing monitoring as set out within the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) (Appendix I of the Transport Assessment [APP-202]).

There are opportunities through this process to identify any impacts that are being realised in future and seek to investigate the potential implementation of traffic management and/or parking control measures in local areas.

SLAE Response

Partial answer with suggestions that it will be delegated to the Local Authority, although caused by the airport.

If LR are seeking to gain the land outright then it becomes a matter for LR and this DCO application.

Interested Party and Examination Library Reference Stop Luton Airport Expansion (The Pavilion, Skate Park and Children's Playground at Wigmore Valley Park), REP1-162

Response Topic Open Space

Written Representation (Verbatim)

SLAE ask the inspectors to make a condition if the DCO is approved that the Pavilion, Skate park and play park as given planning permission is delivered as detailed in 17/02300/EIA and protected in law like the Green Controlled Growth proposal. If GCG can become law then so can Wigmore Valley Park amenities offered to benefit the residents. We are suspicious that Pavilion and play park plans will be cut back when it comes to local planning decisions made after the DCO application process has completed.

Luton Rising's Response,

None of these facilities form part of this application for development consent, they are already permitted under a separate planning permission. The Pavilion building is outside of the development boundary.

Nevertheless, the Applicant remains keen on bringing forward elements of the improvements to the retained area of Wigmore Valley Park at the earliest opportunity, subject to availability of funding and successful applications to satisfy relevant planning conditions.

SLAE Response

Noted and SLAE may revisit in a future Written Representation