

SLAE's response to **8.33 Applicant's Summary of Oral Submissions and Responses to Comments Made at Open Floor Hearing 1, Open Floor Hearing 2 and Post-Hearing Submissions.** Application Document Ref: TR020001/APP/8.33

4	Stop Luton Airport Expansion (SLAE)	Applicants Response	SLAE's response
a.	<p>Wigmore Valley Park: group founded to save park with members of LBC who told members that park would not be built on for airport expansion</p> <p>Scott Stalham passed from cancer and cared about the loss of county wildlife which will incur as a result of additional carparks and the airport expansion.</p> <p>The Council utilises LA Regulation 2012 to exclude the public from meetings, so we cannot clarify whether LBC have leased the land to the Applicant or sold it. Under schedule 1 of the DCO, the description of land states it is “<b>owned</b> by applicant and LBC” indicating it was sold. This land was intended to be in LBC’s ownership.</p>	<p>Wigmore Valley Park is owned by Luton Borough Council. The Applicant has entered into a Licence Agreement with the Council in respect of the park. In order to bring forward development, should the DCO be granted, the Applicant would seek to acquire a long leasehold interest in the park. To enable that to happen the Council would need to go through the appropriate processes for disposal of such land, including following any required actions relating to the park’s status as an Asset of Community Value.</p> <p>The Applicant acknowledges that this approach does not provide the certainty required for future development and for that reason the land is also included within the Compulsory Acquisition powers sought within the application. The Applicant is however keen to not have to resort to use of such powers.</p>	<p>LR submissions have not made this clear and SLAE thank LR for clarification</p> <p>SLAE reserve the right to comment once LR's intentions on Compulsory Acquisition are known.</p> <p>If not known by the end of the DCO process, then SLAE have no trust in either LR or their shareholder, LBC to do what is right for best interest of the land.</p>
b.	<p>SLAE asks conditions to be applied within DCO to remove the labour council management committee (who are currently in charge of such decision) to be removed when airport expansion decisions made as there is no trust.</p>	<p>The Applicant does not consider it appropriate to comment on requests that conditions be added to the draft DCO which seek to remove lawfully elected officials from post.</p> <p>The relationship between the Applicant and Luton Borough Council has been addressed in the document submitted at Deadline 1 on the Roles and Responsibilities of <b>Luton Borough Council (REP1-108)</b></p>	<p>SLAE are not looking for the applicant to comment.</p> <p>SLAE will comment on the relationship, Roles &amp; Responsibilities of Luton Borough Council for Deadline 4.</p>
c.	<p>There are no boundaries between LBC and the Applicant’s relationship (such as employment of LBC members by Applicant). LBC CEO is promoting expansion via personal social media account. Luton News printed extract from Hazel Simmons issuing plea to support expansion.</p>	<p>The Applicant considers that it has addressed this point in the document <b>Roles and Responsibilities of Luton Borough Council [REP1-018], which was submitted to the Examining Authority at Deadline 1.</b></p>	<p>SLAE are not looking for the applicant to comment. SLAE will comment on the Roles &amp; Responsibilities of Luton Borough Council for Deadline 4.</p>

d.	Development management committee: Anne Donavon was not selected to represent Luton, her letter shows how labour council ignores planning laws.	<p>Noted.</p> <p>The Applicant does not feel it would be appropriate to comment on the personal opinions expressed by an ex-Member of Luton Borough Council in their letter of resignation.</p>	<p>SLAE are not looking for the applicant to comment. Perhaps the applicant would like to comment on 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.</p>
e.	Submitting overwhelming duplications and nonevidential material is classed as unreasonable behaviour. e.g., open spaces documents and lack of knowledge of EIA Century Park application (29 June 2021) detailed in more than one application.	<p>The documents the Applicant submitted as part of the application are the documents required under the Planning Act 2008.</p> <p>This Application is made in the form required by Section 37(3)(b) of the Planning Act 2008 and application documents comply with Section 37 of the Planning Act 2008 and those set out in:</p> <ul style="list-style-type: none"> <li><b>b. a.</b> The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ("the APFP Regulations");</li> <li><b>C.</b> The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017;</li> <li><b>d.</b> The Department for Communities and Local Government's 'Planning Act 2008: application form guidance' (June 2013);</li> <li><b>e.</b> The Planning Inspectorate's 'Advice Note Six: Preparation and submission of application documents' (Version 11).</li> </ul> <p>The Applicant appreciates that a high volume of documents submitted in relation to the Application, however these are necessary to provide evidence on the need and impacts of the proposed development consent order. The Applicant notes in each cover letter when a new version of an existing document is submitted.</p>	<p>SLAE note that LR have not actually answered the point being made.</p>

		The Applicant is fully aware of the New Century Park application (now Green Horizons Park) and the relationship between the applications, as set out in Section 5 of the <b>Planning Statement [AS-122]</b> and the response to the Rule 6 Letter [PDA-001].	
f.	Sustainable aviation and slow recovery – models reflecting passenger growth should take into account the risk of flying to wildfire destinations. Due to global warming some populations may flee to Luton to escape.	The factors are taken into account in the future demand forecasts as fully explained in Section 6 of the <b>Need Case [AS-125]</b> .	SLAE note that LR have not answered the question.
g.	Use of word “local”, “neighbouring” and “community” is too unspecific (such as within 6.01 of the consultation report rev. 1), there needs to be more clarity.	These are industry standard terms which are used commonly throughout a range of planning and environmental reports.	SLAE note that LR may be using industry standard terms, however they are used in the applicants submission to mean a variety of locations, both far and wide, each suited to the applicants needs and to obscurificate a true meaning and distance.