

# London Luton Airport Expansion

## Buckinghamshire Council Comments on Further Deadline 2 Submissions

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**PINS REFERENCE:** TR020001

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Directorate for Planning, Growth & Sustainability

Planning & Environment

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## 1 Introduction

### 1.1. Terms of Reference

1.1.1. Buckinghamshire Council (the Council), is a neighbouring authority for the London Luton Airport Expansion Development Consent Order (DCO) referred to as ‘the Scheme’.

1.1.2. This document provides the Council’s overarching comments on the updated application documents submitted at Deadline 2 (2 – 12/09/23; and 2A – 15/09/23). The primary focus is on the relevant parts of the submissions from the Applicant, covering 42 submissions as specified in (and including) REP2-001 and a further 7 submissions as specified in (and including) REP2A-001. At Deadline 3, the Council also submits the following:

- Covering letter
- Post hearing submission including written submissions of oral cases
- Updated Principal Areas of Disagreement Summary Statement (PADSS)
- Responses to Action Points raised in Issue Specific Hearings (ISH) 1 and 2

### 1.2. Buckinghamshire Council’s Position

1.2.1. The Council welcomes the Applicant’s approach to continuing to supplement the information relating to the Proposed Development with additional submissions. Notwithstanding this, based on the review of the additional submissions supplied by the Applicant at Deadline 2 and 2A, the Council maintains that its comments made to date have not been fully addressed.

1.2.2. The Council’s latest position remains as per that expressed within its Written Representation (REP1-042) and Local Impact Report (REP1A-001), reinforced within the Updated Principal Areas of Disagreement Summary Statement (REP2-045) and comments previously supplied on Deadline 1 documents (REP2-044).

1.2.3. The Council’s position is anticipated to evolve through the examination process and the continuing development of a Statement of Common Ground between the Council and the Applicant. The Council is receptive to continuing to engage with the Applicant and welcomes involvement in discussions on all matters raised in respect of its stated position.

### 1.3. Structure of this document

1.3.1. This document is presented in five sections, as follows:

- Section 1 – Introduction

- Section 2 – Comments on Applicant and additional relevant submissions at Deadline 2
- Section 3 - Comments on Applicant and additional relevant submissions at Deadline 2A
- Section 4 – Detailed comments on REP2A-004 – the Applicant’s response to Buckinghamshire Council’s Local Impact Report (LIR) (REP1A-001)
- Section 5 – Tabulated summary of the Council’s principal comments.

## 2 Comments on Further Deadline 2 Submissions

### 2.1. REP2-002: Guide to the Application

2.1.1. The content of this submission is noted as superseded by REP2A-002. The Council has no comments.

### 2.2. REP2-003: Draft Development Consent Order; REP2-004: Draft Development Consent Order (tracked changes)

2.2.1. The content of this submission is noted. The Council has compared it using the tracked changes version REP2-004 and has no additional comments. The Council's position has been refined following Issue Specific Hearing (ISH) 1 and this is reflected in its updated Principal Areas of Disagreement Summary Statement (PADSS) submitted at Deadline 3.

### 2.3. REP2-005: Draft Compensation Policies Measures and Communities First

2.3.1. The proposal for a fund, available to registered charities, community groups, and town and parish councils, as set out in the Draft Compensation Policies, Measures and Community First (REP2-005) is welcomed.

2.3.2. It is proposed that the Fund should be available in an area which includes Luton, Bedfordshire, parts of Hertfordshire and "eastern parts of the Buckinghamshire district of Aylesbury Vale" (page 21, point 9.1.2). This area has been derived from "*historical data on the location of complaints received about airport operations, flight paths, areas containing higher levels of social deprivation and consideration of optimising a balance between an area large enough to be confident that all Community First funds should be capable of being used but not so wide that it dilutes the effectiveness of the fund in meeting its objective*".

2.3.3. The Council welcomes the inclusion of some parts of Buckinghamshire. Based on the social deprivation criteria, the Council encourages consideration being given to the inclusion of additional areas of the county, specifically the wards of Aylesbury North, Aylesbury North-West, Aylesbury South-West and Chesham.

2.3.4. The Indices of Multiple Deprivation (IMD) 2019, the official relative measure of deprivation for small areas, shows that within these four wards there are Lower Super Output Areas (LSOAs) with higher levels of deprivation than some of the others included within the proposed Communities First fund Zone. Each ward contains LSOAs that are within the most deprived 40% of all LSOAs in England, with Aylesbury North-West containing one LSOA within the 20% most deprived.

2.3.5. These four wards are identified as priority areas under the Opportunity Bucks Programme – Buckinghamshire's response to the Levelling Up agenda. These are wards where health, work and education outcomes are below those experienced in other parts of the county.

- 2.3.6. As the aim of the fund is understood by the Council to be to tackle deprivation, and as higher levels of deprivation were one of the two factors used to identify the Communities First fund Zone, the Council would argue for coverage of the Communities First fund to extend to the wards of Aylesbury North, Aylesbury North-West, Aylesbury South-West and Chesham. These wards are close to the existing boundary of the Zone and would be a beneficial addition to the Buckinghamshire areas already included.
- 2.4. [REP2-006: Draft Compensation Policies Measures and Communities First Appendix A \(Part 1 of 2\)](#)
- 2.4.1. The content of this submission is noted. It provides indicative boundaries relating to noise insulation scheme eligibility. The Council has no comments.
- 2.5. [REP2-007: Draft Compensation Policies Measures and Communities First Appendix A \(Part 2 of 2\)](#)
- 2.5.1. The content of this submission is noted. It overlays indicative proposed boundaries for noise insulation scheme eligibility with boundaries for the existing noise insulation scheme. The Council has no comments.
- 2.6. [REP2-008: Statement of Common Ground between London Luton Airport Limited and Bedfordshire Police](#)
- 2.6.1. The content of this submission is noted. The Council has no comments.
- 2.7. [REP2-009: Statement of Common Ground between London Luton Airport Limited and World Fuel Services](#)
- 2.7.1. The content of this submission is noted. The Council has no comments.
- 2.8. [REP2-010: Statement of Common Ground between London Luton Airport Limited and Prax Downstream UK Limited](#)
- 2.8.1. The content of this submission is noted. The Council has no comments.
- 2.9. [REP2-011: Statement of Common Ground between London Luton Airport Limited and Cadent Gas](#)
- 2.9.1. The content of this submission is noted. The Council has no comments.
- 2.10. [REP2-012: Statement of Common Ground between London Luton Airport Limited and Historic England](#)
- 2.10.1. Historic England clarifies that its interest extends to Grade I and II\* listed buildings and Scheduled Monuments and Registered Park and Gardens (RPG) only. The connection between noise data and impacts on the historic environment and



citation to research material on potential noise impacts to the historic environment from proposals for airport expansion in England at 3.1.5 is noted. The Council has no further comments.

2.11. [REP2-013: Statement of Common Ground between London Luton Airport Limited and Thames Water Utilities Limited](#)

2.11.1. The content of this submission is noted, including the reservations expressed by Thames Water at 3.4.1. The Council has no further comments.

2.12. [REP2-014: Statement of Common Ground between London Luton Airport Limited and the Environment Agency](#)

2.12.1. The content of this submission is noted. The Council has no comments.

2.13. [REP2-015: Statement of Common Ground between London Luton Airport Limited and Affinity Water](#)

2.13.1. The content of this submission is noted. The Council has no comments.

2.14. [REP2-016: Statement of Common Ground between London Luton Airport Limited and NATS \(Services\) Limited](#)

2.14.1. The content of this submission is noted. The Council has no comments.

2.15. [REP2-017: Statement of Common Ground between London Luton Airport Limited and the Civil Aviation Authority](#)

2.15.1. The content of this submission is noted, including areas that continue to be under discussion. The Council has no further comments.

2.16. [REP2-018: Statement of Common Ground between London Luton Airport Limited and National Highways](#)

2.16.1. The content of this submission is noted, including the requirement for additional information relating to TRIMMA (3.7.1) and the Travel Plan management and monitoring (3.7.2) – the Council is also keen to review this. The Council has no further comments.

2.17. [REP2-019: Statement of Common Ground between London Luton Airport Limited and the UK Health Security Agency](#)

2.17.1. The content of this submission is noted. The Council particularly notes that the UK Health Security Agency (UKHSA) remains in ongoing discussions regarding the detail of the assessment of health impacts relating to changes in air pollution concentrations and the use of appropriate co-efficients to capture all changes (3.1.2 and 3.1.3). The Council's view aligns with the UK HSA on this matter.

- 2.17.2. The Council also notes the points made by UK HSA regarding the unproven efficacy and potential side-effects of promoting noise insulation to properties (e.g. consequentially poorer internal air quality and increased health disparities) to mitigate noise, noting also that this is ineffective for external environments, such as areas of tranquillity (3.4.9). It is noted that UK HSA is seeking strong and clear commitments to monitoring of the impacts of the Scheme (particularly noise) on communities, health and well-being (3.6.1 and 3.6.2). The Council is keen to see further Applicant responses to this point, as it may be of relevance to the AONB and future impacts that may manifest in other parts of Buckinghamshire. The Council wishes to be kept informed of any actions taken by the Applicant to address the UKHSA concerns, particularly regarding the assessment of health impacts.
- 2.18. [REP2-020: Statement of Common Ground between London Luton Airport Limited and Luton Borough Council](#)
- 2.18.1. The content of this submission is noted, including ongoing discussions regarding the lack of clarity on specific transport intervention and travel planning measures and their means of assured delivery (LBC25-27; 31-33). The Council is generally aligned with Luton Borough Council in relation to these matters but raises no further comments.
- 2.19. [REP2-021: Statement of Common Ground between London Luton Airport Limited and Central Bedfordshire Council](#)
- 2.19.1. The content of this submission is noted. There are a number of matters where Central Bedfordshire Council raises similar matters to the Council.
- 2.19.2. At CBC12, a request is made for additional clarity relating to the Communities First fund, including its overall effectiveness. The Council notes that whilst information has been provided by the Applicant on the aims of the Communities First fund, its coverage, administration and review, further detail would be beneficial. In particular, further clarity on how the 60/40 split between Luton and other areas has been determined and how the effectiveness of the fund will be defined, measured and reported upon. This is reflected in the Council's Updated PADSS.
- 2.19.3. Central Bedfordshire Council concurs with the Council on a range of transport issues, which are reflected in the Council's updated PADSS. CBC25 highlights concerns about the modelling of junctions; CBC25 concurs with the Council that no additional public transport measures are proposed for east to west travel, with Central Bedfordshire Council stating that the proposals do not appear to address this issue. Concerns are expressed around the ability of the modal split to be achieved (CBC25 and CBC30), with CBC26 specifically stating that the approach to bus and coach travel is not supported and further details on the strategy are needed. CBC32 requests an opportunity for the modal share minimum targets to be looked at in greater detail. At CBC27, there is agreement with the Council's assertion that Stansted is not a suitable comparator for public transport service

and fund proposal; and CBC36 echoes the Council's concerns around the mechanisms proposed for the funding and delivery of the travel plan.

- 2.19.4. The Council notes concerns around mitigation for mental health and wellbeing in the updated PADSS. CBC88 echoes this matter, suggesting that there is insufficient mitigation to address the 'significant effect on mental health and wellbeing during the planning and construction stages of the development.' CBC137 indicates that Central Bedfordshire Council is also not satisfied that the noise envelope would be effective in controlling breaches of a noise limit.
- 2.19.5. CBC164 relates to the membership of the ESG. It states that 'local authority involvement is likely to be required from beyond the Host Authorities to other authorities that are impacted by the airport operations.' The Council welcomes this comment and views it as supporting the assertion that the Council should be included in the ESG, as set out in the updated PADSS and the Council's post-hearing submission of oral cases.
- 2.20. [REP2-022: Statement of Common Ground between London Luton Airport Limited and Hertfordshire County Council](#)
- 2.20.1. The content of this submission is noted. There are some matters on which Hertfordshire County Council is aligned with the Council, as well as REP2-021, REP2-023 and REP2-024.
- 2.20.2. HCC24 echoes the Council's concern that east-west public transport is not addressed within the proposals, with HCC26 expressing concern about how new or enhanced bus and coach services will manifest, linked to meeting modal share targets. HCC29 reinforces the point that existing public transport provision to Luton Airport is inadequate. HCC35 raises concerns about how the travel plan will be delivered with HCC46 raising questions about the detail of the Travel Plan and the role of the ATF. HCC51 raises similar questions to those within the Council's PADSS regarding the Sustainable Transport Fund – the level of investment and means of determining projects to be funded and their delivery.
- 2.20.3. Hertfordshire Council indicates that it is yet to confirm its position regarding the health outcomes assessment of aircraft noise; and HCC100 indicates dissatisfaction that the Noise Envelope would be effective in controlling breaches of a Noise limit. These are impacts on health determinants that the Council also raises concerns about within the updated PADSS.
- 2.20.4. HCC155 raises the same point as Central Bedfordshire Council regarding the need for ESG membership to capture all local authorities where effects may be experienced, beyond the Host Authorities. The Council welcomes this comment and views it as supporting the assertion that the Council should be included in the ESG, as set out in the updated PADSS and the Council's post-hearing submission of oral cases.

## 2.21. REP2-023: Statement of Common Ground between London Luton Airport Limited and North Hertfordshire Council

- 2.21.1. The content of this submission is noted. There are some matters on which Hertfordshire County Council is aligned with the Council, as well as matters included in REP2-021, REP2-022 and REP2-024.
- 2.21.2. NHDC24 highlights that east-west public transport is not addressed within the proposals, with NHDC26 questioning how new or enhanced bus and coach services will be realised, linked to meeting modal share targets. NHDC27 and NHDC35 question how the Travel Plan is to be delivered and funding provided. NHDC29 reinforces the point that existing public transport provision to Luton Airport is inadequate. NHDC31 cites a need to review modal share targets if they are exceeded in early years of operation and NHDC51 criticises the STF as currently described – it raises similar questions to those within the Council’s PADSS – the level of investment and means of determining projects to be funded and their delivery.
- 2.21.3. NHDC133 raises the same point as Central Bedfordshire Council and Hertfordshire Council regarding the need for ESG membership to capture all local authorities where effects may be experienced, beyond the Host Authorities. The Council welcomes this comment and views it as supporting the assertion that the Council should be included in the ESG, as set out in the updated PADSS and the Council’s post-hearing submission of oral cases.

## 2.22. REP2-024: Statement of Common Ground between London Luton Airport Limited and Dacorum Borough Council

- 2.22.1. The content of this submission is noted. There are some matters on which Dacorum Borough Council is aligned with the Council, as well as matters included in REP2-021 – REP2-023.
- 2.22.2. DBC24 cites that east-west public transport is not addressed within the proposals, with DBC26 questioning how modal share targets will be met through new or enhanced bus and coach services. DBC27 and DBC35 question how the Travel Plan is to be delivered and funding provided. DBC29 states that existing public transport provision to Luton Airport is inadequate (less than 25% modal share). DBC31 cites a need to review modal share targets if they are exceeded in early years of operation. DBC51 highlights the unclear relationship between GCG mode share, TRIMMA and Travel Plan modelling, noting the risk this presents for impacts on the surface access network to go undetected before restrictions on airport growth are triggered – further detail and explanation are sought, which the Council accords with.

- 2.22.3. DBC96 indicates that Dacorum Borough Council is yet to confirm its position regarding the health outcomes assessment of aircraft noise; and DBC95 indicates dissatisfaction that the Noise Envelope would be effective in controlling breaches of a Noise limit. These are impacts on health determinants that the Council also raises concerns about within the updated PADSS.
- 2.22.4. DBC133 raises the same point as the other Host authorities regarding the need for ESG membership to capture all local authorities where effects may be experienced, beyond the Host Authorities. The Council welcomes this comment and views it as supporting the assertion that the Council should be included in the ESG, as set out in the updated PADSS and the Council's post-hearing submission of oral cases.
- 2.23. [REP2-025: Statement of Common Ground between London Luton Airport Limited and Buckinghamshire Council](#)
- 2.23.1. The content of this submission is noted. The Council is aware that the Applicant prepared this document in advance of considering the content of the Council's Written Representation, submitted at Deadline 1 (REP1-042), and the Council's Local Impact Report, submitted at Deadline 1A (REP1A-001) - it instead reflects earlier comments made by the Council in its relevant representation (RR-0166) and PADSS (AS-053). On this basis, the Council is not providing comments on this Deadline 2 submission by the Applicant.
- 2.23.2. The Council's position is as stated in its Deadline 3 covering letter. The ExA may note that the Council has requested that the SoCG be updated by the Applicant to take into account comments made by the Council in its Local Impact Report (REP1A-001) and Written Representation (REP1-042). The Council will review this position based on the SoCG that the Applicant iterates for Deadline 6.
- 2.24. [REP2-026: Statement of Common Ground between London Luton Airport Limited and the East of England Ambulance Service NHS Trust](#)
- 2.24.1. The content of this submission is noted, including the consideration by the Applicant to set up a Transport, Community Safety, Health and Wellbeing Working Group in response to engagement with the Trust (3.3.1). The Council will be interested to understand any progression on this matter but has no comments at present.
- 2.25. [REP2-027: Statement of Common Ground between London Luton Airport Limited and the Bedfordshire Fire and Rescue Service](#)
- 2.25.1. The content of this submission is noted. The Council has no comments.

2.26. [REP2-028: Statement of Common Ground between London Luton Airport Limited and NATS \(En Route\) PLC](#)

2.26.1. The content of this submission is noted. The Council has no comments.

2.27. [REP2-029: Statement of Commonality for Statements of Common Ground](#)

2.27.1. The content of this submission is noted, however, as with REP2-025 it would appear that the Applicant prepared this document in advance of considering the content of the Council's Written Representation, submitted at Deadline 1 (REP1-042), and its Local Impact Report, submitted at Deadline 1A (REP1A-001) - it instead reflects earlier comments made by the Council in its relevant representation (RR-0166) and PADSS (AS-053). On this basis the statement fails to reflect the Council's position on matters relating to Health and Community and Cumulative Effects, a such the Council is not providing comments on this Deadline 2 submission by the Applicant.

2.28. [REP2-030: Applicant's Summary of Oral Submissions and Responses to Comments Made at Open Floor Hearing 1, Open Floor Hearing 2 and Post-Hearing Submissions](#)

2.28.1. The content of this submission is noted. The Council has no comments.

2.29. [REP2-031: Applicant's draft itinerary for the Accompanied Site Inspection](#)

2.29.1. The content of this submission is noted. The Council has no comments and notes the Rule 17 letter on this matter.

2.30. [REP2-032: Noise Envelope – Improvements and worked example](#)

2.30.1. The Council welcomes the improvements proposed by the Applicant however remains to be convinced that the mechanism would allow timely intervention given the five-year forward plan of slot allocation and resulting commercial pressures on the airport operator. It is also unclear how late running flights would be managed given these are often outside of the control of the operator. The Council wishes to receive further clarity on these matters.

2.31. [REP2-033: Applicant's Response to Written Representations – Part 1a members of the public and businesses \(Thematic\)](#)

2.31.1. The content of this submission is noted. The Council has no comments.

2.32. [REP2-034: Applicant's Response to Written Representations made by Members of the Public at Deadline 1 \(Part 1b\)](#)

2.32.1. The content of this submission is noted. The Council has no comments.

- 2.33. [REP2-035: Applicant’s Response to Written Representations – Part 2 Interested Parties subject to a Statement of Common Ground](#)
- 2.33.1. The Council notes the contents of the document and the similarities in its content to the response to BC's Relevant Representation (RR-0166) and the Applicant’s response to the Council’s LIR (REP1A-001; and REP2A-004, respectively). As such the Council's position remains unchanged from what it has set out in Section 4 below.
- 2.33.2. It should be noted that the Council has made further requests to the Applicant that its SoCG be updated in line with the Council's LIR (REP1A-001), Written Representation (REP1-042) and further written submissions. This will enable the Council and the Applicant to come to an agreement on what matters are still outstanding across its Examination submissions and, alongside an updated PADSS, it will provide a true representation of the Council's up to date position at Deadline 6.
- 2.34. [REP2-036: Applicant’s Response to Written Representations made by Affected Persons at Deadline 1 \(Part 3\)](#)
- 2.34.1. The content of this submission is noted. The Council has no comments.
- 2.35. [REP2-037: Applicant’s Response to Written Representations made by Non-Statutory Organisations at Deadline 1 \(Part 4\)](#)
- 2.35.1. The content of this submission is noted. The Council has no comments.
- 2.36. [REP2-038: Applicant’s Response to Written Representations – Part 4 – Appendix \(NEF\)](#)
- 2.36.1. The content of this submission is noted. The Council has no comments.
- 2.37. [REP2-039: Applicant’s Response to Written Representations made by Other Statutory Organisations and Additional Submissions at Deadline 1 – Part 5](#)
- 2.37.1. The content of this submission is noted. The Council has no comments.
- 2.38. [REP2-040: Surface Access Noise Modelling Additional Information](#)
- 2.38.1. The content of this submission is noted. It is not considered to affect the Council, or its communities and no comments are made.
- 2.39. [REP2-041: Statement of Common Ground between London Luton Airport Limited and Natural England](#)
- 2.39.1. The content of this submission is noted. The Council has no comments.

2.40. REP2-042: Response to Chris Smith Aviation Consultancy Limited – Initial Review of DCO Need Case for the Host Authorities

2.40.1. The content of this submission is noted. The Council has no comments.



### 3 Comments on Further Deadline 2A Submissions

#### 3.1. REP2A-001: Cover Letter

3.1.1. The content of this submission is noted. The Council has no comments.

#### 3.2. REP2A-002: Application Document Tracker

3.2.1. The content of this submission is noted as superseding previous versions. The Council has no comments.

#### 3.3. REP2A-003: Status of Negotiations / Compulsory Acquisition Schedule

3.3.1. The content of this submission is noted. The Council has no comments.

#### 3.4. REP2A-004: Applicant's Comments on Local Impact Reports (Buckinghamshire Council)

3.4.1. The content of this submission is noted. The Council has reproduced the material supplied by the Applicant, supplemented with comments as appropriate. This is contained in Section 4 of this document.

#### 3.5. REP2A-005: Applicant's Comments on Local Impact Reports (Central Bedfordshire Council)

3.5.1. The content of this submission has not been reviewed in detail.

#### 3.6. REP2A-006: Applicant's Comments on Local Impact Reports (Hertfordshire County Council, Dacorum Borough Council, North Hertfordshire Council)

3.6.1. The content of this submission has not been reviewed in detail.

#### 3.7. The content of this submission has not been reviewed in detail. REP2A-007: Applicant's Comments on Local Impact Reports (Luton Borough Council)

3.7.1. The content of this submission has not been reviewed in detail.

## 4 REP2A-004: Applicant’s Comments on Local Impact Reports (Buckinghamshire Council)

Table 4-1 – Buckinghamshire Council’s Response to Applicant’s Comments on Local Impact Reports (Buckinghamshire Council)

LIR Ref	Applicant topic category	The Council’s LIR extracts (copied verbatim and organised by Applicant)	Luton Rising’s Response	The Council’s response at Deadline 3
2.2.1-2.3.4	Need Case	<p>There is expected to be strong growth in demand for air travel, with the market recovering to 2019 (pre-COVID 19) levels by around 2024. This growth is expected to continue, and the airport is expected to reach 32 million passengers per annum (mppa) at some point between the years 2042 and 2049. Additional capacity will be required at London Luton Airport if it is to keep pace with this level of projected demand.</p> <p>There is clear government policy support for aviation growth and for airports making best use of their runways, as set out in various national aviation policy documents. The Scheme seeks to expand the current operational airport on a phased basis, including the construction of a new passenger terminal and additional aircraft stands to the north-east of the</p>	<p>The in principle support for the Need Case [AS125] is noted, including the demand forecasts. It is accepted that Buckinghamshire has raised areas of concern, and these are responded to below.</p>	<p>The Council’s maintains its position in relation to its concerns on the assessment of the potential environmental, sustainability and social impacts of the Scheme on Buckinghamshire.</p>

		<p>runway. This will take the overall passenger capacity to 32 million passengers per annum (mppa). In addition to the above and to support the initial increase in demand, the existing infrastructure and supporting facilities will be improved in line with incremental growth in capacity of the airport. The Council understands Government policy on aviation in the context of the need case for the Scheme. The general principle of the Scheme is understood, and the Council can see some benefits for Buckinghamshire, particularly in respect of economic development and growth. Notwithstanding this, the Council has some concerns about the conclusions drawn relating to the assessment of the potential environmental, sustainability and social impacts of the Scheme on Buckinghamshire. These concerns are set out in this LIR, supported by the Council's WR.</p>		
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3.2 Climate Change and Greenhouse Gases			
3.2.3	Greenhouse Gases	<p>The Council is keen to ensure that the inherent uncertainty associated with technological development in the aerospace sector is correctly factored into the assessment of impacts on Climate Change. As described in detail within the WR, the Council believes the Applicant’s Greenhouse Gas (GHG) Assessment to be inadequate in relation to this matter. It is reasonable that the Applicant has based its core planning case upon established Government policy as outlined in the Jet Zero Strategy (JZS) (2022). However, the Applicant has failed to reflect the inherent uncertainty of the technological development outlined within the JZS by failing to conduct appropriate sensitivity analyses with respect to the resulting GHG emissions from different air traffic movement (ATM) scenarios, even though it has conducted such sensitivity analyses elsewhere within the Application to assess their effect upon other quantities.</p>	<p>The Applicant acknowledges the uncertainty associated with the implementation of any future policy, such as the mitigation measures described within the Jet Zero Strategy, transport mitigation measures from the Transport Decarbonisation Plan, or the future decarbonisation trajectory of the UK power grid. These are, however, the stated policies and projections of the UK Government, which bears the ultimate legal responsibility for delivering the UK’s 2050 net zero target and interim carbon budgets.</p> <p>Regarding the uncertainty of key technological development of aviation mitigation measures described in the UK Government’s Jet Zero Strategy, Inset 12.4 within Section 11 of Chapter 12 Greenhouse Gases of the Environmental Statement [APP-038] presents a graphical summary of how</p>
			<p>As discussed extensively at ISH2 and within the Council’s previous submissions (RR-0166, REP1-042 and REP1A-001); the Jet Zero Strategy itself recognises the inherent uncertainty and challenges associated with realising the ambitions outlined therein. Multiple different technological trajectories are possible with a significant potential effect upon cumulative emissions. The Applicant should conduct appropriate sensitivity studies upon the effect of different technological trajectories upon cumulative emissions.</p> <p>The Applicant should then state in Table 12.26 of the GHG assessment within the ES what the upper bound of the sensitivity studies would be in terms of total emissions and in terms of % of total carbon</p>

			<p>each measure is expected to reduce aviation emissions from the Proposed Development. This inset therefore also shows quantified emissions associated with each of the key technical developments included in the Jet Zero Strategy not being delivered. This is assumed to be the 'sensitivity test' referred to in the comment. Therefore, further sensitivity testing on this issue is not required, it is reported as part of the assessment in this chapter.</p> <p>The chapter also discusses how these assumptions are backed up and controlled by a range of mechanisms, such as the UK Emissions Trading Scheme (UK ETS) and the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) which will control the majority of aviation emissions, and the Green Controlled Growth (GCG) Framework which will control emissions from</p>	<p>budget. The cumulative emissions should also be compared as a percentage not only of the total UK budget for CB6 but as a percentage of the allowance within CB6 for aviation. This would more clearly show the impact of the Application upon aviation emissions and present a more meaningful comparison.</p> <p>The Inset itself, 12.4 (GHG assessment in the ES), referred to by the Applicant is not, and is not referred to, as a sensitivity study. The same document explicitly states that the Applicant has not undertaken a Sensitivity Study in Table 12.23.</p> <p>The reliance upon CORSIA and UK ETS is, in the Council's assessment, given too much weight. The Applicant has not sufficiently justified its reliance upon CORSIA and UK ETS to use</p>
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			<p>airport operations and surface access.</p> <p>Regarding sensitivity testing consider as described in Chapter 5 Approach to the Assessment of the Environmental Statement [AS-075], a qualitative approach has been taken and this is described in Table 12.23 within Section 12.9 of Chapter 12 Greenhouse Gasses of the Environmental Statement [APP038].</p> <p>Inset 12.3, which considers the passenger numbers for the Core Planning Case, Faster Growth and Slower Growth Cases from 2025 to 2050, does not show a quantified GHG trajectory, however, the text in Table 12.23 states that the change in operational GHG emissions would be in line with the passenger number projections demonstrated and small relative to trajectory and budgets. Therefore, quantification of the Faster Growth Case is not required,</p>	<p>that as sufficient justification for not conducting sensitivity studies upon the JZS developments.</p> <p>A qualitative approach to the sensitivity study is inadequate. A quantitative approach is required. Further, the qualitative approach only considers ZEA technology. No consideration at all has been given to SAF or efficiency improvements within Table 12.23.</p> <p>Table 12.23 asserts that the changes are “small”, yet the Applicant states that they have not been quantified. Only a quantitative assessment can demonstrate whether something is small or large. A quantitative assessment is therefore required.</p>
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			<p>and the overall conclusion of the assessment would not change.</p>	
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3.2.4	Planning	<p>The enforcement arrangements proposed by the Applicant would involve the Environmental Scrutiny Group (ESG), which includes Luton Borough Council, recommending the undertaking of enforcement action by the relevant planning authority – also Luton Borough Council. It is observed that Luton Borough Council is also the airport owner, and it is unclear that this potential conflict of interest has been adequately addressed.</p>	<p>At present, the airport is operating under a planning consent granted under the Town and Country Planning Act 1990 (TCPA), with planning reference 12/01400/FUL, as amended by 15/00950/VARCON. Under the TCPA, only the local planning authority can bring enforcement action against the airport operator for breach of a condition in planning permission and there are limited requirements for transparency around the enforcement process.</p> <p>As set out in Section 2.4 of the Green Controlled Growth (GCG) Explanatory Note [APP-217] it is proposed that governance of GCG will be through a new body established through the DCO, the Environmental Scrutiny</p>	<p>As stated in the updated PADSS, the Council believes it should be included within the ESG membership. The rationale for exclusion offered by the Applicant is not accepted.</p>
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			<p>Group (ESG). Section 2.4 sets out the proposed functions and membership of the ESG, enshrined through Terms of Reference included at Appendix A of the Green Controlled Growth Framework [APP-219]. The ESG will be chaired independently and include independent experts.</p> <p>The GCG process is designed to be self enforcing in respect of mitigating environmental effects above Limits, with the process designed to require action by the airport operator to address any exceedances of the Limits.</p> <p>However, it is acknowledged that circumstances where the processes set out in the GCG Framework are not followed also need to be considered, and this is set out in Section 2.7 of the GCG Explanatory Note.</p> <p>In addition to the GCG process, and as outlined in Section 2.7, the</p>	
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			<p>statutory enforcement regime for DCOs is set out in the Planning Act 2008. This defines the 'relevant planning authority' for the purposes of enforcement action as the planning authority for the area in which the development is situated. This means the 'relevant planning authority' for most of the Proposed Development must be Luton Borough Council. However, Section 2.7 also sets out ways in which other local authorities could bring action under the Planning Act 2008.</p> <p>In summary therefore, the GGC proposals are considered to include independent and transparent oversight and scrutiny in response to concerns around the potential conflict of interest of LBC and represent a significant improvement from current processes.</p>	
3.2.7	Greenhouse Gases	There is a need to account for uncertainty in the assessment of impacts of technological change in the aerospace	The Applicant's response to this issue is provided under 3.2.3 above.	The Council's response is provided in 3.2.3 above.

		<p>sector on GHG emissions. This requires two core sets of actions by the Applicant:</p> <ul style="list-style-type: none"> <li>• The Applicant should quantitatively assess the effect upon GHG emissions of the “Faster Growth Scenario” as set out in the JZS</li> </ul>		
3.2.7	Greenhouse Gases	<p>The Applicant should conduct sensitivity analyses with respect to the effects of the different technological development trajectories that are recognised within the JZS. This should include, as a minimum:</p> <ol style="list-style-type: none"> <li>What would be the effect upon cumulative emissions of annualised efficiency improvements that still meet the 2% over the whole period, but where the initial improvements are lower and made up for with accelerated development in the 2040s?</li> <li>What if sufficient feedstock is not available to supply the required levels of Sustainable Aviation Fuel (SAF)?</li> <li>c) What would the impact upon cumulative emissions if the zero</li> </ol>	<p>The Applicant’s response to this issue is provided under 3.2.3 above.</p> <p>The total aviation emissions associated with each of the technological developments not being implemented is shown in Inset 12.4 in Chapter 12 of the Environmental Statement [APP-038]. This shows the efficacy of the measures included in the Jet Zero Strategy and no further combination of events or scenarios is required.</p>	<p>The Council’s response is provided in 3.2.3 above.</p>

		emission aircraft do not develop at the anticipated rate?		
3.2.8	Greenhouse Gases	The above are all uncertainties that are recognised as challenges within the JZS and a sensitivity analysis leading to quantitative assessment is therefore appropriate.	The Applicant’s response to this issue is provided under 3.2.3 above.	The Council’s response is provided in 3.2.3 above.

<p>3.2.9</p>	<p>Green Controlled Growth</p>	<p>There is a need for independent scrutiny of the assessment work undertaken within the environmental workstreams. It is acknowledged that the ESG has been established to provide this oversight and this is welcomed. The Council has reviewed the current membership of the ESG and given its role in relation to enforcement, wishes to be part of the ESG to aid in ensuring its independence. The Council would also support the ESG being given a right of appeal to the relevant Secretary of State (SoS), on the same basis of the equivalent right conveyed to the airport operator.</p>	<p>The Applicant considers that the issue raised regarding membership of the ESG was answered within the Applicant's Response to Relevant Representations Part 2A [REP1-021] pages 298 to 300, in response to RR-0166.</p> <p>It is not clear why it would be necessary for the ESG to have a right of appeal to the SoS, as the ESG is the only decision-making body in the GCG process. Section 2.7 of the Green Controlled Growth Explanatory Note [APP217] sets out the possible enforcement approaches where the GCG Framework has not been complied with. This includes the option for any local authority to take enforcement action pursuant to Section 161 of the Planning Act 2008, including those where land under the application for development consent is not within their jurisdiction.</p>	<p>As stated in the updated PADSS, the Council believes it should be included within the ESG membership. The rationale for exclusion offered by the Applicant is not accepted.</p>
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3.2.10	Green Controlled Growth	The Council also wishes to have representation of suitably qualified and experienced technical officers on each of the four Technical Panels being proposed, which relate to Air Quality, GHG, Noise and Surface Access – the GHG Technical Panel is the one relevant to this topic.	The Applicant considers that the issue raised regarding membership of Technical Panels was answered within the Applicant’s Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.	It is understood that the Applicant sees no justification for the Council to be a member of the ESG or the Technical panels. At the Issue Specific Hearing 1 the Applicant indicated that additional rationale for exclusion from these groups was that there were no significant effects

				<p>identified in the ES for the Council – the ExA has requested further justification for the membership of the ESG as an action point from this ISH (26.09.23).</p> <p>The Council does not accept that future changes will not result in significant effects within Buckinghamshire. Assuming that GCG and the technical panels are part of the Applicant’s approach to future mitigation, the Council sees a role and does not accept the Applicant’s view.</p> <p>The Council’s position remains unchanged. The Council wishes to have representation at all four technical panels and the ESG.</p>
3.2.12	Draft DCO	The Council should be added to the ESG and all four Technical Panels – see Requirement paragraph 20 of the dDCO (AS-067).	The Applicant considers that the issue raised regarding membership of ESG and Technical Panels was answered within the Applicant’s Response to Relevant Representations Part 2A [REP-1-021]	It is understood that the Applicant sees no justification for the Council to be a member of the ESG or the Technical panels. At the Issue Specific Hearing 1 the Applicant indicated that additional rationale for exclusion

			<p>pages 298 to 300, in response to RR-0166.</p>	<p>from these groups was that there were no significant effects identified in the ES for the Council – the ExA has requested further justification for the membership of the ESG as an action point from this ISH (26.09.23).</p> <p>The Council does not accept that future changes will not result in significant effects within Buckinghamshire. Assuming that GCG and the technical panels are part of the Applicant’s approach to future mitigation, the Council sees a role and does not accept the Applicant’s view.</p> <p>The Council’s position remains unchanged. The Council wishes to have representation at all four technical panels and the ESG.</p>
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3.2.13	Draft DCO	<p>Within the GCG Framework the ESG Terms of Reference (paragraph A2.3.3) (APP219) and the dDCO (AS-067) has identified that Airport Operator has a right of appeal to the SoS for Transport. The Council recommends that, in addition to the Council being admitted to the ESG, each of the (then) five Local Authorities sitting within the ESG are additionally given a right of appeal to the SoS.</p> <p>It is noted that de-commissioning of the Scheme has been scoped out (para 9.3.18 of Chapter 9 –Climate Change Resilience of the Environmental Statement (APP-035)). The Council recommends a requirement of the DCO to ensure that a separate assessment is required for future de-commissioning.</p>	<p>Please see response to LIR reference 3.2.9 regarding appeals to the Secretary of State.</p> <p>The requirement for statutory environmental assessment for any development, including demolition, is decided through application of the relevant legislation at the time of application for permission, a further requirement is not considered necessary.</p>	<p>The Council accepts the Applicant’s position on this matter.</p>
3.3 Transport and Highways				

<p>3.3.10</p>	<p>Transport Modelling</p>	<p>The Council is unable to conclude its position regarding the highways impacts within Buckinghamshire, until such time as the Applicant has completed the additional work required by the ExA to update the strategic modelling as set out in the letter from the Applicant to the Examining Authority dated 27th June 2023 (AS-064). In addition to addressing these matters, the Council does not consider that the strategic model is suitable for use in relation to the Buckinghamshire highway network in its current form. The suitability of the traffic model is a fundamental issue affecting the robustness of the conclusions drawn by the Applicant in respect of the Buckinghamshire highway network.</p>	<p>In response to the Rule 9 letter, the Applicant is undertaking further work referred to as:              ‘accounting for COVID-19 in transport modelling’, which responds to the ExA request to consider the Department for Transport Guidance on the treatment of COVID-19, which was published (on 31st May 2023) after the modelling for the DCO application had been completed and after the DCO application had been submitted.</p> <p>The ‘Rule 9 work’ should enable the local authorities and the ExA to consider whether the package of mitigation measures set out in the DCO application documents continue to mitigate the impacts of the Airport Expansion. The methodology and timescales for this work have been submitted and the Applicant is currently progressing this work.</p>	<p>The Council maintains that it has concerns that have not as yet been addressed regarding the validation of the Strategic model within the Buckinghamshire area. It is reiterated that Buckinghamshire Council requested to be included within the scoping of the strategic modelling, as set out in the Councils Written Representation (REP1-042 paragraph 2.2.11). The Council remains concerned that the B489 route is a sensitive route and therefore small changes to the traffic volumes may have a severe impact, it is this sensitivity that the Council seeks to understand.</p> <p>The Applicant’s approach does not allow for this sensitivity to be addressed within the model as presented. The Buckinghamshire network falls outside all the validation screen lines, despite</p>
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			<p>As such, the submitted documents and associated mitigation strategy remain as the main application documents for consideration.</p> <p>The Applicant does consider the strategic model to be a suitable tool to assess the level of traffic impact on the highway network in Buckinghamshire for the following reasons.</p> <ul style="list-style-type: none"><li>• The model has been calibrated and validated as per the DfT's TAG guidance and is considered fit for purpose by all Host Authorities and National Highways, as is referenced in the statements of common ground with these parties.</li></ul> <ol style="list-style-type: none"><li>1. The model includes Buckinghamshire within its modelled simulation, with the fully modelled area covering much of the county. This is shown in the Transport Assessment Appendices - Part 1 of 3 Appendix E1:</li></ol>	<p>being shown to be part of the long distance East West route validation line (APP-200 Transport Assessment Appendix E).</p> <p>The trip distribution plans (REP1-019) show an observable thickening of the line along the B489 in the future years between figure 15 and figure 27. It is therefore the Council's position that this demonstrates that an impact will be experienced along this route.</p> <p>It is noted that Buckinghamshire welcome the ExA's request during ISH4 Highways and Transportation for the distribution plans to be updated for greater clarity, the Council agrees that it is required to be presented with quantitative data regarding the numbers of vehicles using this route in the peak hours and across the whole day.</p>
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			<p>Highway LMVR (LMVR), Figure 4.1 CBLTM-</p> <p>LTN Fully Modelled Area and in the LMVR</p> <p>Figure 7.1 Luton Airport and Non-Airport CBLTM-LTN Zones.</p> <ol style="list-style-type: none"><li>2. The mobile phone demand data, upon which the model travel demands have been built, includes the whole of Buckinghamshire, as shown in the LMVR Figure 5.7 CBLTM-LTN Mobile Network Cordon.</li><li>3. The model has also been calibrated / validated to screenlines for demands to/from the county, as shown in LMVR Figure 11.2 'Initial Assignment Calibration' Screenline Classification (Calibration=blue   Validation=Red) – Overview.</li></ol>	<p>It is also noted that the Applicant's have conceded within ISH4 that they can provide the Council with output data from the model showing journey times, flows, and validation information within the Buckinghamshire area. This was confirmed in a meeting on 02/10/2023 with the applicant and an email summary of the information required was supplied to the Applicant following that meeting.</p> <p>Without this information the Council maintains that it is not possible to conclude its position on this matter.</p>
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			<p>4. The level of existing and future forecast airport traffic travelling to/from Buckinghamshire is observed and forecast to remain relatively low, when compared to other areas as shown in the Volume 8 Additional Submissions (Examination) 8.30 Trip Distribution Plans, which were submitted on 25<sup>th</sup> August 2023.</p> <ul style="list-style-type: none"><li>• The level of traffic impact within Buckinghamshire is forecast to be relatively low, as shown in the Transport Assessment Appendices - Part 2 of 3 Appendix F: Strategic Modelling Forecasting Report [APP-201].</li></ul>	
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<p>3.3.12 – 3.3.13</p>	<p>Transport Modelling</p>	<p>Issue 1- Technical Concerns with Strategic Model</p> <p>The Council does not consider that the validation and calibration of the strategic model is of an adequate standard within Buckinghamshire to provide certainty of the traffic impacts within the county.</p> <p>Without the certainty of the quality of the modelling as an assessment tool, the exact nature of the impacts within Buckinghamshire cannot be quantified by the Applicants or the Council, and the Council is unable to agree that the assessment methodology is suitable or appropriate in this location.</p>	<p>The Strategic Model CBLTM-LTN has been calibrated and validated as per the DfT’s TAG guidance. Moreover, the model was considered fit for purpose by all Host Authorities and National Highways. The level of detail in the model’s geographical coverage was agreed with Host Authorities and National Highways, and was informed by observed Civil Aviation Authority (CAA) data on the distribution of airport passengers / staff.</p> <p>As set out within the Strategic Modelling- Model Specification Report, Appendix B of the Transport Assessment [APP-203 to APP-206], the model is originally based on the CBLTM, following which a more enhanced version was developed to add more network and zoning details within the core area of influence. Areas within Buckinghamshire were included within the model simulation area, although the level of detail decreases the further the distance from the</p>	<p>The Council again highlights that Buckinghamshire Council has not been included within the scoping of the strategic model, and has not been engaged regarding the validation and the standard of the model within the Buckinghamshire area.</p> <p>The Council notes that the route validation has been undertaken, and shows routes being used through Buckinghamshire, using the B489 and onto the A41 into Aylesbury.</p> <p>The Route Validation exercise demonstrates that this route should have been investigated properly as to the quantification of impacts along it.</p> <p>As with the previous point, the Council awaits the additional Buckinghamshire information to be supplied by the Applicant in order to consider further the</p>
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			airport. Several routing validation analyses were reported in the model LMVR, including east-west routes.	acceptability of the model outputs within Buckinghamshire.
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<p>3.3.14 – 3.3.16</p>	<p>Surface Access</p>	<p>Issue 2 – Impact of Scheme trip generation within Buckinghamshire</p> <p>The primary link between Aylesbury and the Main Application Site takes the A41 and the B489 before leaving the county on the B488 heading east towards the airport.</p> <p>The Council is aware that sections of this primary link, particularly on the B489, already experience issues due to traffic flows that are poorly suited to the narrow sections that pass through historic villages including Ivinghoe, Marsworth and Pitstone.</p> <p>The Ivinghoe Neighbourhood sets out local policies regarding local highway matters, TRA2 is the most relevant to this proposal. The supporting text explains the existing issues with traffic volumes on the constrained routes through the village, with HGVs being a particular concern, and highway safety and the lack of suitable crossing points.</p>	<p>The trip distribution of the airport traffic was based on observed CAA data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included. The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority. The distribution shows relatively low volumes via the mentioned route corridor.</p> <p>The forecast airport HGV generation is also considered low, and very minimal levels travelling through the Buckinghamshire local road network. The Applicant notes the issue within Ivinghoe but does not agree that the proposed airport expansion would have any material impact at this location.</p>	<p>The Council agrees with the ExA that the information currently supplied is not of a suitable level to be able to be able to agree with the Applicant’s conclusions as presented.</p> <p>The Council requires data to be provided regarding the peak hour flows, and pre AM peak as well as inter peak flows.</p> <p>It is also noted that the information provided within the trip distribution plans (REP1-019) are for a 13 hour day, however no start and end times are provided for that 13 hour period. It is necessary for greater information to be provided to ensure that the data captures all those commuting trips associated with the AM peak flights.</p> <p>The Council will not conclude its position on this matter until it has</p>
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				received this information and has been able to review this with the additional information expected as a result of the revisions to the transport modelling.
3.3.17 – 3.3.18	Surface Access	The route is already subject to a number of measures to protect it from excessive and inappropriate use. Traffic calming measures within the villages, and shuttle working traffic signals on narrow and historic bridges have also been	The forecast airport HGV generation within the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201] is considered low, with minimal volumes of airport related traffic	The Council accepts that HGV traffic within Buckinghamshire is expected to be low, however it is concerned that appropriate consultation shall be required if construction routes do use the

		<p>implemented. Within the Council’s Freight Strategy Objective 1 (and sub-policies) is to ensure appropriate road use for HGVs and other freight vehicles. This includes mitigation of freight travelling along unsuitable roads. The Council has implemented a 7.5 tonne weight restriction zone in and around Ivinghoe.</p> <p>Accommodating additional traffic flow along this section of the B489/B488 route raises concerns that these pre-existing issues will be exacerbated and existing mitigation measures may be insufficient to appropriately address impacts. The Council has articulated the concerns regarding the level of confidence that can be applied to the assessment of this route by the Applicant within its WR.</p>	<p>travelling through the Buckinghamshire local road network.</p> <p>The Applicant notes the existing issues within Ivinghoe, however does not agree that the proposed airport expansion would have any material impact at this location.</p>	<p>Buckinghamshire network. There is currently no requirement for the LPA in reviewing the CTMP to consult with all affected authorities.</p> <p>As stated above the Council requires the accurate information from the Strategic model in order to complete its assessment of this matter.</p> <p>The Council does note that it is necessary to consider the local context and nature of a route when considering the impacts at a strategic modelling level. Local constraints, and local understanding are necessary to be applied through the sifting process at a strategic model level and when considering the impacts against the NPPF severance test, as this is a subjective test.</p>
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<p>3.3.19</p>	<p>Surface Access</p>	<p>The Council’s objective is to secure mitigation against that pre-existing issue to ensure that the conditions that are currently experienced on this route do not suffer from a deterioration as a result of intensification of use by long distance commuting to the airport as a result of airport expansion.</p>	<p>The trip distribution of the airport traffic was based on observed CAA passenger survey data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included. The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority. The distribution shows relatively low volumes via the mentioned route corridor.</p>	<p>The trip distribution plans (REP1-019) show an observable thickening of the line along the B489 in the future years between figure 15 and figure 27. It is therefore the Council’s position that this demonstrates that an impact will be experienced along this route.</p> <p>It is noted that Buckinghamshire welcome the ExA’s request during ISH4 Highways and Transportation for the trip distribution plans to be updated for greater clarity, the Council agrees that it is required to be presented with quantitative data regarding the numbers of vehicles using this route in the peak hours and across the whole day.</p> <p>The Council’s position remains unchanged until such information is received.</p>
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<p>3.3.20</p>	<p>Transport Modelling</p>	<p>The Local Model Validation Report (LMVR) for the strategic modelling identifies this as a long-distance commuting route and therefore intensification of use of the route is to be expected. It is also noted that based on the information that has been presented to the Council to date, the Applicant is indicating that in the region of an additional 30 movements are expected within the peak hour periods. This would indicate to the Council that this route requires further assessment in order to fully understand the impacts of the Scheme, noting the Council does not consider the strategic model to be fit for assessment purposes within Buckinghamshire at present. The Council at present cannot consider this figure to be reliable due to the outstanding work required to demonstrate that the strategic model can be relied upon</p>	<p>The Strategic Model CBLTM-LTN has been calibrated and validated as per the DfT’s TAG guidance. Moreover, the model is considered fit for purpose by all Host Authorities and National Highways.</p> <p>Within Appendix E of the LMVR, several route choice validation analyses were reported, including to and from the airport, and “long distance”.</p> <p>The Applicant will continue to liaise with Buckinghamshire County Council on any concerns. However, it is advised that the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201] should be considered, as it includes an extensive level of outputs such as traffic flows, link volume to capacity ratios, nodes delays and routing analysis.</p> <p>This should help provide Buckinghamshire County Council with</p>	<p>The Council maintains that it has concerns that have not as yet been addressed regarding the validation of the Strategic model within the Buckinghamshire area.</p> <p>It is reiterated that the Council requested to be included within the scoping of the strategic modelling, as set out in the Council’s Written Representation (REP1-042 paragraph 2.2.11).</p> <p>The Council remains concerned that the B489 route is a sensitive route and therefore small changes to the traffic volumes may have a severe impact, it is this sensitivity that the Council seeks to understand.</p> <p>The Applicant’s approach does not allow for this sensitivity to be addressed within the model as presented. The Buckinghamshire network falls outside all the validation screen lines, despite</p>
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			<p>a more detailed insight into the areas of interest.</p>	<p>being shown to be part of the long distance East West route validation line (APP-200 Transport Assessment Appendix E).</p> <p>It is noted that during ISH4 the Applicants has undertaken to provide the Council with additional information regarding the links and routes of concern. It is expected that once this information has been supplied, the Council will be able progress its assessment of the impacts.</p>
<p>3.3.21 – 3.3.22</p>	<p>Surface Access</p>	<p>The B488 provides an alternative route between the junction with the B489 and the A41, which the Council considers to be more suitable for through traffic, including that which would be generated by the Scheme and the long-distance commuting route. This is supported by the findings of the Council’s review of the accident record on this route, which indicates that there were a greater number of accidents within the past 5 years on the B489 than the B488.</p>	<p>It is the Applicant’s position that the volume of additional trips generated by the proposed Airport expansion is not of a sufficient magnitude to justify the inclusion of highway mitigation measures at these locations.</p> <p>Existing issues relating to highway accidents are the responsibility of the local highway authority</p>	<p>Please see the response to 3.3.17 and 3.3.18</p>

		The Council does not consider the B489 to be a safe and suitable or preferential route for accommodating additional trips due to the Scheme.		
3.3.23	Surface Access	The Council considers it necessary to have continued engagement with the Applicant in order to address the concerns regarding the assessment within the Transport Assessment (APP-203, AS-123, APP-205 and APP-206) and reach an agreement for mitigation on this route to protect the sensitive locations on the B489. The Council reserves its position on the final mitigation measures that may be required to address the impacts on traffic within Buckinghamshire.	Whilst the Applicant is willing to continue engagement with Buckinghamshire County Council, the Applicant does not consider the generated traffic associated with the Airport expansion sufficient to justify additional mitigation.	<p>The Council maintains its position that mitigation is required until such time as the additional modelling information has been supplied.</p> <p>It is noted that the Applicant's presentation of the TRIMMA accepts that there will be impacts that have not been assessed that require mitigation, and therefore additional mitigation would be provided in these situations. It is the Council's position that full and comprehensive assessment should be made of these impacts prior to determination of the DCO.</p>

<p>3.3.24</p>	<p>Surface Access</p>	<p>Issue 3 – Inadequate Public Transport provision</p> <p>The Council’s LTP5 will place greater emphasis on the prioritisation of public transport over the use of the private car as part of achieving ‘Quantifiable Carbon Reduction’. It is against this emerging policy context and the existing policy background that the Council considers that the existing public transport commitments by the Applicant (Framework Travel Plan AS-131) are inadequate to address sustainable surface access requirements from the Buckinghamshire area and west of the airport.</p>	<p>The Applicant considers that the issue raised regarding public transport commitments was answered within the Applicant’s Response to Relevant Representations Part 2A [REP1-021] pages 291-293, in response to RR-0166.</p> <p>The Applicant’s cross-reference is to the following text:  <i>“The Applicant is committed to working with local stakeholders to improve sustainable transport options including public transport. The 5-yearly Travel Plans will monitor airport travel against the agreed targets and any mitigation required will be subject to consultation before implementation - all relevant councils will be consulted with on potential initiatives to improve the sustainable mode share and meet targets. The Applicant is committed to working with bus operators to support measures for further improving sustainable transport within the area. Improvements to the</i></p>	<p>The Council welcomes the invitation to the ATF, which grants a seat at the table for the discussion of public transport needs for access to the airport. However concerns are still raised regarding the review schedule of the Travel Plans, 5 year plans are acceptable, however annual review should be required in order to make corrective adjustments to the plans should measures be unsuccessful or found to be a poor use of funds. The Council is also concerned that there is no commitment to funding for services that are required at the early stages of the development, as presented during ISH4.</p> <p>Greater certainty and commitments are required to ensure that funding and provision will be made for public transport links that provide full connectivity</p>
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			<p><i>public transport network are not entirely within the gift of the Applicant and require discussion and negotiation with third parties. In the future, the airport operator will work closely with bus service operators and development of future Travel Plans, which will set out measures to improve services in order to meet future mode share Targets."</i></p>	<p>to the airport, and that provision serves the whole community.</p>
3.3.25	Surface Access	<p>The Council has been informed that there is to be a Sustainable Transport Fund created, however, there are currently no clearly defined parameters set for establishing the value of that fund. If the Sustainable Transport Fund is not sufficient to support the services across all parts of the highway network needed to support sustainable transport to serve the Scheme it shall not be able to make the provisions necessary to make the application acceptable. On this basis, the Council considers that there is no certainty that any public transport provision can be secured, nor is there clarity around the process for assessing need and benefit.</p>	<p>Following the submission of the application for development consent, the Applicant has further developed proposals for a Sustainable Transport Fund (STF), to be used to fund measures identified within the Framework Travel Plan [AS-131].</p> <p>The Applicant will continue to engage with the Council as the proposals are developed, including the size of the fund, the parameters for prioritising measures to be funded by the STF and the legal mechanisms for securing the fund.</p>	<p>The Council seeks further engagement with the Applicant regarding this matter to know the level of funding expected to be provided, how the funding lag identified in ISH4 will be addressed and if the proposed level of funding will be sufficient to meet the needs of the Sustainable Transport Fund.</p> <p>The Council remains of a position that certainty is required, as set out in its original position on this matter.</p>



3.3.26	Surface Access	<p>The Council considers it necessary for the Sustainable Transport Fund to be established on the basis of a robust and locationally specific assessment of Luton Airport and its surrounding areas, rather than benchmarking from other airports within the UK, as has been presented as Applicant's proposed approach.</p>	<p>Benchmarking was one component of the approach taken. The Applicant has been progressing and developing more detail around bus and coach routes to demonstrate the range of potential opportunities for improving bus and coach access to and from the airport, mapping gaps in current service provision and frequencies. These improvements are being developed in tandem with a Sustainable Transport Fund that will set the framework around how these types of improvements, alongside the others listed out within the toolbox of measures within the Framework Travel Plan [AS-131], would be funded. The Applicant will continue to engage with the Council as the proposals are developed</p>	<p>The Council does not consider the position on this matter to have changed.</p> <p>The Council requires information setting out the way in which the benchmarking process has been carried out. This, however, remains secondary to a specific assessment regarding the needs of Luton Airport and its surrounding area.</p>
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<p>3.3.27 – 3.3.30</p>	<p>Surface Access</p>	<p>The Council considers it necessary for key provisions to be established prior to the setting of the Sustainable Transport Fund’s value to ensure that strategic needs are clearly defined and secured through the DCO process.</p> <p>It is also the Council’s position that the governance of the Sustainable Transport Fund has not been adequately presented, and therefore it is unclear what structure is to be and if it provides the interested parties and transport authorities with a strong enough voice to ensure that key strategic provisions shall be delivered. Public Transport provision to the airport from the western approaches is an essential provision that is required to provide adequate opportunities for sustainable transport choices for both staff and customers of the airport. Without this provision Buckinghamshire residents shall be reliant on the private car for all journeys to and from the airport.</p>	<p>Following the submission of the application for development consent, the Applicant has been progressing and developing more detail around bus and coach routes to demonstrate the range of potential opportunities for improving bus and coach access to and from the airport, mapping gaps in current service provision and frequencies.</p> <p>These improvements are being developed in tandem with a Sustainable Transport Fund that will set the framework around how these types of improvements, alongside the others listed out within the toolbox of measures within the Framework Travel Plan AS-131], would be funded.</p> <p>The routes indicated as being a priority for Buckinghamshire Council will be considered alongside other east-west routes that may need to be provided to improve connectivity to the airport from surrounding areas. The prioritised routes that will</p>	<p>The Council remains of a position that the identified links are an essential provision that is required of the development. As presented during ISH4, these provisions are required to support the Applicants ETS as well.</p> <p>It is noted that work is being undertaken to identify gaps within the current provision, however the case remains that without connections as identified within the PADSS (AS-053) (reiterated in the updated PADSS) and the Relevant Representation (RR-0166), access to the airport from the west shall remain car dependant.</p> <p>It has not been shown that the Sustainable Transport Fund will be adequate to meet the sustainable transport needs of the airport, and so the Council remains of the position that these services should be secured</p>
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		<p>Therefore, the Council considers it necessary that both a high-speed bus is provided from Aylesbury to the airport and the number 61 local service is reinstated to the airport (the PADSS (AS-053) and Relevant Representation (RR-0166) introduce these matters) to provide employee commuting and passenger access from the Buckinghamshire area. The high speed bus will provide a real alternative to the private car on the basis of it offering a high quality, high frequency, high speed service from Aylesbury. The number 61 local service will incorporate a greater number of stops and offer a lower cost alternative to the private car and high speed bus service for local trips and staff commuting to the airport.</p>	<p>be funded by the Sustainable Transport Fund will be agreed through governance structure that is clearly set out within the Framework Travel Plan [AS-131].</p>	<p>ahead of the sustainable transport fund process.</p>
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<p>3.3.31</p>	<p>Construction Traffic Management Plan</p>	<p>Issue 4 – Certainty of the impact of Construction Traffic on the Buckinghamshire highway network</p> <p>The code of construction practice (APP-049) and the outline Construction Traffic Management Plan (CTMP) (APP-130) uses the M1 motorway to the west of Luton Airport and routes to the east into Bedfordshire and Hertfordshire during the construction period. However, it does not identify last mile locations, especially for groundworks movements and Buckinghamshire is already heavily impacted by High Speed 2 (HS2) and East West Rail (EWR) construction HGV movements. The CTMP is silent on protections for the Buckinghamshire network from freight operations and lack detail on freight routing strategy. Councillors and residents are already expressing concerns about the impacts from extensive movements from HGVs through the county from other national infrastructure projects, as set out in the health and communities issues within this LIR.</p>	<p>Detailed measures to manage construction traffic impacts would be set out in the Construction Traffic Management Plan (CTMP) (as secured by Requirement 14 of the draft Development Consent Order [AS-067]), which would be developed in detail by the appointed contractor during the detailed design stage, and must be substantially in accordance with the Outline Construction Traffic Management Plan [APP130].</p> <p>It is expected that origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes</p>	<p>The Council accepts that HGV traffic within Buckinghamshire is expected to be low, however it is concerned that appropriate consultation shall be required if construction routes do use the Buckinghamshire network. There is currently no requirement for the LPA in reviewing the CTMP to consult with all affected authorities.</p>
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<p>3.3.32</p>	<p>Construction Traffic Management Plan</p>	<p>Without strong provision within the CTMP, the Council does not have confidence that there will be suitable control of potential impacts from freight operations in respect of the Buckinghamshire transport network. The Council seeks to secure consultation on these documents where they affect Buckinghamshire’s network and residents, and the ability to require changes and/or clarifications and controls within the management strategies be included within the documents.</p>	<p>Detailed measures to manage construction traffic impacts would be set out in the Construction Traffic Management Plan (CTMP), which would be developed in detail by the appointed contractor during the detailed design stage, and must be substantially in accordance with the Outline Construction Traffic Management Plan [APP-130].</p> <p>It is expected that origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p> <p>The Construction Traffic Management Plan (CTMP) outlines the formation of a traffic management working group (TMWG) as a forum for stakeholder engagement prior to the commencement of the Proposed Development. The TMWG would seek representation from the lead</p>	<p>The Council accepts that HGV traffic within Buckinghamshire is expected to be low, however it is concerned that appropriate consultation shall be required if construction routes do use the Buckinghamshire network. There is currently no requirement for the LPA in reviewing the CTMP to consult with all affected authorities.</p>
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			contractor, Luton Borough Council (LBC), highways authorities and National Highways.	
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<p>3.3.34 – 3.3.35</p>	<p>Surface Access</p>	<p>The Council’s position is that the B489 does not appropriately meet the requirement for safe and suitable access for through traffic due to the alignment of the road, width of the carriageway, the presence of signal-controlled bridges, and modal conflict with pedestrians within the villages of Ivinghoe, Pitstone and Marsworth.</p> <p>Alternative routes along the B488 are therefore required to be considered to be the primary access route for traffic commuting on the longdistance route to the airport. It should also be noted that this route would be considered wholly inappropriate for any HGV movements associated with construction of the airport expansion and so should feature as an excluded route within the Code of Construction Practice (APP-049). This would accord with the Council’s Freight Strategy.</p>	<p>Detailed measures to manage construction traffic impacts would be set out in the Construction Traffic Management Plan (CTMP), which would be developed in detail by the appointed contractor during the detailed design stage, and must be substantially in accordance with the Outline Construction Traffic Management Plan [APP-130].</p> <p>It is not intended by the Applicant to utilise the local road network for material supplies however it is expected that the origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p>	<p>The Council accepts that HGV traffic within Buckinghamshire is expected to be low, however it is concerned that appropriate consultation shall be required if construction routes do use the Buckinghamshire network. There is currently no requirement for the LPA in reviewing the CTMP to consult with all affected authorities.</p> <p>Additionally, the Council considers that the Framework CTMP has the ability to identify routes that should be avoided, and this provision should be made at within that document.</p>
<p>3.3.36</p>	<p>Surface Access</p>	<p>The analysis of the key transport and highways issues by the Council enables the identification of the impacts that are</p>	<p>The Applicant considers the strategic model to be a suitable tool to assess the level of traffic impact on the</p>	<p>The Council maintains that it has concerns that have not as yet been addressed regarding the</p>

		<p>considered relevant to this topic. These impacts are summarised in the list below, followed by a fuller explanation of the way in which the Council would wish to see them addressed by the Applicant:</p> <ol style="list-style-type: none"> <li>1. Certainty of the traffic impacts within the County, which requires a validated and correctly calibrated strategic traffic model to underpin all aspects of the technical assessment.</li> <li>2. Detailed consideration of traffic impacts due to Scheme trip generation along the A41, B489, B488 route, with a specific focus on Ivinghoe, Pitstone and Marsworth.</li> <li>3. Impacts on modal shift due to the proposals for the provision of public transport to support the Scheme in construction and operation.</li> </ol> <p>Impacts of construction traffic on the Buckinghamshire Highway Network.</p>	<p>highway network in Buckinghamshire, for reasons outlined in Matter 3.3.10. The Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201], has an extensive level of outputs reported.</p> <p>Based on the forecast and impact assessment, the impact on the mentioned areas were considered not significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p> <p>As per previous responses, it is not intended by the applicant to utilise the local road network for material supplies, however it is expected that origin of these movements would be from existing freight and materials suppliers who would have existing</p>	<p>validation of the Strategic model within the Buckinghamshire area. It is reiterated that the Council requested to be included within the scoping of the strategic modelling, as set out in the Council’s Written Representation (REP1-042 paragraph 2.2.11). The Council remains concerned that the B489 route is a sensitive route and therefore small changes to the traffic volumes may have a severe impact, it is this sensitivity that the Council seeks to understand.</p> <p>The Applicant’s approach does not allow for this sensitivity to be addressed within the model as presented. The Buckinghamshire network falls outside all the validation screen lines, despite being shown to be part of the long distance East West route validation line (APP-200 Transport Assessment Appendix E).</p>
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			permissions to utilise the network for their purposes.	It is noted that during ISH4 the Applicant has undertaken to provide the Council with additional information regarding the links and routes of concern. It is expected that once this information has been supplied, the Council will be able progress its assessment of the impacts.
3.3.37	Surface Access	<p>The Council requires the following to address impact 1 and therefore enable the Council to have confidence in the nature of the traffic impacts of the Scheme within the county:</p> <ul style="list-style-type: none"> <li>• Journey time data to confirm the model’s appropriateness for the purposes of assessing development proposals within Buckinghamshire.</li> <li>• Calibration and validation data to confirm the model’s appropriateness for the purposes of assessing development proposals within Buckinghamshire.</li> </ul> <ol style="list-style-type: none"> <li>1. Confirmation that long stay survey data was included in the Civil Aviation Authority trip rate data.</li> </ol>	<p>The Strategic model CBLTM-LTN has been calibrated and validated as per the DfT’s TAG guidance. Moreover, the model was considered fit for purpose by all Host Authorities and National Highways. While the model does not cover detailed calibration / validation within Buckinghamshire, it is still considered to be robust tool to assess the impact of the proposed airport expansion. Moreover, the airport trip distribution information, which was based on observed CAA passenger survey data, shows relatively low level of travel demands to/from Buckinghamshire.</p>	<p>The Council maintains that it has concerns that have not as yet been addressed regarding the validation of the Strategic model within the Buckinghamshire area. It is reiterated that the Council requested to be included within the scoping of the strategic modelling, as set out in the Council’s Written Representation (REP1-042 paragraph 2.2.11). The Council remains concerned that the B489 route is a sensitive route and therefore small changes to the traffic volumes may have a severe impact, it is</p>

		<p>2. A Forecasting Report that confirms how growth has been calculated and applied within the model to ensure that growth within Buckinghamshire has been taken into account appropriately.</p> <p>An updated Local Model Validation Report (LMVR) that addresses the above.</p>	<p>An extensive Strategic Modelling Forecasting Report is included as Appendix F of the Transport Assessment [APP-201]. This explains the forecasting method in accordance with the DfT's TAG guidance. The Applicant notes Buckinghamshire Council's concerns in relation to the level of calibration/validation within its local road network, but due to the reasons mentioned above, the Applicant does not agree on the need of an updated base model or its calibration / validation</p>	<p>this sensitivity that the Council seeks to understand.</p> <p>The Applicant's approach does not allow for this sensitivity to be addressed within the model as presented. The Buckinghamshire network falls outside all the validation screen lines, despite being shown to be part of the long distance East West route validation line (APP-200 Transport Assessment Appendix E).</p> <p>It is noted that during ISH4 the Applicant hav undertaken to provide the Council with additional information regarding the links and routes of concern. It is expected that once this information has been supplied, the Council will be able progress its assessment of the impacts.</p>
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<p>3.3.38</p>	<p>Surface Access</p>	<p>Impact 2 relates to the level of confidence that can be applied to the assessment of the of the Scheme on the principal access route to the airport through Buckinghamshire – the A41, B489, B488. The Council requires the following:</p> <ol style="list-style-type: none"> <li>1. Details of link flows for the base year and future years with and without development for the B489, B488 and A41.</li> <li>2. Select link analysis of development traffic only for the B489, B488 and A41 links.</li> </ol>	<p>The Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP201] has an extensive level of outputs reported such as traffic flows, link volume to capacity ratios, nodes delays, select link and routing analysis. Moreover, the recently submitted daily airport passenger and staff trip distribution, which was requested by the Examining Authority, adds to the list of outputs.</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>	<p>The Council maintains that it has concerns that have not as yet been addressed regarding the validation of the Strategic model within the Buckinghamshire area. It is reiterated that the Council requested to be included within the scoping of the strategic modelling, as set out in the Council’s Written Representation (REP1-042 paragraph 2.2.11). The Council remains concerned that the B489 route is a sensitive route and therefore small changes to the traffic volumes may have a severe impact, it is this sensitivity that the Council seeks to understand.</p> <p>The Applicant’s approach does not allow for this sensitivity to be addressed within the model as presented. The Buckinghamshire network falls outside all the validation screen lines, despite being shown to be part of the</p>
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				<p>long distance East West route validation line (APP-200 Transport Assessment Appendix E).</p> <p>It is noted that during ISH4 the Applicant have undertaken to provide the Council with additional information regarding the links and routes of concern. It is expected that once this information has been supplied, the Council will be able progress its assessment of the impacts.</p>
3.3.39	Surface Access	<p>The Council anticipates that the updated modelling information will support the case for some form of traffic intervention at Ivinghoe. Matters that the Council considers will need to be explored include junction re-prioritisation at the B488/B489 junction, modal conflict, traffic speeds and safety for all users. The Council wishes to be consulted on the findings of the updated modelling work and discussions</p>	<p>Whilst the Applicant is willing to continue engagement with Buckinghamshire County Council, the Applicant does not consider the volumes of generated traffic associated with the airport expansion sufficient to justify mitigation measures.</p>	<p>The Council maintains its position that mitigation is required until such time as the additional modelling information has been supplied.</p> <p>It is noted that the Applicant's presentation of the TRIMMA accepts that there will be impacts that have not been assessed that require mitigation, and therefore</p>

		regarding mitigation and/or enhancement works along the whole of this route.		additional mitigation would be provided in these situations. It is the Council’s position that full and comprehensive assessment should be made of these impacts prior to determination of the DCO.
3.3.40	Surface Access	<p>The Council is seeking efficient, effective and reliable public transport connections to the airport for residents of Buckinghamshire and communities to the west of the London Luton Airport, in order to support modal shift away from the private car and support sustainable transport behaviours. Addressing impact 3 is also seen as an essential means of realising the full economic benefits of the Scheme to the County, by securing connectivity for a greater proportion of the population. The Council requires the following:</p> <ol style="list-style-type: none"> <li>1. The provision of a high speed, high quality, high frequency bus service between Aylesbury and the airport.</li> </ol>	<p>Following the submission of the application for development consent, the Applicant has been developing more detail around bus and coach routes to demonstrate the range of potential opportunities for improving bus and coach access to and from the airport, mapping gaps in current service provision and frequencies.</p> <p>These improvements are being developed in tandem with a Sustainable Transport Fund that will set the framework around how these types of improvements, alongside the others listed out within the toolbox of measures within the Framework</p>	<p>The Council remains of a position that the identified links are an essential provision that is required of the development. As presented during ISH4, these provisions are required to support the Applicant’s ETS as well.</p> <p>It is noted that work is being undertaken to identify gaps within the current provision, however the case remains that without connections as identified within the PADSS (AS-053) and the Relevant Representation (RR-0166), access to the airport from</p>

		<ol style="list-style-type: none"> <li>1. The reinstatement of the number 61 local service to the airport, on at least an hourly service frequency.</li> <li>2. Certainty of an appropriate Sustainable Transport Fund.</li> <li>3. Clarity of how the Sustainable Transport Fund will be calculated.</li> <li>4. Certainty of mode shift, linked to specific targets and hold points and embedded in the Sustainable Transport Fund.</li> </ol> <p>2. The Framework Travel Plan (APP-229, superseded by AS-131) is required to be updated to provide certainty of governance of the Sustainable Transport Fund. Further details on the review by the Council of the Framework Travel Plan can be found in the Council's WR.</p>	<p>Travel Plan [AS-131], would be funded.</p> <p>The routes indicated as being a priority for Buckinghamshire Council will be considered alongside other east-west routes that may need to be provided to improve connectivity to the airport from surrounding areas. The prioritised routes that will be funded by the Sustainable Transport Fund will be agreed through a governance structure that aligns with the processes set out in the Framework Travel Plan [AS-131] (Section 7.4 Paragraph 7.4.4).</p>	<p>the west shall remain car dependant.</p> <p>It has not been shown that the Sustainable Transport Fund will be adequate to meet the sustainable transport needs of the airport, and so the Council remains of the position that these services should be secured ahead of the sustainable transport fund process.</p>
3.3.41	Surface Access	It is acknowledged that the proposals for construction traffic movement do not currently include the Buckinghamshire highway network.	Detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP) (as secured by Requirement 14 of the draft Development Consent Order	The Council accepts that HGV traffic within Buckinghamshire is expected to be low, however it is concerned that appropriate consultation shall be required if

		<p>However, the CTMP is in outline form only (AP130) and the full details of use of the wider highway network, including by construction workers, are unlikely to be clear until this is further developed. The Council therefore requires the following:</p> <ol style="list-style-type: none"> <li>1. Consultation on the further development of the CTMP, which should incorporate specific targets for each mode to expand on the current division between sustainable and unsustainable modes.</li> <li>2. Consultation on freight routing and suitable controls to be included within the CTMP.</li> <li>3. • The Outline Construction Workers Travel Plan (APP-131) is required to be updated to show how the Buckinghamshire network is to be affected; and this should be tested within the updated traffic modelling as appropriate. Further details on the review by the Council of this Travel Plan can be found in the Council’s WR.</li> </ol>	<p>[AS-067]), which would be developed in detail by the appointed contractor during the detailed design stage and must be substantially in accordance with the Outline Construction Traffic Management Plan [APP-130].</p> <p>It is expected that origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p>	<p>construction routes do use the Buckinghamshire network. There is currently no requirement for the LPA in reviewing the CTMP to consult with all affected authorities.</p>
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<p>3.3.42</p>	<p>Draft DCO</p>	<p>The dDCO (AS-067) has been reviewed from the perspective of transport and highways. There are three items that the Council considers relevant:</p> <ol style="list-style-type: none"> <li>1. The Council should be included within the Airport Transport Forum as Highway Authority and secured through the dDCO (AS-067) • The dDCO Schedule 2 Part 3, paragraph 24 should set out the maximum timescales for delivery of any actions.</li> <li>2. A list should be included to indicate which bodies are responsible for monitoring the findings of the GCG Framework and the FTP, including the data collection and authorisation of changes to in order to address any failures to meet targets.</li> </ol>	<p>The Applicant is currently considering the future make-up of the Airport Transport Forum, including its role in relation to the proposed Sustainable Transport Fund. The Applicant will continue to engage with the Council on this matter.</p> <p>Due to the diversity of potential future circumstances that might materialise and require mitigation, the proposed requirement for actions in the Mitigation Plan to “avoid or prevent exceedances of the Limit as soon as reasonably practicable” is considered more appropriate to reflect this uncertainty. The determination of whether the proposed actions would meet this threshold would be determined by the independent Environmental Scrutiny Group when approving or refusing a Mitigation Plan.</p> <p>Proposals for monitoring surface access performance under the GCG</p>	<p>The Council’s response to the dDCO is presented within the relevant sub-section of this table.</p>
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			<p>Framework are set out in Green Controlled Growth Framework Appendix F – Surface Access Monitoring Plan [APP-224]. Governance arrangements for the Framework Travel Plan [AS-131] are set out in Section 7.4 of that document, compliance with which is secured through Requirement 30 of the DCO. The requirements within the FTP do not therefore need to be transposed in the DCO itself.</p>	
3.4 Noise and Vibration				
3.4.3	Noise and Vibration	<p>Within Buckinghamshire, the areas most likely to be affected by changes to aircraft noise along existing flightpaths are Dagnall, Pitstone and an area east of Aylesbury, including Wendover, which is also overflowed by low level northbound traffic from Heathrow. Edlesborough Parish Council is voicing concern in its relevant representation (RR-0404) about what it describes as potential “noise impacts” from expansion.</p>	<p>The Applicant considers that the issue raised regarding aircraft noise in the named areas was answered within the Applicant’s Response to Relevant Representations Part 2A [REP1-021] pages 296-297, in response to RR-0166.</p> <p>RR-0404 from Edlesborough Parish Council is responded to within the Applicant’s Response to Relevant Representations Part 2E [REP1025] pages 20-21.</p>	See answer to 3.4.5

<p>3.4.5</p>	<p>Noise and Vibration</p>	<p>Given the increasing importance of such areas to community health and wellbeing the Council encourages the Applicant to place particular emphasis on protection of the Chilterns AONB. Currently the Chilterns AONB is somewhat overflown but radical changes in airspace management could lead to the area being substantially overflown. The Council would like to see overflight of the Chilterns AONB formally reviewed by the Noise Envelope Design Group (NEDG). The NEDG themselves recommended that the Noise Envelope should be reviewed if there were to be any significant changes to the airport’s operations. Especially as such a change will result from the anticipated modernisation of airspace known as Future Airspace Strategy Implementation South (FASI-S).</p>	<p>The Applicant considers that the issue raised regarding noise and tranquillity in the Chilterns AONB was answered within the Applicant’s Response to Relevant Representations Part 2A [REP1-021] page 300, in response to RR-0166.</p> <p>The work of the Noise Envelope Design (NEDG) group has concluded and the NEDG issued their final report in October 2022. The purpose of the NEDG was to provide advice and recommendations of the design of the Noise Envelope, with no intention that the NEDG would have an ongoing role post consent. See the NEDG terms of reference appended to the NEDG Final Report in Annex A of Appendix 16.2 of the Environmental Statement [APP-111].</p> <p>Ongoing oversight and technical review of Green Controlled Growth and the Noise Envelope will be</p>	<p>Having been a part of the Noise Envelope Design Group, the Council wishes to continue its involvement in the operation and refinement of the Noise Envelope itself. The Applicant’s Green Controlled Growth Framework will prevent this. The remedy would be for the Council to be a formal member of the Environmental Scrutiny Group and Noise Technical Panel. The Applicant has suggested that this is not appropriate because no significant noise effects in Bucks are predicted in the Environmental Statement. BC suggests that this is not a justification because effects resulting from future changes, in airspace for example, are not yet known and cannot be predicted.</p>
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			<p>undertaken by the Noise Technical Panel and Environmental Scrutiny Group. See Green Controlled Growth Explanatory Note [APP217].</p> <p>In line with the NEDG recommendations, the Noise Envelope contains a defined framework to review the Noise Envelope Limits in response to airspace change (see paragraph 3.2.27 onwards of Green Controlled Growth Explanatory Note [APP-217].</p> <p>Assessment of changes to airspace and flightpaths (and their impacts on the Chilterns AONB) are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment (which explicitly requires the consideration of overflight of AONBs) and consultation exercise by the</p>	
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			airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616).	
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<p>3.4.6</p>	<p>Noise and Vibration</p>	<p>The noise and vibration assessment in Section 16.9 of the ES (16 Noise and vibration Chapter) (APP-042 superseded by AS-080) demonstrates how the Applicant proposes to mitigate and reduce to a minimum potential adverse impact resulting from noise from the Scheme and avoid noise giving rise to significant adverse effects on health and the quality of life (Noise Policy Statement for England (NPSE) March 20109). The Council understands the arguments presented by the Applicant, that there will be no observed adverse significant effect with Buckinghamshire and therefore no specific Buckinghamshire mitigation is necessary. However, to protect this position the Applicant relies on the mechanism Green Controlled Growth Framework (APP-218) to prevent/mitigate impacts. The Council is concerned that this mechanism is not clear or transparent.</p>	<p>The acknowledgement that there will be no observed adverse significant effect within Buckinghamshire and therefore no specific Buckinghamshire mitigation is necessary is noted.</p> <p>The Green Controlled Growth Framework [APP-218] transparently sets out the necessary processes required for the functioning of the GCG approach, as well as the values of the Limits and Thresholds used to manage the impacts of growth. The Framework is supported by an Explanatory Note [APP-217] and a number of appendices, including Terms of Reference for the proposed Environmental Scrutiny Group (ESG) [APP-219] and Technical Panels [APP220] as well as by a Noise Monitoring Plan [APP221].</p>	<p>This is understood but the ES is based on a set of assumptions and predictions. These may turn out to be incorrect because they are affected by market forces and airspace change.</p>
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<p>3.4.8</p>	<p>Green Controlled Growth</p>	<p>Although broadly in agreement with the role of the ESG, the Council is further concerned that the ESG may not be fully independent. This is because (according to The Green Controlled Growth Framework Explanatory Note (APP-217)) the independent chair will initially be nominated by the airport operator, following consultation with the London Luton Airport operator. The Council suggests the initial appointment be reviewed by all ESG members within the first year of operation and this continues on a rolling basis.</p>	<p>Whilst the airport operator will identify the proposed chairperson of the ESG, ultimately the appointment of that Chairperson is decided by an independent third party (the Secretary of State).                  As set out in the ESG Terms of Reference included as Appendix A of the Green Controlled Growth Framework [APP-218], it is proposed that the independent chairperson serves a three-year term. Any subsequent appointments of a chairperson would be subject to consultation with all members of the ESG.</p> <p>As set out in Section 2.3 of the Green Controlled Growth Framework [APP-218], it is also proposed that the airport operator carries out a review of all GCG processes within 12 months of the end of the Transition Period. The findings of this review will be submitted to the ESG for comment. Subsequently, a similar</p>	<p>The SoS should oversee the first review.                  CAP 1165 says “The CAA believes that a noise envelope underpinned by law could be designed as an effective tool to afford communities confidence that airport expansion can be managed sustainably.”</p> <p>GCG is the underpinning proposed by the Applicant and is a new mechanism and should be scrutinised by the SoS.</p>
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			review will be carried out every five years.	
3.4.9	Noise and Vibration	Due to the Council's concerns regarding the robustness of the traffic modelling that underpins the noise assessment (see Transport and Highways sub-section), it is felt to be appropriate that the Council reserves its final position in respect of related noise impacts.	Noted. See responses on the surface access points in this document (LIR Reference 3.3.10).	The Council's position remains unchanged.
3.4.12	Noise and Vibration	The analysis of the key noise issues by the Council enables the identification of the impacts that are considered relevant to the noise topic. These impacts are summarised in the list below, followed by a fuller explanation of the way in which the Council would wish to see them addressed by the Applicant: <ul style="list-style-type: none"> <li>• The Noise Envelope has a fundamental role to play in the ongoing management and future mitigation of adverse noise effects that could arise from noise impacts associated particularly with any changes in airspace usage, arising from FASIS.</li> </ul>	See responses below.	The Applicant has inserted the summary of issues presented by the Council. As such, please refer to previous responses within this sub-section.

		<ol style="list-style-type: none"> <li>1. Due to the incremental growth proposed by the Scheme, the noise impacts and their consequential effects are anticipated to evolve. There is a need for the implications of these changes to be robustly analysed, including within Buckinghamshire.</li> <li>2. Impacts of increases in noise disturbance to the Chilterns AONB.</li> </ol> <p>Adherence of noise levels to WHO Environmental Noise Guidelines. • Confirmation of the noise impacts of Scheme construction on receptors within Buckinghamshire.</p>		
3.4.13	Noise Envelope	In order to ensure the correct application and efficacy of the Noise Envelope, the Council is seeking reassurance that the Noise Envelope will be subject to timely review at such time as changes in airspace are proposed (i.e. through FASI-S). In addition to this, the Council wishes to see a review one year after operation and a mechanism to trigger intervening reviews more frequently than the five years currently	In line with the NEDG recommendations, the Noise Envelope contains a defined framework to review the Noise Envelope Limits in response to either the ICAO publishing a new 'noise chapter' for the Next-Gen, low carbon, aircraft (i.e. the next 'Chapter' following on from the current 'Chapter 14') or the approval of an Airspace Change Proposal such	The Applicant has inserted the summary of issues presented by the Council. As such, please refer to previous responses within this sub-section.



		<p>proposed within the Terms of Reference for the NEDG, secured appropriately through the DCO.</p>	<p>as FASI-S (see paragraph 3.2.27 onwards of Green Controlled Growth Explanatory Note [APP-217]).</p> <p>This mechanism would be triggered by these operational changes, rather than being time limited as suggested.</p> <p>See response to paragraph 3.4.8 on timing of the review cycle.</p>	
3.4.14	Noise Envelope	<p>The NEDG, which includes representation from the Council, should be in a position to check all of the parameters and ensure that these are adopted as appropriate targets within the GCGF, on a rolling basis. In addition, the NEDG should continue to operate as an independent entity from the ESG, with this independence secured through appropriate means as part of the DCO.</p>	<p>See response to paragraph 3.4.5 on the completed role of the NEDG.</p>	<p>The Applicant has inserted the summary of issues presented by the Council. As such, please refer to previous responses within this sub-section.</p>

3.4.15	Noise and Vibration	There is understood to be an intention to form an Aircraft Noise Technical Panel in relation to noise impacts of the Scheme. The Council is seeking representation from suitably qualified and experienced technical officers from the Council on this Panel.	The Applicant considers that the issue raised regarding membership of the Noise Technical Panel was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.	The Applicant's response is not accepted. The Council remains of the position that it should be included within the Noise Technical Panel.
3.4.16	Green Controlled Growth	The ESG is intended to provide oversight and scrutiny of the ongoing development of the Scheme, and then the environmental performance of the Scheme. The Council is seeking representation from suitably qualified and experienced technical officers from the Council on the ESG.	The Applicant considers that the issue raised regarding membership of ESG was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.	The Applicant's response is not accepted. The Council remains of the position that it should be included within the ESG.
3.4.17	Noise Envelope	The Council wishes to see overflight of the Chilterns AONB included within the Terms of Reference for the NEDG, and secured appropriately through the DCO, as the Noise Envelope is developed further. In addition, the Council is seeking a guarantee that the Noise Envelope review process will provide	See response to paragraph 3.4.5 on overflight of the Chilterns AONB and the completed role of the NEDG.  The Noise Limit Review process (see paragraph 3.2.27 onwards of Green Controlled Growth Explanatory Note [APP-217]) sets out the process	The Applicant has inserted the summary of issues presented by the Council. As such, please refer to previous responses within this sub-section.

		<p>certainty that any future airspace changes will ensure that noise impacts are no greater than those relied upon should the DCO be granted.</p>	<p>through which the Noise Limits will be reviewed, and where possible reduced, following an approved airspace change.</p> <p>Paragraph 2.3.4 of the Green Controlled Growth Framework [APP-218] states <i>“There will be no ability to change any of the Level 1, Level 2 Thresholds or Limits to permit materially worse environmental effects than those identified in the Environmental Statement (ES).”</i></p>	
3.4.18	Noise and Vibration	<p>To protect residents from local impacts, as far as reasonably practicable, the Council asks that the Scheme should be compliant with “WHO Environmental Noise Guidelines 2018 (as they relate to aircraft noise) for the European Region”.</p>	<p>The Government response on the WHO Environmental Noise Guidelines 2018 (Ref 2.1) is as follows: <i>“The government is considering the recent new environmental noise guidelines for the European region published by the World Health Organization (WHO). It agrees with the ambition to reduce noise and to minimise adverse health effects, but it wants policy to be underpinned by the most robust evidence on these effects, including the total cost of action and recent UK</i></p>	<p>The Applicant has inserted the summary of issues presented by the Council. As such, please refer to previous responses within this sub-section.</p>

			<p><i>specific evidence which the WHO report did not assess.” (Ref 2.2).</i></p> <p>Although the dose-response relationship in the new WHO Guidelines is not currently adopted in UK policy, sensitivity testing using the relevant updated relationships in the WHO guidelines has been undertaken and is presented in Chapter 13 Health and Community of the Environmental Statement [AS-078].</p>	
3.4.19	Construction Traffic Management Plan	The Council is seeking additional clarity on the controls that will be incorporated within the CTMP as it is developed. Ideally this will include controls preventing mass haul and lorry routes and construction compounds or other sites supporting construction (e.g. spoil disposal) being sited within Buckinghamshire.	<p>Detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP) (as secured by Requirement 14 of the draft Development Consent Order [AS-067]), which would be developed in detail by the appointed contractor during the detailed design stage.</p> <p>It is expected that origin of these movements would be from existing freight and materials suppliers who</p>	The Applicant has inserted the summary of issues presented by the Council. As such, please refer to previous responses within this sub-section and the response relating to transport issues.

			<p>would have existing permissions to utilise the network for their purposes.</p> <p>The Construction Traffic Management Plan (CTMP) outlines the formation of a traffic management working group (TMWG) as a forum for stakeholder engagement prior to the commencement of the Proposed Development. The TMWG would seek representation from the lead contractor, Luton Borough Council (LBC) and local councils, highways authorities and National Highways.</p>	
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3.4.20	Draft DCO	<p>The relationship between GCGF, Noise Envelope and the ESG are not yet fully defined, and the Council is concerned that the Noise Envelope, which is national policy, is not referenced in the dDCO whilst the GCGF and ESG which are not policy feature prominently. Additionally, references are made to legal frameworks that are not explained – this explanation should be included.</p>	<p>As set out in Section 3.1 of the Green Controlled Growth Framework [APP-218], the Noise Envelope and the GCG Framework have similar principles and functions and hence the noise section of GCG is being defined as the Noise Envelope for the Proposed Development, so there is single control process for aircraft noise and this is integrated with the wider control processes which form GCG.</p> <p>It is unclear which references to legal frameworks Buckinghamshire Council consider are not explained, and clarification is requested on this matter.</p>	<p>The Council’s response to the dDCO is presented within the relevant sub-section of this table.</p>
3.4.21	Draft DCO	<p>To protect the interests of Buckinghamshire residents, the Council wishes to become a member of the ESG. The Council is currently missing from the ESG member authorities listed in the dDCO Requirement paragraph 20 of Part 2, Schedule 2 (AS-067)</p>	<p>The Applicant considers that the issue raised regarding membership of ESG was answered within the Applicant’s Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.</p>	<p>The Council’s response to the dDCO is presented within the relevant sub-section of this table.</p>

3.5 Air Quality			
3.5.5	Air Quality	<p>There are nine air quality management areas (AQMAs) present within the Buckinghamshire Council area. However, only three of the AQMAs are located on routes where the Council anticipates there to be increases or changes in traffic due to the DCO Application. There are the Stoke Road AQMA, Friarage Road AQMA and Tring Road AQMA all located within Aylesbury. The Councils' Strategic Environmental Protection Team would seek to ensure that these AQMAs are not negatively impacted by the DCO Application. This is especially as air quality monitoring data collected by the council in 2022 found exceedances of the National Air Quality Objectives within the Friarage Road AQMA. The results of the air quality monitoring can be found within the 2023 Annual Status Report.</p>	<p>The air quality assessment (Chapter 7 [AS-076]) has provided an assessment of air quality following the methodology and study area agreed with the local Councils, including Buckinghamshire Council.</p> <p>This matter is addressed in the Statement of Common Ground submitted at Deadline 2 [TR020001/APP/8.18] item no 3.5.6. The study area is considered appropriate and takes into account the affected road network using the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) guidance.</p> <p>The three mentioned AQMAs (Stoke Road AQMA, Friarage Road AQMA, and Tring Road AQMA) located on routes that the Council anticipates will experience increases or changes in traffic, are all over 19km from the affected road network. No significant</p>

The Council reserves its position to comment until the updated the traffic modelling has been completed and finalised as outlined within the Rule 9 letter. [PD-005 and PD-006]. This is because this data feeds into the air quality assessment (Chapter 7 [AS-076]) and without this information it is not possible for the Council to conclude its position on this matter.

			<p>impacts are predicted to occur within the study area. No significant air quality effects would occur outside of the study area, which would include the above-mentioned Buckinghamshire AQMAs.</p>	
3.5.6	Air Quality	<p>The Council’s Highways Officers report that the preferential route to access Luton Airport through Buckinghamshire is the A41, B488, B489. This route passes through a number of villages with some properties fronting the highway. On the basis that the Council has concerns about the validity of the transport modelling undertaken by the Applicant to date, there are also concerns that the air quality modelling will be based on inaccurate transport information in respect of the Buckinghamshire highway network. This gives rise to an issue around the accuracy of the air quality assessment findings relating to receptors along the preferential airport access route.</p>	<p>This matter is addressed in the Statement of Common Ground submitted at Deadline 2 [TR020001/APP/8.18] item no 3.5.8.</p> <p>The Strategic Model CBLTM-LTN used for the transport modelling has been calibrated and validated as per the DfT’s TAG guidance. Moreover, the model is considered fit for purpose by all Host Authorities and National Highways.</p> <p>The trip distribution of the airport traffic was based on observed CAA passenger survey data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included.</p>	<p>The Council has no concerns with the modelling methodology used within the air quality assessment (Chapter 7 [AS-076]). However, the Council maintains that it has concerns that have not yet been addressed regarding the validation of the Strategic model within the Buckinghamshire area used within the Transport Assessment [APP-201]. This data feeds into the air quality assessment and therefore until these concerns are addressed it is not possible for the Council to conclude its position on this matter.</p>



			The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority. The distribution shows relatively low traffic volumes using the mentioned route corridor.	
3.5.8	Air Quality	the Council has concerns about the traffic modelling that has been used to underpin the assessment, and this has implications for the conclusions drawn regarding the air quality impacts of the Scheme, which are set out in this sub-section.	Concerns raised regarding the approach to traffic modelling has been addressed in LIR references 3.3.12-3.3.18 and its impacts on air quality in LIR references 3.5.9.	Please see response to 3.5.6.
3.5.9	Air Quality	The principal impacts on air quality are associated with traffic emissions during construction and operation of the Scheme. The Council has stated within the relevant representations (RR-0166) that the highway network in Aylesbury acts as a route hub for all directions and is therefore very sensitive to congestion and small changes in traffic have a significant impact on the performance of the network. The Council can see no reference to Aylesbury within the impact assessment. The Council would therefore	As mentioned above in reference 3.5.5, the air quality assessment (Chapter 7 [AS-076]) has provided an assessment of air quality following the methodology and study area agreed with the local Councils. The study area is considered appropriate and takes into account the affected road network using the Institute of Air Quality Management (IAQM) and Environmental	Additional information has been requested by the Council with respect to this as outlined in points 3.3.14 – 3.3.16. The Council awaits the receipt of this information in addition to the findings of the Rule 9 letter work before concluding it's position.

		<p>wish to see the evidence underpinning the conclusion that this location is not going to experience adverse impacts, noting also that as yet the construction traffic management plan is yet to be defined, and this could have implications in terms of HGV movements.</p>	<p>Protection UK (EPUK) guidance. It is noted that Aylesbury is not within the study area. Aylesbury is located over 19km from the study area, no air quality effects would occur outside of the study area.</p> <p>The trip distribution of the airport traffic was based on observed CAA passenger survey data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included. The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority. The distribution shows relatively low volumes of traffic heading towards Aylesbury.</p> <p>Access routes for construction traffic will be limited, as far as reasonably practicable, to the trunk road network and main roads on the local road network. It is not intended by</p>	
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			<p>the Applicant to utilise the local road network for material supplies however it is expected that the origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes.</p>	
3.5.10	Air Quality	<p>The Council's Highways team has also highlighted that there is the potential for the villages within the north of Buckinghamshire to be negatively impacted by changes in traffic from the Scheme. If the revised traffic data shows that the screening thresholds, as outlined within the Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance document 'Guidance on land-use planning and development control: Planning for air quality', are exceeded in any area within Buckinghamshire then there may be a requirement to conduct an additional air quality assessment.</p>	<p>This matter is addressed in the Statement of Common Ground submitted at Deadline 2 [TR020001/APP/8.18] item no 3.5.3.</p>	<p>Please see response to 3.5.5.</p>

3.5.11	Transport Modelling	<p>In order to address the two impacts referenced above, the Council requests updated traffic modelling, in accordance with the requirements set out in the Transport and Highways subsection above; updated CTMP to include either details of HGV routing through Buckinghamshire or clauses to prevent such movements; and updated air quality modelling that makes use of this updated traffic information. The Council is seeking quantitative data, particularly in relation to impacts on Aylesbury and relevant receptors along the A41, B489, B488 route through the county.</p>	<p>As per previous responses, detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP) (as secured by Requirement 14 of the draft Development Consent Order [AS-067]), which would be developed in detail by the appointed contractor during the detailed design stage.</p> <p>It is not possible to provide quantitative detail on HGV routing at this stage, and this would be developed further at detailed design stage.</p>	<p>The Council's position remains that it requests updated traffic modelling to be completed in line with the Rule 9 letter which should feed into an updated air quality assessment.</p> <p>It is noted as that there is currently no requirement for consultation on the CTMP with all affected authorities.</p>
3.5.12	Surface Access	<p>It is recognised that public transport options for residents seeking to access Luton Airport from towns and villages within Buckinghamshire could be significantly improved. Any improvement in the form of additional public transport options would also have a positive impact on local air quality generally through enabling a modal shift to a more sustainable form of transport. This is because there would be less reliance on private cars for all journeys to and from</p>	<p>Please see previous response to LIR reference 3.3.30 regarding future consideration of the reinstatement of the 61 bus service.</p>	<p>See comments in 3.3.27 – 3.3.30.</p> <p>The Council maintains that without adequate provision of public transport access to the airport from the west will remain dependent on private cars.</p>

		<p>the airport for both staff and customers. Therefore, the Council’s Strategic Environmental Protection team supports the comments made by the Council as the Highway Authority in relation to this – the Council requests the provision of an express bus service between Aylesbury and Luton Airport; and the reinstatement of service 61 to provide a reliable, frequent and effective connection between Buckinghamshire villages and the airport along the preferential access roads.</p>		
3.6 Economy, Tourism and Employment				
	<p>Employment and Economics</p>	<p>The Council recognises the potential positive benefits of the Scheme for the Buckinghamshire economy and seeks to maximise any economic opportunities available to residents and businesses of Buckinghamshire as a result of the Scheme. 3.6.7. The Council’s comments on this topic are predicated on the assumption that the forecast employment and Gross Domestic Product (GDP) figures provided by the Applicant are reasonable and accurate as set out in the Environmental Statement</p>	<p>Buckinghamshire Council’s position on the benefits of the scheme are noted.</p>	<p>No additional comments.</p>

		<p>(APP-037). This has not been investigated by the Council, which does not intend to explore this further unless a reason arises for such examination to be undertaken</p>		
<p>3.6.8</p>	<p>Surface Access</p>	<p>Whilst the Council welcomes the activities outlined in the Employment and Training Strategy (APP-215) and supports a focus on some of the more deprived areas within Buckinghamshire, it is vital that accessibility is addressed. As noted above in relation to surface access transport (see Transport and Highways sub-section), at present there are no effective public transport connections between Buckinghamshire and Luton Airport that could be utilised by potential employees of the airport. Without significant improvements in accessibility, the prospect of Buckinghamshire residents taking up employment at London Luton Airport are limited and will undermine the aims of the Employment and Training Strategy. Note also that the airport is to continue operating throughout the expansion, so it is just as relevant for the immediacy of this issue to be noted – it is</p>	<p>This matter is addressed in the Statement of Common Ground submitted at Deadline 2 [TR020001/APP/8.18] Item number 3.7.1.</p>	<p>The surface access response is articulated earlier in the table in point 3.3.24. From an Employment and Economic perspective, the importance of commitments to improving public transport access remain, with such improvements being key to securing economic benefits in Buckinghamshire, particularly in more deprived areas.</p>

		<p>already disadvantaging the opportunities of people with limited mobility to access employment.</p>		
3.6.9	<p>Employment and Training Strategy</p>	<p>Where the Employment and Training Strategy includes an initiative to encourage local employment and local businesses as part of the construction and operation phases of the expansion, the Council would welcome initiatives to support local procurement and look</p>	<p>The Applicant will seek to regularly engage with relevant local government partners to coordinate on how the growth plans at the airport align with the employment, skills and training strategies in the ETS Study Area.</p>	<p>The Council reserves its position pending the outcome of further engagement with the Applicant.</p>

		forward to discussions with Luton Rising on this.	This topic will be discussed with the Council and reported as part of the Statement of Common Ground [TR020001/APP/8.18].	
3.6.10	Employment and Training Strategy	The Employment and Training Strategy makes several references to the importance of ongoing engagement with local government, including Goal 1 “Maximise the impact of the Proposed Development through engagement with local government partners who can coordinate with their skills and growth strategies” and the creation of a Local Economic Development Working Group (LEDWG) that includes representation from relevant local authority teams, e.g. economic development. The Council would welcome involvement in this working group, to ensure alignment with local employment and skills strategies and to help facilitate links with other appropriate stakeholders (including, but not limited to, the Bucks Skills Hub, Buckinghamshire College Group,	The Council’s request to be included as part of the Local Economic Development Working Group has been noted. The working group will include relevant attendees from local authorities across the ETS Study Area.	Local Economic Development Working Group (LEDWG) – The Mitigation Route Map [AS-047] states that the Section 106 agreement also includes commitments to measures set out in the Employment and Training Strategy [APP-215] to maximise the employment benefits from the construction and operation of the Proposed Development. The LEDWG is included as Initiative 1.1 at para 4.2.4 of the ETS. However, the Mitigation Route Map only references EE-1 and EE-2, with the securing document being Section 2 of the ETS and the securing mechanism being the S106 Agreement. On that basis it



		<p>Buckinghamshire New University). The Council would also seek to be part of the working group to help identify and encourage activities that maximise the benefits for Buckinghamshire’s residents and businesses and support the overarching aim of the Employment and Training Strategy (ETS) “to ensure that, as many of the jobs and economic opportunities generated by the Proposed Development as possible, go to the residents of Luton and the “ETS Study Area”.”</p>		<p>is concluded that the LEDWG is not secured at this point.</p> <p>Note also that the Applicant does not directly state that it considers the Council to be a ‘relevant attendee’ – it is implied only.</p> <p>There is a requirement for secured commitments on this matter.</p>
3.6.12	Employment and Training Strategy	<p>According to the Employment and Training Strategy, 623 FTE jobs are expected to be created in the construction period. It needs to be recognised that with other major infrastructure projects ongoing in Buckinghamshire, including HS2 and EWR, the availability of an adequate construction workforce locally is a challenge.</p>	<p>This has been noted.</p>	<p>The Council awaits further information from the Applicant relating to how this matter is to be addressed.</p>

3.6.16	Employment and Training Strategy	<p>Whilst the claimant count rate has been falling in Buckinghamshire and remains below national rates, there are variations across the county, with some persistent pockets of higher unemployment and deprivation. The importance of 'levelling up' has been recognised by the Council in the Opportunity Bucks programme which has identified ten priority wards on which to target activity. The programme includes a focus on jobs, careers, skills and learning. In line with references made to inclusivity within the Employment and Training Strategy, the Council would welcome opportunities for Employment and Training interventions targeted at the ten priority wards.</p>	<p>As outlined in Goal 2 of the ETS the Applicant and airport operator aim to run a programme of engagement aimed at getting ETS Study Area residents into work at the airport.</p>	<p>The Council's position on this matter remains unchanged.</p>
3.6.17	Employment and Training Strategy	<p>The Employment and Training Strategy makes reference to career progression and above average wages, as well as to apprenticeships. The Council would welcome opportunities, through engagement with the LEDWG, to promote such opportunities to young people and residents across the county.</p>	<p>The Council's request to be included as part of the Local Economic Development Working Group has been noted. The working group will include relevant attendees from local authorities across the ETS Study Area.</p>	<p>Refer to 3.6.10.</p>

3.6.18	Employment and Training Strategy	<p>Based on the above, the Council’s expression of economy, tourism and employment impacts and requests for ways in which the Applicant could seek to address them are summarised as follows:</p> <ul style="list-style-type: none"> <li>• Maximising beneficial economic impacts for Buckinghamshire residents through securing accessibility to job opportunities – the Council considers the provision of sustainable transport modes to access the airport to be key to addressing this impact. As set out in the Highways and Transport sub-section, an express bus connection between Aylesbury and the Airport is sought, together with the reinstatement of an at least hourly bus service along line 61.</li> </ul>	<p>Please see previous response to LIR reference 3.3.30 regarding future consideration of the reinstatement of the 61 bus service.</p>	<p>The Council’s position on this matter remains unchanged.</p>
3.6.19	Employment and Training Strategy	<p>Realising the beneficial economic impacts of procurement for local businesses – the Council is keen to work with the Applicant to develop specific initiatives for inclusion in the further development of the Employment and Training Strategy, which should also target the ten priority wards</p>	<p>The expression of interest to develop the Employment and Training Strategy (ETS) [APP-215] further is noted. As outlined within the ETS the airport operator will continue to prioritise the utilisation of local businesses</p>	<p>The Council’s position on this matter remains unchanged.</p>

		listed in the 'Opportunity Bucks' programme.	within the supply chain and measure within existing frameworks will be implemented to help ensure opportunities are more accessible for small to medium sized enterprises.	
3.6.19	Employment and Training Strategy	Tackling adverse impacts of out-migration of skills from Buckinghamshire – the Council is keen to work with the Applicant as part of the LEDWG to exert influence on the way in which employment opportunities are developed. In particular, the Council will look to promote opportunities to young people within the Buckinghamshire communities.	The Council's request to be included as part of the Local Economic Development Working Group has been noted. The working group will include relevant attendees from local authorities across the ETS Study Area.	Refer to 3.6.10.
3.6.19	Employment and Training Strategy	Maximising beneficial economic impacts and developing transferable legacy skills within the supply chain – the Council wishes to partner with appropriate organisations, such as Bucks Business First, to work with the Applicant on supply chain readiness and accessibility of local businesses to suitable supply chain opportunities.	As outlined in the Employment and Training Strategy [APP-215] during the construction phase, the existing procurement process will support, the development of standard procurement materials, easy-to-understand requirements, and provide support to ensure procurement opportunities are inclusive and accessible to various types and sizes of businesses.	The Council's position on this matter remains unchanged.

3.6.20	Draft DCO	<p>The dDCO (AS-067) does not include any specific reference to ensuring how the economic benefits associated with expansion will be secured. It is to be assumed that this detail will emerge through further development of, and discussions around, the Employment and Training Strategy. The Employment and Training Strategy includes a commitment to engaging with local authorities so to reiterate, the Council would be seeking a place on the LEDWG to ensure collaborative efforts to maximise economic benefits across the county. This should be reflected in the dDCO (AS-067) as appropriate.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>The Council's response to the dDCO is presented within the relevant sub-section of this table.</p>
3.7 Landscape and Visual				

<p>3.7.5 – 3.7.6</p>	<p>Landscape and Visual</p>	<p>The submitted Environmental Statement Chapter 14 Landscape and Visual Revision 1 (AS-079) identifies significant adverse effects on the Chilterns AONB as a result of ‘a noticeable deterioration to the aesthetic and perceptual characteristics of the AONB’ during both the construction and operation of Phase 2b of the Scheme, as a result of increased aircraft movements.</p> <p>The Environmental Statement is unclear as to the extent of these effects with considerable ambiguity between the submitted elements of the Environmental Statement. For example, despite identifying that there would be significant effects in the Chilterns AONB, the assessment does not appear to identify any significant effects in the Landscape Character Areas (LCAs) that fall within Chilterns AONB in the Study Area.</p>	<p>The study area defined in Chapter 14 Landscape and Visual of the ES ([AS-079]) is considered to be large enough to assess all of the likely significant landscape and visual effects of the Proposed Development.</p> <p>Considering potential landscape or visual effects within an overly large study area (for example considering all landscape character areas within 15km of the Main Application Site) would make understanding the key landscape and visual effects of the Proposed Development more difficult by including extraneous baseline information and receptors which are unlikely to be significantly affected by the Proposed Development (such as the landscape of (Buckinghamshire).</p> <p>Accordingly effects on the landscape in Buckinghamshire are considered in relation to tranquillity and</p>	<p>This matter has been resolved and is addressed in SoCG submitted at Deadline 3.</p>
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			specifically land within the Chilterns AONB where aircraft would be below 7,000 ft above mean sea level (AMSL).	
3.7.7	Landscape and Visual	<p>There also seems to be a discrepancy between the extent of the study area and the areas identified as being overflown by increased flight numbers (the potential source of adverse effects). The Study Area stops at approx. 5km whilst flights below 7,000ft are shown to extend out to approx. 35km. As a result, the Environmental Statement is unclear whether the identified significant adverse effects extend beyond the Study Area and into Buckinghamshire. The Council requires additional clarification of the assessment, to confirm whether the conclusions drawn area applicable to the parts of the Chilterns AONB that are within Buckinghamshire.</p>	<p>The study area is defined in Chapter 14 Landscape and Visual of the ES (AS-079) and presented on Figures 14.1 and 14.17 of the ES. Figure 14.17 shows, amongst other things, the maximum extent of the area within the AONB where the number of overflights per day up to 7,000ft (including part of Buckinghamshire).</p> <p>The conclusions drawn in Chapter 14 of the ES, in terms of the landscape and visual effects of the Proposed Development on Buckinghamshire, related solely to effects on tranquillity within the Chilterns AONB where aircraft would be below 7,000 ft above mean sea level (AMSL).</p>	<p>This matter has been resolved and is addressed in SoCG submitted at Deadline 3.</p>

<p>3.7.8</p>	<p>Landscape and Visual</p>	<p>In addition to over flights, it also apparent that there is potential for highway works and increased traffic on rural roads (particularly in the Chilterns AONB) in the Buckinghamshire area that have not been explored within the Environmental Statement. There is the potential that further development of the CTMP, which is currently in outline form (APP130) will identify aspects of the Scheme that could introduce additional landscape and visual impacts within Buckinghamshire. This will particularly be the case should HGV routes or construction activities be sited close to the Chilterns AONB or the more rural villages of the County. In the absence of the resolution of these ambiguities and the provision of clearer information, the Council reserves its position on the potential adverse impacts of the Scheme on the Buckinghamshire area. The Council is seeking additional clarity on the controls that will be incorporated within the CTMP as it is developed. Ideally this will include controls preventing mass haul and lorry routes and construction compounds or other sites supporting construction (e.g.</p>	<p>The Affected Road Network (ARN) is determined by the strategic model and includes the roads from which likely significant effects may potentially occur and is therefore the study area for traffic related environmental effects. The ARN is shown in Figure 7.1 [AS-098] and [Figure 16.1 [AS-103] for air quality and noise respectively. Receptors within the ARN determined study areas are included in the assessments and effects assessed and reported in the Environmental Statement. Roads and receptors outside of the ARN, which includes most of Buckinghamshire and the rural roads mentioned, are not likely to experience significant environmental effects and are therefore not assessed. This approach is widely accepted, included in relevant guidance, and best practice for assessment of environmental effects from highway related impacts.</p>	<p>The Council's position on this matter remains unchanged.</p>
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		<p>spoil disposal) being sited within Buckinghamshire.</p>	<p>The Outline Construction Traffic Management Plan (CTMP) [APP-130] provides the principles to and measures to be developed in the full CTMP by the appointed contactor which, as secured by Requirement 14 of the draft DCO [AS-067] must be substantially in accordance with the Outline CTMP. As described in Section 4.2 of the Outline CTMP “<i>A principal consideration when identifying designated routes will be the minimisation of travel along any road that does not form part of the Primary Route Network (PRN)</i>” and “<i>it is envisaged the great majority of construction vehicles will approach the Site using the M1 and the A1081 (New Airport Way)</i>”.</p> <p>Given that the areas of concern raised are the west of the M1 very little construction traffic is expected on that part of the network. Requirement 14 of the draft DCO [AS-067] states that construction will not commence until the full CTMP is</p>	
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			<p><i>“approved in writing by the relevant planning authority, following consultation with the relevant highway authority on matters related to its function.”.</i></p> <p>There are no construction activities or compounds proposed in Buckinghamshire.</p>	
3.8 Heritage				
3.8.6	Cultural Heritage	<p>due to the Council’s concerns regarding the robustness of the traffic modelling that underpins the noise assessment (see Transport and Highways sub-section) it is felt to be appropriate that the Council reserves its final position in respect of related noise impacts to heritage assets.</p>	Noted.	<p>The Council’s position on this matter remains unchanged.</p>

3.8.7	Cultural Heritage	<p>In addition, it is unclear whether there may be further implications to heritage assets in Buckinghamshire as the Scheme is further defined. For example, in relation to construction traffic routes in proximity to sensitive assets or passing through historic landscapes and villages, which could arise following further development of the detail in the CTMP (APP-130). Potential impacts to setting could also arise if off-site Highways works sought by the Council are developed, for example, at Ivinghoe.</p>	<p>Noted.</p> <p>The Proposed Development as defined in Chapter 4 The Proposed Development of the Environmental Statement [AS-074] has been assessed appropriately and effects reported in the Environmental Statement.</p> <p>The Construction Traffic Management Plan will be developed by the contractor and will be substantially in accordance with the Outline Construction Traffic Management Plan [APP130] which outlines appropriate measures to manage impacts from construction traffic. No further assessment is required.</p>	<p>The Council's position on this matter remains unchanged.</p>
3.8.8	Cultural Heritage	<p>The analysis of the key issues within Buckinghamshire enables the identification of the following impacts that are considered relevant to the heritage topic. These impacts are associated with</p>	<p>Noted.</p> <p>The Applicant considers the traffic modelling and the environmental assessments that employ traffic data,</p>	<p>The Council's position on this matter remains unchanged.</p>

		<p>an explanation of the way in which the Council would wish to see them addressed by the Applicant:</p> <ol style="list-style-type: none"><li>1. Potential for new heritage impacts to be identified following update to the noise modelling and subsequent analysis – the Council has set out how it wishes the Applicant to address the updates to the traffic modelling. Once this is completed, the Council wishes to receive updated noise modelling and analysis of consequential impacts for the heritage topic.</li><li>2. Potential for additional heritage impacts to be identified following further development of the CTMP (APP-130) – the Council is keen to be in a position to influence the further development of the CTMP (APP-130), as set out in the Highways and Transport sub-section.</li></ol>	<p>or outcomes of assessments that employ traffic data, submitted with the application to be robust. No further assessment is required.</p>	
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3.9 Health and Community				
3.9.28	Health and Community	Impacts from HGV traffic movements: contributing to noise effects, severance and reduction of amenity. Relevant to construction and operation.	<p>It is expected that the great majority of construction HGVs will use only motorways and 'A' roads, the Construction Traffic Management Plan (CTMP) will be developed by the appointed contractor and must be substantially in accordance with the Outline CTMP [APP-130] , as secured by Requirement 14 of the draft Development Consent Order [AS-067].</p> <p>The impacts of construction and operational traffic (including HGVs) have been assessed in Chapter 18: Traffic and Transportation of the ES [AS-030] and associated noise and air quality effects have been assessed in Chapter 16: Noise and Vibration of the ES [REP1-003] and Chapter 7: Air Quality of the ES [AS-076].</p> <p>Based on these assessments, the magnitude of traffic impacts (including severance effects on drivers and pedestrian/cyclists), noise</p>	<p>The Council understands the process that the Applicant intends to follow. The issue raised is that the input information used for the assessments includes uncertainties that have not been addressed to the satisfaction of the Council:</p> <p>1. 'Substantially in accordance with the Outline CTMP' includes an element of flexibility for the contractor to work up detailed proposals. The principle of a requirement for flexibility is understood; however, this does not preclude the contractor from electing to adopt a construction methodology that increases the proportion of HGV movements in Buckinghamshire and/or HGV movements originating in Buckinghamshire depending on the suppliers used, potentially beyond those 'expected' by the</p>

			<p>and air quality impacts do not give rise to significant adverse health effects and therefore no effects are reported in Chapter 13: Health and Community of the ES [AS-039]. The sensitivity of receptor populations has been taken into account in the health assessment.</p>	<p>Applicant. This could be addressed through specific controls within the Outline CTMP to prevent such an increase manifesting once the contractor is involved. Alternatively, there would need to be a mechanism to monitor movements with an enforceable and suitably secured mitigation trigger, acceptable to the Council.</p> <p>2. The Council understands the methodology for the air quality and noise assessments, which are derived from the traffic data. The Council has repeatedly expressed concerns that the traffic modelling used by the Applicant is not demonstrably suitable (validated or calibrated) for use in relation to the Buckinghamshire highway network. Further, flaws and ambiguities relating to the traffic growth and trip generation data exist. The Council cannot apply confidence to the</p>
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				<p>conclusions of the downstream assessment of noise and air quality effects (both within the topic assessment; and specifically in relation to health) until the relevant technical officers in the Council are satisfied that the traffic modelling outputs are robust. The Council asserts that the downstream assessments must be reviewed and updated once the traffic modelling is completed to the satisfaction of the Council's officers.</p>
3.9.28	Health and Community	<p>Impacts from increasing Luton Airport traffic demand using the Buckinghamshire highway network, as a preferential route at the county and sub-regional scale: contributing to noise effects, severance, visual intrusion, reduction of environmental quality (particularly where routes are unsuitable for traffic flows and/or vehicle composition) and reduction of amenity. Relevant to operation and meriting consideration of the timing of</p>	<p>The Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP201] has an extensive level of outputs reported such as traffic flows, link volume to capacity ratios, nodes delays, select link and routing analysis. Moreover, the recently submitted daily airport passenger and staff trip distribution, which was requested by the Examining Authority, adds to the list of outputs.</p>	<p>The Council understands the process that the Applicant has followed for transport modelling. The issue raised is that the input information used for the assessments includes uncertainties that have not been addressed to the satisfaction of the Council. The Council has repeatedly expressed concerns that the traffic modelling used by the Applicant is not demonstrably suitable (validated or calibrated)</p>

		<p>these increased flows, which may be earlier than typical peaks.</p>	<p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p> <p>The impact of road traffic noise from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. No significant adverse effects have been identified for Buckinghamshire. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p>	<p>for use in relation to the Buckinghamshire highway network. Further, flaws and ambiguities relating to the traffic growth and trip generation data exist. The Council cannot apply confidence to the conclusions of the downstream assessment topics until the relevant technical officers in the Council are satisfied that the traffic modelling outputs are robust.</p> <p>The Trip Distribution plans (REP1-019) indicate impacts on the Buckinghamshire network, notably the B488/B489 access route. The underlying data is not supplied; therefore the Council does not have quantitative information about these increased flows. Furthermore, in cross-referencing peak air travel times with the general airline requirement to arrive c. 2 hours prior to scheduled departure, the Council notes that operational</p>
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				<p>trip generation along the B488/B489 route may overlap with existing night-time noise periods (e.g. 04:00-06:30 at Ivinghoe for 06:30-09:00 departures), which will have implications for the perception of noise nuisance for residential receptors along this route. The Council requires confirmation that this temporal aspect of the noise effects from trip generation has been adequately addressed, both in the traffic modelling and the subsequent noise assessment (for noise as a determinant of human health).</p> <p>The Council believes the Applicant's conclusion that it considers 'the impact on the mentioned areas to not be significant' to be premature. The additional information requested by the Council is needed before a robust conclusion can be drawn.</p>
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<p>3.9.28</p>	<p>Health and Community</p>	<p>Impacts from increased vehicular traffic within Aylesbury, including the three AQMAs: contributing to congestion and driver delay/stress, reduced air quality from traffic derived pollutants, severance, reduction of environmental quality, modal conflict and reduction of amenity. Relevant to construction and operation.</p>	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p> <p>Regarding air quality impact see previous response to 3.5.5.</p> <p><i>Response copied here: The three mentioned AQMAs (Stoke Road AQMA, Friage Road AQMA, and Tring Road AQMA) located on routes that the Council anticipates will experience increases or changes in traffic, are all over 19km from the affected road network. No significant impacts are predicted to occur within</i></p>	<p>The Council understands the process that the Applicant has followed for transport and air quality modelling.</p> <p>The issue raised is that the input information used for the assessments includes uncertainties that have not been addressed to the satisfaction of the Council. The Council has repeatedly expressed concerns that the traffic modelling used by the Applicant is not demonstrably suitable (validated or calibrated) for use in relation to the Buckinghamshire highway network. Further, flaws and ambiguities relating to the traffic growth and trip generation data exist. The Council cannot apply confidence to the conclusions of the downstream assessment topics until the relevant technical officers in the Council are satisfied that the traffic modelling outputs are robust.</p>
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			<p><i>the study area. No significant air quality effects would occur outside of the study area, which would include the above-mentioned Buckinghamshire AQMAs.</i></p>	
3.9.28	Health and Community	<p>Impacts from increased vehicular traffic within the villages of Pitstone, Marsworth and Ivinghoe: contributing to noise effects, severance, visual intrusion, reduction of environmental quality (particularly where routes are unsuitable for traffic flows and/or vehicle composition), modal conflict, increased risks to safety of all modes and reduction of amenity. Relevant to construction and operation.</p>	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>	<p>The Council understands the process that the Applicant has followed for transport modelling. The issue raised is that the input information used for the assessments includes uncertainties that have not been addressed to the satisfaction of the Council. The Council has repeatedly expressed concerns that the traffic modelling used by the Applicant is not demonstrably suitable (validated or calibrated) for use in relation to the Buckinghamshire highway</p>

				<p>network. Further, flaws and ambiguities relating to the traffic growth and trip generation data exist. The Council cannot apply confidence to the conclusions of the downstream assessment topics until the relevant technical officers in the Council are satisfied that the traffic modelling outputs are robust.</p> <p>The Trip Distribution plans (REP1-019) indicate impacts on the Buckinghamshire network, notably the B488/B489 access route. The underlying data is not supplied; therefore the Council does not have quantitative information about these increased flows. Furthermore, in cross-referencing peak air travel times with the general airline requirement to arrive c. 2 hours prior to scheduled departure, the Council notes that operational trip generation along the B488/B489 route may overlap</p>
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				<p>with existing night-time noise periods (e.g. 04:00-06:30 at Ivinghoe for 06:30-09:00 departures), which will have implications for the perception of noise nuisance for residential receptors along this route. The Council requires confirmation that this temporal aspect of the noise effects from trip generation has been adequately addressed, both in the traffic modelling and the subsequent noise assessment (for noise as a determinant of human health).</p> <p>The Council believes the Applicant's conclusion that it considers 'the impact on the mentioned areas to not be significant' to be premature. The additional information requested by the Council is needed before a robust conclusion can be drawn.</p>
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3.9.28	Health and Community	Impacts from increased travel demand from south Buckinghamshire including Chesham, Amersham and High Wycombe: contributing to noise effects, severance, visual intrusion, modal conflict, increased risks to safety of all modes and reduction of amenity. Relevant to operation.	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>	<p>See previous replies explaining why the Council’s position is that the additional information requested by the Council regarding traffic modelling and consequential downstream assessment work is needed before robust conclusions on the impacts and effects of the Scheme on health can be drawn.</p> <p>Note, in this instance, the Applicant has mis-interpreted the Council's concern. The Council is seeking for trip generation from the south Buckinghamshire area to be quantified and used within the transport modelling, rather than asserting that there will be operational impacts in these locations per se.</p>
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3.9.28	Health and Community	Impacts on the ability of rural communities to access employment opportunities: contributing to effects on rural connectivity (including to healthcare and community assets that support physical health), social cohesion and mental well-being. Relevant to construction and operation.	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>	<p>Note, in this instance, the Applicant has mis-interpreted the Council's concern.</p> <p>The Council is seeking assurances that the Applicant will deliver sustainable transport through Buckinghamshire as part of the Scheme in order to ensure that rural communities are able to access employment opportunities from the outset. The Council is keen that this is pro-actively provided, to enable access to employment for all (in the interests of equality and mental health and well-being), as well as encourage sustainable travel behaviours, rather than reactively pursued in response to unsustainable travel behaviours once prescribed modal share thresholds are exceeded, which is understood to be the current proposal by the Applicant.</p>
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<p>3.9.28</p>	<p>Health and Community</p>	<p>Impacts from increased noise (construction and operational traffic and aircraft) on areas valued for tranquillity and/or environmental quality: contributing to effects on tranquillity, reduced amenity, environmental quality and neighbourhood characteristics, and mental health and well-being. Relevant to construction and operation.</p>	<p>The impact of noise (construction and operation) from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>The approach to the assessment of noise and tranquillity in line with the National Planning Policy Framework (Ref 2.3) is set out in Section 16.5 of Chapter 16 of the Environmental Statement (ES) [REP1-003].</p> <p>An assessment of the landscape and visual effects, including consideration of noise and tranquillity (amongst other factors including overflight below 7,000 ft) on the Chilterns AONB is presented in Chapter 14 of the Environmental Statement [AS-079].</p>	<p>The Council understands the methodology employed for the noise assessment and the derivation of the mitigation measures proposed by the Applicant. The underlying issue here is related to the lack of confidence in the transport modelling that informs the downstream noise assessment.</p> <p>The Council requires the transport modelling to be undertaken to the satisfaction of the relevant Council technical officers; and the downstream assessment work to be reviewed and updated accordingly.</p> <p>This additional work is necessary to allow the Council to have confidence in the robustness of the conclusions drawn by the Applicant regarding impacts of the Scheme in Buckinghamshire, including on health and</p>
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				determinants of health (i.e. areas of tranquillity and high environmental quality).
3.9.28	Health and Community	Impacts from increased employment opportunities for Buckinghamshire residents: contributing to mental well-being and social cohesion.	Noted.	<p>Note, in this instance, the Applicant has mis-interpreted the Council's concern.</p> <p>The Council is seeking assurances that the Applicant will specifically target Buckinghamshire residents as part of the Employment and Training Strategy (ETS); and also, that the ETS is demonstrably secured as part of the DCO. The Council is keen to have direct and influential involvement in the development of the ETS as part of this.</p> <p>In addition, the Council is seeking assurances that the Applicant will deliver sustainable transport through Buckinghamshire as part of the Scheme in order to ensure that all residents are able to access employment opportunities from the outset.</p>

				<p>The Council is keen that this is pro-actively provided, to enable access to employment for all (in the interests of equality and mental health and well-being), as well as encourage sustainable travel behaviours, rather than reactively pursued in response to unsustainable travel behaviours once prescribed modal share thresholds are exceeded, which is understood to be the current proposal by the Applicant.</p>
3.9.29	Health and Community	<p>The Health and Community Assessment (AS078) acknowledges that increased traffic generated from the expanded airport and changes to the highway network will result in adverse impacts on social capital and access to services. Consideration is also given to the direct relationship between air pollutants and mortality rate, leading to a reported minor adverse health effect. However, the analysis of impacts derived from traffic modelling, such as changes in air quality and noise, are focused on the local</p>	<p>The Health and Community assessment [AS-078] has not identified significant adverse impacts on social capital and access to services due to increased traffic. Any potential impacts would be mitigated by proposed off-site highways intervention works, as described in ES Chapter 4: The Proposed Development [AS-074] and the Outline Construction Traffic Management Plan [APP130].</p>	<p>See previous replies explaining why the Council’s position is that the additional information requested by the Council regarding traffic modelling and consequential downstream assessment work is needed before robust conclusions on the impacts and effects of the Scheme on health can be drawn.</p>

		neighbourhood study area. Detailed consideration of traffic derived impacts on receptors within the wider study area, which is the category that Buckinghamshire County is placed in, is not provided.	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned area to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>	The Council maintains that the Applicant's conclusions regarding the level of impact in Buckinghamshire are premature, pending the provision of the additional information, modelling and assessment work requested.
3.9.30	Health and Community	The potential for changes in traffic to affect health determinants is acknowledged in the Environmental Statement in the context of health effects associated with pollution, changes in traffic flows and disruptions to access resulting in uncertainty and negative perceptions about potential negative impacts during construction and operation, which may give rise to stress, worry / negative impact on mental wellbeing, citing that this was raised	The Environmental Statement (ES) at Chapter 13 Health and Community [AS-078] identifies effects on mental wellbeing arising from public concern and uncertainty during the planning and construction stages about the construction and operational effects of the Proposed Development (see Table 13.20). This effect is identified as temporary since it will not continue once the project is operational and the effects are	<p>The Applicant's reference to the Errata regarding the assessment conclusions is noted.</p> <p>The Council notes the requirement of the CoCP (APP-049) for the lead contractor to prepare a construction-specific engagement plan for the construction of the Scheme. The Council is seeking a stronger commitment, to ensure that</p>

		<p>during public consultation. The Environmental Statement does report a moderate adverse temporary effect on mental wellbeing which is significant (for the local neighbourhood of the area and the Wider Area), but in the absence of underlying detail, there is limited scope to propose effective mitigation, and this is considered a weakness of the assessment. It relates directly to the impacts listed above at nos. 1, 2, 3, 4, 5, 6 and 7.</p>	<p>known (see paras 13.9.6 and 13.11.2). (Note that paragraph 13.9.3 of Chapter 13 incorrectly identifies a significant effect during all assessment phases where only the planning and construction stages should have been referred to. This correction has been captured in the Errata Document submitted at Deadline 1).</p> <p>Embedded mitigation is described in Section 13.8, including measures to reduce traffic effects and associated environmental effects.</p> <p>Good practice mitigation set out in Section 13.8 states that the lead contractor will prepare a construction-specific community engagement plan for the construction of the Proposed Development, as detailed in the Code of Construction Practice [APP-049]. Ongoing engagement will provide information</p>	<p>further clarity is provided within the CoCP of the specific minimum activities that the contractor should undertake, which should include efforts to engage communities on an equitable and accessible basis; and that the geographic dimension of the communities to be engaged by the contractor is also specified as part of this mitigation, to reflect that the Applicant concludes significant adverse effects across the 'Wider Area'.</p>
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			<p>which may help to reduce uncertainty and stress.</p> <p>The Health assessment has made a reasonable worst-case judgement that stress related to the actual and perceived effects of the Proposed Development will persist despite any mitigation measures proposed, and therefore a residual effect has been identified in the ES.</p>	
3.9.30	Health and Community	<p>The Council wishes to see this addressed in the following ways:</p> <ul style="list-style-type: none"> <li>• Expansion of the study area for traffic related health and community impacts to include Buckinghamshire County highway network.</li> </ul>	<p>The trip distribution of the airport traffic was based on observed CAA data. Within Appendix F of the Transport Assessment [APP-201], airport distribution figures were included. The Applicant also submitted daily airport passengers and staff distribution figures as was requested by the Examining Authority at Deadline 1 which showed relatively low volumes of traffic through Buckinghamshire [REP1-016].</p>	<p>The Council is not a host authority – it has not declared the traffic model fit for purpose in application to the Buckinghamshire highway network, nor agreed the level of detail relative to the geographical coverage of the model. See previous replies explaining why the Council’s position is that the additional information requested by the Council regarding traffic modelling and consequential downstream assessment work is</p>

			<p>The traffic data used in the health assessment, Chapter 13 Health and Community [APP-039], was provided by the Strategic Model CBLTMLTN which has been calibrated and validated as per the DfT's TAG guidance. Moreover, the model was considered fit for purpose by all Host Authorities and National Highways. The level of detail in the model's geographical coverage was agreed with Host Authorities and National Highways, and was informed by observed CAA data on the distribution of airport passengers / staff.</p> <p>As such, and taking into account the low volumes of airport-related traffic passing through Buckinghamshire, it is not considered necessary to undertake any further assessment of the impacts within Buckinghamshire.</p> <p>As there are no significant traffic effects in Buckinghamshire, it is not considered necessary to undertake a</p>	<p>needed before robust conclusions on the impacts and effects of the Scheme on health can be drawn.</p> <p>The Council maintains that the Applicant's conclusions regarding the level of impact in Buckinghamshire are premature, pending the provision of the additional information, modelling and assessment work requested.</p>
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			health assessment of traffic increases in this area.	
3.9.30	Surface Access	<ul style="list-style-type: none"> <li>Application of traffic modelling for the Buckinghamshire County highway network, to the satisfaction of technical officers in relation to relevant third-party developments and validation, in accordance with the requirements presented in the Transport and Highways subsection of this LIR.</li> </ul>	See above response to LIR 3.9.30 'Health and Community'.	The Council is not a host authority – it has not declared the traffic model fit for purpose in application to the Buckinghamshire highway network, nor agreed the level of detail relative to the geographical coverage of the model. See previous replies explaining why the Council's position is that the additional information requested by the Council regarding traffic modelling and consequential downstream assessment work is needed before robust conclusions on the impacts and effects of the Scheme on health can be drawn.

				<p>The Council maintains that the Applicant’s conclusions regarding the level of impact in Buckinghamshire are premature, pending the provision of the additional information, modelling and assessment work requested</p>
3.9.30	<p>Surface Access</p> <p>Noise</p>	<ul style="list-style-type: none"> <li>• Use of updated traffic modelling, addressing the concerns raised earlier in this LIR regarding validation of the modelling for use in Buckinghamshire, to enable a greater confidence to be assigned to downstream topic analysis. In particular, the noise and air quality assessment will need to be updated, in accordance with the requirements presented in the relevant sub-sections of this LIR. This should include qualitative analysis of potential health implications of all changes of greater than 1dB in noise, to reflect the increasing scrutiny of this matter within health assessment.</li> </ul>	<p>See above responses.</p> <p>As there are no significant traffic effects in Buckinghamshire, it is not considered necessary to undertake a health assessment of traffic increases in this area.</p>	<p>The Council is not a host authority – it has not declared the traffic model fit for purpose in application to the Buckinghamshire highway network, nor agreed the level of detail relative to the geographical coverage of the model. See previous replies explaining why the Council’s position is that the additional information requested by the Council regarding traffic modelling and consequential downstream assessment work is needed before robust conclusions on the impacts and effects of the Scheme on health can be drawn.</p> <p>The Council maintains that the Applicant’s conclusions regarding</p>



				<p>the level of impact in Buckinghamshire are premature, pending the provision of the additional information, modelling and assessment work requested.</p> <p>Qualitative assessment of all changes greater than 1dB in noise are relevant to understanding the effects of noise from the Scheme on health.</p>
3.9.30	Construction Traffic Modelling	<ul style="list-style-type: none"> <li>Further development of the detail within the Construction Traffic Management Plan (APP-130), sufficient to allow identification of relevant receptors for health and community impacts from changes to traffic flows within Buckinghamshire. For example, clarifying the longer-distance haul routes; and proposals for the disposal of spoil – this could either be through early contractor engagement, or adopt the approach of restrictions preventing certain activities within Buckinghamshire.</li> </ul>	<p>Detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP), which would be developed in detail by the appointed contractor during the detailed design stage, The CTMP is required to be substantially in accordance with the Outline CTMP [APP-130], as secured by Requirement 14 of the draft Development Consent Order [AS-067].</p>	<p>‘Substantially in accordance with the Outline CTMP’ includes an element of flexibility for the contractor to work up detailed proposals. The principle of a requirement for flexibility is understood; however, this does not preclude the contractor from electing to adopt a construction methodology that increases the proportion of HGV movements in Buckinghamshire and/or HGV movements originating in Buckinghamshire depending on</p>

			<p>The CTMP outlines the formation of a traffic management working group (TMWG) as a forum for stakeholder engagement prior to the commencement of the Proposed Development. The TMWG would seek representation from the lead contractor, Luton Borough Council (LBC) and local councils, highways authorities and National Highways.</p>	<p>the suppliers used, potentially beyond those 'expected' by the Applicant. This could be addressed through specific controls within the Outline CTMP to prevent such an increase manifesting once the contractor is involved. Alternatively, there would need to be a mechanism to monitor movements with an enforceable and suitably secured mitigation trigger, acceptable to the Council.</p> <p>Is the Council intended to interpret the Applicant's response such that the Council will be invited to the TMWG?                  Clarification is sought from the Applicant on this point.</p>
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3.9.30	Surface Access	<ul style="list-style-type: none"> <li>• Further development of the detail within the Surface Access Strategy (APP-228), sufficient to allow identification of relevant receptors for health and community impacts from changes to traffic flows within Buckinghamshire.</li> </ul>	<p>As set out in the above response, the traffic modelling results identified low volumes of airport-related traffic passing through Buckinghamshire, and it is therefore not considered necessary to undertake any further assessment of the impacts with Buckinghamshire.</p>	<p>See previous replies explaining why the Council’s position is that the additional information requested by the Council regarding traffic modelling and consequential downstream assessment work is needed before robust conclusions on the impacts and effects of the Scheme on health can be drawn.</p> <p>Note, in this instance, the Applicant has mis-interpreted the Council’s issue. The Council is seeking specific details of the Surface Access Strategy (APP-228) as input data to the updates sought within the traffic modelling. This should also be considered in conjunction with the Council’s request for assured sustainable transport provision serving Buckinghamshire residents from the outset of the Scheme.</p>
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3.9.30	Health and Community	<ul style="list-style-type: none"> <li>Updated downstream topic analysis, using modelling as appropriate, to ensure that receptor identification (i.e. the study area may need to be reviewed), sensitivity and impact magnitude is updated and the analysis of significance of effects is robust for Buckinghamshire health and community receptors.</li> </ul>	<p>See above responses.</p> <p>As there are no significant traffic effects in Buckinghamshire, it is not considered necessary to undertake a health assessment of traffic increases in this area.</p>	<p>See above responses. The Council maintains that the Applicant's conclusions regarding the significance of traffic impacts in Buckinghamshire is premature – there is insufficient robust evidence to underpin it.</p>
3.9.30	Health and Community	<ul style="list-style-type: none"> <li>Review of suitable mitigation to address significant effects that may be identified following the updated analysis (see further detail to follow); including any relevant environmental appraisal of interventions that might be proposed</li> </ul>	<p>See above response.</p> <p>As there are no significant traffic effects in Buckinghamshire, it is not considered necessary to undertake a health assessment of traffic increases in this area, or to provide mitigation measures.</p>	<p>See above responses. The Council maintains that the Applicant's conclusions regarding the significance of traffic impacts in Buckinghamshire is premature – there is insufficient robust evidence to underpin it.</p>
3.9.30	Mitigation and control mechanism	<ul style="list-style-type: none"> <li>Development of suitable delivery mechanisms and assurances for the delivery of mitigation.</li> </ul>	<p>See above response.</p>	<p>See above responses. The Council maintains that the Applicant's conclusions regarding the significance of traffic impacts in Buckinghamshire is premature – there is insufficient robust evidence to underpin it.</p> <p>The Council is also seeking proactive delivery of sustainable</p>

				transport serving Buckinghamshire residents, to enable accessibility to employment opportunities in the interests of mental health and well-being.
3.9.31	Health and Community  Construction	The Outline Traffic Management Plan (APP130) does not preclude any works traffic/spoil deliveries in the vicinity of the airport passing through Buckinghamshire. The uncertainty that this presents in relation to understanding potential impacts on the communities of Buckinghamshire has been raised as an issue in the Buckinghamshire PADSS (AS-053). This clarity is key to addressing impact no.1 regarding HGV movement; and may subsequently be linked to the need to explore disturbance related impacts on additional communities in Buckinghamshire, depending on whether there are relevant works locations proposed in the County.	Detailed construction impacts would be set out in the Construction Traffic Management Plan (CTMP), which would be developed in detail by the appointed contractor during the detailed design stage.  It is likely that the origin of these movements would be from existing freight and materials suppliers who would have existing permissions to utilise the network for their purposes. Notably however, the cut / fill balance within the Proposed Development has been designed to minimise the movement of earth to / from the site during construction.	See earlier comments regarding the Council's position on the development of the CTMP in respect of the connection to the health assessment.  As per the response to 3.9.30 above, is the Council intended to interpret the Applicant's response such that the Council will be invited to the TMWG? Clarification is sought from the Applicant on this point.

			<p>The Construction Traffic Management Plan (CTMP) outlines the formation of a traffic management working group (TMWG) as a forum for stakeholder engagement prior to the commencement of the Proposed Development. The TMWG would seek representation from the lead contractor, Luton Borough Council (LBC) and local councils, highways authorities and National Highways.</p>	
3.9.32	Health and Community	<p>In addition to the above list of actions, the Council requires consideration of the impacts of the Scheme on Aylesbury, which relates to impact no. 3. This relates both to the proposals for traffic movement on the highway network in and around Aylesbury and specifically in relation to the impacts on the AQMAs, which are not reported within the health and communities chapter of the Environmental Statement (AS-078). An update to the assessment is sought and should any significant adverse effects be identified, the Council would wish to be directly</p>	<p>The change in traffic flows as a result of the Proposed Development were reviewed for the road links in the strategic model, including those in the south of Buckinghamshire, to identify those links that met the magnitude of impact thresholds in Environmental Impact Assessment (EIA) terms. The impacts on road links in this area did not meet the thresholds that triggered consideration of significant effects.</p>	<p>The Council understands the process that the Applicant has followed for transport and air quality modelling. The issue raised is that the input information used for the assessments includes uncertainties that have not been addressed to the satisfaction of the Council. The Council has repeatedly expressed concerns that the traffic modelling used by the Applicant is not demonstrably suitable (validated or calibrated)</p>

		involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.	Any significant effects have been identified through detailed modelled assessments and mitigation proposed. More details are provided in the Transport Assessment [APP-203 to APP206].	for use in relation to the Buckinghamshire highway network. Further, flaws and ambiguities relating to the traffic growth and trip generation data exist. The Council cannot apply confidence to the conclusions of the downstream assessment topics until the relevant technical officers in the Council are satisfied that the traffic modelling outputs are robust.
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<p>3.9.33</p>	<p>Health and Community</p>	<p>Impact 4 relates to the rural villages on the preferential route to the Airport. For the villages of Pitstone, Marsworth and Ivinghoe, it is acknowledged that the projected peak hour traffic is expected to be low (AS-078). However, as noted in the transport and highway sub-section of this LIR, the Council has concerns about the level of confidence that can be assigned to the traffic modelling in the county due to reservations about the validity and transferability of the strategic modelling to local issues. The Council asserts that traffic movements through these villages will merit a high level of impact control, noting that they are situated on a direct route to the airport. This should also be reflected within the sensitivity assigned within the health and communities assessment, which the Council would wish to be elevated in recognition of the local transport context.</p>	<p>See previous replies relating to the Strategic Modelling Forecasting Report, Appendix F of the Transport Assessment [APP-201].</p> <p>Based on the forecast and impact assessment, the Applicant considers the impact on the mentioned areas to not be significant. This is primarily due to the low level of airport demands travelling to and from Buckinghamshire and/or using its local road network.</p>	<p>The Council understands the process that the Applicant has followed for transport modelling. The issue raised is that the input information used for the assessments includes uncertainties that have not been addressed to the satisfaction of the Council. The Council has repeatedly expressed concerns that the traffic modelling used by the Applicant is not demonstrably suitable (validated or calibrated) for use in relation to the Buckinghamshire highway network. Further, flaws and ambiguities relating to the traffic growth and trip generation data exist. The Council cannot apply confidence to the conclusions of the downstream assessment topics until the relevant technical officers in the Council are satisfied that the traffic modelling outputs are robust.</p>
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				<p>The Trip Distribution plans (REP1-019) indicate impacts on the Buckinghamshire network, notably the B488/B489 access route. The underlying data is not supplied; therefore the Council does not have quantitative information about these increased flows. Furthermore, in cross-referencing peak air travel times with the general airline requirement to arrive c. 2 hours prior to scheduled departure, the Council notes that operational trip generation along the B488/B489 route may overlap with existing night-time noise periods (e.g. 04:00-06:30 at Ivinghoe for 06:30-09:00 departures), which will have implications for the perception of noise nuisance for residential receptors along this route. The Council requires confirmation that this temporal aspect of the noise effects from trip generation has been adequately addressed,</p>
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				<p>both in the traffic modelling and the subsequent noise assessment (for noise as a determinant of human health).</p> <p>The Council believes the Applicant's conclusion that it considers 'the impact on the mentioned areas to not be significant' to be premature. The additional information requested by the Council is needed before a robust conclusion can be drawn.</p>
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3.9.34	Health and Community	<p>In order to fully address impact nos. 5 and 6, the Council requires completion of the items listed above in addition to specific trip profiling for the communities within the south of the county; and potential commuting demand for employment associated with the Scheme. It is considered imperative to understand the potential additional trip generation from the Scheme and how people may seek to use the network in order to inform the identification of the potential for impacts, appropriate levels of sensitivity to change and to complete the assessment. Should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities</p>	<p>The Applicant considers that the issue raised regarding trip generation within the south of the county was answered within the Applicant's Response to Relevant Representations Part 2A of 4 [REP1-021] page 293-294, in response to RR-0166.</p>	<p>See previous replies explaining why the Council's position is that the additional information requested by the Council regarding traffic modelling and consequential downstream assessment work is needed before robust conclusions on the impacts and effects of the Scheme on health can be drawn.</p> <p>The Council is seeking for trip generation from the south Buckinghamshire area to be quantified and used within the transport modelling, rather than asserting that there will be operational impacts in these locations per se. The Council does not agree with the Applicant that the concerns were adequately answered within the cited part of REP1-021.</p>
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3.9.35	Health and Community  Noise	Impact 7 relates both to traffic derived disruption, but also aircraft noise. In order to address this issue and impact, the Council requires completion of the items listed above such that the potentially sensitive receptors can be accurately identified – this will inform the assessment of traffic derived impacts on the Chilterns AONB and other relevant sensitive locations (at present the Environmental Statement (AS-078) only considers the community recreational assets of Wigmore Valley Park and Prospect House Day Nursery in relation to aircraft noise, both of which are in Luton). In addition, there is a need for the noise baseline concerns to be overcome and additional information supplied and modelled in relation to aircraft noise, including potential changes to flight paths (as set out in the Noise sub-section of this LIR).	See response to paragraph 3.9.28 for impact 7 relating to aircraft noise and tranquillity.	<p>The Council understands the methodology employed for the noise assessment and the derivation of the mitigation measures proposed by the Applicant. The underlying issue here is related to the lack of confidence in the transport modelling that informs the downstream noise assessment.</p> <p>The Council requires the transport modelling to be undertaken to the satisfaction of the relevant Council technical officers; and the downstream assessment work to be reviewed and updated accordingly.</p> <p>This additional work is necessary to allow the Council to have confidence in the robustness of the conclusions drawn by the Applicant regarding impacts of the Scheme in Buckinghamshire, including on health and</p>
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				determinants of health (i.e. areas of tranquillity and high environmental quality).
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<p>3.9.36</p>	<p>Health and Community</p>	<p>The health and communities chapter of the Environmental Statement (AS-078) reports increased aircraft movements and changes in aircraft noise exposure in the population as a moderate adverse permanent effect on health outcomes across the study population. This is considered very generalised and the health and community assessment should be expanded to assess the impacts on tranquillity of affected parts of the Chilterns AONB, as well as any sensitive community receptors that are scoped in following the updates. Should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.</p>	<p>See response to paragraph 3.9.28 for impact 7 relating to aircraft noise, tranquillity and the Chilterns AONB.</p> <p>The impact of noise from the Proposed Development on health and quality of life for residential and sensitive community receptors has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003].</p> <p>An assessment of the impact of noise on health and communities has been undertaken and reported in Chapter 13 Health and Community of the Environmental Statement [APP-039]. This assessment inherently considers impacts and results of the assessment in Chapter 16 Noise and Vibration of the Environmental Statement [REP1-003]</p>	<p>See previous responses relating to noise.</p> <p>The concern of the Council here is that should there be future changes that alter the noise effects of the Scheme, such that parts of Buckinghamshire stand to experience changes to noise as a determinant of health, there is a need for mechanisms to be in place for suitable mitigation to be triggered. Further, the Council wishes to be able to influence any such mitigation. The Council seeks additional information from the Applicant about this matter.</p>
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<p>3.9.37</p>	<p>Health and Community  Employment and Training Strategy</p>	<p>Impact 8 relates to the potential effects from the implementation of the ETS (APP-215), which are currently reported in the Environmental Statement (AS-078) as contributing, generally (not specifically to any section of the population) to a moderate beneficial temporary effect on mental and physical health associated with increased income, skills and job security. The Council is keen to ensure that actions are secured to deliver benefits at the local scale, meeting specific areas of need. In order to correctly assess and underpin such actions, the Council is seeking clarity on the implementation of the LETS, such that impact magnitude can be understood and assessment reviewed. The Council is also seeking involvement in the Economic Development Working Group, particularly in order to be able to express the local priorities and shape the mitigation and enhancement proposals.</p>	<p>The Employment Training and Skills Strategy [APP-215] outlines a study area for the ETS which encompasses Buckinghamshire. The ETS outlines that opportunities presented from the Proposed Development can benefit residents of the ETS study area and the ETS explores the potential impact of the Proposed Development on employment and training in the whole study area. The Employment and Training Strategy [APP215] sets out a series of goals and initiatives which will help ensure that benefits are realised in the study area.</p> <p>The Applicant notes the interest to join the Local Economic Development Working Group and will engage further with the Council when the group is being established.</p> <p>The Applicant highlights that the ETS is a strategy and does not make an assessment. The ETS outlines how the Applicant, and its strategic partners can maximise employment benefits through good practice</p>	<p>The Council notes that the potential efficacy of the ETS was a subject of questions from the ExA at ISH2, and keenly awaits the submission of further information by the Applicant on this point.</p> <p>Further, the Mitigation Route Map [AS-047] states that the Section 106 agreement also includes commitments to measures set out in the Employment and Training Strategy [APP-215] to maximise the employment benefits from the construction and operation of the Proposed Development. The LEDWG is included as Initiative 1.1 at para 4.2.4 of the ETS. However, the Mitigation Route Map only references EE-1 and EE-2, with the securing document being Section 2 of the ETS and the securing mechanism being the S106 Agreement. On that basis the Council would conclude that</p>
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			<p>approaches to employment and training.</p>	<p>the LEDWG is not secured at this point.</p> <p>Note also that the Applicant does not directly state that it considers the Council to be a 'relevant attendee' – it is implied only.</p> <p>There is a requirement for secured commitments and clarification on these matters.</p>
3.9.39	Draft DCO	<p>Schedule 2, Part 2 (1) references 'the' relevant planning authority (singular entity). However, some of the matters to be considered have trans-boundary implications. It is suggested that this should be broadened to state 'all relevant authorities' (plural) so, for example, the CoCP is scrutinised by all authorities that may experience impacts. There would be consequential changes to (2) and (3) as well, to change to authorities (plural), The CoCP is considered an important mechanism for controlling the magnitude of impacts, particularly those linked to construction pollution and nuisance, on</p>	<p>See the response to 3.11.2 (row 1) below.</p>	<p>See the response to 3.11.2 (row 1) below.</p>



		the physical and mental health of community members.		
3.9.40	Draft DCO	Schedule 2, Part 2 (8). As per the point above, the CoCP has trans-boundary implications that mean that there could be impacts across more than one highway authority. Consequently, it is considered that the approval should be sought from all relevant authorities, linked to where the impacts will occur (geographically).	See the response to 3.11.2 (row 1) below.	See the response to 3.11.2 (row 1) below.
3.9.41	Draft DCO	Schedule 2, Part 2, 8 (2) - the Council agrees that these plans need to be developed precommencement, but there should also be reference in the requirement to them being 'implemented' pre-commencement. In the context of the health and community assessment, the specific rationale here is 8 (2) (e) Community Engagement Plan, which the Council would expect to include precommencement activities, for example, to ensure that affected communities are fully aware of the impacts and potential effects that they will experience and able to feel supported and heard, should any	The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.	The Council maintains its position on this matter and will await the Applicant's further submissions at Deadline 3.

		adverse effects arise once construction is underway.		
3.9.42	Draft DCO	It is noted that the requirements currently listed in Schedule 2 principally have a spatial dimension in terms of their implementation. However, the Council is keen to understand whether there is potential for the Employment and Training Strategy (APP-215) to be included within the Schedule 2 list of documents that need to be approved (and implemented, as per earlier comment) in advance of construction. Or to receive clarification of alternative proposed means for ensuring that this strategy is developed and implemented pre-construction; and monitored thereafter.	It is not appropriate for the Employment and Training Strategy (ETS) to be secured through a requirement in the Development Consent Order. It is proposed that commitment to the ETS will be secured through the s106 agreement to be entered into between the parties.	Further to discussions at Issue Specific Hearing 2 the Council has concerns regarding the securing mechanism for the broader ETS and the ability for a non-host authority to enter into a s106 agreement where the proposed development is not located within its boundaries.
3.9.43	Draft DCO	Schedule 2 – Environmental Scrutiny Group 20 (2) and Technical Panels - does not include representation from the Council. The Council is requesting inclusion within the ESG and this would then need to be updated here.	The Applicant considers that the issue raised regarding membership of ESG was answered within the Applicant’s Response to Relevant Representations Part 2A [REP1-021] pages 298 to 300, in response to RR-0166.	See response to 3.11.2 (row 2) below.

3.10 Cumulative effects assessment				
3.10.5	Cumulative Impact Assessment	<p>The cumulative effects assessment does not consider the cumulative interactions from the expansion of airspace on residents in Buckinghamshire. The relevant representation (RR -0166) raises concerns that there is no consideration of the potential cumulative impacts of aircraft noise for residents under Heathrow, Stansted and Luton flight paths. The Council PADSS (AS-053) also raises concerns surrounding the change required to allocate more airspace for safe departures and arrivals across the south-east of England airports to allow expansion. There is a need for the ES to consider how these changes will impact residents and review whether there are potentially significant cumulative effects that would then require mitigation.</p>	<p>Changes to airspace and flightpaths and their cumulative effects are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment and consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course. A note explaining the relationship between the two processes was submitted at Deadline 1 [REP1-028].</p>	<p>The content of REP1-028 is noted. This addresses the relationship with the process around reconfiguration across all 11 airports in the relevant group (London Terminal Manoeuvring Area). However, the issue remains regarding the cumulative impacts of the planned growth within the Scheme (i.e. potentially 50 movements per hour, (stated at para. 1.4.1 of REP1-028)) interacting with the known routes, as well as relevant development proposals at Heathrow and Stansted, outside the scope of changes that may arise from FASI-S and LAMP.</p> <p>The Council wishes the Applicant to more fully explain how the ES addresses this aspect of the CEA.</p>

<p>3.10.6</p>	<p>Cumulative Impact Assessment</p>	<p>It is recognised that that the assessment includes proposed development at Stansted, Heathrow, Gatwick and London City airports. However, it has been identified that would be no overlap with the core Zone of Influences (ZOI) for the Scheme and therefore the cumulative effects with other airport expansions are not considered further. The Council considers this conclusion to be premature and wish it to be kept under review pending further clarification of how airspace and flight paths may be altered in order to accommodate planned expansion.</p>	<p>The cumulative effects assessment follows the methodology agreed through EIA Scoping [APP166 to APP-168] and the engagement with consultees described in Section 21.3 of Chapter 21 of the Environmental Statement [AS-032], and considered other developments based on the environmental information available at the time of writing.</p> <p>Changes to airspace and flightpaths and their cumulative effects are outside the scope of the Proposed Development. Any changes to future flight paths are the subject of a future airspace change process being sponsored by the UK Government and will be subject to a separate assessment and consultation exercise by the airport operator in accordance with Civil Aviation Authority (CAA) procedure (CAP1616), in due course.</p>	<p>The content of REP1-028 is noted. This addresses the relationship with the process around reconfiguration across all 11 airports in the relevant group (London Terminal Manoeuvring Area). However, the issue remains regarding the cumulative impacts of the planned growth within the Scheme (i.e. potentially 50 movements per hour, (stated at para. 1.4.1 of REP1-028)) interacting with the known routes, as well as relevant development proposals at Heathrow and Stansted, outside the scope of changes that may arise from FASI-S and LAMP.</p> <p>The Council wishes the Applicant to more fully explain how the ES addresses this aspect of the CEA.</p>
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<p>3.10.7</p>	<p>Cumulative Impact Assessment</p>	<p>These are manifesting as issues of disturbance, anxiety, mental health and, for residents with pre-existing conditions, some instances of physical health impacts. The potential addition of similar impacts due to the Scheme raises issues around cumulative impacts. The relevant representation (AS-053) cites the need to check last mile locations for groundworks such that this issue and the cumulative interactions are correctly articulated and addressed.</p>	<p>The first part of this comment is noted as a continuation of the issue raised above.</p> <p>The second part referring to AS-53 and 'last mile' or 'groundworks' is not fully understood however the Applicant believes this response is related to construction traffic and is addressed in 7.7.8 above. The Applicant will engage with the Council to understand the issue that is being raised.</p>	<p>The Council has noted requests relating to the detail that may flow from the CTMP within previous responses.</p> <p>The Council's interest regarding cumulative effects is appropriate consideration of the way in which the Scheme may interact with construction activities associated with HS2 and EWR, within Buckinghamshire. This is a matter that the Council notes has also been raised in a number of other relevant representations by Parish and borough councils.</p>
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<p>3.10.8</p>	<p>Cumulative Impact Assessment</p>	<p>The Council notes that the relevant representation from BMKALC (RR-0165) asserts that cumulative impacts on ecological connectivity have not been accurately portrayed – it claims that the sum of numerous 'minor adverse effects' (not significant) are not commented on. The Council is of the view that this is an essential requirement of the cumulative effect assessment and would wish to see further justification of this approach by the Applicant. The Council notes that explanation offered presently – that ecology has not been assessed further in the incombination effects assessment as interactions of different aspect effects upon these receptors are provided in relevant Environmental Statement chapter (interactions between AQ, noise upon ecological receptors). The Cumulative Effects Assessment chapter of the Environmental Statement considers the combined impact on different ecological receptors. The Council would like to see confirmation that this combined impact assessment considers all impacts on</p>	<p>The comments in RR-0165 are not clear on which part of the Environmental Statement (ES) BCC are directly referring to and they have been directed to the assessment of effects on biodiversity reported in Chapter 8 of the ES [AS027] and the cumulative effects assessed and reported in Chapter 21 of the ES [AS-032]. The assessed effects of other relevant environmental aspects such as noise, air quality and agricultural land use changes are considered in the assessment of effects on biodiversity incombination within Chapter 8 of the ES [AS027]. In terms of combined ecological effects for the Proposed Development within chapter 8, effects are considered in totality rather than in isolation. For example the loss of different sections of hedgerows across the site are considered as whole. The chapter follows the methods set out for assessment, as approved by statutory stakeholders, and considers both</p>	<p>The Council has no further comments.</p>
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		<p>ecological receptors, rather than narrowing scope to those that only record significant effects from single impacts.</p>	<p>mitigation and enhancement as part of the assessment of effect. The Proposed Development will deliver an overall net gain in biodiversity..</p> <p>. Habitat creation is provided as part of the design of the robust scheme with adequate embedded mitigation through the provision of open space and landscape restoration areas. Additional areas of mitigation are also provided within the Habitat Creation Areas and off-site hedgerow restoration which will conserve and enhance ecological connectivity. These are detailed within the Outline Landscape and Biodiversity Management Plan (OLBMP) which forms Appendix 8.2 of the ES [AS -029] (secured by Requirement 10 in the Draft DCO [AS-067]) and the Biodiversity Net Gain Report which forms Appendix 8.5 of the ES [APP-067]. These will ensure appropriate management of the habitats for 50 years with monitoring included to</p>	
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			identify the need for adjustments to the management as required.	
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3.10.11	Draft DCO	Schedule 2, Part 2 (1) references ‘the’ relevant planning authority (singular entity). However, some of the matters to be considered have trans-boundary implications. It is suggested that this should be broadened to state ‘all relevant authorities’ (plural) so, for example, the CoCP is scrutinised by all authorities that may experience impacts. There would be consequential changes to (2) and (3) as well, to change to authorities (plural), The CoCP is considered an important mechanism for controlling the magnitude of multiple intraScheme impacts acting in combination, particularly those linked to construction pollution and nuisance.	See the response to 3.11.2 (row 1) below	See the response to 3.11.2 (row 1) below
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3.10.12	Draft DCO	<p>Schedule 2, Part 2 (8). As per the point above, the CoCP has trans-boundary implications that mean that there could be impacts across more than one highway authority. Consequently, it is considered that the approval should be sought from all relevant authorities, linked to where the impacts will occur (geographically).</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p> <p>The Applicant has amended Requirement 8(1) Code of Construction Practice deleting reference to the tail piece. This is unnecessary because paragraph 2 of Schedule 2 already makes provision to amend approved plans, details and schemes under Schedule 2, provided certain conditions are met and necessary further approvals obtained.</p> <p>See also the response to 3.11.2 (row 1) below.</p>	<p>The Council maintains its position on this matter and will await the Applicant's further submissions at Deadline 3.</p> <p>The Council notes the Applicant's response on this matter and has no further comment to make.</p> <p>See also the response to 3.11.2 (row 1) below.</p>
3.11 Draft Development Consent Order				

3.11.2	Draft DCO	<p>DCO wording: Part 1 Paragraph 2, Interpretation “Relevant highway authority” “Relevant planning authority”</p> <p>Suggested changes: “To which the provision relates” is insufficient to capture all circumstances.</p> <p>Comments: Amend to “provision of the Order, part of development or relevant effects of the development relate” To allow for Buckinghamshire Council Planning Authority/ Highway Authority to be consulted, if required.</p>	<p>The Applicant considers that the definition of the relevant planning and relevant highway authority is appropriate as the definition refers to <i>‘... the area to which the provision relates.’ so already refers to the part of the Authorised Development.</i></p> <p>However, the Applicant is happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>Further to the updated definition of relevant highway authority provided in the updated dDCO [REP2-004] the Council accepts the Applicant’s position.</p>
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<p>3.11.2</p>	<p>Draft DCO</p>	<p>DCO wording:                  Amendments to approved details, Sch.2, paragraph 2</p> <p>Suggested changes:                  As above, amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments:                  'Relevant Planning Authority' definition to be expanded to include consultation of neighbouring authorities, such as Buckinghamshire Council, where appropriate; and standard consultation period to apply.                  Please see Section 2.10 of Written Representations</p>	<p>The Applicant considers that the relevant local planning authority is competent to approve such variations and does not need to consult on any proposed changes.</p> <p>However, the Applicant is happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>The Council maintains its position that the Applicant cannot categorically rule out the need for external consultees to be consulted on any / all potential variations and changes.</p> <p>Given the Applicant's assertion that the relevant local planning authority is competent to approve any proposed changes the Council would contend that the relevant local planning authority are also competent to make judgement on who needs to be consulted on those changes. As such the Council would suggest that the Applicant provide sufficient wording within the drafting of the dDCO to allow for the relevant planning authority to undertake consultation with an external consultee where they consider it necessary and appropriate.</p>
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3.11.2	Draft DCO	<p>DCO wording: Parameters of authorised development, Sch.2, paragraph 6</p> <p>Suggested changes: Make provision for the relevant planning authority to undertake consultation on any changes to the parameters specified.</p> <p>Comments: Absence of consultee specification to inform paragraph 2(4) of Part 1 of Schedule 2 of the dDCO. Please see Section 2.10 of Written Representations.</p>	Please see the Applicant's response to 3.11.2 (row 2) above.	Please see the Council's response to 3.11.2 (row 2) above.
3.11.2	Draft DCO	<p>DCO wording: Code of construction practice, paragraph 8</p> <p>Suggested changes: As above, amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.</p>	<p>See the response to 3.11.2 (row 1) above.</p> <p>The Applicant considers that the relevant local planning authority is competent to approve such variations to the Code of Construction Practice and its associated management plans and does not need to consult on all proposed changes save where</p>	See the Council's response to 3.11.2 (rows 1 and 2) above.

		<p>Implementation Trigger required.</p> <p>Comments: To include consultation Buckinghamshire Highways, who would like to be party to details relating to construction matters.</p> <p>The construction of the development must be carried out in accordance with The Code of Construction Practice Please see Sections 2.2 and 2.10 of Written Representations.</p>	<p>specifically identified in the requirement.</p> <p>The Applicant is, however, happy to engage further with the Council to understand and progress this matter where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>	
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3.11.2	Draft DCO	<p>DCO wording:                  Construction workers, paragraph 15</p> <p>Suggested changes:                  Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient insulation period with consultees.</p> <p>Comments:                  'Relevant Planning Authority' to include, consultation with Buckinghamshire Highways, who would like to be party to details relating to construction matters. Please see Section 2.2 Transport and Highways of Written Representations.</p>	Please see the Applicant's response to 3.11.2 (row 2) above.	See the Council's response to 3.11.2 (row 2) above.
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3.11.2	Draft DCO	<p>DCO Wording:                      Landscaping design, paragraph 9</p> <p>Suggested changes:                      Implementation Trigger required.</p> <p>Comments:                      Landscaping to be carried out prior to first use of the development.                      Please see Section 2.10 of Written Representations.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>The Council maintains its position on this matter until such time that the Applicant provides a further response.</p>
3.11.2	Draft DCO	<p>DCO wording:                      Landscape and biodiversity management plan, paragraph 10</p> <p>Suggested changes:                      Implementation Trigger required.</p> <p>Comments:                      To be carried out prior to construction/occupation, whichever is most appropriate.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>The Council maintains its position on this matter until such time that the Applicant provides a further response.</p>



<p>3.11.2</p>	<p>Draft DCO</p>	<p>DCO wording:                  Landscape and biodiversity management plan, paragraph 10</p> <p>Suggested changes:                  Amendment to allow consultation with Natural England.</p> <p>Comments:                  Given the implications of the management plan for protected species Buckinghamshire Council would suggest that paragraph 10, sub paragraph 1 makes provision for the relevant planning authority to undertake consultation on the landscape and biodiversity management plan with Natural England. Please see Section 2.10 of Written Representations</p>	<p>The Applicant considers that the issue raised regarding approval of the LBMP by NE was answered within the Applicant’s Response to Relevant Representations Part 2A of 4 (REP1021) page 315, in response to RR-0166.</p> <p>The Applicant considers that the relevant local planning authority is competent to approve such management plans and does not need to consult Natural England.</p> <p>The Applicant is, however, happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>	<p>The Council maintains its position on this matter that the Applicant cannot categorically rule out the need for external consultees to be consulted on the Landscape and biodiversity management plan.</p> <p>Moreover, whilst the Council accepts the Applicant’s statement that an approved LBMP must be substantially in accordance with the outline LBMP this does not guarantee that the submitted LBMP will meet this requirement.</p> <p>As such, given the Applicant’s assertion that the relevant local planning authority is competent to approve such management plans, the Council would contend that the relevant local planning authority are also competent to make judgement on who needs to be consulted on those plans. As such the Council would suggest that the Applicant provide sufficient wording within</p>
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				<p>the drafting of the dDCO to allow for the relevant planning authority to undertake consultation with an external consultee where they consider it necessary and appropriate.</p>
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<p>3.11.2</p>	<p>Draft DCO</p>	<p>DCO wording:                  Construction traffic management,                  paragraph 14</p> <p>Suggested changes:                  Amendments to wording to allow for                  sufficient flexibility to definition of                  'Relevant Highway                  Authority' and to allow for sufficient                  consultation period with consultees.</p> <p>Comments:                  Relevant Planning Authority' to include                  consultation with Buckinghamshire                  Highways, who would like to be party to                  details relating to construction traffic                  matters. Please see Section                  2.2                  Transport and Highways of Written                  Representations.</p>	<p>The Applicant considers that the                  relevant local planning authority is                  competent to make such decisions                  and does not need to consult save                  where specifically identified in the                  requirement.</p> <p>The Applicant is, however, happy to                  engage further with the Council to                  understand and progress these                  matters where possible. Where                  appropriate, the Applicant will                  provide a further response at                  Deadline 3 alongside any updates to                  the draft DCO.</p>	<p>The Council maintains its position                  that the Applicant cannot                  categorically rule out the need for                  external consultees to be                  consulted on the required                  management plans.</p> <p>Given the Applicant's assertion                  that the relevant local planning                  authority is competent to approve                  any plans the Council would                  contend that the relevant local                  planning authority are also                  competent to make judgement on                  who needs to be consulted on                  those plans. As such the Council                  would suggest that the Applicant                  provide sufficient wording within                  the drafting of the dDCO to allow                  for the relevant planning                  authority to undertake                  consultation with an external                  consultee where they consider it                  necessary and appropriate.</p>
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<p>3.11.2</p>	<p>Draft DCO</p>	<p>DCO wording:                  Construction workers, 15</p> <p>Suggested changes:                  Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees</p> <p>Comments: Relevant Planning Authority' to include consultation with Buckinghamshire Highways, who would like to be party to details relating to construction worker travel plan matters. Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>The Applicant considers that the relevant local planning authority is competent to make such decisions and does not need to consult save where specifically identified in the requirement.</p> <p>The Applicant is, however, happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>	<p>The Council maintains its position that the Applicant cannot categorically rule out the need for external consultees to be consulted on the discharge of DCO requirements.</p> <p>Given the Applicant's assertion that the relevant local planning authority is competent to approve any requirements the Council would contend that the relevant local planning authority are also competent to make judgement on who needs to be consulted on those requirements. As such the Council would suggest that the Applicant provide sufficient wording within the drafting of the dDCO to allow for the relevant planning authority to undertake consultation with an external consultee where they consider it necessary and appropriate.</p>
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<p>3.11.2</p>	<p>Draft DCO</p>	<p>DCO wording:                  ESG, paragraph 20 (2)</p> <p>Suggested changes:                  Suggested wording changes to Paragraph 20 to include Buckinghamshire Council in the ESG.</p> <p>Comments:                  Please see Section 2.10 of Written Representation.</p>	<p>The Applicant considers that the issue raised regarding local authority membership of ESG was answered within the Applicant’s Response to Relevant Representations Part 2A [REP-1021] pages 298 to 300, in response to RR-0166.</p>	<p>The Council maintains its position on this matter. There are areas within Buckinghamshire where there are accepted impacts. Whilst it is correct that not all of those impacts are significant there is accepted to be a significant impact on the AONB in relation to tranquillity through noise impacts and including in the AONB in Buckinghamshire. Notwithstanding the above the more important point is that the GCG Framework is designed to be dynamic and over the period of operation of the proposed development change is very likely, with material changes in the offering regarding airspace changes that could materially affect the noise environment in Buckinghamshire. In such circumstances, and where BC has previously been involved in the noise envelope design group, the resistance to BC’s presence on the ESG is not understood. Surface access is also significant</p>
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				in terms of ensuring that residents from Buckinghamshire can be protected from future impacts through the route to monitoring and mitigation that the ESG will afford.
3.11.2	Draft DCO	<p>DCO wording: ESG, paragraph 20 (2)</p> <p>Suggested changes: The 'representation from an airline industry body' must not be the airport owner/ Luton Rising.</p> <p>Comments: The ESG must remain an independent body, this will be assisted with Buckinghamshire Council being on the panel. Please see Sections 2.1, 2.2 and 2.3 of Written Representations.</p>	<p>The 'representation from an airline industry body' will not be the airport owner/ Luton Rising. A fundamental principle of the Green Controlled Growth Framework [APP-218] is that the scrutiny provided by the ESG should be independent and impartial, and that airport representatives (including representatives of airlines operating at the airport) should not have a role on ESG. The purpose of an airline industry representative is to provide guidance on how growth at the airport can be managed via the slot allocation process. Changes to</p>	<p>The Council welcomes and accepts the Applicant's response on this matter; however, it is suggested that this is made absolutely clear within the ESG Terms of Reference.</p>

			drafting are being considered to clarify this point.	
3.11.2	Draft DCO	<p>DCO wording:                      Technical Panel, Paragraph 20 (8 -9)</p> <p>Suggested changes:                      Tighter definition to name the individuals and bodies.</p> <p>Comments:                      Buckinghamshire Council would like to be a named body on the Technical Panel. Please see Section 2.10 of Written Representations Highways rep.</p>	<p>Named individuals and bodies are included in the draft Technical Panels Terms of Reference included at Appendix B to the Green Controlled Growth Framework [APP-220].</p> <p>The Applicant considers that the issue raised regarding membership of Technical Panels was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.</p>	<p>The Council maintains its position on this matter. There are areas within Buckinghamshire where there are accepted impacts. Whilst it is correct that not all of those impacts are significant there is accepted to be a significant impact on the AONB in relation to tranquillity through noise impacts and including in the AONB in Buckinghamshire. Notwithstanding the above the more important point is that the GCG Framework is designed to be dynamic and over the period of operation of the proposed development change is very likely,</p>

				<p>with material changes in the offering regarding airspace changes that could materially affect the noise environment in Buckinghamshire. In such circumstances, and where BC has previously been involved in the noise envelope design group, the resistance to BC's presence on the Technical Panels is not understood. Surface access is also significant in terms of ensuring that residents from Buckinghamshire can be protected from future impacts through the route to monitoring and mitigation that the Technical Panels will afford.</p>
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3.11.2	Draft DCO	<p>DCO wording:                  Exceedance of Limit. Paragraph 24</p> <p>Suggested changes:                  An implementation timeframe for the Mitigation Plan, once approved, needs to be provided.</p> <p>Comments:                  To ensure that mitigation is carried out in a timely manner. Sub para (4) insert new (b) must “include a timetable for implementation” Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>The definition given for a Mitigation Plan in Paragraph 18 of Schedule 3 of the draft Development Consent Order [AS-0067] states that it must include a proposed programme for implementation of mitigation.</p>	<p>The Council accepts the Applicant’s response on this matter.</p>
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<p>3.11.2</p>	<p>Draft DCO</p>	<p>DCO wording:                  Review of implementation of this Part, Paragraph 25</p> <p>Suggested changes:                  Review of implementation should be undertaken annually. Amend sub para (1) from 5 to 1 year.</p> <p>Comments:                  To ensure mitigation is quickly applied, when required. Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>The review of implementation of this part relates to a review of the overall GCG process and is not related to the implementation of mitigation. It is not considered necessary to carry out an annual review of the GCG process.</p>	<p>The Council maintains its position on this matter. It is the Council's view that the review mechanism in the GCG Framework is insufficient in that Requirement 25 only envisages review of the implementation of the GCG Framework every five years (see Requirement 25(1)). In BC's view, 5-year review periods are insufficient and could lead to negative impacts being felt by local communities across the full breadth of effects subject to the GCG, for extended periods of time. Change and redirection is easier and more effective at an earlier stage where measures are required to be implemented as early as possible in the process of the development in order to establish positive patterns and behaviours. Setting expectations and behaviours in this way is significantly more successful than attempting to change established and entrenched patterns. It is</p>
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				<p>necessary to determine that the measures being implemented are achieving their aims quickly and to make any necessary adjustments early. The optimum position would be to have continuous monitoring; however, the Council recognises the need to be pragmatic about monitoring and suggest annual monitoring until full capacity reached and 5-year reviews thereafter.</p>
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3.11.2	Draft DCO	<p>DCO wording: Passenger cap for the authorised development, paragraph 26</p> <p>Suggested changes: Amended to address the inconsistency with the Green Controlled Growth Framework (GCGF).</p> <p>Comments: As currently drafted, the Council is of the opinion that these requirements do not adequately deal with the phased approach to increasing passenger numbers to the cap. This places the Requirements at odds with the GCGF. Please see Section 2.10 of Written Representations</p>	<p>Please see response to Section 2.10.18 (page 176) of the Applicant's Response to Written Representations made by Interested Parties subject to an SoCG at Deadline 1 (Part 2) [TR020001/APP/8.39].</p>	<p>The Council maintains its position on this matter until such point that the Applicant provides a further response.</p>
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<p>3.11.2</p>	<p>Draft DCO</p>	<p>Night quota cap, paragraph 27</p> <p>Suggested changes:                  Amend paragraph 20 for Buckinghamshire Council, and other neighbouring authorities, to form part of the ESG.</p> <p>Comments:                  makes provision for the relevant planning authority to approve a variation to the night quota cap, in consultation with the ESG. Buckinghamshire Council is concerned that its absence from the ESG would prevent it, and other neighbouring authorities, from representing the best interests of their communities on this matter. Please see Section 2.10 of Written Representations</p>	<p>The Applicant considers that the issue raised regarding membership of ESG was answered within the Applicant's Response to Relevant Representations Part 2A [REP-1-021] pages 298 to 300, in response to RR-0166.</p>	<p>The Council maintains its position on this matter. There are areas within Buckinghamshire where there are accepted impacts. Whilst it is correct that not all of those impacts are significant there is accepted to be a significant impact on the AONB in relation to tranquillity through noise impacts and including in the AONB in Buckinghamshire. Notwithstanding the above the more important point is that the GCG Framework is designed to be dynamic and over the period of operation of the proposed development change is very likely, with material changes in the offering regarding airspace changes that could materially affect the noise environment in Buckinghamshire. In such circumstances, and where BC has previously been involved in the noise envelope design group, the resistance to BC's presence on the ESG is not understood. Surface access is also significant</p>
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				<p>in terms of ensuring that residents from Buckinghamshire can be protected from future impacts through the route to monitoring and mitigation that the ESG will afford.</p>
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3.11.2	Draft DCO	<p>DCO wording:                  Offsite highways works paragraph 29</p> <p>Suggested changes:                  Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments:                  Relevant Planning Authority' to include, Buckinghamshire Highways, if off-site highway works fall within Buckinghamshire Council. Or to allow consultation with Buckinghamshire Council, where required; who would like to be party to the transport related impacts monitoring and mitigation approach.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>The Council maintains its position on this matter until such point that the Applicant provides a further response.</p>
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3.11.2	Draft DCO	<p>DCO wording:                  Offsite highways works paragraph 29</p> <p>Suggested changes:                  Trigger required for implementation of mitigation scheme.</p> <p>Comments:                  Within X period. – to ensure timely implementation of mitigation. Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>The Applicant has amended the draft DCO, submitted at Deadline 2, to clarify the trigger for the implementation of the mitigation scheme. This amendment clarifies that, the airport is not to be operated above the passenger cap permitted by the LLAOL planning permission until a transport related impacts monitoring and mitigation approach for the operation of the airport above that cap has been submitted to and approved in writing by the relevant planning authority.</p>	<p>The Council accepts the Applicant’s response on this matter.</p>
3.11.2	Draft DCO	<p>DCO wording:                  Travel Plans paragraph 30</p> <p>Suggested changes:                  Amendments to wording to allow for sufficient flexibility to definition of ‘Relevant Highway Authority’ and to allow for sufficient consultation period with consultees.</p> <p>Comments: Relevant Planning Authority’ to include consultation with</p>	<p>The Applicant considers that the relevant local planning authority is competent to make such decisions and does not need to consult save where specifically identified in the requirement.</p> <p>The Applicant is, however, happy to engage further with the Council to understand and progress these matters where possible. Where appropriate, the Applicant will provide a further response at</p>	<p>The Council maintains its position that the Applicant cannot categorically rule out the need for external consultees to be consulted on the required travel plans.</p> <p>Given the Applicant’s assertion that the relevant local planning authority is competent to approve any plans the Council would contend that the relevant local planning authority are also</p>



		<p>Buckinghamshire Highways, who would like to be party to the travel plans.                  Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>Deadline 3 alongside any updates to the draft DCO.</p>	<p>competent to make judgement on who needs to be consulted on those plans. As such the Council would suggest that the Applicant provide sufficient wording within the drafting of the dDCO to allow for the relevant planning authority to undertake consultation with an external consultee where they consider it necessary and appropriate.</p>
3.11.2	Draft DCO	<p>DCO wording:                  Travel Plans paragraph 30</p> <p>Suggested changes:                  (3) Updating of travel plans should take place annually.</p> <p>Comments:                  To ensure mitigation/intervention is quickly applied, when required.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>The Council maintains its position on this matter until such point that the Applicant provides a further response.</p>

3.11.2	Draft DCO	<p>DCO wording:                      Travel Plans paragraph 30</p> <p>Suggested changes:                      Mitigation/ successful implementation strategy/ review required.</p> <p>Comments:                      To ensure targeted intervention should travel plan targets not be met. Please see Section 2.2 Transport and Highways of Written Representations.</p>	<p>CAA data will be analysed and progress towards modal share Targets will be reported on an annual basis as set out within the Framework Travel Plan [AS-131] Section 4 Paragraph 4.1.2.</p>	<p>The Council maintains its position on this matter. See the Council’s response to 3.3.24</p>
3.11.2	Draft DCO	<p>DCO wording:                      Operational air quality plan paragraph 31</p> <p>Suggested changes:                      Amendments to wording to allow for sufficient flexibility to definition of ‘Relevant Planning Authority’ and to allow for sufficient consultation period with consultees.</p> <p>Comments:                      Relevant Planning Authority’ to include consultation with Buckinghamshire</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>The Council maintains its position on this matter until such point that the Applicant provides a further response.</p>

		Environmental Health, who would like to be party to air quality matters. Please see Section 2.10 and 2.4 of Written Representations.		
3.11.2	Draft DCO	<p>DCO wording:                      Greenhouse gas action plan, paragraph 32</p> <p>Suggested changes:                      Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments:                      Relevant Planning Authority' to include consultation with Buckinghamshire Climate Change Officers, who would like to be party to the Greenhouse gas action plan. Please see Section 2.10 and 2.1 of Written Representations.</p>	The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.	The Council maintains its position on this matter until such point that the Applicant provides a further response.

3.11.2	Draft DCO	<p>DCO wording: Operational waste management plan, paragraph 33</p> <p>Suggested changes: Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.</p> <p>Comments: Relevant Planning Authority' to include consultation with Buckinghamshire Council, who would like to be party to the water management plan. Please see Section 2.10 of Written Representations.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>The Council maintains its position on this matter until such point that the Applicant provides a further response.</p>
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3.11.2	Draft DCO	<p>DCO wording:                  Applications made under requirements, paragraph 35</p> <p>Suggested changes:                  Amendment to allow for statutory 21 day consultation period for consultees and further extension of this period, should it be required.</p> <p>Comments: To make provision for a minimum consultation period for applications made under requirements, akin to the 21 days defined in Paragraph 18, of Part 3, of Schedule 2 of the dDCO. The Applicant should also ensure that an appropriate mechanism is included within the dDCO for extending this consultation period should further issues arise or if insufficient information is made available to the consultee. Please see Section 2.10 of Written Representations.</p>	<p>The Applicant notes the comments made and is considering these further. Where appropriate and/or necessary, the Applicant will engage further with the Council to understand and progress these matters. Where appropriate, the Applicant will provide a response at Deadline 3 alongside an updated draft DCO.</p>	<p>The Council maintains its position on this matter until such point that the Applicant provides a further response.</p>
3.11.2	Draft DCO	<p>DCO wording:                  Further information, paragraph 36 (3)</p> <p>Suggested changes:</p>	<p>The Applicant notes the comments made and is considering these further.</p>	<p>The Council maintains its position on this matter until such point that the Applicant provides a further response.</p>

		<p>Amendments to wording to allow for sufficient flexibility for neighbouring authorities to act as consultees.</p> <p>Comments:                  Limits consultation on the discharge of DCO requirements to those consultees specified within a requirement itself. Please see Section 2.10 of Written Representations.</p>	<p>The Applicant notes the Council’s concerns on the procedure for discharge of requirements. It notes that the list provided is not exhaustive but an initial response to the identified requirements is set out below.</p> <p>The Applicant remains happy to continue its dialogue with the Council to better understand and progress these matters where possible. Where appropriate, the Applicant will provide a further response at Deadline 3 alongside any updates to the draft DCO.</p>	
3.11.2	Draft DCO	<p>DCO wording:                  Paragraph 39 (4) “specified local authority”</p> <p>Suggested wording: Buckinghamshire Council to be named as a specified local authority.</p>	<p>The Applicant’s current position is that it is only the host authorities that should be specified as a local authority.</p> <p>The Applicant remains happy to continue its dialogue with the Council to better understand and progress these matters where possible.</p>	<p>Following Issue Specific Hearing 1 on the dDCO the Council accepts the Applicant’s response on this matter.</p>

## 5 Summary of Comments on Updated Application Documents

5.1.1. The section provides a summary of the comments of the Council in relation to the updated application documents submitted by the Applicant, where matters of concern to the Council are included.

*Table 5-1 - Summary of comments on updated Application documents submitted by the Applicant at Deadline 2*

Document	Summary of Comments
REP2-001: Cover Letter	This forms the Applicant's covering letter – no comments from the Council.
REP2-002: Guide to the Application	This has been reviewed. No comments from the Council.
REP2-003: Draft Development Consent Order REP2-004: Draft Development Consent Order (tracked changes)	The Council's position has been refined following Issue Specific Hearing (ISH) 1 and this is reflected in its updated Principal Areas of Disagreement Summary Statement submitted at Deadline 3.
REP2-005 – REP2-007: Draft Compensation Policies Measures and Communities First and Appendices	The proposal for this fund is welcomed by the Council in principle. The Council is seeking the inclusion of additional areas of the county, specifically the wards of Aylesbury North, Aylesbury North-West, Aylesbury South-West and Chesham, as eligible to apply for monies from this fund. The Council has no comments on the Appendices.
REP2-008 – REP2-017; and REP2-027 – REP2-028 – SoCG between London Luton Airport Limited and various named parties	These have been reviewed. No comments from the Council
REP2-018 – SoCG between London Luton Airport Limited and National Highways	This has been reviewed. The content of this submission is noted, including the requirement for additional information to be supplied by the Applicant relating to TRIMMA (3.7.1) and the Travel Plan management and monitoring (3.7.2) – the Council is also keen to review this. The Council has no further comments.
REP2-019 – SoCG between London Luton Airport Limited and the UK Health Security Agency	This has been reviewed. The Council notes ongoing discussions between the Applicant and UK HSA regarding the assessment of health impacts from changes in air pollutant concentrations; and the intentions for mitigating the impact of noise on areas of tranquillity. The Council also concurs with UK HSA on

Document	Summary of Comments
	<p>the need for stronger commitments to monitoring of effects on communities, human health and well-being. The Council wishes to be kept informed of any actions taken by the Applicant to address the UKHSA concerns, particularly regarding the assessment of impacts on health determinants.</p>
<p>REP2-020 SoCG between London Luton Airport Limited and Luton Borough Council</p>	<p>This has been reviewed. The Council notes that Luton Borough Council is in ongoing discussions with the Applicant in relation to a number of matters that are also raised as concerns within the Council's updated PADSS. These principally relate to transportation.</p>
<p>REP2-021 – SoCG between London Luton Airport Limited and Central Bedfordshire Council</p>	<p>This has been reviewed. The Council notes that Central Bedfordshire Council is in ongoing discussions with the Applicant in relation to a number of matters that are also raised as concerns with the Council's updated PADSS and post-hearing submission of oral cases. Topics where there is strong alignment are the Communities First Fund; public transport provision for east-west routes; clarity on the nature and deliverability of public transport measures; further exploration of proposed modal share targets; adequacy of mitigation for significant mental health and wellbeing effects in the planning and construction stages; suitability of noise mitigation controls; and support for non-host authorities to be involved in the ESG where they are impacted.</p>
<p>REP2-022 – SoCG between London Luton Airport Limited and Hertfordshire County Council</p>	<p>This has been reviewed. The Council notes that Hertfordshire County Council is in ongoing discussions with the Applicant in relation to a number of matters that are also raised as concerns with the Council's updated PADSS and post-hearing submission of oral cases. Topics where there is strong alignment are the need for public transport provision for east-west routes; clarity on the nature and deliverability of public transport measures, including through the STF; concerns around mitigation for noise impacts on health; and support for non-host authorities to be involved in the ESG where they are impacted.</p>
<p>REP2-023 – SoCG between London Luton Airport Limited and North Hertfordshire Council</p>	<p>This has been reviewed. The Council notes that North Hertfordshire Council is in ongoing discussions with the Applicant in relation to a number of matters that are also raised as concerns with the Council's updated PADSS and post-hearing submission</p>



Document	Summary of Comments
	<p>of oral cases. Topics where there is strong alignment are public transport provision for east-west routes; clarity on the nature and deliverability of public transport measures; and support for non-host authorities to be involved in the ESG where they are impacted.</p>
<p>REP2-024 – SoCG between London Luton Airport Limited and Dacorum Borough Council</p>	<p>This has been reviewed.                      The Council notes that Dacorum Borough Council is in ongoing discussions with the Applicant in relation to a number of matters that are also raised as concerns with the Council’s updated PADSS and post-hearing submission of oral cases. Topics where there is strong alignment are public transport provision for east-west routes; clarity on the nature and deliverability of public transport measures; questions relating to the STF; and support for non-host authorities to be involved in the ESG where they are impacted.</p>
<p>REP2-025 – SoCG between London Luton Airport Limited and Buckinghamshire Council</p>	<p>This SoCG reflects the Applicant’s response to documents provided by the Council that have since been superseded. The Council’s position is as stated in the Deadline 2 covering letter (REP2-043). The ExA may note that the Council has requested that the SoCG be updated by the Applicant to take into account comments made by the Council in its Local Impact Report (REP1A-001) and Written Representation (REP1-042). The Council will review this position based on the SoCG that the Applicant iterates for Deadline 3.</p>
<p>REP2-026 – SoCG between London Luton Airport Limited and East of England Ambulance Service NHS Trust</p>	<p>This has been reviewed.                      The content of this submission is noted, including the consideration by the Applicant to set up a Transport, Community Safety, Health and Wellbeing Working Group in response to engagement with the Trust (3.3.1). The Council will be interested to understand any progression on this matter but has no comments at present.</p>
<p>REP2-029 – Statement of Commonality for Statements of Common Ground</p>	<p>This has been reviewed.</p>

Document	Summary of Comments
	The document needs to be updated to reflect the Council's latest position and submissions.
REP2-030 – Applicant's Summary of Oral Submissions and Responses to Comments made at Open Floor Hearing (OFH) 1, OFH2 and Post-Hearing Submissions	This has been reviewed. The Council has no comments.
REP2-031 – Applicant's draft itinerary for the Accompanied Site Inspection	This has been reviewed. The Council has no comments.
REP2-032 – Noise Envelope – improvements and worked example	This has been reviewed. The Council welcomes the improvements proposed by the Applicant however remains to be convinced that the mechanism would allow timely intervention given the five year forward plan of slot allocation and resulting commercial pressures on the airport operator. It is also unclear how late running flights would be managed given these are often outside of the control of the operator. Further detail is sought.
REP2-033 – Applicant's Response to Written Representations – Part 1a members of the public and businesses (Thematic)	This has been reviewed. The Council has no comments.
REP2-034 – Applicant's Response to Written Representations made by Members of the Public at Deadline 1 (Part 1b)	This has been reviewed. The Council has no comments.
REP2-035 – Applicant's Response to Written Representations – Part 2 Interested Parties subject to a Statement of Common Ground	The Council notes the contents of the document and the similarities in its content to the response to BC's Relevant Representation (RR-0166) and the response to the Council's LIR (REP1A-001). As such the Council's position remains unchanged from what it has set out in Section 4 above. It should be noted that the Council has made further requests to the Applicant that its SoCG be updated in line with the Council's LIR (REP1A-001), Written Representation (REP1A-042) and further written submissions.
REP2-036 – REP2-039 – Applicant's Response to	These documents have been reviewed. The Council has no comments.

Document	Summary of Comments
Written Representations made by a range of persons and organisations	
REP2-040 – Surface Access Noise Modelling Additional Information	This has been reviewed. It is not considered to affect Buckinghamshire and the Council has no comments.
REP2-041 – Statement of Common Ground between London Luton Airport Limited and Natural England	This has been reviewed. The Council has no comments.
REP2-042 – Response to Chris Smith Aviation Consultancy Limited – Initial Review of DCO Need Case for the Host Authorities	This has been reviewed. The Council has no comments.
REP2A-001 – Cover Letter	This has been reviewed. The Council has no comments.
REP2A-002 – Application Document Tracker	This has been reviewed. The Council welcomes the provision of a tracker.
REP2A-003 – Status of Negotiations / Compulsory Acquisition Schedule	This has been reviewed. The Council has no comments.
REP2A-004 – Applicant's Comments on Local Impact Reports (Buckinghamshire Council)	<p>Comments are provided in Section 4 of this document. The Council maintains its position on the matters raised previously, which fall into the following generalised themes:</p> <ul style="list-style-type: none"> <li>- Concerns about the lack of direct engagement and opportunities to influence the Scheme afforded to the Council by the Applicant. Specifically, the Applicant’s resistance to the Council being involved in the ESG and Technical Working Groups.</li> <li>- Substantial reservations about the suitability of the traffic modelling to inform robust ES conclusions relating to impacts and effects of the Scheme in Buckinghamshire. This particularly affects transport, noise, air quality and health topics where the Council believes that the Applicant’s conclusions are premature.</li> <li>- Lack of transparency in the traffic modelling inputs and outputs in relation to the Buckinghamshire</li> </ul>

Document	Summary of Comments
	<p>highway network, including Trip Distribution Plans (REP1-019).</p> <ul style="list-style-type: none"> <li>- Substantial reservations about the likely efficacy of the Sustainable Transport Fund in establishing sustainable travel behaviours on a pro-active basis.</li> <li>- Concerns that the ETS is not currently assured; and that its nature fails to provide certainty of tangible interventions in Buckinghamshire (and more broadly).</li> <li>- The GHG Assessment is considered to be inadequate. There are concerns regarding the Applicant's reliance on the Jet Zero Strategy without undertaking appropriate quantitative sensitivity studies upon the effect of different technological trajectories on cumulative emissions.</li> <li>- Concerns regarding the Applicant's reliance on CORSIA and UK ETS in the absence of sufficient justification.</li> <li>- Substantial reservations over the absence of an independent body, separate to the ESG, that should be tasked with reviewing the Noise Envelope.</li> <li>- Concerns over the Council's absence from the Noise Technical Panel given the likely future changes in airspace and the subsequent noise related effects.</li> <li>- Reserve final position on noise pending the update to the Transport Model.</li> </ul>
REP2A-005 – Applicant's Comments on Local Impact Reports (Central Bedfordshire Council)	The Council has not reviewed this document in detail.
REP2A-006 – Applicant's Comments on Local Impact Reports (Hertfordshire County Council, Dacorum Borough Council, North Hertfordshire Council)	The Council has not reviewed this document in detail.
REP2A-007 – Applicant's Comments on Local Impact Reports (Luton Borough Council)	The Council has not reviewed this document in detail.

