

October 2023

# London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.56 Applicant's response to Deadline 2 submissions  
(Comments from Interested Parties on Deadline 1  
submission) Appendix C - Stop Luton Airport Expansion**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.56

**The Planning Act 2008**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

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

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**8.56 APPLICANT'S RESPONSE TO DEADLINE 2 SUBMISSIONS  
(COMMENTS FROM INTERESTED PARTIES ON DEADLINE 1  
SUBMISSION) APPENDIX C – STOP LUTON AIRPORT EXPANSION**

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<b>Author:</b>	Luton Rising

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## Appendix C - Stop Luton Airport Expansion [REP2-073]

Table C1.1 Applicant's response to Stop Luton Airport Expansion's comments on Deadline 1 submission

I.D	Response Topic	Comments on deadline 1 submission (Verbatim)	Luton Rising's Response
1	Green Controlled Growth Environment	<p><b>[see pages 1-2 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>GCG on LR's terms</p> <p>Please read SLAE's 'Good Neighbours' WR submitted for Deadline 2, as it identifies some enhancement to the GCG proposals. SLAE will submit a GCG WR for Deadline 3.</p> <p>Regarding environmental impacts associated with the Proposed Development, SLAE are happy that the Planning Inspectorate will consider the balance between the costs and benefits of the Proposed Development.</p> <p>SLAE are well aware of LR's proposals and find LR's response to go and find information in proposal documents dismissive and typical of the attitude shown throughout the whole of the consultation process. Great ideas to improve the proposal dismissed in with generic feedback text and grouped together. SLAE are well aware of where to look.</p>	<p>The Applicant has responded to SLAE's 'Good Neighbours' document <b>[REP2-074]</b>, as presented in the Deadline 3 submission, 'Appendix C2, 'Applicant's Response to Deadline 2 Submissions (Stop Luton Airport Expansion – Comments in Written Representations)' (TR020001/APP/8.56).</p> <p>It is acknowledged that SLAE intend to submit a Written Representation on the topic of Greenhouse Gases (GHG), which the Applicant will respond to at Deadline 4.</p>

I.D	Response Topic	Comments on deadline 1 submission (Verbatim)	Luton Rising's Response
		<p>SLAE ask once again to get rid of the duplication, the application filler, the ambiguous statements and words in a generic manner</p>	
2	Governance	<p><b>[see page 2 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>Noted. Places maybe places available for representatives of each of the three main political parties forming Luton Borough Council, however SLAE's evidence points to a historic dictatorship by the majority party make-up of the council. Reference, Annes Donelans letter of resignation.</p> <p>Can LR provide the evidence of the conflict of interest? Our understanding is the Liberal Democrats want the expansion, just not on Wigmore Valley Park.</p>	<p>The Applicant is unsure what is being requested in reference to 'evidence of the conflict of interest'.</p> <p>The Applicant set out in the referenced first response in REP2-073 what the conflict of interest related to, and that the two Directors concerned have since resigned from the Board.</p>
3	Governance	<p><b>[see page 3 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>See answer as given above. It is a matter for the Examining Authority to determine, as the Board of Directors consist of Councillors making decisions on behalf of Wigmore residents, some who didn't know where the park was.</p>	<p>The Applicant stands by its position that membership of the Board of Directors of Luton Rising is not a matter for consideration by the Examining Authority for this application for development consent.</p>

I.D	Response Topic	Comments on deadline 1 submission (Verbatim)	Luton Rising's Response
		<p>SLAE suggest to ask Luton councillors from all areas what the airport brings and they will say, jobs, economic growth and charitable money with no understanding of what adjoining ward residents think.</p>	
4	Planning	<p><b>[see pages 3-4 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>SLAE propose that LR give the Examining Authority the funds (£65 million) to be able to neutrally and truly test the robustness of the proposals on an equal footing. With £65 million anyone could gain the expertise to counter the proposal documents and statements.</p> <p>SLAE do not believe that the Examining Authority will conclude the application based upon a debate, if that is LR's understanding then SLAE are disappointed that is LR's view and question that the proposal's focus and evidence is collated and presented to win a debate. The National Infrastructure Planning web site says,</p> <p>“Advice Note 8.2: How to register to participate in an Examination 7. What not to include in a Relevant Representation 7.1 The Examining Authority may disregard a representation if it considers that it is vexatious or frivolous, or if it</p>	<p>It is the role of the Examining Authority to test the robustness of the proposals, taking on board comments made by Interested Parties throughout the process.</p> <p>The Examining Authority, having heard and considered all sides of the debate will conclude whether or not the expected benefits of the proposals outweigh the expected disbenefits and recommend to the Secretary of State whether or not the application should be approved. The process is in place to ensure that all parties have a voice which is heard, regardless of the resources available to them, financial or otherwise.</p>

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		concerns the merits of national policy, contained in National Policy Statements. The role of the Examination is not to debate the merits of National Policy Statements that have already been consulted on, laid in Parliament and designated as Government policy.”	
5	Planning	<p><b>[see page 4 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>SLAE note the response and it is Luton Borough Council and Luton Rising who have initiated this whole expansion idea. Who pays for the DCO tab?</p> <p>The difference between a good or an outstanding programme or project plan is demonstrated here by LR. A good example of being a 'poor neighbour' and a lack of project planning.</p>	The Infrastructure Planning (Fees) Regulations 2010 sets out the fees that the Applicant is responsible for.
6	Planning	<p><b>[see page 4 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>Noted.</p>	Noted and no further comment required.
7	Planning Stakeholder Engagement	<p><b>[see page 5 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>SLAE accept that the Application documents were prepared in accordance with relevant</p>	The Application documents were prepared in accordance with relevant requirements and guidance. The Applicant has sought to strike the balance between providing the necessary technical detail whilst also seeking to ensure that documents

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		<p>requirements and guidance. Some draft documents were also shared with technical stakeholders, including local authorities and statutory undertakers, prior to submission in order to improve their accuracy and readability. Though SLAE question that if the application documents were prepared in accordance with relevant requirements and guidance, that these took into consideration that educational attainment is generally lower across Luton.</p>	<p>were written using non-technical language wherever possible.</p> <p>A non-technical summary of the Environmental Statement was also produced to ensure the accessibility of technical information.</p>
8	Open Space	<p><b>[see pages 7-8 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>SLAE ask what the strict planning tests are? There are no key word references to 'strict planning test' in any of the Sift documents, 000823, 000824, 000825, 000826, 000827 &amp; 000828.</p> <p>SLAE believe that all other options have not been exhausted. This is evident with the smaller footprint on Green Horizons Park, which means GHP can now be built on Brownfield land and the cost of the AAR greatly reduced.</p> <p>The original Century Park is another option, where Century Park was going to be located to the east of the airport.</p>	<p>Alternative options to the Proposed Scheme have been explored and are detailed in <b>Chapter 3 Alternatives and Design Evolution of the ES [AS-026]</b>. This document details the options tested and the design evolution, which considers the feedback from stakeholder engagement and statutory consultation. It also provides justification for selection of the final Proposed Development.</p> <p>Green Horizons Park (GHP) is the subject of a separate planning permission. Alternative options for that development were considered as part of that application process and do not form part of this application for development consent.</p>



I.D	Response Topic	Comments on deadline 1 submission (Verbatim)	Luton Rising's Response
		The replacement Wigmore Valley Park is outside of the Luton Local Plan LLP6 Strategic Allocation boundary.	
9	Planning	<p><b>[see page 8 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>Noted.</p>	Noted and no further comment required.
10	Noise and Vibration	<p><b>[see pages 8-9 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>LR avoiding and ducking the point being made and playing deflection tactics by pointing SLAE and the Inspectorate to the compensation scheme.</p> <p>Spending considerable time in Luton and surrounding area is not the same experience as a 6month 24x7 experience. Surely this can't have been missed?</p> <p>A typical response that has been experienced by SLAE throughout the whole project, from the start until the DCO submission. 'Trust' is the key word, evidence document 000746 - NB: the community group SLAE (Stop Luton Airport Expansion) declined to participate in the consultation due to their lack of trust in Luton Rising</p>	The Applicant considers that the issue raised regarding experience of the aircraft noise in Luton and the surrounding area was answered within the referred to <b>Applicant's Response to Relevant Representations Part 2C of 4 [REP1-023]</b> page 297, in response to RR-1448.

I.D	Response Topic	Comments on deadline 1 submission (Verbatim)	Luton Rising's Response
11	Noise and Vibration	<p><b>[see page 9 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>SLAE ask the LR project team and all those councillors that think expansion is such a good idea, to 'walk the walk' and live under the flight path in South Luton for a period of six months, 24x7. Then make judgement and talk about the assessment of noise and working from home from personal experience.</p>	<p>The Applicant considers that the issue raised regarding experience of the aircraft noise in Luton and the surrounding area was answered within the referred-to <b>Applicant's Response to Relevant Representations Part 2C of 4 [REP1-023]</b> page 297, in response to RR-1448.</p>
12	Community First	<p><b>[see page 10 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>Noted, SLAE have submitted a Charities WR for Deadline 2 that looks into this a little more.</p>	<p>The Applicant has responded to SLAE's 'Good Neighbours' document <b>[REP2-074]</b>, as presented in the Deadline 3 submission, 'Appendix C2, 'Applicant's Response to Deadline 2 Submissions (Stop Luton Airport Expansion – Comments in Written Representations)' (TR020001/APP/8.56).</p>
13	Planning	<p><b>[see pages 10-11 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>Green Horizons Park has changed since Century Park was approved. Please see evidence relating to Anne Donelan resignation and SLAE ask the Examining Authority to stop the majority Labour party that represent the Luton planning Authority from determining planning matters relating to the airport and land that LR lease / own (?). If GHP is now a future matters application, what is it doing in the DCO?</p>	<p>The interface between the Green Horizons Park consent and this application for development consent has been set out in the document <b>Green Horizons Park Additional Information [REP1-005]</b>.</p>

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14	Planning	<p><b>[see page 11 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>SLAE ask the inspectorate to ask LR to publish what the defined clear and robust study areas are for the purposes of the assessments submitted in support of the application? As mentioned in other SLAE documents, the LR documents 000848 c7.1.3 and 001108 paragraph 13.9.26. uses the word 'adjoining' which gives clear and understood meaning and sets the precedent for all other documents. Clarity that the word 'local' means adjoining ward and village communities would be very beneficial when reading proposals and also when commenting in further WR's</p>	<p>The study areas for each of the technical assessments are defined and justified in their specific Environmental Statement chapters.</p>
15	Design	<p><b>[see page 11 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>The Bridle path that goes to the footpath in the farmers field is not shown on 000810 Provision of Open Space map. SLAE will respond to Lead Contractor in further WR's.</p>	<p>The <b>Strategic Landscape Masterplan [APP-172]</b> identifies the existing network of Public Rights of Way (PRoW) within the replacement open space. It also shows the new PRoWs (footpaths and bridleways) planned as part of the Proposed Development and how these tie in with the existing PRoWs</p> <p>If the respondent could be more specific on which bridle path they are referring to and provide a full reference of the map then this can be considered further.</p>
16	Need Case	<p><b>[see page 11 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p>	<p>As set out in the <b>Need Case [AS-125]</b> Section 8, there is expected to be job growth as a result of the Proposed Development, with any uncertainties in</p>

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		<p>Job loss doesn't appear to be covered in the slower and Faster Growth cases.</p>	<p>relation to the rate of growth addressed by the Faster and Slower job growth. To the extent that there would be any displacement of employment or potential employment as a consequence of the Proposed Development, this is addressed in <b>Chapter 11</b> of the ES <b>[APP-037]</b>. Any loss of jobs due to displacement of activity is considered not significant (section 11.9).</p>
17	Wigmore Valley Park	<p><b>[see page 13 of REP2-073 for Matters Raised in Relevant Representation (Verbatim) and Luton Rising's Response]</b></p> <p>Ultimately land is being taken and the current park reduced in size. It's a great PR exercise that LR have relabelled farmland as a new Wigmore Valley Park and providing at least 10% more than the current park.</p> <p>Lack of deliberate investment in the current Wigmore Valley Park enables LR to say 'more attractive', however that sums up the lack of awareness of what the current park provides and the recent awards it has won.</p> <p>SLAE will respond to Chapter 13 Health and Community of the Environmental Statement, [AS-078] and the Open Space Assessment.</p> <p>SLAE are disappointed that the proposals have not recognised the two best park in Bedfordshire awards that Wigmore Valley park won in 2019 and 2022 and that the park was also a regional finalist for the East of England in both years.</p>	<p>The northern portion of Wigmore Valley Park and existing access will be retained and improved as part of the consented Green Horizons Park.</p> <p>The <b>Strategic Landscape Masterplan [APP-172]</b> details the re-provision of open space, which would transform agricultural land to an accessible, biodiverse park space at least 10% larger than what currently exists. .</p> <p>As part of a robust three-stage sifting process, Sift 1 considered the performance of a range of options against sustainability and environmental criteria.</p> <p>Under S9 Natural habitats and biodiversity, loss of Wigmore Valley County Wildlife Site (CWS) was appraised across the options (refer to P32 Design and Access Statement Appendix B <b>[APP-209]</b>).</p> <p>At Sift 2 <b>[APP-210]</b>, the results of the appraisal in relation to landscape and visual impact, and</p>

I.D	Response Topic	Comments on deadline 1 submission (Verbatim)	Luton Rising's Response
		<p><a href="https://www.fieldsintrust.org/ArchivedNews/celebrating-the-east-ofenglands-best-parks-2019">https://www.fieldsintrust.org/ArchivedNews/celebrating-the-east-ofenglands-best-parks-2019</a> (accessed 10/09/23).</p> <p><a href="https://www.fieldsintrust.org/favourite-parks/localfavourites#eastofengland">https://www.fieldsintrust.org/favourite-parks/localfavourites#eastofengland</a> (accessed 10/09/23).</p> <p>SLAE noted that LBC also did not recognise the award either and this adds to the lack of investment evidence in the park by LBC to make both the Century Park and Expansion more attractive.</p> <p>The three stage Sift process was predetermined, before a scheme that sought to avoid Wigmore Valley Park in its entirety was developed. Surely the project team would have thought to include the park in the initial Sift stage. The park was an afterthought following feedback for the non-statutory consultation.</p>	<p>environmental land use, were set out in Table 5.14. These were both completed ahead of non-statutory consultation.</p>