

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 Written Representations) Appendix C2 - 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**

**8.56 APPLICANT'S RESPONSE TO DEADLINE 2 SUBMISSIONS
(COMMENTS FROM INTERESTED PARTIES ON WRITTEN
REPRESENTATIONS) APPENDIX C2 – STOP LUTON AIRPORT EXPANSION**

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Appendix C2 - Stop Luton Airport Expansion [REP2-074]

Table C2.1 Applicant's response to Stop Luton Airport Expansion's comments on Written Representations

I.D	Response Topic	Comments on Written Representations (verbatim text)	Luton Rising's Response
1	Climate Change	<p>The article titled, 'The extreme summer weather that scorched and soaked the world' cc1 by the BBC at https://www.bbc.co.uk/news/resources/idt-8f0357f9-9013-4567-8407-be938c8c70cf (accessed 02/09/23) both describes and pictorially covers the extreme weather events in the Northern Hemisphere this summer. Not all these events can be immediately linked to climate change as it can take a while for scientists to untangle what exactly is going on - plus, the planet's natural weather and climate systems are powerful and also affect the weather. Although by the end of the August, scientists with the World Weather Attribution group (https://www.worldweatherattribution.org/ (accessed 02/09/23)) had analysed the data and concluded that the heat waves would have been "virtually impossible" without human-induced climate change. A good number of the application documents cover Climate Change and associated weather events and SLAE would like the Planning Inspectorate to question LR from a different view point.</p>	<p>Noted.</p> <p>The Applicant understands the global nature of greenhouse gas emissions and their impact on long term weather patterns. The Applicant has assessed the greenhouse gas impact of the scheme in Chapter 12 Greenhouse Gases of the ES [APP-038]. The expansion is in line with government policy for Net Zero and the Jet Zero Strategy, and it is deemed the UK government's responsibility to manage greenhouse gas emissions from aviation at a UK wide level. As such, the greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK Emissions Trading Scheme (UK ETS) within the European Economic Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSA). The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050. The impact of changing weather events projected across the project lifetime is addressed in and in Chapter 9</p>

I.D	Response Topic	Comments on Written Representations (verbatim text)	Luton Rising's Response
			Climate Change Resilience of the ES [APP-038] , and mitigation measures are included.
2	Climate Change Green Controlled Growth	<p>Important</p> <p>SLAE believe that LR, LLOAL, LBC and the airlines all have a joint responsibility to reduce the impact of Climate Change and associated weather events globally, as their ambitions to increase and extend to both international and global destinations are plain to read. Any airport expansion is an enabler for flight operations (LLAOL and the airlines using Luton Airport), now and in the future inflicting emissions that contribute to Climate Change and associated weather events on other countries. Emissions that have initially been sourced and extracted from fossil fuels, a double whammy of damage. SLAE ask LR to work with LBC, LLAOL and the airlines on a compensation scheme that covers the cost of mitigating climate change impacts on other country destinations by all Luton Airport activities and enablers. SLAE feel that comparisons with the historic Slave Trade era can be made, inflicting Luton sourced misery on those unable to defend themselves.</p> <p>SLAE ask LR why this is not covered in the application? LR should submit such an undertaking in the application? Even better a section in the Green Controlled Growth proposals, and covered by</p>	<p>The Applicant accepts that the development will result in increased flights, analysis of which has been included in Chapter 12 Greenhouse Gases of the ES [APP-038]. Refer to the response above in I.D. 1 with respect to greenhouse gas emissions arising from the scheme.</p> <p>With regard to airlines working together on a compensation scheme, the Applicant considers that this is beyond the remit of the planning process in terms of Climate impacts and Green Controlled Growth proposals.</p> <p>The remit of the Climate assessment was to assess the likely significant effects the Proposed Development has on climate, while the remit of the Green Controlled Growth proposals extend to managing local impacts. Global impacts, such as those arising from increased aviation are to be managed by the UK government.</p>

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		law? That would show true commitment as LR attempt to demonstrate in GCG.	
3	Green Controlled Growth	<p>In fact, LR are advised to follow the non for profit and UN backed global Science-based targets award scheme, which is independent from aviation schemes and provides companies with a clearly-defined path to reduce emissions in line with the Paris Agreement goals https://sciencebasedtargets.org/how-it-works. (accessed 07/09/2023) This would prove if GCG is worthy of the emphasis that LR place on environment protections.</p>	<p>As set out in section 1.4 of the Green Controlled Growth Framework Explanatory Note [APP-217], the Framework is not intended to replace or substitute the need for environmental mitigation measures associated with the Proposed Development and identified by the Environmental Impact Assessment (EIA) process.</p> <p>Instead, the intention of the Green Controlled Growth (GCG) Framework is to provide additional certainty that the environmental effects forecast will not be exceeded irrespective of the performance of the up-front mitigation measures secured through the DCO and set out in the Mitigation Route Map [AS-047] by making future growth dependent on achieving the environmental performance forecast at the time of the DCO.</p> <p>This approach has been taken forward in the context of the UK government's Aviation Policy Framework (APF), which sets out how the aviation sector delivers economic growth and other benefits for the country, whilst acknowledging that the sector results in local environmental impacts that need to be managed and balanced against these benefits. The APF is also clear that GHG emissions from aviation are not a local issue, and should be dealt with at a national level through</p>

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			measures such as the UK Emissions Trading Scheme and CORSIA.
4	Climate Change Need Case	SLAE ask LR to make a statement on the impact of their enabler activities to the rest of the world? Writing to each destinations Government explaining the 'growth' to Luton's economy is the cause. This would show a true commitment and responsibility to deal with aviation emissions and would also fit nicely in with the Governments Jet Zero aspirations of an earlier target for UK domestic aviation to reach net zero by 2040,	This is beyond the remit of the application process. The remit of the Climate assessment was to assess the likely significant effects the Proposed Development has on climate, while the remit of the Green Controlled Growth proposals extend to managing local impacts. Global impacts, such as those arising from increased aviation are to be managed by the UK government.
5	Climate Change	The application includes statements in regards to Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), (example document 000833, paragraphs 3.4.26, 3.4.27, 3.4.28, 3.4.29) and International Civil Aviation Organization (ICAO), and the UK Emissions Trading Scheme (UK ETS), however the above paragraph (headed Important) stands alone and separate from any Government publications and CORSIA, ICAO and UK ETS) considerations on involvement as identified in the recent 'jet zero strategy one year on' publication, (https://www.gov.uk/government/publications/jet-zero-strategy-one-year-on , (accessed 02/09/2023).	Noted
6	Need Case	To support the (headed Important) paragraph, evidence can be found in the following. In the many	Noted.

I.D	Response Topic	Comments on Written Representations (verbatim text)	Luton Rising's Response
		<p>application document and responses to hearings and Written Representations, LR hide behind Government Policy and unproven future technology to address such concerns. Such as, Document 001117 3.4.6 The Jet Zero Strategy makes clear that growth of airport capacity is supported and that the Government does not intend to introduce demand management measures and that it is the responsibility of Government to address carbon emissions from aircraft at the national level. Policy makes clear that growth, in principle, remains supported and that the focus is on addressing the impacts of aviation rather than constraining economically beneficial growth.</p>	
8	Climate Change	<p>In document 001097, the paragraphs 5.2.8 Giving passengers the opportunity to fly from the airport to a wider range of destinations will save time and money, amounting to around £512 million in journey time savings (discounted over a 60-year period) for air travellers to and from the Three Counties. and 5.4.1 The Proposed Development will enable the airport to increase its capacity in response to demand, which in turn will deliver benefits for the airlines that operate from it. In addition, airlines and other airport users will benefit from being able to operate at an airport from which passengers want to use (refer to Section 5.3, which sets out the benefits for future passengers).</p>	Noted.

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9	Climate Change	<p>Heat. Wildfires. Torrential rain. Typhoons and hurricanes. Much of the northern hemisphere has been battered by extreme weather this summer. Not all these events can be immediately linked to climate change. It can take a while for scientists to untangle what exactly is going on - plus, the planet's natural weather and climate systems are powerful and also affect the weather. But in the past few weeks, significant meteorological records have been broken in quick succession, to the concern of climate change experts. In the UK, the balmy days of early summer may feel like a distant memory after weeks of unsettled weather - but this year saw the UK's hottest June on record. 74% of areas in the UK broke heat records. The average mean temperature, counting both days and cooler nights, was 15.8C. That eclipsed the previous record by 0.9C and was a significant jump in climate terms. Record temperatures were reached in 72 of 97 areas of the UK where temperature data is collected. Scientists at the Met Office said climate change made the chance of surpassing the previous record at least twice as likely. In the first week of July, the planet saw its hottest day ever recorded when the average mean global temperature hit 17.23C. This broke the previous 2016 record of 16.92C. The extreme weather which has affected many millions of people in July is unfortunately the harsh reality of climate change and a foretaste of the future. By the end of the month, scientists with the World Weather</p>	<p>Noted. The Applicant understands the global nature of greenhouse gas emissions and their impact on long term weather patterns. The Applicant has assessed the greenhouse gas impact of the scheme in Chapter 12 Greenhouse Gases of the ES [APP-038]. The expansion is in line with government policy for Net Zero and the Jet Zero Strategy, and it is deemed the UK government's responsibility to manage greenhouse gas emissions from aviation at a UK wide level. As such, the greenhouse gas emissions from aviation at Luton airport will be managed and capped by the UK Emissions Trading Scheme (UK ETS) within the European Economic Area, and the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). The UK government has made it clear that available allowances under the UK ETS will be aligned with the UK meeting the 6th Carbon Budget and later Carbon Budgets to net zero in 2050. The impact of changing weather events projected across the project lifetime is addressed in and in Chapter 9 Climate Change Resilience of the ES [APP-038], and mitigation measures are included.</p>

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		<p>Attribution group - which looks at the role of climate change in specific extreme weather events - had analysed the data and concluded that the heatwaves would have been “virtually impossible” without human induced climate change. Warming the atmosphere by burning fossil fuels has made the heatwave in southern Europe 2.5C hotter, they said. El Niño, which began in June, could contribute to make 2023 the hottest year ever, scientists believe. The powerful natural phenomenon is linked to higher temperatures, and occurs every two to seven years when warm water rises to the surface in the Pacific off the coast of South America. Scientists expect that as global warming intensifies, wildfires will become more powerful. The impact of extreme weather in different countries is a reminder that how humans respond is vital. This summer the UN and leading climate scientists again urged governments to keep to their promises to urgently tackle climate change. Scientists say this summer is a sign of things to come as climate change worsens. It's no longer something in the future; we are really seeing it now. The article photos show the impact of extreme weather events in locations such as Japan, America, China, Greece, Rhodes, London, Mexico, British Columbia, Italy, Philippines, Algeria, Tunisia, Canada, Hawaii, South Korea, the Mediterranean and Southern Europe.</p>	

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10	Green Controlled Growth	SLAE agree with the statement found in document 000840, the EXECUTIVE SUMMARY for Green Controlled Growth. Airports do much that is good. They are gateways to the world for business and leisure. They are very important economic hubs. They can generate tens of thousands of jobs. Airports can also generate negative environmental effects that, unless controlled and managed, can impact on surrounding communities. Green Controlled Growth (GCG) is a key value of Luton Rising in its ambition to enable the sustainable expansion of Luton Airport.	Noted.
11	Climate change	On Tue 29 Mar 2022 the Met Offices news article https://www.metoffice.gov.uk/aboutus/press-office/news/weather-and-climate/2022/heatwave-threshold-changes , redefined the heat wave classification for Bedfordshire, a good example of how the effects of Climate Change are coming closer to home.	Noted.
12	Climate change Needs case	The Government paper titled Jet Zero strategy: one year on, (https://www.gov.uk/government/publications/jet-zero-strategy-one-year-on , (accessed 02- 09-23)) includes the following. Transport remains the largest emitting sector in the UK, and by 2035, aviation is expected to be one of the largest emitting transport modes. This year, we have updated our scenarios to reflect the latest macroeconomic conditions, including updating inputs on oil prices, GDP and	The Applicant is aware that the Jet Zero: One year on report indicates that the current Government projections of air passenger demand in 2050 are slightly lower than their previous projections. However, since these were produced, economic projections for the UK economy have been revised upwards as explained in Section 2.2 of the Applicant’s Response to Chris Smith Aviation Consultancy Limited – Initial Review of DCO Need Case for the Host Authorities [REP2-042] .

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		<p>consumption growth, and foreign exchange rates. This has had the impact of reducing forecast passenger demand growth under our High Ambition scenario to 52% in 2050, relative to 2018 levels, compared to 70% in the published Jet Zero Strategy. We have committed to reviewing our Jet Zero Strategy every five years, with the first review in 2027. SLAE comment that this is too late for LR's expansion application. These measures are in line with those considered in our Jet Zero Strategy. Unsurprisingly, given the complexity of decarbonising the aviation sector and high levels of uncertainty, the contributions of individual measures do not align exactly with those implied by our modelling.</p>	<p>As such the Applicant is confident that the demand projections adopted are robust and continue to align with the Jet Zero High Ambition Scenario.</p>
13	General	<p>Having read LR's responses to Relevant Representations it is disappointing to find in most cases that they are paraphrasing what is written in the application documents and not answering questions directly. This sums up the whole approach 'we know best' attitude to the consultation exercises since 2018, including accepting suggestions that made the application stronger in LR & LBC opinion.</p>	<p>The Applicant has attempted to respond to all representations as best as possible, including making reference to submitted documentation where relevant.</p>
14	Economics and Employment	<p>SLAE have taken the time and care to read the letters of support, transcripts from the Open Floor Hearings and the application documents that refer to charities, community & volunteer groups, and parish and town councils. The speaker at Open Floor Hearing 1 summed it up, "If that money did not come in, the</p>	<p>Noted.</p>

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		<p>negative effect on our town, where Luton is probably one of the most deprived towns, it would be a lot more worse off. The impact firsthand, I've seen the difference with the support the airport, made too many community groups, many charities. It puts happiness in putting people into jobs. Seeing children fed, it hits, it hits you. I understand the pollution. I understand. There's some positives and some negatives. But for me the growth polluter means more aspirations for the young people in our town. More jobs for people in our community." Document 001257.</p>	
15	Community Benefits	<p>SLAE 100% recognise the difference that airport funding makes to charities and the those in need of help. Not one of our group has not turned to a Charity for help at some stage in our lives. Each of us in our group either give our time or make financial contributions to charitable causes.</p>	Noted.
16	Community Benefits Green Controlled Growth	<p>SLAE also support LR increasing the financial support to voluntary communities and charitable organisations to help make life-transforming changes for people. SLAE feel that a lot of the good things that LR do for charities and the community can be achieved without the expansion SLAE also recognise that there are charities that are both for and against expansion. SLAE recognise that charities are expected to pick up the pieces when councils are unable to fund / provide services SLAE understands that the most tax efficient way for councils to fund</p>	Noted.

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		charities is by setting up private companies to provide donations SLAE ask if charitable organisations will still support expansion if GCG is not legalised?	
17	Health and Community	The airport expansion will be the enabler for further climate change, global warming, further health, noise, traffic and emissions issues. Is airport funding of health charities a circular investment, as aviation impacts people's health?	No. The environmental effects of the Proposed Development have been assessed, both adverse and beneficial, and reported in the Environmental Statement. The Community Funding Programme and Community First are open to all who qualify .
18	Community Benefits	SLAE would like the following to be clarified, If expansion is not approved will community or charitable financial support be reduced or taken away?	No. The Applicant is clear that its existing Community Funding Programme will be unaffected by this application for development consent.
19	Funding	<p>LR to be more specific on where the borrowed funds came from as mentioned in document 000609 paragraph 02 Background to the consultation? 'When the Covid-19 pandemic impacted operations and revenues, we borrowed funds to maintain our contribution levels to local charities, understanding the greater need within the community.'</p> <p>Where did the source of that funding come from (UK taxpayers, loans given by the Government or council)?</p> <p>Do LR have to pay interest on the borrowed money and if so how much spread over how many years?</p> <p>SLAE would like to ask if funding will be cut as a result of the debt / interest repayments?</p>	<p>The referenced statement relates to an error in one of the 2022 Consultation documents, which hadn't previously been picked up by the Applicant. For the avoidance of any doubt, the Applicant has not, at any time, borrowed funds for the purpose of contributing to charity. The Applicant did take loans from Luton Council during the pandemic as part of a stabilisation plan. As set out at page 183 of Applicant's Response to Written Representations made by Non-Statutory Organisations at Deadline 1 (Part 4) [REP2-037] during this period the Applicant continued to make donations to charity but did so from its reserves, not from borrowing.</p>

I.D	Response Topic	Comments on Written Representations (verbatim text)	Luton Rising's Response
		If expansion is not approved will Luton Councils 2040 vision fail?	
20	Green Controlled Growth	SLAE also ask for more clarity on the statements made in document 000833, 1.7.4, 1.7.5 and 1.7.6, document 000834 A1.1.8 and document 000835 B1.1.7 as it is not clear if LR or the operator is responsible for taking GCG through the legal process? Many of the charity RR's and OFH statements are based upon the GCG proposal.	<p>The Green Controlled Growth process is secured by Requirements in the draft Development Consent Order (DCO) [REP2-003], specifically those in Part 3 to Schedule 2 of the draft Order. A DCO is a statutory instrument in its own right, and breaching the terms of a DCO is an offence under the Planning Act 2008.</p> <p>As set out in Section 1.7 of the Green Controlled Growth Explanatory note [APP-217], due to the way that DCOs work the requirement to comply with the DCO, including to implement GCG, will fall to the Applicant, Luton Rising.</p> <p>However, Article 8 of the draft DCO also includes a mechanism to transfer these obligations to the current airport operator. The obligations would revert back to Luton Rising at the end of the current concession and could be transferred onwards to a new operator.</p>
21	Green Controlled Growth	Will a private operator company who is focused on profit, implement GCG when it's not beneficial for them to do so?	<p>Yes.</p> <p>As set out in the response under ID20 (above) it is an offence to breach the terms of a Development</p>

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			Consent Order, which includes the requirements to implement GCG.
22	Green Controlled Growth	Would charities be satisfied that a private operator company will take forward and legalise GCG?	As set out in the response under ID20 (above) the requirement to implement GCG is secured through the Development Consent Order.
23	Funding	SLAE would like to see funding forecast projections for each phase, up to and beyond the last phase timelines? Charities would then be able to plan strategically and be more robust for susceptible aviation events.	<p>The Applicant has been clear that its existing community funding programme will remain unaffected by this application for development consent.</p> <p>The Applicant has received no request from any charity for such information.</p>
24	Community Benefit	SLAE do not accept the LR response made to our Relevant Representation suggestion that if 'Green Control Growth' (GCG) will be passed into law, a similar law be put in place to protect charitable financial benefits. "The Applicant remains a private company and must operate within the laws governing such organisations, it would not therefore be appropriate to seek to make legally binding obligations beyond the scope of the growth being sought through this application to making minimum annual charitable contributions." Document 001527. Is 'growth' a dependent on LR's definition?	As set out in the Applicant response to SLAE's Relevant Representation at page 301 of Applicant's Response to Relevant Representations - Part 2C of 4 (Non-Statutory Organisations) [REP1-023] , notwithstanding the response referenced in the preceding column, Community First will be secured through a s106 agreement, making it an obligation on the Applicant should this application for development consent be approved.
25	Community Benefits	SLAE ask LR to provide year by year financial information on all funding given to charities, voluntary	The applicant uses 1998 as a date for measuring direct contributions to front line services as this

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		<p>and community groups since 1998? The evidence found in many of the application documents (highlighted in yellow) is unwieldy, difficult to follow and doesn't appear to add up. Ideally in a table format. Similar to passenger, transport and noise layouts, easy to read, clear and transparent.</p>	<p>represents the start date of the current concession agreement, and a significant change in management of the airport. Until 2002 those contributions were solely to Luton Borough Council.</p> <p>From 2002 the applicant has additionally made direct contributions to the local charity and voluntary sector. Up until 31 March 2023, those contributions had totalled more than £178m as set out in the table below.</p> <table border="1" data-bbox="1294 743 1637 1407"> <thead> <tr> <th>Year</th> <th>£ (millions)</th> </tr> </thead> <tbody> <tr><td>2002/03</td><td>0.5</td></tr> <tr><td>2003/04</td><td>0.6</td></tr> <tr><td>2004/05</td><td>1.7</td></tr> <tr><td>2005/06</td><td>3.6</td></tr> <tr><td>2006/07</td><td>4.3</td></tr> <tr><td>2007/08</td><td>5.7</td></tr> <tr><td>2008/09</td><td>9.9</td></tr> <tr><td>2009/10</td><td>10.9</td></tr> <tr><td>2010/11</td><td>10.9</td></tr> <tr><td>2011/12</td><td>11.9</td></tr> <tr><td>2012/13</td><td>16.0</td></tr> <tr><td>2013/14</td><td>13.5</td></tr> <tr><td>2014/15</td><td>13.0</td></tr> <tr><td>2015/16</td><td>14.8</td></tr> <tr><td>2016/17</td><td>10.3</td></tr> </tbody> </table>	Year	£ (millions)	2002/03	0.5	2003/04	0.6	2004/05	1.7	2005/06	3.6	2006/07	4.3	2007/08	5.7	2008/09	9.9	2009/10	10.9	2010/11	10.9	2011/12	11.9	2012/13	16.0	2013/14	13.5	2014/15	13.0	2015/16	14.8	2016/17	10.3
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			2017/18	9.4
			2019/20	9.2
			2020/21	8.3
			2021/22	7.3
			2022/23	7.3
			Total	178.3
			Note minor inconsistencies may be observed due to rounding.	
26	Community Benefits	SLAE ask LR to clarify the sentences made in the following documents, as when read together they appear to be deliberately meant to obfuscate, confuse and not add up. Document 001117 - 8.7.1& 000611, Since 1998, £155 million to support local community investment projects, organisations and charities	Please refer to the table contents presented under ID: 25.	
27	Community Benefits	Document 000611- since 2002 we have provided more than £150 million to local charities and voluntary organisations	Please refer to the table contents presented under ID: 25.	
28	Community Benefits	Document 000611 - In 2021, our unique community investment programme had an annual budget of around £7.4 million	Please refer to the table contents presented under ID25.	
29	Community Benefits	Document 000624 - Last year, just over £9 million was allocated to our Community Funding Programme. This amounted to 53 pence per passenger in 2018/2019 being provided for community causes – 20 times more than any other major UK airport.	This was a reference to 2019/20 contributions which totalled £9.2m. When divided across the number of passengers in the year that was the equivalent of £0.53 per passenger. When comparing against similar contributions at other UK airports the next highest contributor on a per	

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			passenger basis was found to be just over £0.02 - a figure more than 20 times lower than that for London Luton Airport.
30	Community Benefits	Document 000619 - Over the last five years, this total has topped £50m. At 62p per passenger, that's more than 24 times the scale of our nearest airport competitor.	Refer to response presented under ID29.
31	Community Benefits	Document 000623 - since 2002 we have provided over £140 million to local charities and voluntary organisations in Luton and beyond through our community funding programme, including just over £9 million last year.	Refer to response presented under ID25.
32	Community Benefits	Document 001120 - 8.1.4 Over the last 20 years, the Applicant has contributed more than £175m to local community groups and charities providing vital services across neighbouring communities.	<p>See table above showing total contributions in excess of £178m to Financial Year ending 31 March 2023. The Applicant notes that £178m is 'more than £175m'.</p> <p>The Applicant further notes that with further contributions in the current year the figure is now more than £180m.</p> <p>The Applicant considers that the information provided was clear in meaning throughout, and slight differences in reporting over different periods do not detract from the point being made about the order of magnitude of the Applicants very significant Community Funding Programme.</p>

I.D	Response Topic	Comments on Written Representations (verbatim text)	Luton Rising's Response
33	Community First	<p>Fund availability 9.1.4 To ensure that benefits of airport growth are shared across the local area, 40% of the proceeds of Community First will be allocated to areas outside of the boundary of the Borough of Luton and 60% allocated for use within the boundary of the Borough of Luton. This is in recognition of the relatively higher incidence of social deprivation in the town. 10.1.1 The Applicant will appoint a charitable body independent of the Applicant to administer Community First. 10.1.2 The independent administrator will establish an awards panel to determine applications for grant funding and make awards. The independent administrator will be required to demonstrate that membership of award panels includes knowledge and understanding of matters of local interest and priority in the areas in which applications are being considered.</p>	<p>The highlighted text in this comment specifically relates to the Applicant's Community First proposals, indeed the text is taken from the Community First section of the Draft Compensation Policies Measures and Community First document [REP2-005]. The Applicant considers that the text is clear and unambiguous and it is clear that Community First is separate to the Applicant's existing community funding programme to which the previous comments in this train relate as set out at 8.1.6 of that document.</p>
34	Community First	<p>SLAE are confused with meaning of 'of local interest' as found in document 000623 paragraph 8.1.4 and (above) paragraph 10.1.2. Paragraph 9.1.4 implies that areas outside of Luton are included? Can the 'local interest' boundaries be clearly defined?</p>	<p>When considering awards for grants within the Community First zone, award panels will be convened by the independent administrator of the fund. In assembling these panels, the administrator will be required to ensure that the panel(s) include people with relevant knowledge of the locality to which applications are being considered.</p> <p>The Applicant considers that the meaning here is clear and that in conjunction with the consistent use of incorrect document references throughout</p>

I.D	Response Topic	Comments on Written Representations (verbatim text)	Luton Rising's Response
			its representations, the requestor's comments are both frivolous and vexatious.
35	General	<p>SLAE are confused with LR's response to our Relevant Representation statement regarding protecting of charitable financial benefits. LR state that this subject is outside of the scope of this application for development consent. Many supporters have championed airport expansion (letters of support, RR's and OFH's) based upon funding from Luton Airport. Why are there the many application documents on the subject if this is not part of the application?</p> <p>If this is the case than SLAE ask the Examining Authority to instruct Luton Rising to redact all topics that are outside the scope of the application to avoid wasted volunteer time researching.</p> <p>Should it be for the Examining Authority to decide which subjects are outside of the scope of this application for development consent? SLAE see this very much part of the Health and Community scope (document 001253).</p>	<p>The Applicant consider that it is clear in its documentation where it is referring to its existing Community Funding Programme and where it refers to its proposals for Community First.</p> <p>Section 8.1.6 of Draft Compensation Policies Measures and Community First [REP2-005] makes it clear that the Applicant's existing Community Funding Programme remains unaffected by and outside of, this application for development consent. It is nevertheless an important factor in setting the context for the social impact which the Applicant currently delivers and is seeking to go further with through this application.</p>
36	General	<p>Having read LR's responses to Relevant Representations it is disappointing to find in most cases that they are paraphrasing what is written in the application documents and not answering questions directly. This sums up the whole approach 'we know best' attitude to the consultation exercises since</p>	<p>Noted.</p> <p>Rather than repeating previously submitted responses, the Applicant has always looked to direct SLAE and other Interested Parties to the most relevant submission documents or responses to Relevant Representations/ Written Representations.</p>

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		2018, including accepting suggestions that made the application stronger in LR & LBC opinion.	
37	General	<p>Luton Rising use the 'good neighbour' term 28 times in 8 documents. Although this may appear to be a trivial term, it is in fact the building bricks to a caring sharing society and appears to be important to LR.</p> <p>Why does LR use the phrase good neighbours 28 times?</p> <p>Is it because LR are currently perceived as being bad neighbours or that they actually are bad neighbours? Is it LBC or the airport Operator that are bad neighbours? SLAE ask if being a "good neighbour" is part of the planning process or simply an 'application filler'?</p>	The Applicant's use of the term "good neighbour" reflects its social and community impact aspirations.
38	General	<p>LR are striving to be a good neighbour. There appears to be no definition of what constitutes a "good neighbour" in the National Planning Policy Framework (NPPF July 2021) https://www.gov.uk/government/publications/national-planning-policy-framework--2 (accessed 27/8/23). The 2020 Good Neighbour Guide report from Co-op Insurance and Neighbourhood Watch reveals that nearly all Brits think they're good neighbours. The third annual study reveals what really makes a good neighbour, https://www.coop.co.uk/insurance/hub/good-neighbour-guide (accessed 27/8/23). The headline statement reads, 'Be thoughtful, think about your</p>	This Application is compliant with current government policy.

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		neighbours and the impact you have on them in the way you act. Be friendly – but stay away from nosey tendencies. And be courteous when it comes to simple things like noise levels and parking spaces.' SLAE found no 'courtesy' shown in the LR documents.	
39	General	These things are not simple when it comes to the airport although the airport ward neighbours wish they were. In the document 000623 LLAL produced its vision for the airport, titled 'Vision for Sustainable Growth 2020-2050', to outline why LTN should make better use of its runway while being environmentally and socially responsible and a good neighbour to surrounding communities. The good neighbour theme continues throughout the document. Why do LBC, LR and the Operator so often 'talk the talk' (Good PR and Greenwash speak) and not actually 'walk the walk'. Being a Good Neighbour is, on their terms only.	Please refer to the Applicant's response to submission ID37 and ID38 (above).
40	General	In the document 001123 - Framework Travel Plan, the Toolbox of interventions and measures tables 5.1 to 5.5 indicate how LR strive to be a 'good neighbour', on their terms only. SLAE ask LR to clearly define what a 'good neighbour' means in the context of their application?	Please refer to the Applicant's response to submission ID37 and ID38 (above).
41	Surface Access	Please define the physical boundaries of a 'neighbour' as the following do not appear to be?	Please note that not all of the public transport measures, which are promoted as part of the Proposed Development will be specifically

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		<ul style="list-style-type: none"> - Work with operators to strengthen F70 and F77 bus service from Milton Keynes to the airport - introduce new service from Stevenage to the airport and Leighton Buzzard to the airport - Identify and subsidise new bus routes to areas that are not serviced by existing provision, such as Aylesbury, this will add capacity to the overall bus and coach network to benefit both passengers and staff - Work with the bus operators to introduce more frequent bus services to drop-off and pickup at offsite locations such as transit hubs at Hitchin and Stevenage etc <p>The definition of a 'neighbour' is key when reading the construction 'good neighbour' statements because there is the implication that places such as Stevenage, Hitchin, Aylesbury and Milton Keynes will be so far away that they won't hear, see, feel or smell the expansion construction activities. Are these places seen by LR as 'local'?</p>	<p>targeted at providing benefits on routes immediately surrounding the airport, due to the wider catchment area which the airport serves.</p> <p>The intention to be a good neighbour to areas in the immediate vicinity of the airport does not preclude the Applicant from seeking to improve public transport connectivity to wider areas.</p> <p>The Applicant continues to develop 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. This study is 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 [ASS-131], would be funded.</p> <p>The Applicant has engaged with Host and neighbouring authorities on the governance, source, size and scope of the fund, and the S106 agreement for securing the fund, and is developing further detail within consideration of comments raised. The fund takes the FTP's aspirations and demonstrates the airport's</p>

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			commitment to continuing to deliver. The Applicant will continue to engage as the STF's detail is developed.
42	Surface Access	<p>If LR are providing benefits for airport staff, how is that being a good neighbour when promoting staff benefits? How about the ward residents and Hertfordshire villages adjacent to the airport?</p> <ul style="list-style-type: none"> - Discounted/free/season ticket Luton DART tickets for staff - Explore employee-only bus services to poorly connected residential areas - Bring forward a scheme to provide demand-responsive buses operating in the local area to transport employees to and from the airport. This scheme can supplement service buses and will be designed to plug gaps in geographic or temporal provision. 	<p>The provision of the transport improvements mentioned will help to reduce the potential volumes of traffic using the local highway network, by promoting more sustainable methods of transport for airport employees. This is aligned with the proposed mode shift targets set out within the Transport Assessment [APP-203 to APP-206] and Framework Travel Plan [AS-131].</p>
43	Surface Access	<p>How do the following statements tie in with being a good neighbour to those in South Luton, Crawley, Wigmore wards and those living in the adjacent Hertfordshire villages?</p> <ul style="list-style-type: none"> - Upgrade buses that transfer passengers from car parks to Terminals to zero emission fleet? - Work with operators to strengthen F70 and F77 bus service from Milton Keynes to the airport - Introduce new service from Stevenage to the airport and Leighton Buzzard to the airport 	<p>Please see the above response. The provision of upgraded public transport facilities for passengers is considered key to achieving the mode shift targets, which are defined within the Transport Assessment [APP-203 to APP-206] and Framework Travel Plan [AS-131].</p>

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		<ul style="list-style-type: none"> - Identify and subsidise new bus routes to areas that are not serviced by existing provision, such as Aylesbury, this will add capacity to the overall bus and coach network to benefit both passengers and staff. - Deliver the Airport Access Road which will improve connectivity and journey time reliability for buses accessing the airport - Provide supporting infrastructure for the bus and coach station including high quality 'wayfinding' signage and priority lanes for buses, coaches and other multiple occupancy vehicles on the access and egress roads with complementary restrictions on use by private cars. - Installation of additional EV charging points for passengers. Work with the operator to conduct feasibility assessments and review of funding models for the provision of EV charging infrastructure, based on expected demand and charging - Work with taxi and private hire operators to achieve efficient transition to zero emission vehicles serving the airport - Provide Hackney cab rank at T2 forecourt - Improve forecourt operations with ability to handle demand to limit queuing and antisocial drop-off - Improve signage for vehicles between car parks, to limit circulation - Carry out feasibility study/review on Restricted Parking Zones (RPZs) 	

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44	Surface Access	<p>Will the opportunities and enhancements listed below include South Luton (east of the airport), Crawley, Wigmore ward residents and those living in the adjacent Hertfordshire villages (east of the airport)?</p> <ul style="list-style-type: none"> - Explore opportunities associated with the ongoing A505 study considering public transport options including the feasibility of Bus Rapid Transit - Explore bus enhancements, including subsidies for the east- west routes to improve service provision and passenger experience 	<p>The Surface Access Strategy (SAS) [APP-228] and Framework Travel Plan [AS-131] (FTP) name Bus and Coach as one of the Strategy's Priority Areas. There are multiple interventions associated with the priority areas, which comprise the Applicant's surface access toolbox. The longlist of interventions contain such items including 'Engage with bus operators to improve the existing routes and create new and extended routes, better connecting the airport to more places (especially east-west) and in particular urban areas and transport hubs'.</p> <p>The Applicant continues to develop 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. This study is being developed in tandem with a Sustainable Transport Fund (STF) that will set the framework around how these types of improvements, alongside the others listed out within the longlist, referenced above, would be funded.</p> <p>The Applicant has engaged with Host and neighbouring authorities on the governance, source, size and scope of the fund, and the S106 agreement for securing the STF and is developing further detail whilst addressing and considering</p>

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			<p>responses from those engaged. The STF seeks to respond the FTP's aspirations and demonstrates the airport's commitment to continuing to deliver sustainable transport improvements, which could include consideration of many of interventions listed by SLAE.</p>
45	Surface Access	<p>What if the airports neighbours are not going to the airport? How's that benefit South Luton, Crawley, Wigmore ward residents and those living in the adjacent Hertfordshire villages?</p> <ul style="list-style-type: none"> - Engage with bus operators to improve the existing routes and create new and extended routes, better connecting the airport to more places (especially east-west) and in particular urban areas and transport hubs 	<p>Please see the above response (ID44). The provision of improved public transport services, leading to greater connectivity in and around the airport would potentially benefit local residents through the provision of additional route choice.</p>
46	Surface Access	<p>In particular the following statements suggest that LR will not be good neighbours, and shift the responsibilities onto their owner LBC. There would be no need for these, if LR acted in the best interests of ward residents adjacent to the airport. LR can do this via their Councillor led board.</p> <ul style="list-style-type: none"> - Support the expansion of the residents parking zone to the north of the airport - Collaborate with local highway authorities to develop an approach to prevent airport related parking causing nuisance or inconvenience for people living in the residential areas to the north and west of the airport. The approach could also set out 	<p>It is not the intention of the Applicant to shift responsibility itself or the Airport operator to others. The Applicant is supportive of actioning improvements to sustainable transport access to and from the airport and has set out governance procedures within the FTP that demonstrates how engagement and consultation with relevant local and highway authorities will be undertaken. These processes and procedures will allow the local highway authorities to suggest and promote schemes to respond to impacts such as those suggested in the event they do occur. This will be supported both to the Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA)</p>

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		<p>interventions to deter ‘rat-running’ through minor roads east of the airport, including routes within Hertfordshire.</p>	<p>which will seek to monitor and then mitigate impacts on the highway network and the STF which will fund sustainable transport measures.</p> <p>Further detail is being developed and will be shared with relevant parties in due course.</p>
47	<p>Noise and Vibration</p> <p>Air quality</p> <p>Surface Access</p>	<p>Coming back to the '2020 Good Neighbour Guide report' from Co-op Insurance and Neighbourhood Watch, which reads, 'Be thoughtful, think about your neighbours and the impact you have on them in the way you act. Be friendly – but stay away from nosey tendencies. And be courteous when it comes to simple things like noise levels and parking spaces.'</p> <p>SLAE suggest that a good neighbour would,</p> <ul style="list-style-type: none"> - not wake their neighbours up at all hours - not pollute the ward areas around the airport - not destroy the Wigmore Valley County Wildlife site - want to help the residents around the airport - not expand their annoyance to neighbours by doubling the noise and car parking disturbance - offer more people sound proofing from aviation activities - believe adjoining ward residents when they witness the flight paths changing, rather than denying anything has changed - offer to pay for any inconvenience or damage to the ward communities 	<p>An assessment of the impact on health and communities, including an assessment of sleep disturbance, 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>The Applicant does not agree with the statement that noise will ‘double’ over time. Air noise levels (day and night) are expected to reduce over time, with and without the Proposed Development. This is based on the transition of new-generation (quieter and more efficient than the current generation) and next-generation aircraft (assumed to have a similar noise performance as the new-generation as a reasonable worst-case) into the fleet. In addition, the Noise Envelope (see Green Controlled Growth Explanatory Note [APP-217]) contains mechanisms to reduce noise contour area limits to share the noise reduction</p>

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		<ul style="list-style-type: none"> - pay for mobile noise monitoring that their airport enables, rather than charge - be respectful and respond to each individual complaint in a meaningful, genuine and empathic manner, not pass onto others - give the adjoining ward residents a day of rest, maybe once a week, on a Sunday? Allow those under the flight path to hold a normal conversation once in a while. - clean up after themselves if they created mess on other neighbours properties. LR Should fund car washes for all those who's cars get dirty from aircraft discharges underneath the flight path - go and speak to those who live nearby, not holding meetings in venues, expecting everyone to be technology wise or reading Luton newspapers - conduct regular litter picks on their land and surrounding neighbouring areas which their customers (holiday makers leave their cars) and rubbish - tow away holiday maker cars parked in neighbouring roads and store them in an airport compound and charge the holiday maker for storage - get out and about and not rely on the postman to deliver letters - not rely on lazy social media to communicate messages when SLAE can prove that not all ward residents use social media 	<p>benefits of future technological improvements in aircraft between the airport and local communities.</p> <p>The Applicant has substantially extended its noise insulation scheme, including the addition of schemes, which will provide the full cost of insulation for habitable rooms in eligible properties exposed above the daytime and night-time Significant Observed Adverse Effect Level (SOAEL). See Draft Compensation Policies Measures and Community First [AS-128] for further details.</p> <p>A commitment has been made within the Aircraft Noise Monitoring Plan of the Green Controlled Growth Framework [APP-221] to maintain and improve, as needed for the expanded airport, the array of permanent and temporary aircraft noise monitoring stations currently in place at the time of the application for development consent.</p> <p>The Applicant is aware of anecdotal evidence that fly-parking associated with airport users occurs. Measures are contained in the Framework Travel Plan [AS-131] to mitigate the effect of fly-parking. These include 'supporting the expansion of the residents parking zone to the north of the airport' and 'carrying out feasibility studies on restricted parking zones (RZs)'. Actioning of these and</p>

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		<ul style="list-style-type: none"> - go out and speak to the residents on their doorstep, who will be impacted by the works, and not let their lead contractor only talk to the Council about a community engagement plan to tick the box that says to be a better neighbour - not allow their visitors to park outside other peoples house whilst they went on holiday, they would ask first - offer to pay for car parking schemes to adjoining ward residents impacted by their visitors actions (not allow the council to charge residents). Put the cost on a passengers ticket - come around and clean up after themselves if their visitors left property behind - not pollute their neighbours property with odours, particles and other unseen materials. - not interfere and affect the air space up to 50 metres (lower stratum) above a landowner's property which impacts the residents reasonable enjoyment of the land and the structures upon it. - show more accountability to improve their perceived 'bad neighbour image' - 'provide the evidence' that they can improve their standing in the neighbourhood - have realistic trusted performance targets that adjoining ward residents can contribute to - provide portable air monitoring stations to those that request them, with no waiting lists and with online real 	<p>related measures would be governed through Steering Groups within the Airport Transport Forum, either through the TRIMMA or STF processes. Further detail is being developed and will be shared with relevant parties in due course.</p>

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		<p>time results. Monitors will be placed where they need to be and will give residents a true indication of the air pollution being breathed in.</p> <ul style="list-style-type: none"> - Being courteous and respond to letters from the Luton public as published in the Luton News (August 2021) regarding public money and the problems with the testing of DART. - Respond to adjoining ward residents suggestions, such as publishing testing plans when the DART was under trial and provide real time results (defects and all), so the taxpayer funder of the DART could see value for money 	
48	Stakeholder engagement	<p>In document 000619 - Volume 6 Consultation Report LR state, "We are committed to minimising and mitigating as far as possible, the impacts of expansion. In this consultation we will show our assessments of the impacts, and ask for feedback on our proposals for mitigating them. Public engagement on these issues will be vital in making sure that the airport can be a good neighbour to surrounding residents.", After 3 consultations, suggestions taken onboard, why then are there still an overwhelming number of Relevant Representations submitted to the PI that are opposed to the expansion?</p> <p>The whole front load process is to identify and address these before LR submit the application for PI examination. The majority clearly say no to expansion. Why have LR not listened to or heard their</p>	<p>As stated there have been three public consultation processes (two statutory) on the proposed expansion. This level of engagement has been undertaken in accordance with the requirements set out in the Planning Act 2008 and has included reviewing 3,790 responses in the 2022 Statutory Consultation alone.</p> <p>As stated in section 12.1.2 of the Consultation Report [AS-048] <i>"All of the responses received during the 2022 statutory consultation were carefully considered. The Proposed Development was updated having regard as far as possible and practicable to the feedback received."</i> Further details of the key scheme changes can be found in section 12.2 of the same document.</p>

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		good neighbours and surrounding residents prior to the application?	
49	Stakeholder engagement	Who is a 'surrounding resident'? If it's those who don't live in Breachwood Green, Wigmore, South Luton, and Crawley wards, then where are they as they don't surround the airport?	Refer to the response under ID48 (above). As detailed in section 4.4 of the Consultation Report [AS-048], the consultation was not geographically restricted to a specific area. A mailing zone was established in a defined area around the airport to notify those likely to be directly affected by the Proposed Development. Full details on what the mailing zone was based on and a map can be found in image section 4.4.2 and 4.4.3 of the same document.
50	Stakeholder engagement	SLAE ask for a document that clearly defines the loose terms used, like surrounding, communities, local, neighbours, etc. Allow the Examining Authority and all others to know what applies to whom. Is Milton Keynes local? Where are the boundaries defined?	Refer to the response under ID48 (above).
51	Stakeholder engagement	In document 000612 Volume 6 Consultation Report - 6.02 Appendix L 2019 Due Regard Tables Ref 16.1.23, 16.2.35 the LR response points to ref 16.1.4 and 16.1.5 GN2. When reading 16.1.4, the response is generic and not specific and advises to read the PEIR documents of which there are over 450. This is unreasonable. Why are LR not being very helpful?	Refer to the response under ID48 (above).

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52	Code of Construction Practice	6.1.5 provides more details, however SLAE would see any contractor when involved with either drafting or applying the CoCP, speaking directly to residents (SLAE offer to be involved) and not just the Local Planning Authority.	Section 4 of the Code of Construction Practice [APP-049] describes proposals and requirements for community relations and stakeholder engagement during construction.
53	General	<p>SLAE are also confused as to what a 'Near Neighbour Fund' (document 001114 paragraph 8.2010), a 'best possible neighbour' (document 000941), 'neighbouring counties' (document 000831 paragraph 2.1.15), 'local neighbourhood area' (document 000815, paragraph 8.12.16), 'a number of other neighbouring airports' (document 001117, paragraph 6.3.31), local neighbourhood/Luton (document 001108, paragraph 13.9.7), 'local businesses and neighbours' (document 001536, paragraph titled Demolition / construction conditions (07), and finally the difference between 'neighbouring local authorities' (document 000815, paragraph 6.4.5) and 'neighbouring authorities' (document 000977, paragraph 4.3.7).</p> <p>Please clearly define by what 'neighbour' means, either in a reference or the exact ward boundaries or locations?</p>	The document referencing system used is not recognised. However, the Applicant believes that the use of the word 'neighbour' to be plain English and understandable in each context.
54	Open Space	SLAE feel that the 'Open Spaces' topic and documents are severely lacking in any real depth and accuracy and ask the Examining Authority to ask LR to revisit or withdraw this evidence. As a result,	Open Space is defined in the introduction section C1 of Appendix C Open Space Assessment [APP-197] . It is clearly described and considered in application documents to sufficient detail to allow understanding of baseline, proposals,

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		unfortunately this Written Representation is a long read.	effects and mitigation at the planning and consenting stages of an infrastructure project.
55	Open Space	SLAE note that the Open Spaces survey was undertaken to collect key information on open spaces to inform the health and community impact assessment and we submit evidence further in this document. SLAE will also be submitting a separate Written Representation in regards to Wigmore Valley Park for a future Written Representation deadline.	Noted.
56	General	SLAE reject LR's Relevant Representation response on the word 'local'. The Applicant does not have control over how the term 'local' is used by third parties but is of the view that it has defined clear and robust study areas for the purposes of the assessments submitted in support of the application. On this basis, the Applicant does not agree to removing the word 'local' from the application documents.	Noted.
57	Open Space	SLAE note in Document 001108 paragraph 13.9.26. The replacement open space would be located to be accessible to the adjoining communities it serves. Adjoining communities is clearly understood in this paragraph as adjoining communities and will use this term across all Written Responses and other types of responses from now on. SLAE ask LR to make to apply this clear explanation to all documents with a simple addition to the Glossaries.	This amendment is not considered necessary to understand the application documents.

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58	General	<p>SLAE now understands the word 'local' to represent the populations living in the wards adjoining the airport and the Hertfordshire villages closest to the airport, such as Breachwood Green and the houses in-between. The use of the word 'local', is prolific throughout the documents and appears to support the applicants narrative and locations of their choosing. Examples, document 000848 c7.1.3 and document 001108 paragraph 13.9.26. uses the word 'adjoining' which gives clear and understood meaning and sets the precedent for all other documents.</p>	Noted.
59	Open space and Wigmore Valley Park	<p>SLAE note that in document 000719 (table 2.1) the Wigmore Valley Park quality assessment record sheet concludes that the Overall significance is 'not significant' and when comparing against the (table 2.3) Raynham Way Recreation Ground quality assessment record sheet which has an Overall significance, of 'significant', then something is not quite right and amiss. SLAE think that the assessments have got muddled, can LR conform? The assessments are also not based upon a like for like.</p> <p>For example look at the destruction that LBC and LR will do to the current Wigmore Valley Park but not Raynham Way. SLAE estimate at least 16.5 million living creatures reside on the County Wildlife Site (CWS) at Wigmore Valley park (WVP) alone, this includes at least 30 different species of trees (with each tree supporting between 21 to 284 insect</p>	<p>The quality assessment record sheets in Appendix 13.2 Open Space Survey Results of the Environmental Statement (ES) [APP-084] are correct. The overall significance in the Wigmore Valley Park quality assessment record sheet states 'minor beneficial, not significant' – this is due to the replacement parkland being provided as part of the embedded mitigation. The impact of the Proposed Development on Wigmore Valley Park is further explained in Section 13.9 of Chapter 13 Health and Community of the ES [APP-039].</p> <p>In relation to Raynham Way Recreation Ground, the quality assessment record sheet identifies the potential for a significant moderate adverse in-combination effect. However, following mitigation measures, there was no resultant residual</p>

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		<p>species). LR quote a minor beneficial outcome as there is replacement parkland, whilst Raynham Way has a moderate adverse in-combination effect. Observe and maybe read the number of Environment Statement documents in section 5.02 to understand the scope of the destruction expansion will cause.</p> <p>SLAE request the Examining Authority to throw out all Open Space documents if LR have not been able to appreciate and understand the difference.</p> <p>This undermines the 'quality ' statement and also has an impact on all the health documents that use Open Spaces as a justification.</p>	<p>significant noise effect on Raynham Way Recreation Ground and therefore no significant in-combination effect. The significant community effects are identified in Section 13.11 of Chapter 13 Health and Community of the ES [APP-039].</p>
60	Open space and Wigmore Valley Park	<p>SLAE insist that there should be three assessments to allow the Examining Authority to reach a proper outcome. One based on the current Wigmore Valley Park footprint which includes the CWS, one on the future Wigmore Valley park footprint and the existing Raynham Way footprint.</p> <p>This makes more common sense and would not undermine the survey and document results. Adjoining ward residents could then see a logic and give those that know, use and love both Raynham Way and Wigmore Valley Parks more faith in the Open Space assessments.</p>	<p>The Applicant believes that the assessment of the effects of the Proposed Development on Wigmore Valley Park reported in the Environmental Statement is robust and adequate.</p>
61	Open space and Wigmore Valley Park	<p>a) In document 000719 SLAE note the Open Space Survey Results :- a) The surveys favoured school term time in a ratio of nearly 3:1 . This can slew the</p>	<p>Appendix 13.1 Open Space Survey Methodology of the Environmental Statement (ES) [APP-083] in Section 2.2 acknowledges that patterns of usage can vary during the day, week</p>

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		<p>results, particularly if you are trying to gauge usage and talk to as many people as possible</p>	<p>and season. Paragraph 2.2.4 confirms that a series of user count surveys were undertaken throughout 2018 and 2019 to obtain a representative data sample of usage. The surveys were scheduled to cover different seasons, inclusive of school term-time, holiday periods, weekdays and weekends. Surveys were undertaken throughout the duration of daylight hours.</p> <p>The Applicant considers the survey methodology and the surveys undertaken to be robust and appropriate. The survey methodology was shared with Luton Borough Council and feedback incorporated in advance of undertaking the surveys.</p>
62	Open space and Wigmore Valley Park	<p>b) Paragraph 2.1.36 Of the total 155 users surveyed, 72 reported they currently experience no impacts of the airport when using the park. Of those users who reported that they experience impacts of the airport when visiting Wigmore Valley Park: we would dispute this figure. According to our reckoning 97 experienced impact from the airport when visiting the site.</p>	<p>Appendix 13.2 Open Space Survey Results of the Environmental Statement (ES) [APP-084] at paragraph 2.1.36 confirms that of the total 155 users surveyed, 72 reported they currently experience no impacts of the airport when using the park. It is unclear where SLAE have got the figure of 97 from.</p>
63	Open space and Wigmore Valley Park	<p>c) SLAE ask that there appears to be no reference to the wind direction on the days the survey s were taken, or if planes were landing or taking off in the direction of the park? This can impact a visitors experience.</p>	<p>Appendix 13.1 Open Space Survey Methodology of the Environmental Statement (ES) [APP-083] at paragraph 2.3.2 states that the purpose of undertaking user questionnaires was to <i>"...obtain more robust data and ascertain the sensitivity of community resources and receptors,</i></p>

I.D	Response Topic	Comments on Written Representations (verbatim text)	Luton Rising's Response
			<p><i>and to understand the patterns of usage...</i>" The user questionnaires are not intended to be detailed noise assessments. Therefore, no commentary on wind direction is provided.</p> <p>The Applicant considers the survey methodology and the surveys undertaken to be robust and appropriate. The survey methodology was shared with Luton Borough Council and feedback incorporated in advance of undertaking the surveys.</p>
64	Open space and Wigmore Valley Park	d) There is no reference to what the flights during the survey, the plane types, or if it was quiet during the survey periods?	<p>Appendix 13.1 Open Space Survey Methodology of the Environmental Statement (ES) [APP-083] at paragraph 2.3.2 states that the purpose of undertaking user questionnaires was to <i>"...obtain more robust data and ascertain the sensitivity of community resources and receptors, and to understand the patterns of usage..."</i> The user questionnaires are not intended to be detailed noise assessments. Therefore, no commentary on flights or plane types is provided.</p> <p>The Applicant considers the survey methodology and the surveys undertaken to be robust and appropriate. The survey methodology was shared with Luton Borough Council and feedback incorporated in advance of undertaking the surveys.</p>

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65	Open space and Wigmore Valley Park	e) Paragraph 2.1.39 Of the total 155 users surveyed, 29 stated that an increase in flight movements would result in them ceasing to visit Wigmore Valley Park. We would dispute this figure. According to our reckoning 68 would visit less.	Appendix 13.2 Open Space Survey Results of the Environmental Statement (ES) [APP-084] at paragraph 2.1.39 confirms that of the total 155 users surveyed, 29 stated that an increase in flight movements would result in them ceasing to visit Wigmore Valley Park. It is unclear where SLAE have got the figure of 68 from.
66	Health and Community	f) Paragraph 2.1.45 Ten users stated that Stockwood Park is a comparable open space to Wigmore Valley Park. Of these ten users, two stated that they use Stockwood Park regularly; Note Stockwood Park is plagued with noise and is directly under the flight path. No health benefits and the Rugby club could be impacted (read in conjunction with 20039680 WR evidence - LTFC).	Noted.
67	Open space and Wigmore Valley Park	g) In summary there are more positive comments about Wigmore Valley Park than there are negative comments as it stands at the moment. Moreover this is despite LBC allowing the park to run down with a lack of investment (11/09/2023, LBC unable to answer SLAE's FOI request for evidence, letter attached at the bottom of this WR). One only has to look at the current children's play equipment and the derelict changing rooms in the pavilion.	Noted.
68	Open space and Wigmore Valley Park	Document 000848 Open Space Assessment:- i) C.3.1.2 Paragraph 99 indicates that existing open space should not be built on unless "...the loss resulting from the proposed development would be	The Wigmore Valley Park replacement open space meets this criteria as discussed in the Open Space Assessment in Appendix C Open Space

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		<p>replaced by equivalent or better provision in terms of quantity and quality in a suitable location". Do the new proposals meet this criteria as document 000848 C6.1.7 focuses on the establishment of natural habitats, not the replacement?</p>	<p>Assessment of the Planning Statement [APP-197]. Further details on the impact of the Proposed Development on Wigmore Valley Park is set out in Section 13.9 of Chapter 13 Health and Community of the ES [AS-078].</p>
69	Heath and Community	<p>C.3.1.2 Paragraph 130 seeks to ensure that developments create places which "...promote health and well-being, with a high standard of amenity for existing and future users". Is an increase in noise, aviation fuel and car emissions conducive in promoting health and well-being?</p>	<p>Chapter 7 Air Quality [APP-034] of the Environmental Statement (ES) has provided an assessment of air quality following the methodology agreed through EIA Scoping and with local authorities in the air quality Technical Working Group. No significant impacts are predicted to occur. An assessment of the health impacts of air quality was undertaken and is reported in Chapter 13 Health and Community of the ES [APP-039]. This assessment concluded that operational air emissions from the Proposed Development would have no significant impact on health.</p> <p>Chapter 13 Health and Community of the ES [APP-039] identifies a moderate adverse effect on health on the population exposed to aircraft noise (reducing to minor adverse through the provision of noise insulation, where accepted by qualifying residents) from the Proposed Development and a minor (not significant) adverse effect on health for users of Wigmore Valley Park, taking into account</p>

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			the likely effect on enjoyment and use of outdoor space.
70	Open space and Wigmore Valley Park	C4.1.3 connectivity to the existing parkland areas to be retained, and to reposition it closer to the community it serves. This statement is untrue. The park is either equal to or further away from the community, SALE suggest comparing current, GHP and after Phase 2 maps to visually see the difference.	The provision of replacement open space to the east of Wigmore Valley Park would retain the existing main entrance into the park and upgrade connections to the surrounding rights of way network.
71	Open space and Wigmore Valley Park	Fig C5.1 The drawing does not show neither the car park for the park nor children's playground (Covered in 20039680 WR - PSCP Evidence & Evidence v0.1).	The car park is not open space and is therefore not highlighted but part of the background in its existing location. The children's playground is shown in the figure, but not in detail or labelled as it is not required to communicate the purposes of the figure at that scale.
72	Open space and Wigmore Valley Park	C6.1.8 Vague reference to recreational facilities . Surely thought should be given at this stage and indicates an emphasis more on the airport expansion than new open space.	The application for development consent is based on outline design typically generated to inform planning consent. The text goes on to say ' <i>the specific nature of which is still to be determined, but could potentially include additional facilities for picnics , play equipment, gym equipment or trim-trail measures.</i> ' Detailed design is a Requirement (9) of the draft DCO [REP2-003] and would be undertaken after consent is granted before construction.
73	Open space and Wigmore Valley Park	Document 000718 Open Space Survey Methodology :- i) Paragraph 2.3.8 SLAE note the large number of people that were not surveyed. SLAE question that the results are representative? Particularly when	Paragraph 2.3.8 of Appendix 13.1 Open Space Survey Methodology of the Environmental Statement (ES) [APP-083] sets out the limitations of the data including robust reasons why some

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		<p>considering the number of people that quoted the park in their Relevant Representations.</p>	<p>uses of Wigmore Valley Park were not surveyed. A large number of users were surveyed with 155 user questionnaires undertaken. The Applicant considers the survey to be representative and robust.</p>
74	Open space and Wigmore Valley Park	<p>ii) The survey did not mention the value of the District or County Wildlife Site in questions and yet this is a key feature of the park.</p>	<p>The Applicant considers the survey methodology and survey questions to be robust and appropriate. The survey methodology was shared with Luton Borough Council and feedback incorporated in advance of undertaking the surveys.</p>
75	Open space and Wigmore Valley Park	<p>iii) With 155 surveys recorded over 18 half days. SLAE make that around 8.6 surveys a half day. What else were they doing with their time? How many survey consultants took part? How many hours does a consultant AM and PM day consist of?</p>	<p>The Applicant considers the approach to the surveys to be robust and appropriate.</p>
76	Open space and Wigmore Valley Park	<p>SLAE note that maps are not consistent, The Bridle path that goes to the footpath in the farmers field is not shown on 000810 Provision of Open Space map.</p>	<p>The Strategic Landscape Masterplan [APP-172] identifies the existing network of Public Rights of Way (PRoW) within the replacement open space.</p> <p>It also shows the new PRoWs (footpaths and bridleways) planned as part of the Proposed Development and how these tie in with the existing.</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.</p>

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77	Open space and Wigmore Valley Park	Please clarify why the anticipation about changing the character of the park, unless that is going to change after the DCO is granted?	The changes in character, from existing to replacement open space, as a result of the Proposed Development are described in the Strategic Landscape Masterplan [APP-172] .
78	Health and Community	SLAE note that the anticipated changes will impact the Health and community impact assessment and there is a health determinant.	The health effects of the Proposed Development have been assessed and reported in Chapter 13 Health and Community of the ES [APP-039] . It is unclear what health determinant is being referred to in this comment.
79	Open space and Wigmore Valley Park	SLAE understand that the replacement open space for Wigmore Valley Park will be larger as this expands onto agricultural land before Darley Lane and Winch Hill. However, overall the countryside land size will be reduced as much of the current Wigmore Valley park and County Wildlife space will be taken away for car parks and an airport terminal. If LR were returning Brownfield land to countryside then LR could proudly boast that they are making more green / open / county land available. Statements otherwise, suggest 'Green washing'.	The term 'Open Space' in planning terms is defined in the introduction of Appendix C of the Planning Statement [APP-197] " <i>Open space is defined in the Town and Country Planning Act 1990 (Ref 1.2) as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground</i> ". It does not apply to agricultural land or 'countryside'. The Replacement Open Space will be designated as Open Space and in addition to the remaining part of Wigmore Valley Park will provide a greater area of Open Space than is currently available.
80	Landscape and visual	SLAE have the following questions, document 000669, Chapter 14 Landscape and Visual. Was tranquillity was taken into account at each receptor?	Tranquillity is a perceptual or aesthetic quality that contributes to landscape value. Tranquillity was considered for the relevant Landscape receptors as detailed in 5.02 Environmental Statement - Appendix 14.4 - Detailed Landscape Assessment.

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81	Landscape and visual	Where residents living in each of those receptors were involved?	No, residents were not, and are not needed to be involved in the assessment, which was undertaken by competent experts as required by the EIA Regulations.
82	Landscape and visual	Who provided the professional judgements and did they liaise with the ward or village residents?	The Applicant appointed competent experts to undertake the assessment, the role, organisation and qualifications of these experts are described under the heading 'Competent Experts' at the end of each assessment. No, residents were not, and are not needed to be involved in the assessment, which was undertaken by competent experts as required by the EIA Regulations.
83	Landscape and visual	Can the evidence of the application of professional judgement be provided?	Chapter 14 [AS-079] and associated appendices provide the evidence that this assessment employed professionals applying their expert judgment in their production, analysis, authoring and justification for conclusions reached as described throughout the documents.
84	Landscape and visual	Likewise can LR identify the people that are likely to be affected by the Proposed Development as described in Document 000669 paragraph 14.5.12?	As described in paragraph 14.5.12 under the section heading Baseline Methodology <i>"This step involves identifying the components of the landscape and the people that are likely to be affected by the Proposed Development. These are defined as landscape receptors and visual receptors respectively and include the physical landscape, aesthetic or perceptual qualities of the landscape, the character of the landscape and the views experienced by people."</i> Therefore,

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			following this step those landscape and visual receptors are identified in the baseline section 14.7 of the same document [AS-079] with further detailed cross referred to where applicable.
85	Landscape and visual	Document 000669 Paragraph 14.6.2 starts with an assumption, SLAE ask for this to be amended to 'will' and request that all ambiguous words are amended for the avoidance of doubt.	It is entirely reasonable to make and declare assumptions when undertaking assessments of future actions and works.
86	Landscape and visual	Do LR share the same view as CPRE as written in paragraph document 000669 14.7.44 Tranquillity mapping prepared by the Council for the Protection of Rural England (CPRE) (Ref. 14.33) that the area immediately surrounding the airport to be amongst the least tranquil of places within the United Kingdom?	The reported findings are from the cross-referenced report from Council for the Protection of Rural England. It is not for the Applicant to comment on relative tranquillity across the UK. Paragraphs 14.7.45 and 14.7.46 go on to provide the assessors consideration of tranquillity in the study area.
87	Landscape and visual	Could LR identify those exact areas as considered by the assessors to be of a moderate tranquillity? This would help adjoining communities experience some tranquillity.	Paragraph 14.7.45 states " <i>It is considered by the assessors that a sense of moderate tranquillity can be experienced in <u>some locations immediately to the east and south of the airport between aircraft movements.</u></i> " So, in the areas immediately to the east and south of the airport between aircraft movements.
88	Landscape and visual	LR could help it's 'good neighbour' intentions by publishing the times and moderate tranquillity locations immediately to the east and south of the airport between aircraft movements? It would be very useful if perhaps LR or the operator could design a web site that on a given day identifies	Noted.

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		<p>the areas of tranquillity between flights (similar to the times of the sea tides).</p>	
89	Landscape and visual	<p>SALE asked members of two adjoining ward resident Facebook sites the following question, 'Have those of you that walk in the park and the surrounding footpaths read 5.01 Chapter 14: Landscape and Visual of the Expansion documents?' '14.7.46 It is considered additionally that although areas beneath flight paths, in proximity to urban centres and in proximity to the M1 corridor do experience diminished levels of tranquillity, levels throughout the Study Area generally increase with distance from the airport and rise further within the more rural parts of the Chilterns AONB.</p> <p>' Can we ask you if, 'diminished' is the right word that describes your level of tranquillity? Geraldine Hogg, Are they joking??</p> <p>Sue Stalham, That must be the updated version of when we were told to get in a car to visit a park. I'd say our tranquillity has been sold out for greed! Linda Smith, I live in Strathmore avenue , directly under the flightpath and my level of tranquillity is already zero.</p> <p>Caroline Clancy, I live in West Hill and definitely not tranquil can't have my bedroom windows open at night . Have to pause tv, have to stop conversation till the planes have passed over. Jane Spendley, Is that supposed to encourage us to allow LLA to expand and 'diminish' our tranquillity. The airport is intrusive,</p>	<p>Diminished, meaning made smaller or less, describes that fact that it is accepted that tranquillity is already reduced in these areas.</p>

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		<p>polluting, invasive and greedy. It has never been tranquil here since COVID was over. It is insulting Jan Ingham, An appalling use of language.</p> <p>Maureen Gugerly, 'Tranquil' I don't think so! Very noisy at night. We have to stop conversations when outside and also when windows open. You also have to pause the television as planes go over. When we first moved into West Hill Road 42 years ago it was much quieter and most planes took off or landed flying over Capability Green (I worked there so I know) but it seems to me that the plane's flight path is now much lower and constantly over residential areas and parks.</p> <p>SALE ask, what LR means by 'diminished'? I'm not sure that residents of Breachwood Green and South Luton under the flight path would agree that diminished is the right word, would you? How much was a 'Competent Expert' paid to write that?</p>	
90	Cumulative effects	<p>SLAE ask the Competent Experts (or those that have provided professional judgement) to provide the evidence that supports the climate change impacts of document 000848 Table 14.8: Landscape and visual in-combination climate change impacts.</p>	<p>The methodology used to assess the in-combination climate change impacts and effects is described in section 9.5 of Chapter 9 of the Environmental Statement [APP-035], including the step by step application of defined criteria, and and conclusion reached reported in Table 14.8 as referred to.</p>
91	Climate change	<p>Also comment on the lack of the threat of fires caused by the changing climate, as recently experienced</p>	<p>The increase in fire risk on hot days is addressed in section 9.9 of Chapter 9 Climate change Resilience of the ES [APP-038].</p>

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		globally. Or is there an assumption it won't happen here?	
92	Open space and Wigmore Valley Park	Document 000718, Could LR define what a 'Community Resource' is?	The definition of community resource is provided in paragraph 13.5.10 of Chapter 13 Health and Community of the ES [APP-039] .
93	Open space and Wigmore Valley Park	In paragraph 2.1.1 or document 000718, SLAE ask what an informed judgement consists of and how can quality assessments be made via desk studies and not by engaging with ward residents directly with good expert knowledge of the areas assessed?	Section 13.4 of Chapter 13 Health and Community of the ES [APP-039] details the stakeholder engagement that was undertaken as part of the Health and Community assessment.
94	Open space and Wigmore Valley Park	Could the evidence of the quality assessments from seven locations in document 000718 paragraph 2.1.4 be made available for comment?	Appendix 13.1 Open Space Survey Methodology of the Environmental Statement (ES) [APP-083] explains that quality assessment locations were those locations considered most likely to have significant direct or in-combination effects from the Proposed Development. Given that there were no significant residual effects reported at any of the remaining seven locations, these quality assessments were not included in Appendix 13.2 Open Space Survey Results of the Environmental Statement (ES) [APP-084] .
95	Open space and Wigmore Valley Park	In document 000848, paragraph C1.1.3 SLAE understand the word 'replace' to mean 'like for like' and that's not what this airport expansion is doing?	The same paragraph referred to, and the document it is part of, go on to explain the requirements set out in policy for replacement of open space impacted by development, including <i>"...replace open space affected by the proposals with a facility that is comparable in terms of size,</i>

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			<i>usefulness, attractiveness, quality and accessibility as may be lost</i> , not 'like for like'.
96	Open space and Wigmore Valley Park	The statement in paragraph C4.1.1 is not correct, it is missing out the County Wildlife Site. This is shoddy work and insult to those passionate to keep the CWS.	Paragraph C4.1.1 discusses land use as part of the Open Space Assessment reported in Appendix C to the Planning Statement [APP-197] , the whole document is dedicated to Open Space as defined under the planning regime discussed in that document. The paragraph is correct and discusses the habitats and use in the area, but the designation as a County Wildlife Site is not relevant in this context. The County Wildlife Site and its biodiversity value, and the impact of the Proposed Development, are considered in Chapter 8 Biodiversity of the Environmental Statement [AS-027] .
97	Planning	<p>C4.1.2 is again incorrect and SLAE have already pointed this out in previous Relevant and Written Representations. Now that Green Horizons Park has a reduced footprint there is no need to build it on Wigmore Valley Park and therefore the Airport Access Road is not needed and the expansion can be built on Brownfield land to the west. (Reference to 20039680 Green Horizons Park Written Representation)</p> <p>In May 2021, ex LR CEO Graham Olver said that the revised expansion plans would save a billion pounds, by moving Green Horizons Park to Brownfield land</p>	Paragraph C4.1.2 of Appendix C of the Planning Statement states " <i>The existing open space at WVP would be impacted by landfill remediation works, which are unavoidable and necessary to enable the Proposed Development.</i> " This is correct, the construction of the Proposed Development does require work in the landfill, Wigmore Valley Park, and the Airport Access Road to service the new Terminal 2 and other infrastructure to the east and northeast of the existing terminal.

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		west of the airport the proposal would save a further billion pounds and a shorter AAR.	With regards the suggested statement by the ex-Luton Rising CEO, the Applicant has been requested to consider this point and will provide an appropriate response at Deadline 4.
98	Open space and Wigmore Valley Park	C6.1.3 The design of the Proposed Development retains the existing entrance and eastern part of WVP and integrates it into a new area of Replacement Open Space, to be provided over a larger area to the east of the existing park This paragraph proves that residents to the west of the park will be further way.	The replacement open space will be located further from the residential area of Wigmore than the existing park area. This is clearly stated in Chapter 4 The Proposed Development [APP-031] and Figure 4.1 [APP-145] of the ES and has been taken into account in the assessment reported in Chapter 13 Health and Community of the ES [APP-039] .
99	Cultural Heritage	SLAE would like to ask why LR decided to use the guidance and proposed methodology on the impact of noise on the setting and tranquillity of heritage and cultural receptors commissioned by English Heritage (now Historic England) (Ref. 16.66). as found in paragraph 16.5.77 of document 001060 when there are more recent and relevant references that could be used, such as the South Downs National Park Tranquillity Study of 2017 (https://www.southdowns.gov.uk/wp-content/uploads/2017/03/13-04-17-South-DownsNational-Park-Tranquillity-Study.pdf accessed 31/08/23).	The methodology referred to in Chapter 16 of the Environmental Statement [REP1-003] and further described and used in Chapter 10: Cultural Heritage [AS-077] is specific research undertaken for Historic England regarding the potential impact of aviation noise on heritage assets which is entirely relevant to the issue being considered. The methodology for assessing impacts to setting from noise is based primarily on guidance from Historic England, and supplemented by guidance relating to impacts from aviation noise commissioned by English Heritage. This approach is in line with current guidance and best practice and was agreed with the statutory consultees, including Historic England, as documented in Table 10.6:

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			<p>Stakeholder Engagement in Chapter 10 [AS-077].</p> <p>The reference provided is a report of a tranquillity study on the South Downs National Park which states at paragraph 1.5 <i>"The tranquillity scores apply specifically for the South Downs National Park; they are therefore to be considered relative to the National Park area only. They are not intended to be comparative or considered in relation to Tranquillity scores for other National Parks or other areas of the country."</i>; and is therefore not relevant to the Proposed Development or assessment of effects.</p>
100	Planning and Open Space	Document 001114 Planning Statement, paragraph 8.12.21. Overall, the impact of the closure and re-provision of Wigmore Valley Park represents a minor beneficial impact for users of the park. The Open Space Assessment in Appendix C provides a full discussion of this matter. SLAE disagree and refer to the statements made in this written representation.	As stated in the Open Space Assessment [APP-197] the replacement open space would be delivered in assessment Phase 1, prior to the loss of the existing open space. There is anticipated to be change to the character of the Wigmore Valley Park. However, its accessibility and function will not change.
101	Health and Community	8.12.23 Key mitigation measures relevant to health and community effects are summarised in Section 13.8 of Chapter 13 of the ES [TR020001/APP/5.01]. These include measures to reduce noise impacts notably to establish a noise envelope (GCG Appendix C [TR020001/APP/7.08]), provision of replacement open space (Appendix C of this document),	The provision of open space to replace land lost from Wigmore Valley Park forms part of the Proposed Development as described in Section 4.9 of Chapter 4 The Proposed Development of the ES [APP-031] .

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		<p>landscape management at Wigmore Valley Park and where practicable, the Proposed Development would be designed to avoid or reduce adverse effects on other road and public transport users through measures that are targeted at encouraging greater use of those modes of travel that have less environmental impact (e.g. extending the Luton DART). SLAE are totally confused, there appears to be no 'provision of replacement open space' in either (GCG Appendix C [TR020001/APP/7.08] or (Appendix C of this document). Another example of confusion, distraction and time wasting to the reader.</p>	
102	Open space and Wigmore Valley Park	<p>In document 001062 paragraph 4.1.1 The objective of Assessment Phase 1 would be to maximise the capacity of the existing T1, provision of additional aircraft stands, undertake environmental mitigation and the re-provision of public open space. The first objective would be met by enhancing T1, increasing the number of aircraft stands and increasing the number of parking spaces. The second objective would be met by extending the existing Wigmore Valley Park. No thought to the 16.5 million creatures living in the CWS sacrificed for increasing car parking spaces.</p>	<p>Chapter 3 Alternatives and Design Evolution of the ES [AS-026] sets out the reasonable alternatives considered by the Applicant as part of the process in establishing the Proposed Development. It describes how the preferred option was selected over alternatives and what considerations were taken into account during the design evolution, including environmental or other issues raised.</p>
103	Open space and Wigmore Valley Park	<p>In document 001122 the Executive statement states in the table directly under the 4th paragraph, that for the Age group – Older People (65+), 3rd paragraph, 'No disproportionate or differential effects have been identified during construction for older people</p>	<p>Construction and operation are two different phases of the Proposed Development and therefore effects have been assessed for both phases and outcomes stated as such.</p>

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		accessing public open space. Replacement Open Space at Wigmore Valley Park will result in beneficial differential effects on older people during operation. Can LR explain or re-word this paragraph, the meaning is not clear? It appears to contradict itself, 'during construction' or 'during operation'?	
104	Equality Impact Assessment	Please explain the different impacts that apply to older people in paragraph 7.4.10 Older people can be differentially impacted due to changes in access to open space.	Older people may be differentially affected from access to open space as they may find it more difficult to access open space compared to other groups and therefore access to open space for older people has been included in the assessment.
105	Equality Impact Assessment	SLAE would like to bring the adequacy of the paragraphs relating to Pregnant people to the attention of the Examining Authority, and consider the paragraph 1.3.1. An EqlA considers the impact of a proposal on relevant groups who share characteristics which are protected under the Act, and informs decision-making based on likely effects on these groups. The protected characteristics within 1.3. What is an Equality Impact Assessment?	<p>Public sector bodies (and those who exercise public functions) have obligations under the Public Sector Equality Duty (PSED), set out in the Equality Act 2010.</p> <p>Section 149 of the Equality Act sets out the Public Sector Equality Duty (PSED). This requires that public bodies have due regard to the need to:</p> <ul style="list-style-type: none"> • Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; • Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and

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			<ul style="list-style-type: none"> • Foster good relations between persons who share a relevant protected characteristic and persons who do not share it <p>There are eight 'protected characteristics' that are relevant to the PSED. These are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.</p> <p>An EqIA assesses whether a project could have the potential to result in disproportionate or differential equality effects for groups of people with protected characteristics:</p> <ul style="list-style-type: none"> • Disproportionate effects arise when an impact has a proportionately greater effect on people with protected characteristics than the rest of the population. • Differential effects arise, where people with protected characteristics could be affected differently from the rest of the population, due to a particular need or sensitivity.
106	Equality Impact Assessment Open Space	Although the document covers noise it doesn't cover other impacts like dust, odours, and other pollutants that could impact Pregnant individuals and SLAE do not agree with the 'neutral effect' outcome in paragraph 7.7.6, not that pregnant people only stick to PRowS whether they are pushing a wheelchair or	The Equality Impact Assessment (EqIA) has been undertaken at a proportionate scale and all mitigation that is proposed is taken into account when making assessment conclusions.

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		not. Replacement parkland will be provided doesn't cut it in table 10.1 Summary and mitigation.	As stated in Chapter 13 Health and Community of the ES [AS-078] there would be no adverse effects on open access land as a result of the Proposed Development. Qualitative studies in the same chapter were undertaken and informed the proposals for re-provision to ensure that the replacement open space is of equivalent or better provision in terms of size, usefulness, attractiveness, quality, and accessibility.
107	Equality Impact Assessment	<p>Paragraph 4.4.17 Pregnant individuals can be more susceptible to experience negative effects associated with development and the built environment. For example, Pregnant women can be more susceptible to poor air quality, which can have a negative impact on birth weight.</p> <p>Paragraph 4.4.17 provides evidence that LR should have considered all impacts on pregnant individuals which SLAE find severely lacking.</p>	The Equality Impact Assessment (EqIA) has assessed both differential and disproportionate effects across all Protected Characteristic Groups including Pregnancy and Maternity. The assessment has not concluded any differential or disproportionate effects in relation to air quality for this group.
108	Open space and Wigmore Valley Park	<p>13.9.27 It is envisaged that the replacement open space would deliver additional opportunities for unstructured or natural play and would also include some additional recreational facilities, the specific nature of which is still to be determined at detailed design stage but could potentially include additional picnicking facilities, play equipment, gym equipment or trim-trail measures.</p> <p>Why wasn't additional picnicking facilities, play equipment, gym equipment or trim-trail measures</p>	The Applicant cannot comment on previous levels of investment in facilities at Wigmore Valley Park by Luton Borough Council.

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		done before, why wait for the DCO. Provides evidence that the council have not invested in the park. Children and possibly older people already engage in unstructured or natural play activities, (example, hide and seek and variations, making camps and so the opportunities for unstructured or natural play already exists). This paragraph is a prime example of an application filler and wasting readers time!	
109	Health and community	Simple, don't take the existing shade away from the park. Create more shade provision, put up signs warning the population, LR may consider, but that doesn't mean that people using the park requiring more shade won't use the park, so plant more trees. More application filler!	Proposals for planting in the replacement open space, including areas of broadleaved woodland, are set out in Chapter 14 Landscape and Visual [APP-040] and Figures 14.9 – 14.13 [AS-102] of the ES.
110	Open space and Wigmore Valley Park	If the benefits are not realised and it's not worked out how it should after delivery of the Phase 1 Open Spaces, what happens? Carry on? or stop?	The replacement open space and habitats described as part of Phase 1 will be provided during Phase 1 and will therefore be in place before Phase 2a works commence or any decision not to proceed with Phase 2a works. Part of the existing park, the centre west, will have been impacted during Phase 1, the remaining southern part of the existing park would not be impacted if Phase 2a as not delivered. Having provided additional open space and habitats already the Applicant may review proposals if Phase 2 was not continued, this could include continued public access being retained to existing and new areas, or a review of proposals, depending on the

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			<p>circumstances under which Phase 2 was not progressed.</p>
111	<p>Open space and Wigmore Valley Park</p>	<p>What happens if Phase 2a and 2b are not delivered, due to one reason or other? Is the park left in limbo? In that scenario SLAE ask the Examining Authority to add a clause in any DCO decision that makes LR, LBC to restore the park back as it was before Phase 1, as this DCO application covers three phases and it implies it's 'all or nothing'.</p>	<p>Further to the response above, having provided appropriate open space and habitats in Phase 1 to mitigate for the partial loss of Wigmore Valley Park across all assessment Phases, it is not considered appropriate to require the partial restoration of impacted parts of the existing park as that provided by the Proposed Development would be established and available to the public. The situation would be reviewed if circumstances arose that resulted in Phase 2a not being delivered as expected. However, the Applicant would retain powers granted by the DCO.</p>
112	<p>Open space and Wigmore Valley Park</p>	<p>Can LR explain what a mosaic of woodland is?</p>	<p>The paragraph quoted in the SLAE response reads - <i>3.2.3 This provision of open space would contain a landscaped mosaic of woodland, both retained, enhanced and newly planted, retained and restored hedgerows, scrub, ornamental planting (within urban realm areas throughout the Proposed Development), neutral meadow mown grassland and amenity grassland.</i></p> <p>The punctuation used shows that this is not a 'mosaic of woodland', but mosaic of habitats including woodland, grassland, hedgerow and scrub, ornamental planting, and grassland. With</p>

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			mosaic meaning an area composed of different habitats.
113	Open space and Wigmore Valley Park	<p>Document 000848, C6.1.7 <i>The Replacement Open Space would focus on the establishment of natural habitats, delivering areas of meadow grassland, native shrub planting, broadleaf woodland, and mixed-species hedgerows with hedgerow trees, as well as several surfaced footpaths to upgrade connections to the surrounding rights of way network. The Replacement Open Space will be delivered entirely within the road network and nearer to the existing communities it serves; to minimise earthworks activities near the more frequently used parts of the replacement area of parkland; to protect more of the existing scrub and woodland vegetation on Winch Hill; and to ensure valued archaeological and habitat features are not impacted by construction activities.</i></p> <p>LR need to also document the migration, not establishment.</p>	Natural habitats will be established in the replacement open space to replace those lost. No need to change wording.
114	Surface Access	<p>SLAE note that there is insufficient car parking provision around the replacement park road network, and this is not covered in any documents. This will encourage parking wherever possible along restricted lanes not able to cope. It will also encourage taxi services and people picking up passengers to avoid drop off fees and those holiday makers leaving their cars for a week or two in any available space. Are LR compensating the</p>	<p>“The replacement park road network” is not a term recognised by the Applicant.</p> <p>The Applicant is aware of anecdotal evidence that fly-parking associated with airport users occurs. There are interventions contained in the Framework Travel Plan [AS-131] toolbox of measures to mitigate the effect of any potential fly-parking that may occur as a result of the</p>

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		<p>Hertfordshire councils for the additional overhead this will create?</p>	<p>Proposed Development. These include 'supporting the expansion of the residents parking zone to the north of the airport' and 'carrying out feasibility studies on restricted parking zones (RPZs)'. Actioning of these and related measures would be governed through Steering Groups within the Airport Transport Forum, associated with the STF process. Further detail is being developed and will be shared with relevant parties in due course.</p>
115	Surface Access	<p>SLAE comment that there appears to be an overwhelming amount of 'could', and number of aspirations, within the paragraphs of the Framework Travel Plan document. This suggests a 'wish list' and should be identified as such. SLAE say these should be excluded from the DCO. If DCO consent is granted, would the statements in this document become enforceable and if not, then those statements are nothing more than a wish list.</p>	<p>The Framework Travel Plan [AS-131] contains a toolbox of measures, which essentially is a longlist of interventions that could be employed by the Applicant in the development of future Travel Plans. The priority measures will be identified through engagement with the Host and neighbouring authorities through the ATF. The Applicant has engaged with the named parties on the governance, source, size and scope of the Sustainable Travel Fund which is intended to fund those priority measures. It is intended that the S106 agreement will be the mechanism for securing the fund, and the Applicant is developing further detail to respond to comments raised from parties engaged. The fund will respond to the FTP aspirations and demonstrates the airport's commitment to continuing to deliver sustainable transport.</p>

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116	Surface Access	<p><i>TPs will build on the work already undertaken by the operator as part of the ongoing existing Airport Surface Access Strategy with increased monitoring and engagements with stakeholders. Luton Borough Council, as the relevant planning authority, will have final approval of each TP and the proposed Targets over its five-year duration.</i></p> <p>Comments regarding the impartiality of Luton borough Council have already been made in a number of previous RR's, OFH's and WR's. Evidence Anne Donelans letter already previously presented.</p>	This is noted by the Applicant.
117	Surface Access	<p><i>1.3.2 It is the Applicant's intention that the body that operates the airport over the short and longer term must do so having full regard to all of the obligations that the DCO places on them in regard to the implementation of future growth, including those related to this FTP. The intention therefore is that the obligation to produce and implement the TPs from the DCO will be transferred from Luton Rising to LLAOL through a legal agreement.</i></p> <p>What happens if the 'intention' doesn't occur for any reason?</p> <p>What is meant by 'full regard'?</p> <p>The short and long term is mentioned, what happens in the medium term? What is a shorter, medium and longer term?</p>	<p>To provide clarity, it will be the responsibility of the airport operator to produce and implement future Travel Plans.</p> <p>As the future Travel Plans will act as the Airport Surface Access Strategy recommended in the Aviation Policy Framework that these should be produced/updated every 5 years.</p>
118		<p><i>1.3.3 At the end of the current concession, the restrictions, liabilities and obligations will revert from</i></p>	Local authorities do not disappear. There will always be some entity that owns the shares of

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	Financial	<p><i>LLAOL to Luton Rising. They will remain with Luton Rising until a new transfer agreement is made with an appointed operator. In this way, the requirement to periodically produce TPs every five years as a result of the DCO will always be in place (whether with the operator or the Applicant) and can also be transferred to any new future operator.</i></p> <p>What happens if Luton Rising (London Luton Airport Limited) folds, goes insolvent? What if Luton Rising are insolvent and Luton Borough Council also goes insolvent?</p>	LLAL and therefore holds the responsibilities that come with them.
119	Surface Access	<p><i>1.4.1 The Vision and Objectives set out below underpin and guide the intended outcomes of the five-yearly TPs. They have been developed to reflect the ongoing importance of the airport as a regional transport hub and therefore provide a range of socio-economic benefits to Luton and the three Counties (Bedfordshire, Buckinghamshire and Hertfordshire), as well as the wider region and nationally. As the airport delivers significant socio-economic benefits, the operator also recognises that without considered management and intervention, surface access can result in effects that impact local communities and authorities.</i></p> <p>Can the Examining Authority clarify as SLAE are a bit confused as the above paragraph mentions regionally and specifically Luton and the three counties, and then goes on to mention the local communities and authorities. SLAE ask if these are</p>	The paragraph specifically lists the areas of Luton, Bedfordshire, Buckinghamshire and Hertfordshire in terms of providing a range of socio-economic benefits. SLAE can therefore reasonably assume that the section of the paragraph which mentions the potential for effects and impact to be experienced by local communities and authorities this is considering the same geographical area as above. Therefore, it can also be assumed that some effects and impact from the Proposed Development could be experienced in the areas listed in the comments.

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		the same or are they the adjoining communities of South Luton, Wigmore and the adjoining Hertfordshire Villages?	
120	Surface Access	<p><i>Figure 1.1. The SAS's Vision, Objectives and Priority Areas The Applicant and Operator will : -work with partners to contribute towards high quality, efficient, reliable and sustainable surface access for all airport users, and to provide for growth while supporting the needs of local communities.</i></p> <p>How can a surface access strategy (SAS) and a sustainable surface access, provide for growth and support the adjoining local communities?</p>	The provision of improved sustainable transport connectivity in and around the airport would potentially benefit local residents through the provision of additional route choice and improved services, including in terms of frequency and destinations.
121	Surface Access	<p>One of the Intervention / Measures in Tables 5.1 to 5.5 is 'Strive to be the best possible neighbour' to communities & authorities? SLAE have submitted a Written Representation based on the airport as a neighbour. We ask the Examining Authority if adjoining ward residents Relevant Representations indicated that the airport are a good neighbour?</p> <p>SLAE ask LR to prove or withdraw the intervention / measure.</p>	Refer to the response under ID120.
122	Surface Access	<p><i>2.1.2 DfT's Aviation Policy Framework (2013) (Ref 1.1) advises that all airports in England and Wales with more than 1,000 passenger air transport movements a year should set up an Airport Transport Forum (ATF)1. The primary purpose of ATFs is to encourage partnership between airport operators, local authorities, transport operators, local people</i></p>	The Luton Airport Transport Forum (ATF) has been established for some time and is run by the operator London Luton Airport Operations Limited (LLAOL). It is currently comprised of representatives from local authorities, , and public transport operators. Current attendees include Luton Borough Council, North Herts District

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		<p><i>and businesses, and other relevant parties, to improve public transport access to airports, and reduce reliance on private, road-based transport, congestion, and pollution on nearby roads.</i></p> <p>Again the word local is used with no proper definition, used in this context, it would appear to mean the whole of Luton, although in other documents it means adjoining residents and communities?</p>	<p>Council, Stagecoach, Arriva, National Express, APCOA Parking, Govia Thameslink Railway (GTR), and Enterprise. It is intended that the attendance of the ATF is also encouraged from the relevant highway authorities.</p>
123	Surface Access	<p><i>4.1.4 To determine the appropriate magnitude of each Target, the following must be considered: a. the relevant surface access limits set out by the Green Controlled Growth (GCG) Framework [TR020001/APP/7.08], and future growth plans (where the level of passenger throughput at which the limits change might be reached). Targets should strive to achieve higher levels of sustainable transport mode share than the Limits, which correspond with the 'reasonable worst case' assumptions of the TA [TR020001/APP/7.02], to reflect the additional level of ambition of the Applicant and the operator as the airport grows;</i></p> <p>What happens if targets are not met?</p> <p>'Targets should' means nothing, Targets will' is the correct words to use.</p>	<p>The Applicant is keen to ensure that the Travel Plan Targets are ambitious and aim to directly influence the increase in sustainable surface access to and from the airport in the longer term. Therefore, it is proposed that the newly set Targets are more ambitious towards sustainable behaviours compared to those achieved in a preceding TP cycle.</p> <p>The level of ambition when setting the percentage change for Targets will be informed by (where applicable):</p> <ul style="list-style-type: none"> a. striving to go beyond the Limits for passenger and staff mode share; b. responding to modelling forecasts in the TA; c. due regard to recent five-year CAA / staff surveys and surface access / transport trends over the duration of the previous ASAS/TP;

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			<p>d. a lookahead to delivery of transport infrastructure delivery in the next five year period; and</p> <p>e. engagement with the ATF and other bodies involved in the Governance of the TPs.</p>
124	Surface Access	<p><i>c. due regard to recent five-year CAA passenger survey/staff surveys and trends over the duration of the previous ASAS/TP;</i></p> <p>How do we know that surveys won't be tampered with to suit the required outcome? SLAE have been informed that when passengers go through airport security and it is very busy, the survey machines are taken away, whilst when quiet they are made available for customers. As stated in our Relevant Representation 'trust' is a big issue.</p>	<p>The CAA surveys are performed by on-site staff through questionnaires which aim to understand modes of travel to from the airport for passengers and staff. The survey machines within airport security are related to customer satisfaction and are unrelated to the CAA surveys.</p> <p>Staff mode share will be reported based on data collected through an annual Staff Travel Survey. The airport operator will be responsible for commissioning a suitably qualified third-party contractor to carry out this survey once a year.</p>
125	Surface Access	<p><i>4.2.2 At the end of the five-year cycle, TPs will undergo a detailed evaluation, undertaken by a TPC who will be appointed by the operator (more details on their role and responsibilities are set out in Section 7).</i></p> <p>If the Operator wants to make money, what's the point of all of this and will they bother if they can't make money.</p>	<p>Where GCG monitoring has shown that a Limit has been exceeded, the airport will not be able to continue growing until a specific series of steps have been followed, as defined by the Framework. Compliance with each of these steps will be secured through the DCO, and enforcement action could be taken if growth at the airport continued in contravention to the GCG Framework, as explained in the accompanying GCG Framework Explanatory Note [APP-217]</p>

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126	Surface Access	<p><i>4.3.4 Where Targets are not achieved, a review should be undertaken to determine the underlying causes for the lack of progress. Revised interventions must then be proposed within the following TP period and the Targets updated.</i></p> <p>Can LR explain the sanctions that will apply?</p>	Please refer to response under ID23.
127	Surface Access	<p><i>Table 5.3: Toolbox of interventions and measures: walking and cycling Ensure that high quality and appropriate wayfinding is in place to guide pedestrians to transport links and key destinations, ensure walkways are well-lit at night to ensure safe movement throughout the airport site (and vicinity) and consider colour coded paving</i></p> <p>Will the lighting be invasive to residents? If adjoining ward residents complain about the well-lit lighting, will these be taken down?</p>	Any new or replacement lighting would be designed to meet current standards and guidance.
128	Surface Access	<p><i>Table 7.1: Surveying and data collection methods, CAA passenger survey data The staff travel survey must be undertaken in a period avoiding the summer and Christmas school holidays. The airport operator should use best endeavours to ensure the survey is completed at the same time of year in subsequent years.</i></p> <p>Why not Easter as well as this is one of the most busiest times for the airport?</p>	<p>The CAA collects passenger survey data and does not collect travel data on staff. Undertaking the survey at similar times of the year will allow for consistency in review and reporting. The comparison made between Easter, summer and Christmas is noted.</p> <p>The Applicant will consider further whether the suggested change to the timing of the staff travel survey should be adopted, with any changes to be made at a future deadline.</p>

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129	Surface Access	<p>If expansion is granted SLAE ask LR to fund resident car parking schemes in the whole of Luton during the summer, and up to the present LTFC football ground in the winter months and add the cost to the airlines. This would be a very good 'Good Neighbour' scheme. SLAE ask the LR Board Directors who are also councillors to promote this idea to the council there would be no cost to the council as the airport would pay.</p>	<p>The Applicant is aware of anecdotal evidence that fly-parking associated with airport users occurs. Measures are contained in the Framework Travel Plan [AS-131] to mitigate the effect of fly-parking. These include 'supporting the expansion of the residents parking zone to the north of the airport' and 'carrying out feasibility studies on restricted parking zones (RZs)'.</p> <p>Actioning of these and related measures would be governed through Steering Groups within the Airport Transport Forum, either through the TRIMMA or STF processes. Further detail is being developed and will be shared with relevant parties in due course.</p>