

Wigmore Valley Park WR D4.

LR = Luton Rising, LBC = Luton Borough Council, WVP = Wigmore Valley Park, CWS = County Wildlife Site, WR = Written Representation.

Introduction

Wigmore Valley Park, is an award-winning park and located to the east of the existing airport and forms part of the Luton Green Infrastructure Network, is also designated as an Area of Local Landscape Value, an Asset of Community Value and also marks the Green Belt boundary to the east of Luton. Parts of the park are designated as a County Wildlife Site (CWS) and the park was voted the best Park in Bedfordshire both in 2019 and 2022 and was a regional finalist for the East of England in both years by the Fields in Trust (<https://www.fieldsintrust.org/> accessed 23/10/23) national public poll of the most popular Parks in the UK.

There are also two independent Asset of Community Value orders put in place by Offley Parish Council and Kings Warden Parish Council and registered by Luton Borough Council. https://m.luton.gov.uk/Page/Show/Environment/Land_and_premises/Pages/Assets-of-community-value---Community-right-to-bid.aspx (accessed 29/10/2023) One is currently showing as expired.

Wigmore Valley Park is so important to those that love the park and such is the passion to keep the park 'as is' that this Written Submission is over 16 pages in length.

In December 2020 and early 2021 FOWP & SLAE wrote to many individuals and green space / environmental organisations to make them aware of London Luton Airport Limited (now LR) and LBC's desire to build on/ over Wigmore Valley park. Many offered advice and sympathised with our cause. A list can be referenced in Appendix 2 at the bottom of this WR.

This Written Representation can also be read in conjunction with SLAE's Open Spaces Written Representation.

SLAE would like to thank whoever has been litter picking in Wigmore Valley Park for recently keeping the park clean and tidy and SLAE hope that this continues long in the future once the examination is over and the examiners have finished visiting the park. SLAE organise twice yearly litter picks and the recent October litter pick resulted in the least litter we have ever found.

If the capped Landfill wasn't known inconsistencies the LR application could lead to confusion of its exact location as different documents state it's in the North, East and West of the park. Along with the operation of the refuse tip by LBC which is written as between 1925 to 1986 or 1937 to 1978, with other records show it was still in use in the 1990s.

TR020001-000609-6.02 Consultation Report Appendix J 2022 Statutory Consultation Materials Part 1 of 2.pdf

In preparing our proposals, we have sought to achieve the following goals:

- *Be a good neighbour, by minimising and mitigating environmental impacts, including air pollution and noise, in line with our commitment to responsible and sustainable development.*

SLAE Comment. SLAE disagree, please read our Deadline 2 submission titled 'Health & Community – A good neighbour.

Insufficient air pollution monitoring is currently provided in Wigmore Valley Park. The newly installed "best in class, nationally" "super" monitoring station (Robin Porter, LBC chief Exec's statement, 2019), is situated in only one location (latitude 51.88706421, longitude - 0.36570311) and only captures pollution carried by the wind in one direction only. If SLAE was tasked to find a park location to gain a low reading, this would be it. There should be a map showing both current air and noise monitoring stations and showing a wind direction percentage over the past five years made available to the public.

More monitors need to be placed in other areas all around the park and airport to capture air pollution coming from all wind directions. SLAE have been told that cost is the issue, but £65 million for the consultation and millions to be earmarked for expansion, the money could easily be found to accurately forecast risks to public health. Money could be found within the billion pounds saved from excavating less earth from the park.

- *Improvements to the replacement open space for Wigmore Valley Park to protect more valued existing habitat and landscape features, provide improved enclosure and screening to development at the airport, improve connectivity to the existing parkland areas to be retained, and to reposition it nearer to the community it serves.*

SLAE Comment. Please read our Deadline 2 submission titled Open Spaces.

In replacing affected open space, we are committed to:

- *Working with the respective authorities and stakeholders to determine suitable arrangements and amenity facilities for the replacement open space*
- *Engaging with local stakeholders on the potential for future community stewardship of a new park, overseen by a new Community Trust (TR020001-001114-7.01-Planning-Statement-Revision-1.pdf paragraph 5.8.8, TR020001-001671-8.16 SoCG between London Luton Airport Limited and North Hertfordshire District Council.pdf,*

We would also work with local stakeholders to deliver further features to encourage the surrounding community to use, engage with and be active in the park, including picnic areas, provision for dog walking, and opportunities to explore nature to get a multi-sensory experience.

SLAE Comment. Please identify the respective authorities and stakeholders / groups, Trustees local community organisations. Would these be politically influenced organisations?

Taking away green space is an easy target, LR have not thought about returning any brownfield land to green, it's all about the new replacement park. Perhaps an honourable consideration would have been to identify brownfield land around the airport and Luton and return that land to open / green space, like parks.

TR020001-000616-6.02 Consultation Report Appendix M 2022 Due Regard Tables Part 4 of 4 Ref 4.1 on page 77, Appendix 12.2 Table 2.9 states land use change emissions were calculated using the European Commission guidelines for calculation of land carbon stocks^{6F} [Ref 4], and then the carbon values derived were converted to CO₂ (Appendix 12.2). To ensure a highly robust output, it is strongly recommended that conversion to CO_{2e} is adopted, as this is presented in Table 12.24.

SLAE Comment. SLAE question that the 2010 date of reference is so out of date and an alternate more recent calculation method is applied.

TR020001-000657-3.01 Statement of Reasons.pdf
12 SPECIAL CONSIDERATIONS AFFECTING THE LAND

SLAE Comment. 12.1.3 States that The Applicant is not seeking compulsory acquisition of any rights over such land whilst the last sentence of 12.1.6, 12.1.13 & 12.1.14 says they are. Confusing?

It might be helpful to identify via a map which parts of the park are leased, licensed, owned and are ear-marked for compulsory purchase. Also identify the current and future status of the open space land for planning and ownership purposes along with dates. Table representation in documents is too complex.

TR020001-000677-5.02 Environmental Statement Appendix 1.4 Environmental Impact Assessment Scoping Opinion Response.pdf

ID, 2.2.10. Comment Originator, Planning Inspectorate.

Scoping Option Comment, Road closures and diversions are referenced at Sections 14.5.10 and 15.6.3 of the Scoping Report but limited information has been provided in respect of these. The ES should contain a full explanation of such closures and diversions, including whether they are temporary or permanent, and associated impacts should be fully assessed. This information should also be depicted on figures in the ES to provide further clarity

Applicant Response, some local routes will be particularly affected during the construction of the AAR in assessment Phase 2 and the New Wigmore Valley Park works with some roads temporarily closed and others having temporary diversions, traffic lights and/or lane restrictions. The Code of Construction Practice (CoCP) contained within Appendix 4.2 of the ES [TR020001/APP/5.02] provides details of management measures, such as advance warning to, enable affected parties to consider alternative routes or travel arrangements.

SLAE Comment. Responses to each point would be appreciated, and not responses asking SLAE to read the documents that the questions arise from.

All the best management measures can be thought about, but ultimately these local routes will cause chaos, and the best people to advise on that chaos are those residents that regularly use those routes in adjoining wards. Will they be consulted prior for the best management measures to be implemented? Considerations such as, if chaos and delays last

longer than 30 minutes, the road closure will be suspended, would be a good example of being a 'good neighbour', etc.

To be a good neighbour more thinking should be done on a resident's experience during construction activities on the park. For example, in these days of technology, 24 hours a day, 365 days per year helpdesk number is of no use, there should be a real time centre using online tools with real time construction monitoring and news with communication systems to action issues real time. And if issues were noticed by the local residents, a real time escalation model for the public should be provided where they can see action being taken, along with response levels to be achieved.

Lorries coming onto the park should have tracker technology installed for both the airport and public able to view in real time, lorry movements. This could be maintained by a communication centre and be proactive to environment impacts before reactive notifications. Not using the technology that the council uses to video council meetings, that tends to go off line when a contentious issue is to be discussed. Available 24x7 real time and with manned support lines. Incidents logged with progress on fixing available to both airport and public.

Any issues found as a result of working on the landfill and old munitions dump must be able to stop all work immediately, until fully investigated by independent government agencies and then requires certification and sign off from adjoining ward residents before any work resumes.

All contractors working in the park must sign up to a code of practice drawn up by adjoining ward residents before they can start working. Industry codes of practice do not cover adjoining ward local knowledge. This would demonstrate how serious LR are towards being a good neighbour.

Strong penalties applied to construction companies for potential environmental impacts, such as disturbance from construction noise, light, visual and air pollution, and traffic that impact adjoining wards. Penalty information available real time to the public.

Plan and schedule piling works on a one day on and one day off during normal working days only, or if the number of complaints reach a certain threshold, then suspend piling work until the next day. Many current airport workers work shift patterns and piling during the day time can impact well-being. No piling at night, resident welfare to take precedence over night time airport operational activities.

Real time and available to the public monitoring systems that identifies breaches of targets for the diversion of waste from landfill during construction and operation of our proposed development.

Identification of where all waste will end up along with publication of locations to the Luton public of activity in real time.

TR020001-000679-5.02 Environmental Statement Appendix 4.2 Code of Construction Practice

8 AIR QUALITY

8.1 Air quality management – general provisions

8.1.1 The Applicant will require the lead contractor to control and limit dust, air pollution, odour and exhaust emission during the construction works as far as reasonably practicable and in accordance with best practicable means (BPM).

SLAE Comment. As 'reasonably practicable' and 'best practicable means are generic statements which mean different positions depending on an individual's experience of an issue. There needs to be a more defined statement with accountability, such as targets, fines, suspension of construction at breaches of certain levels etc. It will be too late when issues occur and no one is accountable for issues to be resolved.

8.7 Odour

8.7.1 As contaminated materials may be excavated during the Proposed Development, excavated materials could contain odorous materials. The following measures will be implemented by the lead contractor to minimise the risk of odour generation:

SLAE Comment. As recognised by Action 12 in TR020001- 001802 -LUTN-Action-Points-for-ISH5 (1), there is a risk of flies at the Water Treatment Plant. SLAE have not found reference in any of the documents of other possibilities of fly swarms occurring and the most obvious would be when the landfill cap is taken away and the area disturbed with previous contents exposed. Swarms of flies attracted would be a significant nuisance to the adjoining ward residents, especially in times of hot weather. This concern appears to have been missed from the DCO?

TR020001-000719-5.02 Environmental Statement Appendix 13.2 Open Space Survey

Results

SLAE note that 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'.

SLAE Comment. Reading the Relevant Representations, the majority of respondents would not agree with the conclusions found by LR. Are LR aware of how many concerns there are over raised on Wigmore Valley park and Raynham Way Recreation Ground?

TR020001-000874-Hertfordshire County Council.pdf and TR020001-000881- NHDC

Adequacy of Consultation Representation 14.03.2023.pdf

Relationship to Wigmore Valley Park

SLAE Comment. SLAE agree with the statements and questions asked by County and District councils in relation to Wigmore Valley Park and any extended Park (4.16, 4.38, & 4.39). Additionally, SLAE insist that any concerns around future management can be met by funding from the airport (stakeholder, owner or operator) by adding a couple of pence on the price of each airplane fare, problem solved.

It's also common sense, practical and easy to identify that management of the park must be set for the perpetuity of the airport's existence as an entity. A 50-year timeline sounds great, a long way off, but it is burdening future generations (someone else's problem) with a 50-year timeline and also future airport enabled issues associated with global warming and climate change. A cop out, Luton Rising and Luton Council take responsibility for tomorrow's populations.

TR020001-000928-6.01-Consultation-Report-Revision-1.pdf

12.2.25. *Members of the public expressed particular interest in being involved in: the future design and management of Wigmore Valley Park; the development and implementation of the Employment and Training Strategy [TR020001/APP/7.05]; and the development and implementation of Community First.*

SLAE Comment. If the DCO is approved then SLAE welcome the statement 12.2.25 and support adjoining residents designing and managing Wigmore Valley Park.

TR020001-000937-5.01-Environmental-Statement-Chapter-8-Biodiversity-Revision-1.pdf

8.14.3 *In the long term, the Proposed Development is not anticipated to have any significant effect on biodiversity receptors within the study area. From initial creation of the replacement habitats, often of higher biodiversity value than those lost, and throughout their establishment, these habitats will be managed in line with the 50-year management period as described in the Outline LBMP (Appendix 8.2 of the ES [TR020001/APP/5.02]), to ensure their success.*

SLAE Comment. Why is LR placing great emphasis on the long term, for example, Wigmore Park CWS, which by assessment Phase 2a is almost completely lost, then with the provision of new open space suddenly becomes a minor adverse effect once the habitats have developed. However, if the CWS is not touched at all during development then in the long term it becomes an even more valuable habitat. Taking it away, takes the maturity back 50 years. How's that bringing a 10% increase and improving a higher biodiversity. Is it simply a case of Greenwash to make LR and the reader feel good about losing the CWS?

An easily read comparison as to what will be lost and its maturity time should be produced for each habitat, detailing maturity now, if not touched and at each phase of the development, so that all can understand the impact.

TR020001-000948-5.02-Environmental-Statement-Appendix-8.2-Outline-Landscape-and-Biodiversity-Management-Plan-Revision-1.pdf

3.2.2. *This area will include habitat creation measures to mitigate for those habitats lost within Wigmore Park County Wildlife Site (CWS). The replacement habitat, once established, would mitigate for the loss of foraging, dispersal and shelter habitats which are used by a range of species including badger (*Meles meles*), bats, birds, reptiles, amphibians and invertebrate species.*

SLAE Comment. SLAE can find no references to the Animal Welfare (Sentience) Act 2022 law in the applications and yet the LR statement in 3.2.2. lists animals covered under this law that use the CWS.

SLAE also asks what happens to the badger (*Meles meles*), bats, birds, reptiles, amphibians and invertebrate species in the meantime? Is LR playing at being mother nature?

In September 2021 SLAE carried out research to find out how many living creatures live in the CWS, using one of the many tools found on the internet to do this and by also adding information from the Woodlands Trust and Forestry England found that there are an estimated 16.5 million living creatures in the CWS. Converting that number for ease of understanding into humans, then it's over 1.5 times the population of London. More than 80 times the population of Luton. SLAE are sure that if we were talking humans, then LR

would not be able to proceed, building a car park and new terminal over 16.5 million living creatures for job and economic growth reasons.

SLAE can find no evidence that the DCO has looked at the migration paths and natural food chains that insects, underground fungi networks, animals use at the CWS and Wigmore Valley Park. These will be blocked and built over by new car parks and terminal?

Why is there is no migration plan to ensure that the 16.5 million living creatures have a safe passage to safe areas within the new park?

SLAE ask why LR and LBC think that they have the right and superiority to destroy so many living creatures?

Besides Roman Snails, SLAE are amazed that no night time assessments or statements in any of the DCO application documents cover the nocturnal habits and natural activity that takes park overnight. Besides observation, there are lots of tools to help collect this information. Reading other application documents there is plenty on the topics of aircraft noise and night time lighting, but scant research into wildlife and nature. Do LR assume that office hours coverage is sufficient to make a full assessment? This leads onto the next point.

SLAE ask why LR and LBC have shown no regard towards 16.5 living creatures, except quote repeatedly that it will all be alright once the development has completed? LR & LBC obviously do not read the 'state of nature' (<https://stateofnature.org.uk/> accessed 23/10/12) reports in this country. In the period that LR & LBC assure us it will all be back to normal, it may all be over.

2.2.3. Once the contractor's obligations have ended, the maintenance operations identified below will be carried out by a Landscape Maintenance Contractor capable of delivering the measures prescribed within this document appointed by the Applicant, which would also be audited by a suitably qualified ecologist and landscape architect as required, throughout the remainder of the 50-year period of the LBMP, and subject to appropriate review periods.

SLAE Comment. Please read the SLAE response to ***TR020001-000874-Hertfordshire County Council.pdf and TR020001-000881- NHDC Adequacy of Consultation Representation 14.03.2023.pdf***

TR020001-000949-5.02-Environmental-Statement-Appendix-8.10-EMS-Orchid-and-Invertebrate-Revision-1 - Copy.pdf

Orchids

5.3.2. Monitoring for the translocated orchid populations will be undertaken between mid-June and early-July when leaf rosettes of orchids will be visible and species likely to be in flower. This will involve direct counts of individual orchid spikes and plotting of distribution, in particular but not limited to the two receptor sites. These rosettes of orchid will be marked with small sticks or other means of identification, in order to aid future location. Monitoring will continue annually for a period of five years.

SLAE Comment. SLAE ask why monitor for 5 years when the new Wigmore Valley Park will be maintained at least for 50 years?

SLAE don't believe the reason given for the previous unsuccessful translocation of orchids. What has been given as an explanation might be the outcome, but not the root cause. The question to ask, is why the translocation experts carried out this activity when the weather

was so hot? They would have the knowledge to translocate in ideal conditions and should have had a hot weather back up action plan for such circumstances. Where the orchids left to fend for themselves? How could LBC have failed so badly? We believe that the drilling timetable and availability of the LBC parks department and volunteers was to blame. Those translocate times were not suitable for the orchids to be successful.

What will LR do differently to ensure that the orchid translocation is a success and what will they do if not? What is their back up?

How will LR encourage SLAE to believe the 'experts' this time around? How does advocating planting yellow rattle everywhere cause orchids to appear?

To help any translocation be successful, LR need to also identify the fungi that orchids have a symbiotic relationship with? If LR were re housing people, would they re housing on sand foundations?

TR020001-000950-5.02-Environmental-Statement-Appendix-8.1-Ecology-Baseline-Report-Part-B-Revision-1.pdf

2.6 Limitations

All surveys were undertaken at an optimal time of year and in reasonable weather conditions and no significant constraints were encountered in the grassland or woodland of the farmland. Recent scrub clearance across extensive areas of Wigmore Park presented challenges classifying the resultant regenerating vegetation. Elsewhere, heavy trampling pressure by recreational users, disturbance and, more locally, high levels of rabbit grazing had produced a spectrum of short grassland communities that defied attempts to place in NVC communities.

SLAE Comment. Please identify the optimal time of year that the surveys were taken? Please identify what the reasonable weather conditions were? The park is alive 24 hours x 7 days a week.

4. CONCLUSIONS

The LLAL landholding to the east of the existing airport comprises mainly intensively cultivated fields with small associated areas of unmanaged grassland and semi-natural woodland.

..... However, without scrub control it is likely that this small stand will be lost within a few years. Lack of recent silvicultural management and enrichment of the field layer has left them in relatively poor condition.

SLAE Comment. From the conclusion, it appears to SLAE that there are no land management activities being performed currently on LR owned park land, why not?

TR020001-001067-5.02 Environmental Statement Appendix 14.4 Detailed Landscape Assessment Revision 1.pdf

The parkland of Wigmore Valley Park

Sensitivity of Receptor

..... The condition and management of some features within Wigmore Valley Park could however benefit from enhancement and there are few surfaced pathways. The value of the parkland of Wigmore Valley Park is judged to be medium.

SLAE Comment. SLAE recognise that Wigmore Valley Park could be enhanced, though this is due to the lack of upkeep and maintenance by the owners over the past years.

Management should include the fix of any new government environment regulations brought in before 2050 are retrospectively applied to the expansion and the Proposed Development boundary and Operational Airport land. SLAE would expect to see such statements in the DCO application.

TR020001-001102-5.01 Environmental Statement Chapter 4 The Proposed Development Revision 1.pdf

Work No. 1b – Landfill remediation

Paragraphs 4.5.17, 4.5.20, 4.5.21,

SLAE Comment. SLAE refer to the statement made earlier in the written representation in regards to the possibilities of fly swarms forming and bothering adjoining neighbourhoods when the landfill cap is taken away and the area disturbed.

4.9.12 The enhancements to the existing park would also further improve the connectivity, screening and biodiversity value of the retained parkland area, through the creation of additional surfaced paths linking to the replacement open space provision (Work No. 5b(02)), and through the planting of additional scrub and woodland vegetation. And TR020001-000827-7.03 Design and Access Statement Volume II.pdf. 5.16.5 The site accessibility for cycle users has been appraised to ensure that there would be good connectivity with cycling routes. Additional shared walking and cycling routes are also proposed within the Wigmore Valley Park area, to improve linkages with existing rural areas to the north-east of the airport.

SLAE Comment. SLAE note that cycling routes appear to stop at the proposed airport boundary.

SLAE ask if these surfaced paths and cycleways will lead to dead ends or pathways that suddenly stop when continued outside the of the airport development zone and left to other adjoining councils to match the development. Any footpath / cycleway upgrades should be end to end and funding supplied by LR to ensure this.

4.10 Work Type – Highways

SLAE Comment. SLAE note that will be insufficient car parking provision around the new areas or / country lanes around Wigmore Valley Park and cannot find any mention of the issues that will be caused or what will be done to alleviate these in the future. For example, Uber cars already park on the pavement and grass areas leading to Wigmore Valley Park waiting for a possible fare to book a lift via the Uber app system. Roads that will be impacted will be Eaton Green Valley Road, Darley Lane and Winch Hill along with the lanes leading to Tea Green.



This will encourage parking wherever possible along country lanes not able to cope with parked cars waiting for a text or WhatsApp (marked in lilac on the map). Track entrances leading to the park will be blocked and the residents of Winch Hill cottages will struggle with waiting cars (and they are nice people who live there and should not be treated in this manner). It will also encourage waiting taxis and people picking up passengers to avoid drop off fees (especially those waiting on delayed flights) and those holiday makers leaving their cars for a week or two in any available space, causing nuisance and blockages on limited country roads.

Parking on roadside and park grass verges and half on half off the road, churning up the grass and creating driving obstacles. Expansion will only make this worse.

Are LR compensating the Hertfordshire councils for the additional parking and road traffic that this will create?

Although not connected to the park, the nearby Wigmore Asda supermarket advertise car parking spaces on line via a parking site. A recent late-night visit to the petrol pumps at ASDA on a Sunday evening (22/10/23) showed a number of cars parked up, that is more than normally seen for the overnight workers. Charging for car parking is more profitable than visiting cars, though unpopular during the day with shoppers unable to find spaces.

4.10.1 Extensive traffic modelling has been undertaken to inform the Transport Assessment [TR020001/APP/7.02]. A number of highway interventions have been identified to mitigate impacts on the highway network as a result of the increased passenger numbers associated with the Proposed Development.

SLAE Comment. If LR was a truly a good neighbour then these concerns would be identified and addressed in the DCO.

TR020001-001783-LUTN-Action-Points-for-CAH (1).pdf

15 Provide a quantitative (or semiquantitative) assessment of the distances travelled by users of Wigmore Valley Park by car and foot. Provide an equivalent assessment of the distances that would need to be travelled to the proposed new park. This should take into consideration the distance that must be travelled

SLAE Comment. On Saturday 28th October 2023 SLAE walked from the houses nearest the road to the Council Tip on Eaton Green Road to Wigmore Valley Park (letter A on the map). 14 steps were taken to reach a track leading from Eaton Green Road to the park (B). From the same starting point (A) it took 42 steps to reach the road to the Council tip and the footpath to Wigmore Valley Park (C). The route taken of each of the routes was by the Eaton Green Road pavement.



From the same two houses it took between 406 and 411 steps to reach the main entrance of the Park (X), depending on whether walking down or up the hill. This clearly shows that all the residents living to the left of the two houses (A) have a longer walk to reach the main entrance of the Park, only having to cross one road, the Eaton Green Road.



Distances from the WVP car park to the new park mention those with limited walking ability but not sufficiently disabled to use the proposed new patch with a wheel chair or disability vehicle.

Appendix 1 (at the end of this document) refers to two surveys that FOWP undertook in Wigmore Valley Park in 2020 & 2021 that include distances travelled by users of Wigmore Valley Park by car and foot.

TR020001-001897-8.52-Applicant-post-hearing-submission-ISH6.pdf

7.1.7 Post-hearing note: the Applicant would emphasise that any use of the land (otherwise than on formal public rights of way) is unauthorised. The Applicant will provide an update in relation to Action Point 14 at Deadline 4 (CAH1 Action Point 14).

SLAE Comment. The recent mixture of signs and restrictions appearing, will confuse those who have been used to using these areas, may not know where the formal public rights of way are and used to following trampled down pathways.



7.1.2 The Applicant explained that alongside this, a Sift Criteria was developed, based on best practice, referencing the Airport Commission's appraisal framework. The Applicant added that the concept design options were scrutinised by a wide range of team members against the Sift Criteria, in an open-minded way, to identify the best performers.

SLAE Comment. SLAE are an open-minded group of residents, if the team were open-minded that suggests that the Sift criteria wasn't. SLAE ask who funded the Team members?

7.1.8 The Applicant confirmed in response to the ExA, that design detail which has not yet been developed will be secured through the design principles and engagement with the relevant local planning authority, which will be responsible for approval. The Applicant confirmed that the Applicant is open to adding design principles during the examination and is willing to engage with other stakeholders to provide clarity. The Applicant confirmed that it considers the design principles to be a live document.

SLAE Comment. SLAE do not trust the heavily politically biased local planning authority. For example the Eaton Valley Road recently came up at Council for discussion, if there was no bias, then it would never have reached discussion, it would have been accepted as a good option for airport adjoining ward residents.

If the DCO application is approved then SLAE are happy to be engaged as a stakeholder.

7.1.9 The Applicant added that it can update the design principles, but that this can primarily be done in response to stakeholder feedback in respect of which the Applicant noted it has received limited response.

SLAE Comment. SLAE understand why there has been limited response and SLAE's responses to 7.1.2 & 7.1.8 are good example why.

Appendix 1 Surveys.

Friends of Wigmore Park Bank Holiday Survey 2020

During the August Bank Holiday Friends of Wigmore Park undertook a survey of park visitors. The responses are for either a single visitor, or a joint response. for a couple, or group. As such, the total surveyed refers to either a single person, or a group.

Not all the visitors who describes themselves as local specified which particular area of Luton they lived in. Consequently, the 53 persons listed under Wigmore may not all have been from that specific area.

A smaller number of respondents in the survey were from the playground/skateboard areas as the users were further away from our Friends of Wigmore Park base, consequently they are under-represented in the results. Additionally, we were not able to include park visitors who entered and left the park from areas away from the pavilion area.

Many visitors came to the park every day, or several times a week, and thus were able to provide both valuable negative, and positive, data on their experience.

On the negative side, a few parents remarked on how the play equipment was in need of updating and indeed had not changed since they themselves came as children. Despite travelling some way to skate in the skatepark an observation was that now it is an Olympic Sport the ramps and equipment should be updated, that the Skatepark at Dunstable was of much better quality and met an appropriate standard.. Other visitors, both adults and children, who had travelled from other areas in the town were part of the sports groups that are currently using the park for their training sessions.

Many visitors commented on the value of the park during Covid to both enable family meetings, and to bring their children during the long break they have had out of school. Additionally, several visitors said that during this time they have taken the time to walk further away, appreciating the quietness, and exploring the wildlife areas. One older visitor, whose nearest park is People's Park, travelled daily to Wigmore Park as she felt safer and she finds the people more friendly. The value of the open space, peacefulness, exercise, and wildlife, was mentioned

by many respondents during this time when there has been the opportunity to connect with nature.

A surprising number of visitors, who were local, were unaware of the Council’s plans for airport expansion onto the park. A young pilot out walking his dog felt it was not necessary for the Airport to be expanding.

Several respondents, both young and old didn’t use social media at all so had limited resource to local knowledge. Many used the park for both walking, bringing their children to use the equipment, and more recently for sports activities that have taken place in the park during Covid-19. The large area is very popular with dog walkers and indeed one dog walker, stated “my dog smiles whenever he comes here”!

Friends of Wigmore Park Bank Holiday Survey results 2020

Luton area	Wigmore	Stopsley	Round Green	Town centre	New Bedford Rd	High Town	Crawley	Ramridge
	53	11	9	4	1	4	10	1
Villages/towns	Tea Green	Breachwood Green	Caddington	Cockenhoe	Hitchin	Letchworth	Milton Keynes	Hemel Hempstead
	2	1	1	1	1	2	3	1
Reason visited	Dog Walk	Skate park	Playground	Football/sports	Walk/run/Cycle	Covid meet up	Flora/fauna	Open space/trees
	55	21++	18++	23	18	4	6	30
Airport plan awareness	Yes	No	Info wanted	No social media				
	20	32	31	8				
Virtual dog walk/litter pick interest								
	12							
Total no surveyed								
	105							

September 2020

SUMMER 2021 WIGMORE VALLEY PARK VISITOR SURVEY

Introduction

The summer survey took place on two separate occasions consisting of a daytime and evening survey. Overall Wigmore Park visitors appeared happy to take time to share their views and talk about their experiences in the park.

On both occasions in 2021 there were a mix of visitors, individuals, couples, and larger picnicking and sports groups. Prompt sheets were used to stimulate replies to key issues related to distance travelled, frequency of visit, reason for visit, and suggestions for improvement.

The response sheets recorded single/couple/group replies on one individual sheet.

The youngest visitors we talked with were 14-17 year olds using the skatepark in the evening survey. Views of younger children were not sought.

Distance travelled

As expected the majority of visitors came from the Wigmore area, however, others came from elsewhere in Luton, Bury Park, Hockwell Ring, New Town, and more locally from St Anne's, Round Green, Stopsley, and Vauxhall Park (Crawley). One visitor from the Midlands was visiting family locally.

Frequency

53% of responders said they came to the park most days, with 30% doing so several times a week and others less occasionally.

Reason for visit

The replies to this question led to the fact that people felt there was more than one reason for the visit. For instance, dog walkers may also be appreciating nature, green space and relaxing.

Someone from the town centre said she comes to Wigmore Park as there is so much space and it is not too busy. A lady who is registered blind said she comes to escape to nature and listen to the birds. A mother told us it was important for her to bring her children so they could have a good run around. One respondent came to watch the aeroplanes.

During this survey 58% had come to walk their dogs. 40% were coming to walk appreciating the green space and nature or exercise.

Suggestions for improvement

This question elicited many replies. Top of the list was the need for an official notice/information board, followed by suggestions for nature walks/kids trails, bat walks and orchid walks. Organised community picnics appealed to some and many people cited the need for a café and toilets. Litter was a frequent topic and the need for larger and more litter bins featured again and again. A larger car park was a request from those who were not close to the park and found they could not always find a parking space.

Playground/Skatepark

For visitors with children there was a clear need for the playground equipment to be updated. Users of the Skatepark explained that the surface is not suitable for some of the equipment that is being used. For instance scooters and BMXs and they felt this makes it quite dangerous. The skateboarders feel that now skateboarding is an Olympic Sport more needs to be invested in this type of equipment and the ramps should be re-designed accordingly.

Conclusion

The above information summarises the responses received. It is not possible to do a direct comparison with the survey from 2020 as this was a daytime and evening time survey. Covid was frequently mentioned in responses and visitors felt that since the restrictions people were taking more time to appreciate nature.

July 2021

Appendix 2. Wigmore Valley Park awareness exercise in December 2020 / 21.

In December 2020 and early 2021 FOWP & SLAE wrote to many individuals and green space / environmental organisations to make them aware of London Luton Airport Limited (now LR) and LBC's desire to build on/ over Wigmore Valley park. Many offered advice and sympathised with our cause. These included.

Amateur Entomologists' Society

Bedfordshire Bat Group

Bedfordshire Natural History Society

Bees, Wasps and Ants Recording Society (BWARS)

Botanical Society of Britain and Ireland

British Ecological Society

British Lichen Society

British Myriapod & Isopod Group

Buglife

Bumblebee Conservation Trust

Caroline Lucas MP

Centre for Landscape and Climate Research

Countryside Management Association

Claire Balding

CPRE

Dame Fiona Reynolds, Master Emmanuel College Cambridge

Brigadier Archie Miller- Bakewell, Private Secretary to HRH Duke of Edinburgh

Environment Bank

Fields In Trust

Friends of the Earth

Green Alliance

Linda Nunn & Alan Preece

Mammal Society

National Federation of Parks and Green Spaces

Natural England

One Earth

People's Trust for Endangered Species

Plantlife

Population Matters

Rewilding Britain

RSPB

Sir David Attenborough

Sir Simon Bowes Lyon

The Conchological Society of Great Britain and Ireland

The Countryside Charity

The Dragonfly Society

The Gardens Trust (Bedfordshire)

The Open Spaces Society

The Outdoor guide

The Parks Agency

The Royal Society of Biology

Trees for Cities

Claudia Spens on behalf of the office of TRH The Duke and Duchess of Cambridge

UK Butterflies

UK Centre for Ecology & Hydrology (UKCEH)

Wildlife Trusts - Bedfordshire

Woodland Trust

WWF

FOWP / SLAE are happy to pass on to the Inspectorate the letters and email correspondence received.