

Mitigation at Luton Hoo

Your Written Representation [REP1-070, paragraph 2.19] seeks mitigation in the form of financial contributions towards the conservation management of Luton Hoo Estate to be secured through a s106 agreement as this is the asset that you consider would be most affected in respect of noise.

The applicant has identified harm to the significance of the House, Park and Garden in the ES. The applicant considers that it is not practically possible to mitigate the effects of increased noise, and the applicant is not therefore proposing any mitigation measures, we are recommending that the residual impact might instead be off-set by way of some other mechanism. This could be for example compensation through a financial contribution from the developer towards the costs of conservation management of Luton Hoo Estate. We consider that it would be for the applicant to identify a suitable mechanism and approach but this should be suitably detailed to allow the examining authority to assess the proposal and weigh the public benefits.

Please explain what conservation management measures any contribution would be put towards

A complex heritage asset such as Luton Hoo will inevitably require a very specific and specialist ongoing program of management in order to ensure its conservation. This will range from general conservation management - such as routine repair and maintenance of fabric, to larger projects such as reinstatement of lost/missing features, and each individual component of a conservation management plan will need to be prioritised accordingly through negotiation and agreement between the local planning authority and owner. AS the asset would experience a direct effect form the development, we believe that it would be appropriate to seek to address this harm in some way. As set out above we consider it would be for the applicant to determine the mechanism through which this could be a delivered however this should be suitably detailed to allow the examining authority to assess the proposal and weigh the effects







	against public benefit. We do however understand that the ornamental lake required de-silting and suggest that this could an example of an opportunity.
Please provide an indicative costing for the suggested measures	We leave this matter to be negotiated and agreed between the applicant, local planning authority and owner.
Please explain the extent that they would mitigate the harm caused.	As described above, we see this as an appropriate way of off-setting the residual harm that would result due to the effects of increased noise and its impact upon the sensory experience of the affected parts of the registered parkland.
Please explain the policy justification for requesting them	This is recommended in accordance with established mitigation hierarchy practice as described above.



