



Hertfordshire Host Authorities

HERTFORDSHIRE HOST AUTHORITIES' RESPOSES TO DEADLINE 3 DOCUMENTS

London Luton Airport Expansion



Hertfordshire Host Authorities

HERTFORDSHIRE HOST AUTHORITIES' RESPONSES TO DEADLINE 3 DOCUMENTS

London Luton Airport Expansion

TYPE OF DOCUMENT (VERSION) **PUBLIC**

PROJECT NO. 70107305

OUR REF. NO. **TR020001**

DATE: **NOVEMBER 2023**



CONTENTS

1	INTRODUCTION	1
1.1	PURPOSE OF THIS DOCUMENT	1
2	REP3-048: APPLICANT'S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 1	2
3	EP3-049: APPLICANT'S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 2	4
4	EP3-050: APPLICANT'S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 3	7
4.2	2019 BASELINE	7
4.3	NOISE MITIGATION TOOLBOX	11
5	REP3-051: APPLICANT'S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 4	13
6	EP3-052: APPLICANT'S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 5	19
7	REP3-053: APPLICANT'S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 6	20
8	REP3-003: DRAFT DEVELOPMENT CONSENT ORDER	24
9	REP3-074: APPLICANT'S RESPONSE TO SUPPLEMENTARY AGENDA ADDITIONAL QUESTIONS - ISSUE SPECIFIC HEARING 4 (ISH4)	26
10	REP3-009, REP3-010, REP3-011, REP3-012, REP3-013 REP3-014 APPENDIX 14.7 ACCURATE VISUAL REPRESENTATIONS	27
11	REP3-017: GREEN CONTROLLED GROWTH FRAMEWORK	28



12	REP3-015 GREEN CONTROLLED GROWTH EXPLANATORY NOTE	30
13	REP3-019 GREEN CONTROLLED GROWTH FRAMEWORK APPENDIX A - DRAFT ESG TERMS OF REFERENCE	32
14	REP3-021 GREEN CONTROLLED GROWTH FRAMEWORK APPENDIX B - ESG TECHNICAL PANELS DRAFT TERMS OF REFERENCE	34
15	REP3-025: GREEN CONTROLLED GROWTH FRAMEWORK APPENDIX D - AIR QUALITY MONITORING PLAN	36
16	REP3-078: APPLICANT'S CONSOLIDATED RESPONSE TO DRAFT DCO COMMENTS MADE IN WRITTEN REPRESENTATIONS AND LOCAL IMPACT REPORTS	37
17	EP3-077: ISH 4 ACTION 2 INTERIM RESPONSE - PRESENTATION ON THE INTERIM FINDINGS OF THE COVID-19 MODELLING UPDATE	38



1 INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

- 1.1.1. This document submitted at Deadline 4 of the Examination contains the responses to the various documents submitted at Deadline 3. It has been prepared jointly by Dacorum Borough Council (“DBC”), North Herts Council (“NHC”) and Hertfordshire County Council (“HCC”), in collaboration with their technical consultants, together as the “the Host Authorities” to set out further comments considered necessary in detailing the impacts upon the local area of the Applicant’s proposed London Luton Airport Expansion Project (“the Proposed Development”).



2 REP3-048: APPLICANT’S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 1

Document Reference	Topic	Matters Raised	Host Authorities Comment
Section 4.5	Article 44 (interaction with LLAOL planning permission)	The Applicant commits to pursuing a combined response with the Host Authorities at Deadline 5 in relation to the aspects of the existing planning permissions and section 106 obligations would be carried forward into the consent for the Proposed Development.	The Host Authorities welcome this commitment from the Applicant and look forward to working with it accordingly.
Section 5.1	Definitions of “begin” and “commence”	The Applicant outlines that the terms are defined and used differently so as to address the issue arising in the <i>Tidal Lagoon (Swansea Bay)</i> case.	It should be noted that the practical effect of this approach is that very modest “ <i>material operations</i> ” could be carried out by the undertaker without necessarily complying with pre-commencement requirements (where the modest material operations are included in the list of works carved out from the definition of “commence”), in order to implement the development consent.
Section 6.7	Exceedance of a Limit	The two year period for exceedances of a Limit to be rectified.	While it is noted that the Applicant states that the two year period in which the Proposed Development could be operating in exceedances of a Limit “ <i>could</i> ” be addressed by way of the ESG refusing to approve a Mitigation Plan that did not contain a



Document Reference	Topic	Matters Raised	Host Authorities Comment
			satisfactory programme to address issues more promptly, the Host Authorities note that the standard of effort required by the definition of “Mitigation Plan” contained in requirement 18 is “proposed mitigations and actions which are designed to avoid or prevent exceedances <u>as soon as reasonably practicable</u> .” In the context of these provisions, it is the Host Authorities view that this standard is inadequate and would put the ESG in a weak position (were the undertaker to appeal to the Secretary of State) were it to require a more vigorous Mitigation Plan that sought to remedy exceedances of Limit in a shorter time period. Please see the Host Authorities’ response to ExA questions DCO.1.14 for further commentary on this provision.
Paragraph 6.10.4	ESG membership	The Applicant states its view that Dacorum Borough Council ought not be on the ESG on account of the predicted impacts to residents in its administrative area, and should instead be included in the technical panel on noise.	It remains the view of the Host Authorities that Dacorum Borough Council ought to be a member of the ESG.



3 EP3-049: APPLICANT’S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 2

3.1.1. Several of the points raised below have been covered in Document CSACL-003, CSACL’s response to TR020001-001683-8.43 (Response to Chris Smith Aviation Consultancy Limited - Initial Review of DCO Need Case for the Host Authorities) [REP2-042]. Consequently, some of the Host Authorities comments simply refer to CSACL-003. This document is in tabular format, and the reference given is to the numbered Row in CSACL-003.

Document Reference	Topic	Matters Raised	Host Authorities Comment
Para 3.1.14	Need	Government policy on MBU. Applicant suggestion that serving demand locally was also Government policy	<p>This was commented upon in TR020001-001882 (ISH2-Post-hearing submissions of Various Host Authorities) [REP3-093], where it was (a) noted that the Applicant’s Need Case (AS-125) did not refer to this element of the MBU, (b) requested that a specific Policy document reference be provided, and (c) commented that ‘Making Best Use’ was not necessarily consistent with ‘Serving Demand Locally’ as identified during the Hearing by the ExA.</p> <p>It is unclear why the Applicant should raise the issue of serving demand locally, as its own analyses appear to suggest that growth in demand is predicted to be slowest in the areas closest to Luton, with growth rates higher in more distant areas. This is illustrated for example in Figure 6.6 (Page 119) of the Need Case (AS-125). While growth at Luton would include handling more passengers from the areas close to the airport, the proportion of these passengers would reduce given the faster growth predicted from more distant areas.</p>
Para 3.1.19	Need	Applicant’s suggestion that London airport system is not a single market	In 2019, some 36% of terminating passengers at the London area airports were foreign residents (Civil Aviation Authority Passenger Survey 2019). While more frequent visitors to the UK may have a preferred airport, many of these passengers



Document Reference	Topic	Matters Raised	Host Authorities Comment
			<p>with a central London destination will be ‘airport neutral’ and be simply ‘flying to London’.</p> <p>Of total terminating passengers (i.e. including foreign residents) in 2019, some 29% were from outside the South East of England, with the balance having an origin or destination within the region. This last group will select the airport they use for a wide and complex range of reasons, with geographic proximity/ease of access being just one. Destination, flight days and times, price and reputation of both airport and airlines will be other important considerations.</p> <p>The airports themselves offer different types of services, with Heathrow being important for long haul flights, Gatwick noted for short/medium haul holiday destinations, and Luton and Stansted offering more flights to Eastern Europe. There is through a core range of European destinations on offer from most of these airports, and passenger choice then focuses on price, timing of flights, seat availability and perhaps airline service reputation. It is likely that most travellers have used different London airports at different times, no matter where in the South East region they live.</p> <p>This is a complex picture within which looking to minimise airport access costs for passengers is just one component, alongside airline objectives of minimising costs and maximising profits.</p>
Para 3.1.20 and 3.1.21	Need	Balancing Government policies	It must first be demonstrated that Serving Demand Locally is indeed government policy. It is not clear that the Applicant’s response addresses the ExA’s question



Document Reference	Topic	Matters Raised	Host Authorities Comment
Para 3.3.11 and 3.3.12	Need	ExA's questioning of GDP assumptions	This is considered in CSACL-003 Row 7.
Para 3.4.1	Need	Capacity and Coordination	It is not clear that this has been considered within previous agenda items as stated in this paragraph.
Para 3.5.1	Need	Other Airport Capacity	<p>It is not clear that this has been considered within previous agenda items as stated in this paragraph.</p> <p>In addition to being discussed in CSACL's report to the HAs [REP2-057] (Para 3.44 <i>et seq.</i>), this is also covered in CSACL-003, Row 12, and has a material bearing on the timing of the environmental and economic impacts that would be generated by the proposed expansion.</p>



4 EP3-050: APPLICANT'S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 3

- 4.1.1. This response covers the three Host Authorities' comments on the Applicant's Post Hearing Submission, Issue Specific Hearing 3 **[REP3-050]**, where specific points are not covered within the Host Authorities' Issue Specific Hearing 2 post-hearing submission already **[REP3-094]**.
- 4.1.2. The two main issues addressed here are the Applicant's use of 2019 baseline use and the noise mitigation toolbox.

4.2 2019 BASELINE

USE WITHIN ASSESSMENTS

- 4.2.1. The relevant Section of the Applicant's Post Hearing Submission, Issue Specific Hearing 3 **[REP3-050]** is Section 6.2 Use of Actuals and Consented baseline. Paragraphs 6.2.4 and 6.2.5 state:

“The first method to identify adverse likely significant effects in Environmental Impact Assessment terms (EIA) due to noise change as a result of the Proposed Development. This method identifies noise change by comparing the situation with the Proposed Development (the Do-Something scenario) to the situation without the Proposed Development (the Do-Minimum scenario) in each future assessment year. The future air noise baseline (the Do-Minimum) is compliant with the airport's current consented long term noise Limits in each assessment year and therefore demonstrates a scenario where the airport is operating within its currently consented noise Limits. The 2019 baseline does not factor into this assessment.

“The second method is to identify significant effects on health and quality of life in Government noise policy terms. These are identified when noise exposure with the Proposed Development exceeds the SOAEL Threshold. Again, the identification of significant effects on health and quality of life is with reference to the noise exposure from the Proposed Development in a given assessment year and is not affected by the 2019 baseline.”

- 4.2.2. It is accepted that the first method referenced is not affected by any historic baseline, so long as the future baseline is correct, which is also accepted. The second method referenced is however in direct contradiction to the information within Environmental Statement Chapter 16: Noise and Vibration **[REP1-003]**.
- 4.2.3. Within Environmental Statement Chapter 16: Noise and Vibration **[REP1-003]**, under the heading, “Avoid significant adverse effects on health and quality of life from noise”, Section 16.9.8 states:

“For air noise, the 2019 Actuals baseline determines the number of properties last experiencing significant adverse effects on health and quality of life when the airport was



operating under pre-covid circumstances. In this assessment, future DS air noise predictions for each assessment phase are compared to the 2019 Actuals baseline to demonstrate that there will be a reduction in properties experiencing significant adverse effects on health and quality of life. ...”

4.2.4. Sections 16.9.89 and 16.9.90 of the same document then state:

“Table 16.36 demonstrates that there is a reduction in the total population exposed between the LOAEL and SOAEL and between the SOAEL and UAEL in DS 2027 compared to the 2019 Actuals Baseline. This reduction in total population exposed is due to a reduction in contour areas as a result of new generation aircraft entering the fleet. There are no receptors in the study area exposed to noise levels above the UAEL in any assessment scenario.

“Significant adverse effects on health and quality of life in noise policy terms are determined by noise exposure above the SOAEL as defined in Table 16.13. During the daytime and night-time, the population exposed to noise levels above the SOAEL in the DS scenario are also exposed to noise levels above the SOAEL in the 2019 Actuals Baseline. Therefore, there are no new significant adverse effects on health of quality life during the daytime and night-time in assessment Phase 1.”

4.2.5. The same statements are included for other assessment phases in Sections 16.9.114-115 and 16.9.138-139.

4.2.6. The 2019 Actuals baseline can therefore clearly be seen within the Environmental Statement Chapter 16: Noise and Vibration **[REP1-003]** to be used to identify significant effects, which have been underplayed by the use of an inflated baseline. Given that the baseline quantifies conditions during a breach of planning condition, the assessment cannot be taken as correct.

4.2.7. The Applicant states in Section 6.2.8 that a sensitivity test has been undertaken using the 2019 Consented baseline, which does not change the “*conclusions drawn from this comparison in terms of EIA likely significant effects and residual significant effects on health and quality of life are unchanged*”.

4.2.8. This statement directly contradicts the information set out in the second part of Section 6.2.4 of the Applicant’s Post Hearing Submission – Issue Specific Hearing 3 (ISH3) **[REP3-050]**, as the 2019 Actual baseline is clearly being used to draw conclusions on likely significant effects, contrasting the statements from the Applicant where they previously stated the baseline as not affecting the assessment.

4.2.9. While the assessment of likely significant effects may not materially differ when using Consented against Actual 2019 as the baseline, the population counts would be incorrect, and thus any decision would be based on incorrect information. A compliant baseline must be used.

4.2.10. It is also imperative to note that these likely significant effects are based on the Core Planning Case, instead of the Faster Growth sensitivity case which are used to set the



future noise contour Limits. There is not enough evidence within the Environmental Statement Chapter 16: Noise and Vibration [REP1-003] to identify which populations will be affected if using 2019 Actual baseline and the Faster Growth sensitivity case in the same assessment.

- 4.2.11. There are also multiple references to future noise contours “reducing” within Environmental Statement Chapter 16: Noise and Vibration [REP1-003] that do not stand true should 2019 Actuals be replaced with 2019 Consented. This amounts to an unfair and unreasonable bias when reading the Noise Chapter.

APPLICANT’S REASONING

- 4.2.12. Applicant’s Post Hearing Submission – Issue Specific Hearing 3 (ISH3) [REP3-050], Section 6.2.7 goes on to state:

“Where the 2019 baseline does come into play is when comparisons are made to the ‘current baseline’. This has been done in the first instance using the 2019 Actuals baseline to provide context so that people can understand how noise levels will change with the Proposed Development by comparison to what was actually flown and was actually experienced by communities in the baseline year. This is in line with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (which refers to the baseline scenario as “a description of the relevant aspects of the current state of the environment” in Schedule 4, Paragraph 3) (Ref 10).”

- 4.2.13. The use of 2019 Actual baseline clearly goes beyond providing context within the ES and has been used to determine significant adverse effects, as can be seen in the Sections from the ES quoted above.
- 4.2.14. If the baseline is used solely to provide context for local communities, then it would be materially more beneficial to use 2022, 2021 or 2020, rather than a summer which occurred 4 years prior.
- 4.2.15. Using the same reference to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (‘EIA Regulations’) as Section 6.2.7 above, “current” cannot be read as 2019 using the Applicant’s definition. Ignoring intervening years because of the pandemic as atypical would also allow for the omitting of 2019 as atypical since it reflects a breach of planning condition.
- 4.2.16. There can be a strict reading of EIA Regulations, when it is clearly not restrictive in what “current” refers to, nor does it clearly allow for use of a year where the baseline was in breach of condition.
- 4.2.17. Further guidance is provided in an IEMA issued document entitled ‘Guidelines for Environmental Noise Impact Assessment’, published in 2014.
- 4.2.18. Section 3.11 of this IEMA document, under the heading of ‘Characterising the existing noise environment’, states:



“It is necessary to have a clear understanding of the existing situation. Usually this will require the measurement of baseline noise levels at times of the day, night, week, season or year when the project is likely to have an impact. In some instances where detailed baseline data are available, e.g., traffic flow data, it may be appropriate to define the baseline noise environment by prediction. Further guidance on how to determine the baseline conditions is provided in Chapter 5.”

4.2.19. Section 5 is titled ‘Establishing the baseline’ and offers useful guidance for determining the relevant baseline for EIA. Sections 5.5 to 5.6 state:

“5.5 Baseline noise levels may be required for different years. In many cases the year in which the study is carried out will be relevant, and these baseline noise levels may be referred to as existing (or current). However, there may be occasions when baseline data are required for other years (see Paragraphs 5.7 and 5.8).

5.6 Baseline noise levels can serve several purposes in the assessment process:

- They provide context for the noise levels predicted to arise from the proposed development against which they may be appraised.*
- They may be required as a formal part of the noise assessment process.*
- They may demonstrate that the noise environment is already unsatisfactory.”*

4.2.20. The third and fourth sentences of Section 5.8 states:

“Although it is possible to measure noise levels at the time an assessment is conducted, this may not be the relevant time for which the baseline noise levels are required. Baseline noise levels may be determined by direct measurement, by prediction, or by a combination of these methods.”

CONCLUSION

4.2.21. The Host Authorities consider Luton Rising’s approach to be in conflict with the IEMA guidance, which states that predicted noise levels can be used (rather than actual), and / or multiple years (i.e., years where Luton Airport was not in breach of its planning conditions). Both these examples show that “current” does not have to be taken as the 2019 Actuals baseline.

4.2.22. In conclusion, as has been requested in Statement of Common Ground (SoCG) meetings, in the Noise Envelope Design Group meetings, and in multiple written submissions to the DCO Examination, the Applicant needs to revise their assessment to comply with UK aviation noise policy, by basing future contour area Limits from the core assessment case and by committing to an equal share of noise reduction benefits between the local community and the airport, based on a compliant baseline.



4.3 NOISE MITIGATION TOOLBOX

4.3.1. Action 22 of Applicant's Post Hearing Submission – Issue Specific Hearing 3 (ISH3) **[REP3-050]**, within Section 6.3.8 onwards, states that noise mitigation measures have been set out within the updated Green Controlled Growth (GCG) Explanatory Note **[REP3-015]**.

4.3.2. The main mitigation measure relied on is the release of slot capacity. Other mitigation measures are set out in Section 3.2.16 of the Green Controlled Growth (GCG) Explanatory Note **[REP3-015]**:

a. working with airlines to implement noise abatement operational procedures such as Continuous Descent Approaches (CDA), delayed landing gear deployment and adherence to noise preferential routes; and

b. methods of incentivisation for the adoption of quieter aircraft such as differential landing charges and Departure Noise Limits.

4.3.3. Taking information from within the 2021, 2020 and 2019 Annual Monitoring reports¹ for Luton Airport and Delayed Landing Gear Deployment Trial 2017 report², the following can be identified:

- Continuous Descent Approaches are already in use, being used by 91%, 88% and 89% of all aircraft arrivals within 2019, 2020 and 2021, respectively.
- Delayed landing gear deployment is already in use at Luton and does not have an effect on noise levels within any contour areas (only applying beyond 5 nautical miles).
- Adherence to noise preferential routings is well controlled at Luton, with only 53, 11 and 23 instances of aircraft deviating from preferential routings occurring within 2019, 2020 and 2021, respectively. These are from a total number of aircraft movements of 61,560, 63,593 and 141,481 in each respective year, so clearly represent an inconsequential minority of flights.
- Differential landing charges and Departure Noise Limits have both been in effect at Luton Airport for some time and did not prevent, or assist in preventing, previous breaches of planning noise conditions. Therefore, they cannot be taken as a viable mitigation measure. For reference, there were 0, 2, and 6 Departure Noise Limit violations in 2019, 2020 and 2021, respectively.

4.3.4. The only mitigation strategy remaining is therefore slot allocation. The Applicant has committed to responding to *“Action 28: Confirm whether there is any mechanism to remove*

¹ <https://www.london-luton.co.uk/corporate/community/noise/annual-monitoring-reports>

² <https://www.london-luton.co.uk/corporate/community/noise/community-noise-reports>



a slot once it has been allocated, has accrued grandparent rights and is operating in accordance with the slot rules.” at Deadline 4.

4.3.5. The Host Authorities await this information.



5 REP3-051: APPLICANT’S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 4

Document Reference	Topic	Matters Raised	Host Authorities Comment
Para 5.1.4	Surface Access	Off-site Highway Works at three junctions in Hitchin.	<p>The works proposed at the three junctions in Hitchin are relatively minor highway capacity based solutions. The Host Authorities have ongoing concerns that the proposals do not meet their policy requirements in terms of providing for sustainable travel (active travel and public transport) in relation to their Growth Transport Plan (GTP) and also that a larger more expensive scheme will not be possible if it is not developed at the planning stage because additional funding may not be available or would be competitive through the Sustainable Transport Fund (STF), and therefore an enhanced scheme may not be delivered. Active travel enhancements are likely to reduce the traffic capacity and need to be modelled accordingly as part of the Transport Assessment, rather than developed in more detail at a later stage, e.g., A602/B656 Hitchin Hill Roundabout where increasing the flow capacity will increase the peak traffic flows in the A505 and B656 through Hitchin, exacerbating congestion and reducing bus service reliability within Hitchin. A signalised junction improvement to reduce congestion at Hitchin Hill roundabout would also provide the opportunity for improved pedestrian crossing/active travel facilities and improved bus journey time reliability. At Pirton Road roundabout a signalised junction scheme could be preferable to provide improved opportunity for crossing facilities. These options are not considered in the current proposals.</p>



Document Reference	Topic	Matters Raised	Host Authorities Comment
			<p>Furthermore, the mitigations proposed at all three junctions do not assist with prioritising buses (i.e., shortening and/or reducing variability in bus journey times), which is essential to achieving modal shift targets for Luton Rising and HCC.</p> <p>The Host Authorities are also still awaiting further information on the “potential traffic management / traffic calming schemes” at locations in Hertfordshire, these will need to be tested with local communities, designed and costed in order to ensure they are deliverable if and when required, and not contingent on funding being available in the STF.</p> <p>The Host Authorities look forward to understanding the airport traffic impacts and the effect of the proposed mitigation by considering the queues, delay and ratio of flow to capacity in more detail for each scenario as per the ExA request for the additional traffic analysis which is expected at Deadline 4.</p>
Para 7.1.3	Surface Access	Opportunity to introduce other locations into the TRIMMA.	<p>The Host Authorities are concerned that the TRIMMA sites in Hertfordshire may not be adequate to capture the travel demand associated with the airport via rural routes. The Host Authorities understand the Applicant’s position there will be an opportunity to introduce additional locations for monitoring in Hertfordshire through the TRIMMA, which will be part of the Airport Transport Forum (ATF) and that a steering group will be set up for the TRIMMA. The Host Authorities are concerned that the level of governance around the ATF has not adequately been set out – and require that additional core monitoring sites in Hertfordshire need to be identified and locked in from the start with the ability for further additional sites to be added on a needs basis later on</p>



Document Reference	Topic	Matters Raised	Host Authorities Comment
			through the ATF. The Host Authorities welcome further information to confirm the sites that are included and to enable them to propose additional sites for further consideration by the Applicant. As a starting point we have identified 6 additional sites which would benefit from the airport ANPR monitoring.
Section 8.1 & Table 1.1, Action 19	Surface Access	Future rail capacity.	<p>The Host Authorities remain concerned that the impact of the airport on the rail capacity at stations in Hertfordshire is not covered in a sufficient level of detail in the Transport Assessment to be able to understand the impacts on existing passengers and capacity. The Applicant in its submission refers to the physical capacity of the DART station / Luton Airport Parkway but does not confirm that the stations on the line can accommodate the forecast additional peak hours trips. The assessment of capacity to date has been based on the available capacity per train on the routes, not in relation to specific sections of the route or stations. Hertfordshire is still concerned that the Hertfordshire stations are already at capacity for some journeys and the development will have an impact on existing passengers alongside general growth back to pre-pandemic levels [REP2-058, RR-0558, RR-1119, RR-0297].</p> <p>Noted that Network Rail is looking at capacity issues for the appropriate deadline which will assist with Host Authorities formulating a view on this if their assessment is related to station capacity.</p>
Section 8.3	Surface Access	Discussions with bus and coach operators.	The Host Authorities have ongoing concerns about the development proposals not providing for the new and enhanced east-west bus services and public transport links from the outset



Document Reference	Topic	Matters Raised	Host Authorities Comment
			<p>to influence travel behaviour. The proposals associated with improved bus and coach operations has not been detailed in the transport assessment to provide assurance that the services will be funded and provided for airport passengers and staff accessing the airport from the east and that sufficient consideration has been given in terms of the mode share targets. The Applicant references the importance of the East-West public transport links but is not making any proposals or provision for this from the outset. The Host Authorities still have concerns that the timing of the Sustainable Transport Fund (STF) is not appropriate for providing pump-priming for bus services and that the size of the funding pot through the STF will not be sufficient to provide support for long enough (Updated Principal Areas of Disagreement Summary Statement, REP 2-058, Hertfordshire County Council Relevant Representation RR-0558, North Hertfordshire District Council Relevant Representation RR-1119, Dacorum Borough Council Relevant Representation RR-0297). It is unlikely that the new bus services could be commercially operated from the outset so they would need funding support.</p> <p>Hertfordshire County Council has provided additional information to Arup on bus service gaps in Hertfordshire and aspirations for bus service improvements as set out in our adopted local transport plan documents (Growth and Transport Plans) as part of ongoing discussions around the SoCG. Further discussion and negotiation around this is still required with The Applicant.</p>



Document Reference	Topic	Matters Raised	Host Authorities Comment
			Noted that the Applicant will provide an update on the STF including indicative costs and how it would be secured for Deadline 4.
Table 1.1, Action 1	Traffic Modelling	Covid-19	Reviews of the initial outcomes are ongoing with the Host Authorities and a response on the submitted ISH4 Action 2 Interim Response – Presentation on the Interim Findings of the Covid-19 Modelling Update [REP3-077] is provided later in this document.
Table 1.1, Action 24 & 25	Surface Access	Bus mode share & staff bus usage	Staff mode share improvement is cited with reference to improving bus/coach mode share which, post-pandemic, is still 6% behind the pre-pandemic levels. The evidence to support how this mode share can be increased by bus / coach from the east-west is not detailed sufficiently in the Transport Assessment to be able to ensure that sufficient funding through the STF will be in place to pump-prime the services potentially over a long timeframe (Updated Principal Areas of Disagreement Summary Statement, REP 2-058 , Hertfordshire County Council Relevant Representation RR-0558 , North Hertfordshire District Council Relevant Representation RR-1119 , Dacorum Borough Council Relevant Representation RR-0297).The Applicant should provide more detail on the services that will be provided and the expected level of funding available for these.
TBC	Surface Access	Deadline 4 and Deadline 5	The Host Authorities will review the additional information which will be supplied by the Applicant to enhance the various assumptions and content of the Transport Assessment in response to the various questions raised by the ExA and



Document Reference	Topic	Matters Raised	Host Authorities Comment
			interested parties which are being provided at Deadline 4 and Deadline 5.



6 EP3-052: APPLICANT’S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 5

Document Reference	Topic	Matters Raised	Host Authorities’ Comment
7.1 Paragraphs 7.1.19, 7.1.20, 7.1.21, 7.1.22.	Air Quality	<p>Paragraph 7.1.19: “...ExA asked what the likely lag time between identifying an issue through monitoring, commencing additional monitoring to determine whether contributions are related to the airport, and commencing the green controlled growth process if possible”</p> <p>Paragraph 7.1.20: “The air quality Limits are reviewed as annual average concentrations and so monitoring will take place once per year. (...) the report will likely be around April the following year. The ESG would then likely meet at around June or July of the given year ...”</p> <p>Paragraph 7.1.21: “The Applicant further confirmed that because monitoring for air quality assets (...) is ongoing throughout the year, and uses a mixture of different techniques, the airport’s operator will then essentially have early warning of any problems associated with air quality and provided they’re taking a proactive approach to monitoring, they should have early warning of any potential exceedances of the Limit associated with the annual average....”</p>	<p>The Applicant’s response on lag time on the one hand seems to imply that monitoring results would be reviewed only annually with several months lag time before any action is confirmed, but on the other hand that “...the airport’s operator will then essentially have early warning of any problems associated with air quality....” The Host Authorities would request the Applicant advises the ExA on what mechanism would be put in place to alert the operator of a potential problem, and how this would work if monitoring results are only to be reviewed once per year. As the Host Authorities have suggested in their Issue Specific Hearing 5 post-hearing submission [REP3-096], this could be achieved by continuous monitoring of rolling annual mean concentrations – rather than annual means for each calendar year.</p> <p>Responses on monitoring Thresholds and lag time in reporting do not adequately address concerns previously expressed in Paragraphs 7.4.10 and 7.7.15 of the Local Impact Report [REP1A-003].</p>



7 REP3-053: APPLICANT’S POST HEARING SUBMISSION – ISSUE SPECIFIC HEARING 6

Document Reference	Topic	Matters Raised	Host Authorities Comment
Paragraph 8.1.11, 8.1.14 & 8.1.15	Built Heritage	Tranquillity as a component of the setting of Registered parks and gardens.	<p>Paragraph 8.1.11 states that St Paul’s Walden Bury would experience “a negligible change to the park’s noise environment, which would result in imperceptible change to the park’s setting and would result in no harm to its heritage significance.” The assessment is further outlined at paras 8.1.14 which states that change ‘could be noticeable’ and para 8.1.15 which states “Aviation noise from overhead aircraft is already a component of St Paul’s Walden Bury RPG’s setting” (again noting that the Applicant has treated the park and garden as a whole, including all of the individual heritage assets located within the park and garden). It is also acknowledged in Chapter 10 Cultural Heritage of the ES [AS-077]) that there would be ‘a noise increase from the future baseline [...] which would be a negligible change.’</p> <p>However, as guidance makes clear even where this tranquillity has been impacted by later developments (e.g., from aircraft noise), there is still the potential for the Proposed Development to further detract from that setting. As Historic England’s Good Practice Advice Note 3, <i>The Setting of Heritage Assets</i>, (2017) notes of cumulative change: “Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.” (https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/)</p>



Document Reference	Topic	Matters Raised	Host Authorities Comment
			<p>This also relates to the issue of ‘quietness’ at Paragraph 10.7.44 of Good Practice Advice Note 3 which refers to registered parks and gardens specified at Paragraph 10.7.43, including the Grade II* Knebworth Registered Park and Garden.</p> <p>Further information or explanation is needed. to clarify these overall assessments.</p>
Paragraph 6.1.1	Landscape and Visual	Landscape and Visual Impact Assessment (LVIA) Methodology written questions.	The Host Authorities Post Hearing Submission – Issue Specific Hearing (ISH 6) Post Hearing Submission Note [REP3-097] Summary of oral submissions made details of the Host Authorities response in relation to LVIA methodology. The issues raised include: shortcomings in the sensitivity assessment; the requirement for more definition in relation to the spatial scope of assessment in relation to the AONB, more details regarding the establishment of baseline tranquillity levels and the requirements for Accurate Visual Representations (AVRs). These issues remain outstanding.
Paragraph 6.1.2	Landscape and Visual	Updates to the photomontages to be addressed by the Applicant.	Viewpoint parameters are still not present on the figure template as required by Landscape Institute guidance and explained further in the Issue Specific Hearing (ISH 6) Post Hearing Submission Note [REP3-097] .
Paragraph 6.1.3-6.1.5	Landscape and Visual	Discussion relating to the accuracy of the visualisations and how they are used in the LVIA.	The latest photomontages in Appendix 14.7 of the Accurate Visual Representative Viewpoints [REP3-012] still show winter views of deciduous hedge with full leaf cover. Accurate Visual Representations (AVRs) based on winter views should illustrate proposed vegetation in a predominantly defoliated state. Although the Applicant states that the photomontages are ‘illustrative’ the scale of any proposed vegetation



Document Reference	Topic	Matters Raised	Host Authorities Comment
			should be accurate. The Host Authorities request that the AVRs are updated to illustrate an appropriate state of seasonal leaf cover.
Paragraph 6.1.8	Landscape and Visual	The Applicant to produce a cross section which equates to the view represented by Accurate Visual Representation Viewpoint 28 [AS-143].	The main purpose of this cross section is to illustrate the Proposed Development and specifically: built form, landform and planting in relation to the existing situation as described in ISH 6 Post Hearing Submission Note [REP3-053].
Paragraph 6.1.12 – 6.1.17	Landscape and Visual	Matters relating to the Chilterns Area of Outstanding Natural Beauty (AONB) and the proposed assessment of Special Qualities.	The Host Authorities welcome the opportunity to review and comment on AONB Special Qualities assessment when it is available. The Applicant’s proposal to use Nature Scotland’s guidance relating to National Scenic Areas is appropriate although the Applicant refers to ‘AONBs’ (Paragraph 6.1.14). This is assumed be a typographical error.
Paragraph 6.1.18	Landscape and Visual	Confirmation that the Applicant will not produce a larger Zone of Theoretical Visibility to cover more of the AONB.	The Host Authorities expect that the Assessment of Special Qualities will include a more detailed analysis of views and the visual experience of receptors in the AONB particularly in relation to the Special Quality which relates to ‘Panoramic Views’. It is considered that an enhanced Zone of Theoretical Visibility would help to inform this analysis.
Paragraph 6.1.19	Landscape and Visual	The Applicant considers 5km study area and the ‘area	The 5km LVIA study area in relation to the main site is acceptable. However, to determine effects on the AONB there will need to be a



Document Reference	Topic	Matters Raised	Host Authorities Comment
		where aircraft are below 7000 ft over the AONB' to be sufficient.	spatial definition of the geographical extent over which the effects on the Special Qualities will be experienced.



8 REP3-003: DRAFT DEVELOPMENT CONSENT ORDER

Document Reference	Topic	Matters Raised	Host Authorities Comment
General	Local Impact Report	General	The Host Authorities raised a number of issues of concern in relation to the provisions of the draft DCO in their joint Local Impact Report [REP3-092] in relation to which they sought further engagement from the Applicant. While the updated draft DCO addresses some of these concerns (as noted in this table below) the majority remain outstanding.
Article 43	Disapplication of legislative provisions	Protective provisions	The lead local flood authority re-iterates that it will not grant its consent under section 150 of the Planning Act 2008 to the disapplication of its consenting until it is satisfied that appropriate protective provisions are included in the draft DCO to ensure that it can properly carry out its statutory functions.
Requirements 26, 27 & 28	Operational controls	Substitution of the phrase “airport comprised within the authorised development” with “airport”	The Host Authorities welcome the consistent use in these operational requirements of the phrase “airport” which avoids the potential ambiguities arising from the original drafting.
Requirement 23(3) & 24(2)	Drafting clarity	Use of the terms “paragraph” and “sub-paragraph”	Requirements 23(3) and 24(2) use the phrase “This <u>paragraph</u> applies...”. whereas the corresponding provisions in requirement 23(1) and 24(1) refer to circumstances unless “ <u>sub-paragraph</u> ” (3) or (2) applies. The Applicant is requested to review to ensure clarity and consistency of drafting.
Requirements 5(2), 8(1), 9(2), 13(2)	Standard of conformity with secured documents	Use of “in accordance with”	The Host Authorities welcome the amendments to these provisions that make the standard of compliance “accordance”



Document Reference	Topic	Matters Raised	Host Authorities Comment
			with the relevant secured documents certified under the draft Order.
Requirements 8(2), 10(2), 14(2), 16(2), 17(2), 29(2), 30(2), 31(2), 32(2), 33(2)	Standard of conformity with secured documents	Use of “substantially in accordance with” and “reflect”	The Host Authorities note that there remains a significant number of provisions that require submissions of detailed documents to be “substantially in accordance with” the outline documents certified under the draft Order. The Host Authorities note the explanation in Table 1.1 to the Applicant’s Post Hearing Submission from ISH1 [REP3-048] that “in accordance” is used where compliance is required with a final or approved document and “substantial accordance” is used in relation to outline documents. The Host Authorities consider that greater certainty would be provided by ensuring a consistent standard of conformity (i.e. “in accordance with”). Furthermore, the Host Authorities are not clear on the justification for the use of “reflect” in requirement 16(2).



9 REP3-074: APPLICANT'S RESPONSE TO SUPPLEMENTARY AGENDA ADDITIONAL QUESTIONS - ISSUE SPECIFIC HEARING 4 (ISH4)

Document Reference	Topic	Matters Raised	Host Authorities Comment
Table 2.1, ISH4.SA.03	Surface Access & Transport Modelling	<p>The Host Authorities [RR-0558, RR-1119 and RR-0297] queried the proposed traffic calming locations. The Applicants' response that the locations were informed by the outputs from the Strategic Model based on change in AADT with and without the development.</p> <p>The Applicant stressed that locations of traffic calming are indicative and will work with the local authorities to identify traffic management proposals subject to TRIMMA.</p>	<p>The Host Authorities are keen to ensure that their network is sufficiently protected and mitigated from the additional traffic associated with the development and access to the airport from the east. The Host Authorities would like to see further details of the modelling outputs to understand the wider forecast traffic increases within their network [REP 2-058, RR-0558, RR-1119, RR-0297]. The supplementary traffic distribution plots will assist with this, as set out in Table 1.1, Action 4 of the Applicant's Post Hearing Submission – Issue Specific Hearing 4 [REP3-051].</p>



10 REP3-009, REP3-010, REP3-011, REP3-012, REP3-013 REP3-014 APPENDIX 14.7 ACCURATE VISUAL REPRESENTATIONS

Document Reference	Topic	Matters Raised	Host Authorities Comment
REP3-009, REP3-010, REP3-011, REP3-012, REP3-013, and REP3-014.	Landscape and Visual	Accurate Visual Representations (AVR)	The AVR have been updated. Please note, that they do not strictly comply with the requirements set out in the Guidelines for Landscape and Visual Impact Assessment 3 rd edition (GLVIA3) because they do not have the viewpoint parameters on the sheet. This is raised in the Issue Specific Hearing 6 post-hearing submission [REP3-097]. However, at this stage of the process, it is not considered essential to make further updates because the required information is available on the corresponding viewpoint figures.



11 REP3-017: GREEN CONTROLLED GROWTH FRAMEWORK

Document Reference	Topic	Matters Raised	Host Authorities Comment
Table 4.1	Air Quality	The table gives details of all Air Quality monitoring sites proposed by the Applicant.	The table should include additional monitoring sites very close to the airport perimeter to enable airport source contributions to be more clearly 'visible' when analysing the monitoring data. See Page 14 Issue Specific Hearing 5 post-hearing submission [REP3-096].
Paragraph 4.4.1	Air Quality	<i>"...if legal Limits or interim targets change, this will trigger a review of GCG Air Quality Limits and Thresholds. It is proposed that this review should be carried out (...) within six months of the new legal Limits being published ..."</i>	It is noted that the statement has been amended from "... new legal Limits coming into force..." to "...being published...". But what does this actually mean? The statement should be amended to be clear that a review will be carried out when the Government publishes its intention to introduce new legal Limits or targets, and the review will be concluded in advance of these coming into force.
Paragraph 4.4.1	Air Quality	<i>"Such a review cannot introduce new pollutants to the GCG Framework."</i>	This additional statement is not acceptable to the Host Authorities as it rules out potential future regulations for ultra-fine particulate matter for which airport related vehicle and aircraft operations are known sources.
Paragraph 4.4.2	Air Quality	<i>"This review will consider the appropriateness and practicality of revising the Air Quality Limits and</i>	This apparent lack of commitment is considered unacceptable to the Host Authorities. How can the Applicant justify not revising the GCG Air Quality



Document Reference	Topic	Matters Raised	Host Authorities Comment
		<i>Thresholds to align with the new UK legal Limits (or interim targets); however, there will be no absolute requirement to do so."</i>	Limits and Thresholds in the event of new legal Limits/targets?



12 REP3-015 GREEN CONTROLLED GROWTH EXPLANATORY NOTE

Document Reference	Topic	Matters Raised	Host Authorities Comment
Paragraph 1.3.2	Air Quality	<p><i>“GCG will therefore ensure a proactive approach to managing environmental effects, with Limits applying in four key areas: (...) b. Air quality”</i></p>	<p>In relation to air quality, the Host Authorities contest that the GCG framework does not ensure a proactive approach to managing environmental effects [REP1-069, para 2.2.15.1.1, 2.2.15.1.3 and page 72] - especially given the long lag time in obtaining, analysing and reporting on data for each calendar year [REP3-096, page 14]. A better approach would be to set the Level 1 and 2 Thresholds for rolling annual mean concentrations REP3-096, page 14] and initiate investigation and appropriate action when triggered by the continuous monitoring. Furthermore, Thresholds for short-term concentrations should also be set to ensure that emissions can be managed effectively so as to avoid causing acute health effects [REP1A-003, para 7.7.14].</p>



Document Reference	Topic	Matters Raised	Host Authorities Comment
Figure 2.11	Air Quality	Refer to Figure.	Figure 2.11 appears to indicate that Air Quality monitoring (data collection) is limited to a three-month period (October - December) each year. Can the Applicant confirm to the ExA that this is this correct? If so, then this is inadequate. Monitoring needs to take place continuously over all months in every year.



13 REP3-019 GREEN CONTROLLED GROWTH FRAMEWORK APPENDIX A - DRAFT ESG TERMS OF REFERENCE

Document Reference	Topic	Matters Raised	Host Authorities Comment
A2.2.1	Quorum	A quorum for an ESG meeting is met where the independent chair, independent aviation specialist and slot allocation expert (or a substitute agreed as per paragraph A2.1.12) are present.	The Host Authorities understand that the rationale for reducing the Quorate to independent chair, independent aviation specialist and slot allocation expert relates to a review of the Terms of Reference by the Applicant to ensure that the ESG could still function if there were a failure (however unlikely) to secure 50% of the other members. Given the importance of the role of ESG the Host Authorities are of the view that their engagement in ESG and the decisions that it makes is crucial and that it is entirely appropriate for the DCO to make provision for and require a reasonable representation of other members to be present. The text should be returned to <i>“where the independent chair and independent aviation specialist (or a substitute agreed as per paragraph A2.1.12) and at least 50% of other representatives are present”</i> .



A4.9 Paragraph A4.9.1	Air Quality	<i>"Within six months of any change to UK legal Limits for concentrations of NO₂, PM₁₀ or PM_{2.5}, the airport operator will prepare and submit to the Air Quality Technical Panel an Air Quality Limit Review that will consider the potential for the Air Quality Limits and Thresholds to be changed to reflect the new legal Limits, and whether any shortlisted air quality monitoring locations should be brought into or out of scope of the GCG Framework."</i>	Can the Applicant explain to the ExA why changes should not be considered as soon as the intention to change is announced by the Government?
--------------------------	-------------	--	--



14 REP3-021 GREEN CONTROLLED GROWTH FRAMEWORK APPENDIX B - ESG TECHNICAL PANELS DRAFT TERMS OF REFERENCE

Document Reference	Topic	Matters Raised	Host Authorities Comment
			<p>The Host Authorities understand that the rationale for reducing the Quorate to where the independent technical expert is present relates to a review of the Terms of Reference by the Applicant to ensure that Technical Panels could still function if there were a failure (however unlikely) to secure 50% of other approved representatives. Given the importance of the role of the Technical Panels the Host Authorities are of the view that their engagement in them is crucial and that it is entirely appropriate for the DCO to make provision for and require a reasonable representation of approved representatives to be present. The text should be returned to <i>“where the independent technical expert and at least 50% of any other approved representatives (as per Paragraph B2.1.7) are present”</i></p> <p>. If it is considered there needs to be some form of provision made for Technical Panels not meeting, then it should be crafted in a manner where it is assumed that meetings will happen unless there is agreement of membership otherwise.</p>
B2.5.1	Chair of Technical	There is no requirement for any	



Document Reference	Topic	Matters Raised	Host Authorities Comment
	Panel authority to decide whether Technical Panel meets	Technical Panel to meet following submission of monitoring results to it by the airport operator, as per the process set out in Section B4.3. Any member of the Technical Panel may request that a meeting is held, but the decision to do so will be at the discretion of the relevant independent technical expert, acting in their capacity as the Chair of the Technical Panel.	



15 REP3-025: GREEN CONTROLLED GROWTH FRAMEWORK APPENDIX D - AIR QUALITY MONITORING PLAN

Document Reference	Topic	Matters Raised	Host Authorities Comment
D2.1 Paragraph D2.1.1	Air Quality	<i>"The monitoring equipment proposed for each location will consist of two NO₂ diffusion tubes and one continuous sensor monitoring system (AQMesh or equivalent) ..."</i>	This paragraph still refers to indicative continuous monitoring instruments. As previously raised in Paragraphs 7.4.10 and 7.7.15 of the Local Impact Report [REP1A-003] , reliance on indicative techniques without more robust reference equivalent instruments is not considered to be adequate.



16 REP3-078: APPLICANT'S CONSOLIDATED RESPONSE TO DRAFT DCO COMMENTS MADE IN WRITTEN REPRESENTATIONS AND LOCAL IMPACT REPORTS

Document Reference	Topic	Matters Raised	Host Authorities Comment
Table 4.1 Requirement 7	LIR 9.1.31	The Applicant states its view that 14 days prior notice of the commencement of development is sufficient.	The Host Authorities note the response that there will have been some “lead-in” time with the process of approvals of the detailed design. Nonetheless, the Host Authorities consider that a greater period of notice would be appropriate. However, the Host Authorities note that this is a point the Applicant is considering for Deadline 4 and will look forward to reviewing its proposals once they are available.



17 EP3-077: ISH 4 ACTION 2 INTERIM RESPONSE - PRESENTATION ON THE INTERIM FINDINGS OF THE COVID-19 MODELLING UPDATE

17.1.1. The Host Authorities refer the Examining Authority to their earlier points in:

- Hertfordshire Host Authorities Principal Areas of Disagreement Summary Statement, Paragraph 7.4.2 [REP2-058].
- Written Representation Hertfordshire County Council, Dacorum Borough Council, and North Herts Council TR02001-001466- Hertfordshire County Council, Dacorum Council, North Hertfordshire Council, Paragraph 2.2.6.1.2 and Table 3 [REP1-069].
- Hertfordshire County Council, Dacorum Council, North Hertfordshire Council Local Impact Report, Paragraph 7.3.24 [REP1A-003].
- Hertfordshire Host Authorities Principal Areas of Disagreement Summary Statement, Table 1 [REP2-058].

Document Reference	Topic	Matters Raised	Host Authorities Comment
Page 8 Slide 6 Strategic Road Network	Traffic and Transport	Covid- 19 Modelling	The Applicant should explain what selection criteria was applied removing the following sites from the Covid-19 Modelling update analysis, A414 east of M1 J8 (south of St Albans), A1 north and south J8 and A5183 (west of M1 and Slip End).
Page 9-11 Slide 7-9	Traffic and Transport	Covid-19 Modelling	These slides present very high-level comparisons of all traffic. The Applicant should provide more information of the trends by different vehicle types, cars, Light Goods Vehicle's (LGV's) and Heavy Goods Vehicle's (HGV's), between 2016 and 2023 where available.



Document Reference	Topic	Matters Raised	Host Authorities Comment
Page 12 Slide 10 Local Road network – initial locations for selection criteria	Traffic and Transport	Covid-19 Modelling	Can the Applicant confirm to the ExA why HCC site 232 has not been taken into consideration in the count analysis? The area shown in Slide 10 (page 12) from which traffic counts have been used to undertake comparisons between 2016 and 2023 is a lot smaller than the simulation network, presented in Figure 18.3 of the ES [AS-030] . The Applicant should provide justification as to why counts across the wider simulation network have not been considered. As a result of a smaller area being considered, the number of counts used for the local network is very small, only two have been used for HCC and two for CBC. This is not adequate enough to provide a clear picture of the changes in traffic flow across the study area between 2016 and 2023. It is expected that trends between 2016 and 2023 will vary between different vehicle types therefore this is an important aspect of the analysis which appears not to have been undertaken. The Applicant should clarify whether comparisons between vehicle types have been undertaken, cars, LGV's and HGVs.
Page 13 Slide 11 HCC Data	Traffic and Transport	Covid-19 Modelling	Site 372 sees a significant decrease in peak hour traffic post Covid. The Applicant should confirm the month the data has been compared for and that it is consistent between the years. The Applicant should clarify whether



Document Reference	Topic	Matters Raised	Host Authorities Comment
			there is any other explanation for this reduction other than Covid-19.
Page 14 Slide 12 CBC Data	Traffic and Transport	Covid-19 Modelling	The Applicant should confirm the month which data has been used for at each site. At both sites there is a significant reduction in peak hour traffic, in excess of 20% in some instances. The Applicant should clarify whether there is any other explanation for this reduction other than Covid-19.
Page 17 Slide 15 Trend Analysis Key Findings	Traffic and Transport	Covid-19 Modelling	The Applicant should provide an update on this point. <i>LRN for LBC – work still in progress and to be reported once complete</i>
Page 17 Slide 15 Trend Analysis Key Findings	Traffic and Transport	Covid-19 Modelling	It is stated that “ <i>Trends analysis conclusion – SRN largely ‘recovered’, LRN not ‘recovered’ and there may therefore be a case for post model slight downward adjustment to traffic forecasts</i> ”. This is not correct. The adjustment should be to the base year traffic flows upon which forecasts are developed (and possibly to the traffic forecasts in addition). The Applicant should explain what adjustments they plan to make to the base and future year forecasts.



Document Reference	Topic	Matters Raised	Host Authorities Comment
Page 21 Slide 19 Growth in trip productions by mode	Traffic and Transport	Covid-19 Modelling	The Applicant should confirm whether this graph is showing National or Local Growth Productions by mode.
Page 22 Slide 20 Growth in all trip productions through time	Traffic and Transport	Covid-19 Modelling	The Applicant should confirm whether this graph is showing National or Local Growth Productions.
Page 23 Slide 21 Trip productions by purpose - % change 2021-2051	Traffic and Transport	Covid-19 Modelling	The Applicant should confirm whether this graph is showing National or Local Growth Productions by purpose.
Page 24 Slide 22 NRTP22 growth versus RTF18 growth for East of England	Traffic and Transport	Covid-19 Modelling	This statement “LGVs and HGVs represent smaller portions of overall traffic and would not result in significant increases in total all vehicle volumes” needs to be justified with evidence. No evidence shown in the changes in composition of vehicles (car/ LGV/HGV) pre and post Covid-19. See earlier comments about this in pages 9-12 above.
Page 25 Slide 23 Future years modelling updates – summary	Traffic and Transport	Covid-19 Modelling	“Demand model and highway assignment model runs taking place for reporting in October, including new 2023 forecast year and comparison with count data.” The Applicant should confirm the methodology adopted to produce the 2023 forecast matrices.



Document Reference	Topic	Matters Raised	Host Authorities Comment
General	Traffic and Transport	Covid-19 Modelling	No information has been provided in the pre and post Covid-19 changes in use of public transport bus / rail / air. The Applicant should provide information of the analysis undertaken.

