

December 2023

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

8.127 Applicant's Response to Deadline 5 Submissions

Appendix B - Buckinghamshire Council

Infrastructure Planning (Examination Procedure) Rules 2010 Application

Document Ref: TR020001/APP/8.127

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.127 APPLICANT'S RESPONSE TO DEADLINE 5 SUBMISSIONS
APPENDIX B – BUCKINGHAMSHIRE COUNCIL**

Deadline:	Deadline 6
Planning Inspectorate Scheme Reference:	TR020001
Document Reference:	TR020001/APP/8.127
Author:	Luton Rising

Version	Date	Status of Version
Issue 1	December 2023	Additional Submission – Deadline 6

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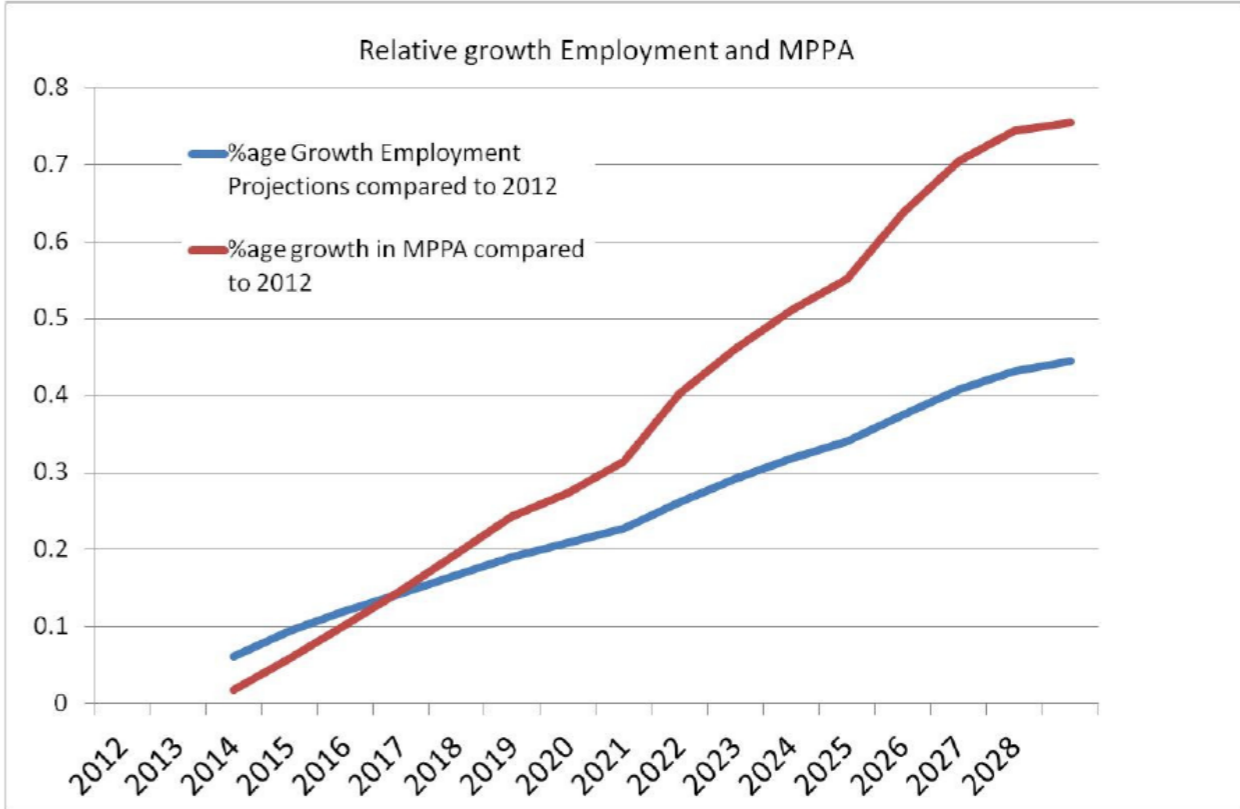
Tables

Table 1.1 Applicant's response to submission by Buckinghamshire Council at Deadline 5

Appendix B – Buckinghamshire Council [REP5-064]

Table 1.1 Applicant's response to submission by Buckinghamshire Council at Deadline 5

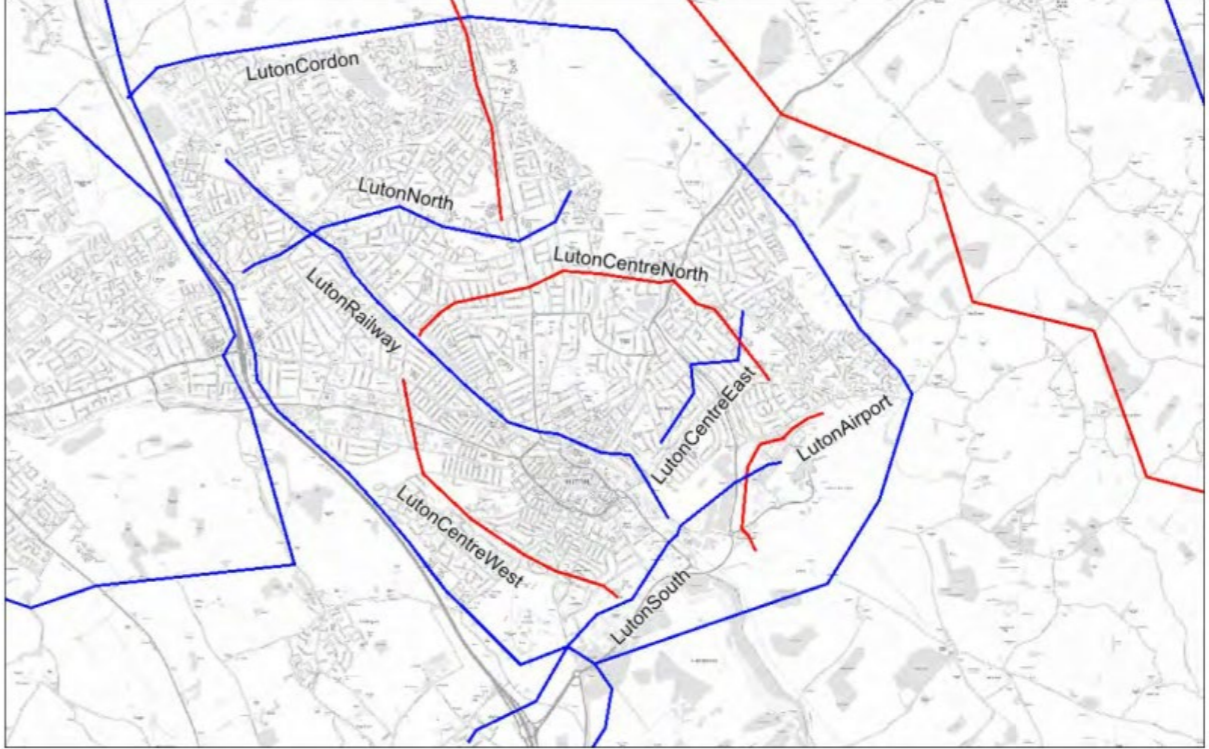
I.D	Topic	Deadline 5 submission (Verbatim)	Luton Rising's Response
1	Surface Access	<p>The Framework Travel Plan still does not set an annual frequency for the measurement of targets as a maximum. The Council remains of the position that this should be the maximum period between surveys undertaken to provide a meaningful measure of the effectiveness of Travel Plan interventions in achieving its aims. This maximum period should be entrenched within the FTP.</p> <p>With reference to section 4.2, targets should be reviewed on an annual basis to ensure that trends are identified and if there is information to show a target is unlikely to be met, additional measures should be introduced to either support the measure to achieve the target, or review if the measure should be changed in order to achieve the overarching objective during the life of the Travel Plan period.</p> <p>The Council takes the opportunity to reiterate the position presented during ISH4 that the 5 year TP period is too long for review processes and allows travel behaviours to become entrenched that would then be harder to amend through the next TP cycle.</p> <p>The Council is pleased to see that there is a recognition of the need to identify and subsidise new bus routes, within the TP toolbox. However, there is a lack of certainty that this will be introduced as it forms part of a list of options. The Council remains of the position that certain elements of the FTP should be absolute commitments within this document.</p> <p>The Council does not consider that this document has addressed the concerns raised previously in its written representations (REP3-082) and SoCG.</p>	<p>Please see response 4, paragraph 3, submitted at Deadline 4 [TR020001/APP/8.107] for response to annual monitoring. The review cycle reflects that of the Airports Surface Access Strategy, as recommended in the <i>Aviation Policy Framework</i>. Travel Plan commitments will be made within the first future Travel Plan. A commitment to funding of sustainable transport interventions has been made through the Sustainable Transport Fund. This will be administered by the Airport Transport Forum Steering Group, of which Buckinghamshire Council is proposed as a member.</p>
2	Surface Access	<p>The submitted trip distribution plans present a visible increase in the number of passengers travelling through Buckinghamshire to the west of Luton when comparing the with and without expansion in 2043. However, quantitative data has not been included within this document to allow the Council to determine the full extent of this impact.</p> <p>It has been previously raised that the Buckinghamshire villages to the west of Luton are sensitive to traffic changes, even if the increase in traffic through these locations appear to have a smaller impact than other routes identified. The Council therefore remains of the position that further work is requested to allow a judgement to be made on the extent of mitigation works which may be necessary within Buckinghamshire.</p> <p>The plans do not show peak hour impacts or the impact of the distribution in the early mornings or interpeak periods when development traffic would have cause to impact on other matters such as health and environmental concerns. This omission should be addressed to allow the necessary assessment to be undertaken and reported as a supplement to the relevant chapters in the ES.</p>	<p>The purpose of the Trip Distribution Plans [REP5-037] is to illustrate the daily volumes and routing to/from the airport by year and scenario. The plans have not been produced to show the quantitative assessment, which is presented in the Transport Assessment 7.02 Transport Assessment Appendices – Part 2 of 3, Appendix F Strategic Modelling Forecasting Report [APP-201].</p> <p>The results of quantitative assessments during the 08:00-09:00 morning peak hour, 10:00-16:00 average interpeak hour and 17:00 evening peak hour are presented in the Strategic Modelling Forecasting Report 7.02 Transport Assessment Appendices – Part 2 of 3, Appendix F Strategic Modelling Forecasting Report [APP-201]. The peak hour impacts are shown in Figure 5.3: Forecast Change in Traffic Volumes (vehicles) between TAG-based "Without" and "With" Expansion, Simulation Network and in Figure 5.4: Forecast Change in Traffic Volumes (vehicles) between TAG-based "Without" and "With" Expansion, Luton Borough. The peak hour trip distributions of airport traffic are shown in Figure 5.5: Forecast Routeing to / From London Luton Airport. These figures show that there is no potential impact, and hence no need for mitigation.</p>

I.D	Topic	Deadline 5 submission (Verbatim)	Luton Rising's Response
3	Economic case	<p>REP4-075: 8.89 Applicant's response to Issue Specific Hearing 2 Actions 5 and 6 – Past Employment Estimates</p> <p>The Council notes the detail provided on past employment estimates and recognises the difficulties associated with estimating employment based upon SIC codes. Whilst the employment forecasts from Halcrow have been provided for 2028, it would be helpful to understand the forecast level of employment in earlier years to understand how actual growth compared to forecast growth.</p> <p>Similarly, further detail could be provided to strengthen the arguments around the Airport's contribution to levelling up and tackling deprivation. This could include more up to date statistics and more information on the beneficiaries of some of the earlier employment and training schemes. This would help to substantiate the argument for the impact of future expansion on levelling up, for both Luton and surrounding counties.</p> <p>The Council welcomes engagement and involvement with the Employment and Training Strategy associated with the DCO. The Council is keen to utilise this involvement, particularly through representation on the Local Economic Development Working Group, to try and maximise the economic benefits for Buckinghamshire. The Council will be seeking to ensure activities align with local need and priority and to facilitate linkages with education, training and support providers in Buckinghamshire.</p> <p>Challenges, however, remain with accessibility by public transport to the Airport. As highlighted in the comments on surface access, addressing this is fundamental to achieving the economic objectives of expansion, particularly around the levelling up agenda. Failing to do so could undermine the aims and activities associated with the Employment and Training Strategy, for Buckinghamshire and other authorities either hosting or close to the Airport.</p>	<p>In terms of the previous forecasts of employment growth, Halcrow did not provide employment estimates explicitly for years other than 2028 but they did provide a graph reproduced below to illustrate growth in employment in their mid-estimate case compared to forecast growth in passenger numbers.</p> <p><i>Figure 6.2 Employment and mppa forecasts for the development scenario</i></p>  <p><i>Source Halcrow 2012, LLAOL 2012</i></p> <p>For the reasons set out in REP5-075, the Halcrow employment estimates are not strictly comparable with those set out in ES Appendix 11.1 [APP-079] and a comparison between their estimates of airport related job creation are compared to the actual results at paragraph 2.4.5 of REP4-075.</p> <p>As previously confirmed, Buckinghamshire Council will be included within the Local Economic Development Working Group and will be engaged with through this forum.</p>
4	Climate Change	<p>REP4-078: 8.90 Applicant's response to Issue Specific Hearing 2 Actions 15, 17, 22, 23: Greenhouse Gases and Climate Change Matters</p> <p>The Applicant's response to action 15 highlights that Inset 12.4 of Chapter 12 of the ES (REP3-007) provides a quantified sensitivity test, based on the High Ambition Scenario in the Jet Zero Strategy that's incorporated in the Core Planning Case. The Council maintains that, by definition, this is not a sensitivity analysis. It is rather a breakdown of the contribution of each of the different measures. A sensitivity test would analyse the impact of differential rates of delivery of each of these measures. This point has been made repeatedly and the Council fundamentally objects to the</p>	<p>The Applicant's position is that Inset 12.4 of Chapter 12 GHG of the ES [REP3-007] is not a quantitative sensitivity analysis, but that it does however effectively represent a proxy for a sensitivity test, in that it illustrates the relative contribution of each mitigation measure to the aviation emissions in the Core Planning Case. A full, quantified sensitivity study to assess the impact of different rates of delivery of each measure to be carried out would by necessity involve a large number of variables, given that differential delivery rates for three different mitigation measures, and combinations thereof, would need to be modelled. This complex and time-consuming process would be of limited value in demonstrating the overall impact on overall emissions rates.</p>

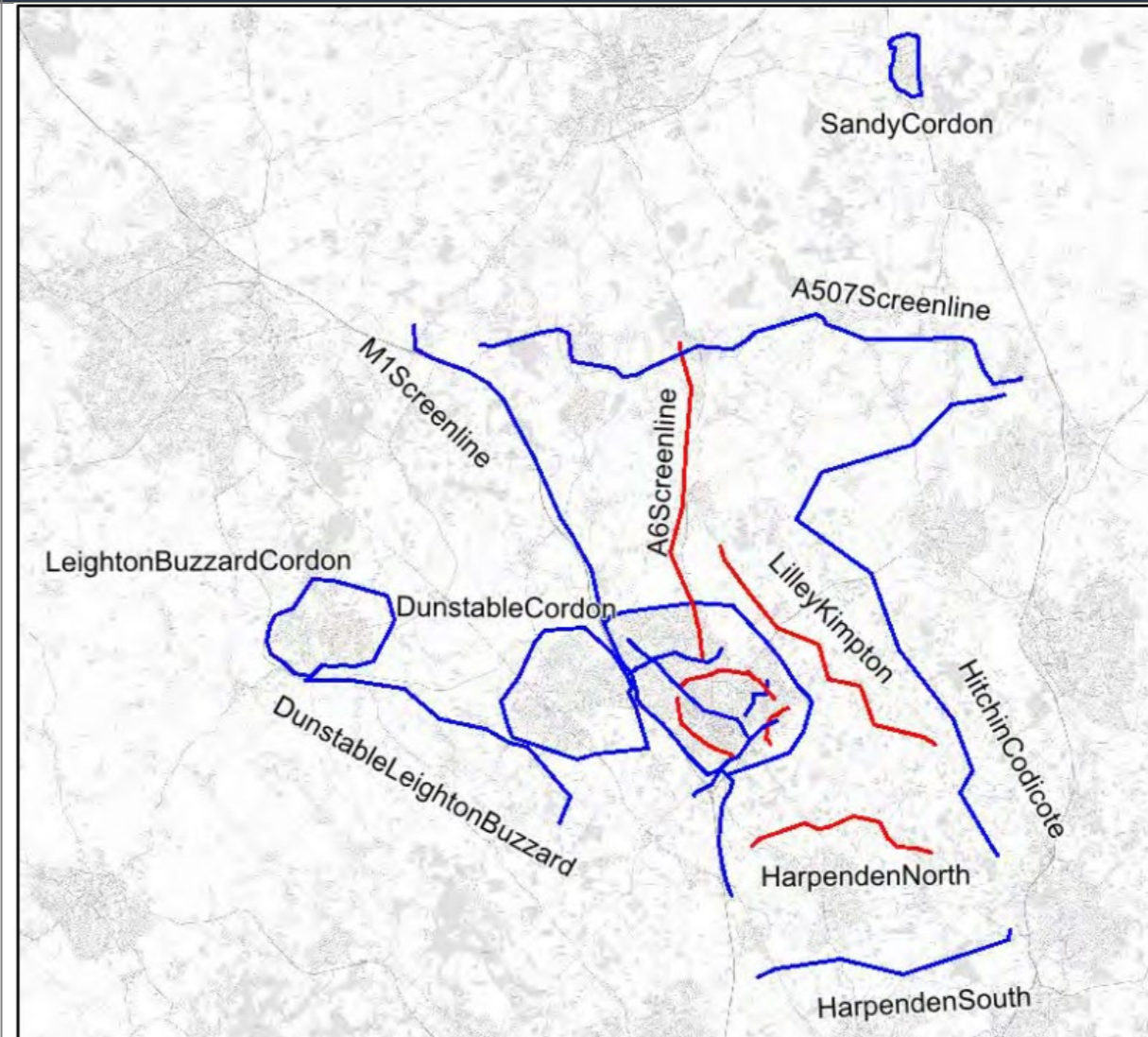
I.D	Topic	Deadline 5 submission (Verbatim)	Luton Rising's Response
		<p>Applicant's misuse of the term sensitivity study, which is becoming misleading due to its repeated misuse.</p> <p>The Applicant places an unwarranted level of confidence in the introduction of Sustainable Aviation Fuels (SAF) and next generation aircraft. The above are uncertain. This is recognised as a challenge within the JZS and a sensitivity analysis leading to quantitative assessment is therefore appropriate. This is further demonstrated in the Department for Transport's 'Jet Zero Illustrative Scenarios and Sensitivities' document, that: "The emissions reductions delivered in practice by SAF will depend on the type of SAF used in future. It is envisaged that some SAF production pathways, with the integration of carbon capture and storage into the production process, will be able to achieve 100% lifecycle savings. However, due to the current early stages of SAF (and carbon capture) development, there is significant uncertainty around the types of SAF that will make up the fuel mix in future." (p.24).</p> <p>This further demonstrates the need to perform sensitivity analysis regarding SAF and Zero Emissions Aviation technologies to ensure that stated benefits in the areas of greenhouse gas emissions are not overstated.</p> <p>Regarding the Applicant's response to action 17, the Council welcomes the breakdown of how many flights are caught by CORSIA, the UK ETS or neither and the provision of the forecast emissions. Though this demonstrates one scenario, the Council's position regarding the need to model uncertainties in areas such as carbon price and the availability of low/zero carbon aviation remains unchanged.</p> <p>By undertaking such an exercise, the Applicant will also be able to demonstrate the impacts of the slower development in the decarbonisation of aviation. Where this could be the case, the slower development in SAF and next generation aircraft would result in greater reliance on the UK Emissions Trading Scheme and CORSIA to offset the resulting GHG emissions from increased passenger number, as well as the BAU emissions. With the increased need for offsetting, this could impact on the Right to Fly at low-cost aspect put forward by the DCO, with the cost of offsetting passed through to the customer by airlines and potentially resulting in reduced passenger numbers due to affordability.</p>	<p>As previously noted, should the mitigation measures described in the Jet Zero Strategy (Ref 1) be delivered more slowly than anticipated, the emissions from aviation will continue to be controlled via market-based mechanisms including the UK ETS and CORSIA. Increased costs resulting from the controls exerted by these mechanisms will have an impact on demand (represented by the Slower Growth Case), but will also act to stimulate and incentivise innovation and speed the development of emissions mitigation measures.</p> <p>Variations in the delivery of SAFs, improvements in efficiencies, and the introduction of zero emissions aircraft, therefore, will have an impact on emissions that is moderated by the effect of market based mechanisms. The Faster and Slower Growth Cases described in the Need Case [AS-125] have taken these effects into account.</p> <p>In relation to the Council's point about low cost flights, it is important to note that the costs of carbon included within the demand forecasts as set out in Section 6 of the Need Case [AS-125] are not simply the current ETS or CORSIA costs but trend towards the BEIS 2021 target carbon costs for appraisal purposes, consistent with the assumptions adopted by the Department for Transport in their Jet Zero modelling. The nature of these costs is explained more fully at point 10 of REP5-050. Hence, to the extent that there are higher costs in future to address the need to reduce carbon emissions, these are already accounted for in the demand forecasts for the Proposed Development.</p>
5	Noise and vibration	<p>REP4-080: 8.92 Applicant's response to Issue Specific Hearing 3 Action 1: Assessment of night-time construction noise</p> <p>The Council accepts that the conclusions of 'no significant effects' within the Applicant's submissions follow the recognised noise assessment methodology. However, the Council considers that this approach fails to reflect the potential significance of night time noise disturbance impacts, leading to sleep disturbance or deprivation that can manifest as adverse mental health and well-being effects that may be significant even over a short duration. There is a need for this to be reflected in the ES and suitable mitigation measures to be clarified and appropriately secured.</p>	<p>The assessment methodology for construction noise, including accounting for night-time noise impacts, follows industry standard approaches and has been agreed with the Host Authorities as recorded in the Statements of Common Ground. It is not agreed that this approach fails to reflect the potential significance of night-time noise disturbance impacts.</p>

I.D	Topic	Deadline 5 submission (Verbatim)	Luton Rising's Response
6	Surface Access	<p>REP4-083: 8.95 Applicant's response to Issue Specific Hearing 4 Action 17: Terms of reference for the Airport Transport Forum (ATF)</p> <p>It is noted that the terms of reference do not make any reference to the decision making process or the commissioning of implementation of interventions identified through the TRIMMA. Further clarification is required on the ATF's role with respect to this implementation and decision making process. The Council considers that whilst the full membership of the ATF would be able to bring forward suggestions for mitigation type 2 requirements through the TRIMMA, it is not clear if the full membership would have the expertise to assess the suggestions and therefore determine a decision on the implementation of type 2 mitigation within the TRIMMA. It is suggested that those decisions should be retained within the steering group.</p>	<p>8.95 Applicant's response to Issue Specific Hearing 4 Action 17: Terms of reference for the Airport Transport Forum (ATF) [TR020001/APP/8.95] refers to the terms of reference for the ATF, whereas the TRIMMA will be administered via a separate steering group formed of a subset of the members of the ATF; this is detailed in the Outline Transport Related Impacts Monitoring and Mitigation Approach [TR020001/APP/8.97], which states:</p> <p><i>The full Terms of Reference for the Steering Group will be provided in final TRIMMA. The final TRIMMA must be substantially in accordance with this OTRIMMA and be approved in writing by the relevant planning authority, following consultation with the relevant highway authority on matters related to its function. The airport cannot be operated above its extant passenger cap until the TRIMMA has been approved.</i></p> <p>It is proposed that the Steering Group will make decisions regarding the delivery of MT2, as stated in sections 2 and 4 of the Outline Transport Related Impacts Monitoring and Mitigation Approach [REP5-041].</p>
7	Surface Access	<p>REP4-084: 8.96 Applicant's response to Issue Specific Hearing 4: Action 29: Catchment area for staff walking and cycling</p> <p>It is noted that the outer most catchment of the cycling isochrones clip the edges of Buckinghamshire. It is questioned whether the Applicant has applied any correction factors for topography and available routes when producing these isochrones.</p> <p>The Council does not consider that there are any safe or suitable routes between the county boundary and the airport that could be considered appropriate for any significant numbers of people commuting between villages in the east of Buckinghamshire and the airport. In order to consider these isochrones to be representative of routes that people could be expected to use for sustainable access to the airport, an audit of available routes should have been carried out and areas where improvements are required identified to allow suitable corridors to be provided.</p>	<p>The street-based cycle isochrones account for speed changes due to the underlying elevation (speed will be lower for uphill journeys) and road type specific speed restrictions, with a standard speed on a flat road of 13mph.</p> <p>To undertake a full audit of all cycle routes was not considered necessary prior to examination. Exact routes were not considered at this stage, as the appropriate place to address this is in the future Travel Plans as part of the monitoring and mitigation process.</p>
8	Surface Access	<p>REP4-085: 8.97 Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA)</p> <p>The Council considers paragraphs 2.1.2 and 2.1.3 to be misleading. They set out that the TRIMMA is to be governed by a subgroup of the ATF steering group, but it then goes on to give details of the steering group and not the sub group. It is the Council's position and understanding from discussion with the Applicants that the whole steering group should be the governing group.</p> <p>The Council is concerned that the Applicant is setting out that Highway Authorities should be responsible for the costs of undertaking monitoring on behalf of the Applicant to show that their development has given need for mitigation type 2. A local authority has no funds of its own and is reliant on taxpayers to carry out its</p>	<p>As shown in Table 2.1 the ATF's subgroup and the Steering Group which will govern the TRIMMA are the same body.</p> <p>The Applicant has assessed the impact of the Proposed Development and has proposed mitigation for identified impacts. The Residual Impacts Fund will exist to mitigate previously unforeseen impacts which have been demonstrated to have arisen due to the proposed development.</p>

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		<p>functions. It should be incumbent on the Applicant to assess and mitigate the impacts of its own development.</p> <p>It is not possible to provide the ExA a position on the acceptance of the RIF as this has not been presented to the Council at this time. It is however said to be finite, which will be acceptable on the basis that it is of a significant enough value to deliver a range of potential schemes and will not be exhausted too readily, and therefore nullifying the proposals of the mitigation type 2.</p> <p>The Council welcomes the examples of the RIF Indicative Principles, of a maximum allocation per year, and a maximum allocation per authority, as ways of ensuring that each authority has the ability to access funding if required.</p>	
9	Surface Access	<p>REP4-086: 8.98 Applicant's response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 1</p> <p>The Council acknowledges the national trends identified within the Technical Note and is conscious of the work undertaken within the host authorities' areas. It is noted that no assessment has been carried out within Buckinghamshire and so it is not possible for the Council to determine if these trends are replicated within it network. The Council's concern remains that the modelling has not been validated for the Buckinghamshire Network and so conclusions drawn from the strategic modelling work cannot, as yet, be considered robust in this area.</p> <p>As part of the Deadline 3 submission, the Council offered to provide recent survey data to be used as part of a 2023 baseline or requested that the Applicant carry out their own surveys of this route. However, this request has not been included as part of the recent submissions. This offer to the Applicant remains.</p>	<p>The Applicant considers the strategic transport model is a suitable tool to assess the level of traffic impact on the highway network in Buckinghamshire for the following reasons:</p> <ol style="list-style-type: none"> 1. The model has been calibrated and validated as per the DfT's TAG guidance and considered fit for purpose by all Host Authorities and National Highways. 2. The model includes Buckinghamshire within its modelled simulation, with the fully modelled area covering much of the county. This is shown in 7.02 Transport Assessment Appendices - Part 1 of 3 Appendix E1: Highway LMVR (LMVR) [APP-201], Figure 4.1 CBLTM-LTN Fully Modelled Area and in the LMVR Figure 7.1 Luton Airport and Non-Airport CBLTM-LTN Zones. 3. The mobile phone demand data, upon which the model travel demands have been built, includes the whole of Buckinghamshire, as shown in the LMVR [APP-201] Figure 5.7 CBLTM-LTN Mobile Network Cordon. 4. The model has also been calibrated / validated to screenlines for demands to/from the county, as shown in LMVR [APP-201] Figure 11.2 'Initial Assignment Calibration' Screenline Classification (Calibration=blue Validation=Red) – Overview. <p>The CBLTM-LTN is a strategic model covering a large area and the focus on calibration and validation is concentrated around the scheme, and its area of impact. Therefore, the CBLTM-LTN core calibration and validation area covers the area surrounding London Luton Airport as reported in Figure 11.3 of the LMVR [APP-201], which is replicated below.</p>

I.D	Topic	Deadline 5 submission (Verbatim)	Luton Rising's Response
			 <p data-bbox="1549 961 2736 1022">For the wider area, Figure 11.2 of the LMVR [APP-201] shows further screenlines which include one titled 'Dunstable Leighton Buzzard', which is also replicated below.</p>

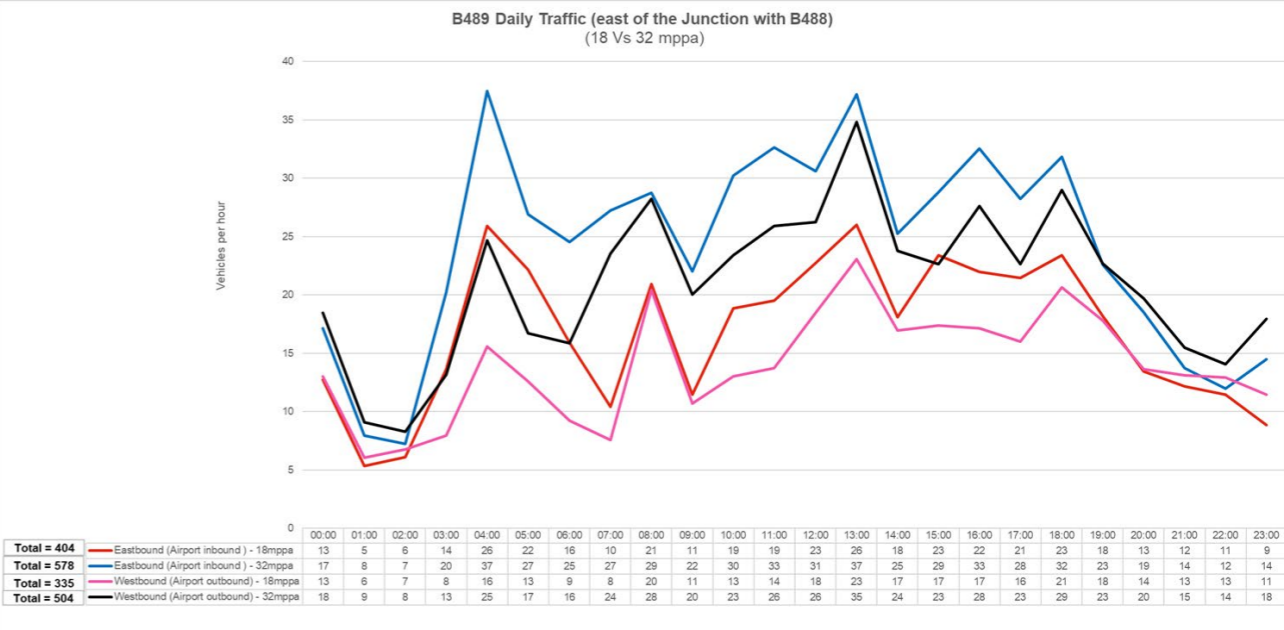
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The validation results for the 'Dunstable Leighton Buzzard' screenline shows a strong match between modelled and observed traffic flows, to the recommended level of the DfT TAG guidance. The results are reported in **Table 11.8** of the LMVR [APP-201], and reproduced, with the addition of the modelled and observed traffic flows, below.

AM Peak Flow in Vehicle per Hour							
<i>Direction</i>	<i>Counts</i>	<i>Observed</i>	<i>Modelled</i>	<i>Difference</i>	<i>%</i>	<i>Screenline</i>	<i>%Links</i>
Northbound	9	1,831	1,821	-10	-0.5%	✓	100%
Southbound	9	2,420	2,422	2	0.1%	✓	89%
Inter-Peak Flow in Vehicle per Hour							
Northbound	9	1,389	1,394	5	0.4%	✓	100%
Southbound	9	1,355	1,359	4	0.3%	✓	100%
PM Peak Flow in Vehicle per Hour							
Northbound	9	2,640	2,645	5	0.2%	✓	78%
Southbound	9	1,912	1,928	16	0.8%	✓	100%

The screenline performance provides confidence in the base model in relation to traffic travelling to and from the Buckinghamshire road network. Considering the above, the Applicant does not see the need to utilise any additional data from Buckinghamshire, as the already reported model performance (for movements to/from

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10	Surface Access	<p>REP4-087: 8.99 Applicant's response to Issue Specific Hearing 4: Action 6 Traffic on B489 Link</p> <p>This note only details the forecasted traffic flow differences for the network peak hours and does not provide flow differences across a 24-hour period. Further information is therefore requested to allow a final judgement to be made on the full impact on this route and any necessary mitigation measures that may be required.</p> <p>Furthermore, both the submitted Transport Assessment and the Traffic on B489 Link document do not contain information on the baseline survey data used as part of the strategic modelling. The model used to inform the forecasted traffic growth is not validated within Buckinghamshire and the Council is therefore unaware of the survey data used to inform this. As part of the Deadline 3 submission, the Council offered to provide recent survey data to be used as part of a 2023 baseline or requested that the Applicant carry out their own surveys of this route. However, this request has not been included as part of the recent submissions. The Council can therefore not be confident that the modelling provided is reliable and further work is required.</p>	<p>the county) are considered 'fit for purpose'. Moreover, the relatively low demands to and from Buckinghamshire, as has been reported in the Trip Distribution Plans, also support this position. However, if the data is provided the Applicant is willing to undertake a comparison.</p> <p>The Applicant has extracted the daily airport traffic, from the reported Trip Distribution Plans, travelling along the B489, and then profiled the traffic over 24-hours utilising the airport passengers trip generation profile. The results are shown in the figure below.</p> <p>The figure shows that the highest hourly increase in airport traffic along the B489 is less than 20 vehicles per hour at each direction, and less than 30 vehicles per hour two-way.</p>  <table border="1" data-bbox="1555 1087 2754 1171"> <thead> <tr> <th></th> <th>00:00</th> <th>01:00</th> <th>02:00</th> <th>03:00</th> <th>04:00</th> <th>05:00</th> <th>06:00</th> <th>07:00</th> <th>08:00</th> <th>09:00</th> <th>10:00</th> <th>11:00</th> <th>12:00</th> <th>13:00</th> <th>14:00</th> <th>15:00</th> <th>16:00</th> <th>17:00</th> <th>18:00</th> <th>19:00</th> <th>20:00</th> <th>21:00</th> <th>22:00</th> <th>23:00</th> </tr> </thead> <tbody> <tr> <td>Total = 404</td> <td>13</td> <td>5</td> <td>8</td> <td>14</td> <td>26</td> <td>22</td> <td>16</td> <td>10</td> <td>21</td> <td>11</td> <td>19</td> <td>19</td> <td>23</td> <td>26</td> <td>18</td> <td>23</td> <td>22</td> <td>21</td> <td>23</td> <td>18</td> <td>13</td> <td>12</td> <td>11</td> <td>9</td> </tr> <tr> <td>Total = 578</td> <td>17</td> <td>8</td> <td>7</td> <td>20</td> <td>37</td> <td>27</td> <td>25</td> <td>27</td> <td>29</td> <td>22</td> <td>30</td> <td>33</td> <td>31</td> <td>37</td> <td>25</td> <td>29</td> <td>33</td> <td>28</td> <td>32</td> <td>23</td> <td>19</td> <td>14</td> <td>12</td> <td>14</td> </tr> <tr> <td>Total = 335</td> <td>13</td> <td>6</td> <td>7</td> <td>8</td> <td>16</td> <td>13</td> <td>9</td> <td>8</td> <td>20</td> <td>11</td> <td>13</td> <td>14</td> <td>18</td> <td>23</td> <td>17</td> <td>17</td> <td>17</td> <td>16</td> <td>21</td> <td>18</td> <td>14</td> <td>13</td> <td>13</td> <td>11</td> </tr> <tr> <td>Total = 504</td> <td>18</td> <td>9</td> <td>8</td> <td>13</td> <td>25</td> <td>17</td> <td>16</td> <td>24</td> <td>28</td> <td>20</td> <td>23</td> <td>26</td> <td>26</td> <td>35</td> <td>24</td> <td>23</td> <td>28</td> <td>23</td> <td>29</td> <td>23</td> <td>20</td> <td>15</td> <td>14</td> <td>18</td> </tr> </tbody> </table> <p>Further information on baseline data is contained in 7.02 Transport Assessment Appendices - Part 1 of 3 Appendix B: Strategic Modelling - Model Specification Report and 7.02 Transport Assessment Appendices - Part 1 of 3 Appendix C: Strategic Modelling Data Collection Report [APP-201]. The model validation is contained in 7.02 Transport Assessment Appendices - Part 1 of 3 Appendix E1: Highway LMVR [APP-201].</p> <p>Further information on the model validation in general and across the 'Dunstable Leighton Buzzard' screenline, as well as the need for additional data, is in the response to I.D 9.</p>		00:00	01:00	02:00	03:00	04:00	05:00	06:00	07:00	08:00	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	22:00	23:00	Total = 404	13	5	8	14	26	22	16	10	21	11	19	19	23	26	18	23	22	21	23	18	13	12	11	9	Total = 578	17	8	7	20	37	27	25	27	29	22	30	33	31	37	25	29	33	28	32	23	19	14	12	14	Total = 335	13	6	7	8	16	13	9	8	20	11	13	14	18	23	17	17	17	16	21	18	14	13	13	11	Total = 504	18	9	8	13	25	17	16	24	28	20	23	26	26	35	24	23	28	23	29	23	20	15	14	18
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Total = 504	18	9	8	13	25	17	16	24	28	20	23	26	26	35	24	23	28	23	29	23	20	15	14	18																																																																																																								
11	Air quality	<p>REP4-088: 8.100 Applicant's Response to Issue Specific Hearing 5 Action 9: Effects in relation to Pollution Climate Mapping Locations</p> <p>This submission has been reviewed. The Council notes the Applicant's statement at para. 6.1.3 that the Proposed Development is not predicted to impact compliance for PM_{2.5}. Further, that monitoring of PM_{2.5} is included as part of the GCG Framework, which will be subject to a review every 5 years and that this will help to identify whether additional monitoring is needed. The Council is concerned that although the air quality monitoring is understood to be annual, there is a risk that any changes to air quality objectives (i.e. the targets set by Government) may not actually be reflected and therefore become enforceable until they are incorporated</p>	<p>Paragraph 4.4.1 in the GCG Framework (Tracked Change Version) [REP3-018] was updated following the Applicant's response to Issue Specific Hearing 5 (ISH5) Action 18 provided in Applicant's Response to the Examining Authority's Deadline 4 Hearing Actions [REP4-070]. The changes state:</p> <p><i>"It is proposed that 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 by the airport operator within six months of new legal limits being published, and the findings of this review should be submitted to the Air Quality Technical Panel and the ESG for comment."</i></p>																																																																																																																													

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		in the GCG framework, which are proposed on a five year cycle. The Council therefore reiterates to the ExA that it believes the GCG reviews should be annual.	Therefore, in the event of new legal limits or interim targets, this would immediately trigger a review rather than following a five year or annual cycle.
12	Green Controlled Growth	<p>REP4-089: 8.101 Applicant's response to Issue Specific Hearing 5 Action 16: Green Controlled Growth Scope Monitoring</p> <p>This submission has been reviewed and the Council welcomes the proposed changes to the GCG Framework for Phase 2a as set out within the document. The Council agrees that out of scope monitoring locations should continue to be reviewed within this phase of construction and that they should be brought back in scope if required. This will ensure that if there were to be any changes in future air quality concentrations from those which are forecast within the air quality assessment at the time of the phase 2a development, they will be appropriately considered and reviewed.</p> <p>The Council would also urge the Applicant to adopt the proposed changes to Phase 2b of the construction in addition the Phase 2a</p>	<p>The Applicant notes the support for proposed changes regarding the review mechanism now included for out of scope monitoring locations for Phase 2a.</p> <p>The Applicant also notes that proposed changes to the Green Controlled Growth Framework [REP5-022] have been made in response to specific concerns raised by the ExA regarding the need to review out of scope air quality monitoring locations for Phase 2a. These concerns have arisen specifically for Phase 2a due to there being no 'in scope' locations identified for this phase and a more responsive approach to review was sought to ensure this remained the case for this particular phase. This is not the case for all other phases (including Phase 2b) where 'in-scope' locations have been identified and are therefore already subject to the GCG process.</p> <p>While this amendment has been made to accommodate concerns regarding this unique case for Phase 2a, the Applicant has confidence in and stands by the findings of the Air Quality Assessment reported in Chapter 7 Air Quality of the Environmental Statement [AS-076] and therefore does not consider it appropriate to introduce a review process for Phase 2b where 'in-scope' locations have already been identified.</p> <p>The Applicant considers that this amendment regarding Phase 2a, along with the existing mechanism for scoping in air quality monitoring locations, to be a robust approach to ensuring adequate air quality monitoring data will be available for assessment against the GCG Thresholds and Limits.</p>
13	P19 (surface access, noise, GCG)	<p>The Applicant makes the case (2.2.1) that the assessments written up in the ES have all been subject to a sensitivity analysis in anticipation of the baseline position changing from 18mppa to 19mppa and, consequently, the Applicant asserts that the conclusions remain robust. The Council interprets this as meaning that there is no intention by the Applicant to revisit the assessments. The Council has reservations about whether this approach is acceptable for all topics, particularly socio-economics, where the change in baseline has direct implications for the quantum of benefits that have been cited by the Applicant (e.g. jobs created) as well as mitigation measures, noting that the Applicant highlights the impact of the change on the maximum Community First Fund per annum, as an illustration of this point.</p> <p>The Transport Assessment did not include a sensitivity analysis as per the above (2.2.4). The Applicant asserts that, nonetheless, maintaining a baseline of 18mppa means that the impacts of the proposed Development are reported as marginally greater, meaning that the assessment remains robust. The Council accepts the principle of this approach and conclusion; however, the principal concern for the Council is the absence of the baseline validation in Buckinghamshire, irrespective of whether that baseline remains at 18mppa or is altered to 19mppa.</p> <p>The change in baseline from 18mppa to 19mppa is acknowledged as meaning that an element of the job creation and GVA reported in the ES will need to move into</p>	<p>The Council's interpretation is correct that the Applicant considers the conclusions remain robust and that there is no intention to revisit the assessments. Chapter 5 of the Environmental Statement (ES) [AS-075] describes the overall approach to sensitivity tests and each technical assessment of the ES reports the conclusions for each sensitivity test, including Chapter 11 on Economics and Employment [APP-037] which concludes that the changes in potential impacts are small and overall there would be no change to the assessment of effects.</p> <p>The Applicant considers the issue regarding baseline validation of the strategic traffic model in Buckinghamshire was addressed in Item 4 (pages 6 and 7) of 8.56 Applicant's response to Deadline 2 submissions (Comments from Interested Parties on Deadline 1 submission) Appendix D - Buckinghamshire Council [REP3-064].</p>

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		<p>the baseline. The Applicant estimates the difference to be c.300 jobs and considers that this change is not material to the overall assessment of the effects of or need for growth at the airport (2.2.6). The Council is not in agreement with the Applicant that a reduction of 300 jobs (through transference into the baseline) is not material. Furthermore, the Council considers that a more detailed analysis of the consequential implications of the change in baseline mppa may identify a number of other matters that need alteration – the Council wishes to see this aspect of the assessment reviewed in a more thorough and transparent manner.</p> <p>The Applicant considers the impact of the change in the baseline to be marginal in respect of the environmental effects within the scope of the GCG. Also in relation to noise, it is noted that the commentary to P19 condition 8 signposts the Applicant's intention to make further updates to its proposals for noise controls secured in the DCO – something to be published at Deadline 5. The Council awaits this document with interest.</p>	
14	Surface Access	<p>REP4-106: 8.109 Applicant's response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 2 Risk Assessment</p> <p>Technical notes have been submitted by the Applicant regarding the updates to the transport modelling in line with guidance from the DfT. It was previously requested by the Council that the Applicant should provide calibration information within Buckinghamshire to confirm that the model results are reliable for the local road network within Buckinghamshire. This has not been provided as part of the recent submissions.</p> <p>The Council remains of the position that validation is required within Buckinghamshire to confirm that the model results are reliable within Buckinghamshire.</p>	Please see responses given to I.D 9 and 10.

REFERENCES

Ref 1 Department for Transport (2022) Jet Zero Strategy: Delivering net zero aviation by 2050