



**LONDON LUTON AIRPORT EXPANSION DEVELOPMENT CONSENT ORDER
APPLICATION**

ISSUE SPECIFIC HEARING 8 DEALING WITH ENVIRONMENTAL MATTERS.

POST HEARING SUBMISSION FOR CENTRAL BEDFORDSHIRE COUNCIL

1. Introduction

This document sets out the post hearing submissions and summary of oral submissions made by Central Bedfordshire Council (CBC) at Issue Specific Hearing 8 (ISH8) held on Wednesday 29th November 2023 in relation to the Development Consent Order for the proposed expansion of London Luton Airport by Luton Rising.

ISH8 was attended by the Examining Authority (ExA), the Applicant, the Host Authorities and other Interested Parties.

This report summarises the position of Central Bedfordshire Council only, focusing on Agenda items 3, 9, 10 and 11. A separate response for the Host Authorities has been prepared by WSP incorporating the feedback provided by Ben Holcombe (Suono) on agenda item 2 (noise). Responses to action points are also included in this document.

2. Noise and Vibration	
<i>Please see the post hearing submission for ISH8 prepared by WSP.</i>	
3. Health and Community	
Whether local datasets and health strategies should be used to inform the health and community assessment	<p>The Applicant confirmed that a meeting had taken place with Officers from Central Bedfordshire Council to detail the rationale for determining the local and wider study area for the assessment and the dataset used in each of those study areas. The applicant confirmed that additional information had been sent to the local authorities for review and the Applicant considers they will be agreed in the SoCG at D6. Further justification for the baseline data was provided.</p> <p>Central Bedfordshire confirmed that a meeting was held with the Applicant in October and additional information has been submitted, which is being reviewed along with the latest SoCG.</p> <p>The ExA indicated that within the CBC LIR there was reference to an absence of Index of Multiple Deprivation scores and income deprivation data. CBC were asked whether those issue have been addressed through the current engagement? Or is it still an outstanding matter?</p> <p>CBC advised that this would be responded to at Deadline 6 and was captured as Action Point 14.</p> <p>CBC were also asked about the healthy airports checklist in terms of what this does and what benefit there would be in using the checklist at this particular point. CBC advised that this would be responded to at Deadline 6 and was captured as Action Point 15.</p> <p>The Applicant was asked to provide some comments on the application of the Healthy Airport Checklist.</p>
The mapped extent of the N-above 80dB LASmax contour linked to awakenings	No comment.
Measures to mitigate impacts on the health and wellbeing of the local communities surrounding the airport.	No comment.
The potential need for future health effects monitoring as suggested by the UK Health Security Agency and any triggers for remedial action [REP4-219].	No comment.

9. Landscape and Visual	
<i>Chiltern Hills Area of Outstanding Natural Beauty (AONB)</i>	
Applicant to provide an update on the current position, details of the discussion/ consultation held with bodies and summary of feedback provided, current scope of the assessment and timescales for submission.	CBC confirmed that they have been involved in meetings held by the Applicant in relation to this matter and will review the proposed draft report on Special Qualities to be submitted by the Applicant at Deadline 6.
Proposed Extension to the AONB, the suitability of the Sensitivity Test [APP-107] and weight to be given to the proposed extension in the assessment of the Proposed Development.	CBC confirmed that this would be confirmed in writing at Deadline 6. There was discussion regarding the weight to be applied to the extension of the AONB. CBC did not comment at the hearing session but consider that limited weight should be applied. However, appropriate consideration should be included in the LVIA as the AONB could be extended in close proximity to the airport boundary and therefore the assessment of a 'low' magnitude of impact on the qualities of the AONB extension area is not accepted.
Implications of Section 245 of the Levelling-up and Regeneration Act 2023, which will amend Section 85 of the Countryside and Rights of Way Act 2000.	Please see response to Action Point 48 in Appendix 1.
<i>Visual effects and approach to mitigation</i>	
Visual effects from buildings and structures on the eastern edge of the development, the fire training ground (Work No. 2d) and the appropriateness of new planting at mitigating effects including in winter.	Viewpoint 20 (REP3-011) was displayed by the Applicant (this shows the view from Hyde Footpath 5a). The ExA asked the Applicant to confirm the reason for site selection for the Fire Training Ground and consideration of alternatives. The Applicant confirmed that alternatives were considered but there are key constraints for the FTG, which needs to be airside but a suitable distance from the runway. The Applicant confirmed that when in operation it " <i>can look quite dramatic</i> " and therefore needs to be remote from buildings. An alternative location to the west was considered but discounted as it was in the Green Belt. The current site was therefore selected as it meets the requirements and is not in the Green Belt. In respect to Hyde footpath 5a, it is acknowledged in Appendix 14.5 of the ES (AS-139) that there would be significant effects through the phases and the ExA asked the Applicant whether the additional mitigation (hedgerows) reduce it to not significant? The applicant confirmed that the visual shown takes a Rochdale approach (parameters) and the FTG would be located within this parameter. The hedgerow mitigation is not shown on the visuals. The Applicant was unable to guarantee that the establishment of mitigation would result in no discernible effects, but it is highly likely to be effective.

	<p>The ExA referred to CBCs D5 submission which states further information is needed to understand the practical implications of the FTG and asked CBC to confirm what further information would be required.</p> <p>CBC confirmed that it was understood that at ISH6 the ExA had requested submission of visuals showing the planting. However, the Applicant has indicated that this did not apply to this location. It is recognised by CBC that planting along the footpath would reduce the visual effects, subject to the planting being suitable, a point raised in paragraph 5.7.13 of the CBC LIR (REP1A-002). However, concern remains regarding the visual and operational effects of the FTG from Someries Castle and the operational effects from Luton Hoo.</p> <p>The Applicant has stated that there would be no landscape mitigation measures from Luton Hoo or Someries Castle. CBC Officers quoted the Applicant who had previously stated that the operation of the FTG “<i>can look quite dramatic</i>” and this is a concern for CBC. Based on the information and visuals provided it is difficult for CBC to understand in real terms the impact of the FTG during operation (i.e., smoke, drifting of smoke, fire). The Design Principles document (REP5-034) indicates in point AF.19 that the ‘<i>new Fire Training Ground will be designed with smoke reducing facilities.</i>’ However, there is no detail as to what these measures are. There is currently lack of clarity and drawing together of information to understand how the FTG would operate during the day and night from Someries Castle and Luton Hoo. Additionally, there is no clarity in respect of any dedicated lighting installations in respect of the FTG facility. The impact of the FTG remains a considerable concern both in landscape and heritage terms for CBC.</p> <p>The ExA advised that on Monday 27 November 2023 PM they witnessed a fire training event from Wigmore Valley Park. It was a standardised test that lasted 15 minutes and flames, smoke, and processes involved were witnessed, which will be considered by the ExA when compiling the recommendation. Since the hearing, the ExA site note has been published (EV1-018) and the Applicant has provided a note regarding the fire training exercise (EV1-017). These documents have been reviewed but CBC welcome a video, as required from the Applicant in Action Point 49.</p> <p>Whilst this point was not raised at the hearing, the airport operators London Luton Airport Operations Limited (LLAOL) have consulted CBC on proposals to construct a solar farm under Schedule 2, Part 8 (Class F) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (CBC ref. 23/03617/OAC). The proposed solar farm would be sited to the south of the runway. The majority of the solar farm would be within the administrative boundary of Luton Borough Council, but a small section would be within Central Bedfordshire. No response has been issued to LLAOL to date either by CBC or LBC, but the proposed solar farm would impact on the scope to relocate the FTG if approved.</p>
<p><i>Lighting Assessment</i></p> <p>Whether the Lighting Obtrusion Assessment [APP-052] and [APP-053] adequately identifies likely significant effects and the need or otherwise for a night-time Landscape and Visual Impact Assessment.</p>	<p>CBC confirmed that a site visit at Luton Hoo was undertaken on Thursday 23 November 2023 to assess the baseline conditions from Tank Drive (Luton Drive) and the terrace area at the Mansion house. There is concern regarding significant harm in terms of the multi-storey car park P1 when viewed from Luton Hoo, which introduces an urban form that is intrusive to a sensitive part of the RPG. Along with the operational effects of the FTG in the evening. Based on that CBC request a nighttime assessment from this location.</p>

	The applicant confirmed that a lighting assessment was not requested as part of the scoping opinion and as part of the ongoing consultation for the LVIA with the working group that consisted of various members of the host authorities. This point is noted by CBC, but it is considered that further assessment is required to fully appreciate the impact on Luton Hoo RPG.
10. Design	
Suitability of the update to the Design Principles document [REP5-034] and [REP5-035] and Principles of Good Design [REP5-043] submitted at Deadline 5.	Item not discussed at ISH8 due to time constraints. Comments moved to WQs/D6 responses.
Discussion on the site layout, parameters and the components of the Proposed Development and extent of primary mitigation measures explored.	Item not discussed at ISH8 due to time constraints. Comments moved to WQs/D6 responses.
Need for masterplan and/ or design code to further inform the detailed design stage.	In response to WQ PED1.2 (REP4-116)), CBC have indicated that a Masterplan and a Design Code is appropriate.
11. Heritage	
All heritage matters were moved to WQs/D6 responses, and these are provided in Appendix 1.	

Response to ISH8 Action Points

Action Point 14 – (Central Bedfordshire Council)

Council to confirm whether the recent agreement regarding use of local health datasets addresses Local Impact Report [REP1A-002] comments on the absence of Index of Multiple Deprivation scores and income deprivation data.

Firstly, understanding the purpose and role of the Joint Strategic Needs Assessment (JSNA) is pivotal. Section 116 of the Local Government and Public Involvement in Health Act 2007 (as amended by the Health and Social Care Act 2012 and Health and Care Act 2022) require the preparation of a Joint Strategic Needs Assessment by the Council together with the Bedfordshire, Luton, and Milton Keynes (BLMK) Integrated Care Board (ICB)¹. In Central Bedfordshire this duty is overseen by the Health and Wellbeing Board.

The Central Bedfordshire JSNA assesses current and future health and care needs locally. It informs the Health and Wellbeing Board and other healthcare organisations to develop plans addressing those needs. The JSNA relies on data from various sources, not just nationally collected datasets. It includes chapters on different life course topics from conception through to old age, which are continuously updated as new information and feedback becomes available. It provides conclusive evidence of the health (and care) needs of our residents. Central Bedfordshire's JSNA can be accessed at: www.bmkjsna.org

Regarding the absence of IMD and income deprivation data, the IMD is a comprehensive measure of relative deprivation for small areas (LSOA). It considers 37 indicators that have been grouped into seven domains, each of which reflects a different aspect of deprivation experienced by individuals living in an area². These domains including income; employment; health deprivation and disability; and local environment, amongst others.

Research has consistently shown the correlation between deprivation and health inequality, affecting both an individual's access to healthcare³ but also opportunities to lead a healthy life⁴. Life expectancy is a key measure of population health and therefore inequality in life expectancy is a key measure of health inequality. The King's Fund has stated that in England there is a systematic relationship between deprivation and life expectancy, sometimes known as the 'social gradient in health' because life expectancy is closely related to people's socio-economic circumstances as measured by the IMD⁵. The Office for National Statistics has found that there are large differences in life expectancy at birth between the least and most deprived areas of England for both Males and Females. A male born in the most deprived areas can expect to live for 9.7 years less than a male born in the least

¹ <https://www.legislation.gov.uk/ukpga/2007/28/section/116>

² <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

³ <https://www.england.nhs.uk/about/equality/equality-hub/national-healthcare-inequalities-improvement-programme/what-are-healthcare-inequalities/deprivation/>

⁴ <https://www.kingsfund.org.uk/publications/what-are-health-inequalities>

⁵ <https://www.kingsfund.org.uk/publications/what-are-health-inequalities>

deprived areas. For females, the gap is 8 years⁶. This relationship is apparent in Central Bedfordshire. As raised in the Council's Local Impact Report (5.6.7), when taken as a whole residents' life expectancy in Central Bedfordshire is above England's average. However, there is an 8-year gap between the highest and lowest life expectancies in CBC, and the areas with the lowest life expectancy are mainly those areas closest to the airport (See Appendix 1).

When considering IMD, a similar pattern is observed (See Appendix 2). It is accepted that there are areas of higher deprivation across Central Bedfordshire. However, it is in the areas closest to the airport, which are more deprived AND have lower life expectancy. As has been set out, income and deprivation are major components in health outcomes, and life expectancy is seen as a key measure of population health. It is for these reasons that Central Bedfordshire has been asking for greater consideration of our local health data and strategies in the assessment of population health outcomes (including potential improvements associated with economic factors), by the applicant. Public Health continue to submit that an authority-wide approach continues to mask the poor health of many of our communities, particularly those in Central Bedfordshire located closer to the airport.

Additionally (in part responding to Action Point 12), Public Health would also like to highlight the areas of Caddington, Slip End, Woodside, Aley Green and Pepperstock on the south-western edge of Central Bedfordshire. These areas fall within the applicant's Local Study Area, as well as the practice boundary of Caddington Surgery (E81069), which is located at 33 Manor Rd, Caddington, Luton LU1 4EE (approximately 3 miles from the airport boundary within Central Bedfordshire).

The Civil Aviation Authority (CAA) have published information and research relevant to the effects of Aviation Noise and Health⁷. These cover some of the most common adverse health effects including annoyance; cognitive impairment; sleep disturbance; and cardiovascular disease. The UK Health Security Agency advise that long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy⁸.

The prevalence of several health conditions is higher at Caddington Surgery than others within the Bedfordshire, Luton, and Milton Keynes (BLMK) ICB area and England as a whole. Whilst the causes of any particular condition can be complex and may have several risk factors (as acknowledged by UKHSA during Hearing 8), both air pollution and noise are established risk factors for cardiovascular disease, and air pollution for exacerbation of COPD and asthma.

Indicator	Prevalence (proportion %) (2022/23)	
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⁶<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthinequalities/bulletins/healthstatelifeexpectanciesbyindexofmultipledeprivationimd/2018to2020>

⁷<https://www.caa.co.uk/consumers/environment/noise/aviation-noise-and-health/>

⁸<https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

(QOF – Dec 2023)	Caddington Surgery	BLMK ICB (average)	England	Ranking within ICB (highest) /96
Coronary Heart Disease	4.2	2.5	3.0	1
Stroke	2.9	1.4	1.8	1
Hypertension	18.9	13.5	14.4	3 (joint)
Smoking (age 15+)	13.8	14.7	14.7	49
Obesity (age 18+)	10.7	11.4	10.0	31
COPD	2.8	1.5	1.8	1 (joint)
Asthma (age 6+)	8.5	6.4	6.5	3

Source: National General Practice Profiles (Caddington Surgery: E81069). Office for Health Improvement and Disparities. Public Health Profiles. Accessed: 06 December 2023⁹.

Action Point 15 – (Central Bedfordshire Council/ Applicant)

Council to explain what the Healthy Airports checklist referred to in its LIR [REP1A-002] does and what additional benefit using the checklist would provide to the assessment of health and community effects. In addition, confirm whether this is something that can be applied retrospectively. Applicant to respond at following deadline.

The Healthy Airports checklist (or more correctly Healthy Airports Framework) was first referred to by CBC in its Statutory Consultation response of April 2022 to the applicant. The Healthy Airports Framework was devised and published by the Centre for Health Equity, Research, and Evaluation (CHETRE) at the University of New South Wales – Australia, in response to the Western Sydney Airport which will be a second airport for Sydney opening in 2026¹⁰. The framework seeks to recognise that airports are simultaneously seen as both major economic engines but also potential threats to health and wellbeing.

The framework sets out 12 dimensions (which CBC have referred to as the checklist) of a Healthy Airport under which various criteria are provided¹¹. These are:

Dimension:	A Healthy Airport:
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⁹ <https://fingertips.phe.org.uk/profile/general-practice/data#page/12/qid/2000005/pat/66/ati/7/are/E81069/iid/93468/age/28/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/>

¹⁰ <https://chetre.org/our-work/special-projects/healthy-airports/#:~:text=a%20Healthy%20Airport%20is&text=within%20its%20spatial%2C%20commercial%20and,as%20%E2%80%9Dengine s%20of%20health%E2%80%9D.>

¹¹ https://chetre.org/wp-content/uploads/2018/05/Healthy-Airports-Report_CHETRE_web.pdf

1. Environment	<ul style="list-style-type: none"> • Engages in planning processes that result in health promoting aesthetic built environments; • Provides a clean, safe, high quality physical environment for all people inside the airport boundaries and in surrounding communities; • Ensures that the systems that are in place to protect individual and collective safety and security are implemented in least-obtrusive ways conducive with their specific purpose.
2. Ecosystem	<ul style="list-style-type: none"> • Creates, maintains and aligns with governance, policies and practices for a sustainable ecosystem; • Protects as much as possible the natural ecosystems within and beyond the airport boundaries; • Addresses sustainability principles; • Reduces its environmental footprint (particularly with regard to carbon emissions and waste generation) to the greatest extent possible, on a trajectory to carbon neutrality; • Reflects local communities' sensitivity/connection to landscape and environment (e.g. local flora, fauna and open spaces, etc.).
3. Community	<ul style="list-style-type: none"> • Builds on consultative/participatory community engagement to ensure fairness and equity in risks and benefits; • Ensures an inclusive, respectful and mutually supportive community through consultative processes; • Actively pursues its ability to build positive social change outside the boundaries of its general business.
4. Participation	<ul style="list-style-type: none"> • Implements governance structures that enable a high degree of public participation in and control over the decisions affecting one's life, health and well-being. • Provides avenues for all airport users and members of communities affected by the airport's operations with effective means of providing feedback on the airport's operations and involvement in decisions that affect them.
5. Basic Services and facilities	<ul style="list-style-type: none"> • Ensures that hygienically prepared food and beverages are available that meet a wide range of preferences and prices; • Ensures that potable plain water is available free of charge throughout the airport; • Ensures that all activities at the airport are conducted with adherence to high standards of workplace health and safety; • Ensures that conditions of employment for all persons working at the airport are meeting appropriate international/national standards; • Offers healthy food choices, including meeting the needs of all diet requirements when travelling and in the airport; • Ensures equitable affordable transport options for workers and visitors.
6. Experiences and resources	<ul style="list-style-type: none"> • Provides a range of passive and active recreational spaces and activities for residents, workers and visitors;

	<ul style="list-style-type: none"> • Provides a wide range of opportunities for relaxation and physical and mental activity for persons waiting at the airport; • Provides free family friendly activities for travellers and people waiting; • Provides accessible and acceptable connectedness to internet and (social) media.
7. Economy	<ul style="list-style-type: none"> • Creates and sustains a lively economy that supports a diversified skill set within local industry and provides opportunities for advancement; • Makes a vital and innovative contribution to the economy of the region around the airport; • Provides equitable employment.
8. Heritage	<ul style="list-style-type: none"> • Maintains and promotes the historical, social, economic, geographic and cultural contexts of the region; • Provides many tangible links with the historical, cultural and biological heritage of the region in which it is located.
9. Form and Design	<ul style="list-style-type: none"> • Has a physical form that is compatible with and enhances all the other elements of a Healthy Airport; • Integrates coordinated high level infrastructure planning with the local urban (political, social and environmental) context.
10. Public Health and Sick Care Services	<ul style="list-style-type: none"> • Engages in activities that promote and maximise the health of individuals, peoples and communities; • Provides appropriate public health and sick care services that are easily accessible by all who need them, particularly travellers and employees.
11. Connectedness	<ul style="list-style-type: none"> • Is designed to make people feel welcomed; • Is designed to blend into the region and culture; • Recognizes its glocal (the interface between global and local) footprint in all of the above qualities.
12. Nuisance and impact	<ul style="list-style-type: none"> • Works pro-actively and in collaboration with potentially affected individuals to reduce health risks and build (health) resilience; • Aims to meet and exceed the strictest standards in noise, air, water and soil pollution.

(Source: CHETR, 2018: *Healthy Airport Regions – A Conceptual Framework*).

Public Health believes that addressing this comprehensive framework would be beneficial for addressing all health-related aspects of the development proposal, and specifically where this acknowledges the distinctive features of an airport in terms of both design and operation. The framework encompasses operational and broader impacts that are impacted by the design choices made for the airport, including employee and passenger health and wellbeing. The ExA might find it useful to apply these criteria as a checklist, similar to the Healthy Urban Development Unit (HUDU) Health Impact Assessment checklist¹² referenced by the applicant during the Hearing.

¹² <https://www.healthyurbandevelopment.nhs.uk/our-services/delivering-healthy-urban-development/health-impact-assessment/>

Regarding its application at this stage, it is suspected that its utility would have been greater earlier in the process when first introduced. This could have allowed the outcomes to influence the design choices more significantly, which unfortunately may not be feasible at this later stage.

Action Point 24 – (Joint Host Authorities)

Joint Host Authorities to comment on the potential issue of odour and flies from water treatment plant.

CBC have concerns regarding the issue of odour and flies from the water treatment plant that could negatively impact residential receptors to the south of the site in Central Bedfordshire. Further details of the efficacy of an odour removal system in preventing sewage odours at sensitive receiver locations is required.

Action Point 46 – (Applicant, LBC, Joint Host Authorities and Central Bedfordshire Council)

Provide a written response regarding the application of paragraph 174(a) of the National Planning Policy Framework (NPPF) and whether the landscape that is within the proposed area of search of a possible extension to the Chilterns National Landscape should be considered a ‘valued landscape’

Paragraph 174(a) of the NPPF states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

(a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

CBC have advised that limited weight should be applied to the extension of the AONB. However, given that the area is being considered for extension then it is appropriate for area to be considered as a ‘valued landscape.’

Action Point 48 – (Chilterns Conservation Board, Joint Host Authorities and Central Bedfordshire Council)

Submission of written response on the implications of Section 245(6) of The Levelling-up and Regeneration Act 2023, which would amend Section 85 of the Countryside and Rights of Way Act 2000.

The amendments to Section 85 of the Countryside and Rights of Way Act 2000 would strengthen the wording in relation to AONBs, changing it from ‘a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty’ to ‘a relevant authority....must seek to further the purpose of conserving and enhancing the natural beauty of the area

of outstanding natural beauty. These changes emphasise the importance the AONB on a national scale and the significance of the Special Qualities Assessment in ensuring the AONB is conserved and enhanced.

Question 10 – (Joint Host Authorities)

Confirm if the update to the Gazetteer at D4 [REP4-017] provides the level of detail sought or whether this needs to be supplemented.

CBC have no concerns.

Question 12 – (Central Bedfordshire Council)

Paragraph 5.4.29 of the Local Impact Report [REP1A-002], reiterated in your submissions at D3 and D5, states that the public heritage benefits should be itemised in respect of individual heritage assets within the control of the Applicant, and itemised in respect of the reduction of risks/mitigation measures to individual heritage assets beyond the Applicant's control. Signpost where this policy requirement can be found and explain where in the application documentation this should be included.

The Applicant concludes in the Heritage Statement (Appendix D of the Planning Statement) (APP-198) that the impact of the proposed development on heritage assets would be less than substantial. As per the requirements of paragraph 202 of the NPPF the harm should be weighed against the public benefits of the proposal. Further detail on public benefits is provided in Paragraph: 020 Reference ID: 18a-020-20190723 of the Planning Practice Guidance, which includes examples of heritage benefits. No such assessment has been undertaken. It would be expected for this assessment, detailing a list of public heritage benefits to be included in the Heritage Statement and this would feed into the planning balance assessment in the Planning Statement. This should be applied widely and not limited to individual heritage assets within the control of the Applicant.

Question 15 – (Central Bedfordshire Council)

In their response to ExQ1 PED.1.13 [REP4-173], Historic England consider that a financial contribution could be a way towards offsetting the residual impact of the proposal that could be put towards conservation management at Luton Hoo. Any costing would be a matter to be negotiated between the Applicant and the local authority. Could you advise whether you have had any negotiations with the Applicant and your views as to whether this would be a suitable form of mitigation?

Historic England's suggestion is noted but CBC are aware that the Applicant does not consider this to be appropriate therefore no discussions have taken place between the Applicant and CBC. Luton Hoo is privately owned, and any discussions should involve the owner. CBC is unclear how financial contributions would be administered and given the private ownership of Luton Hoo it is unclear how any

benefits that may be derived from financial contributions would be practically secured and delivered.

Historic England suggest that a financial contribution could offset the residual impact of the proposal. Mitigation measures, of which none are proposed for Luton Hoo, should address specific issues where impact and harm can be actively reduced. Financial contributions to offset measures would not constitute mitigation.

Question 17 – (Central Bedfordshire Council)

Appendix 1 of your post hearing submission for ISH6 [REP3-087] requests additional viewpoints within the grounds of Luton Hoo because Capability Brown's work would be most evident at these positions. The ExA understands that the grounds of Luton Hoo are private land. Please describe the likely receptors and how accessible they are.

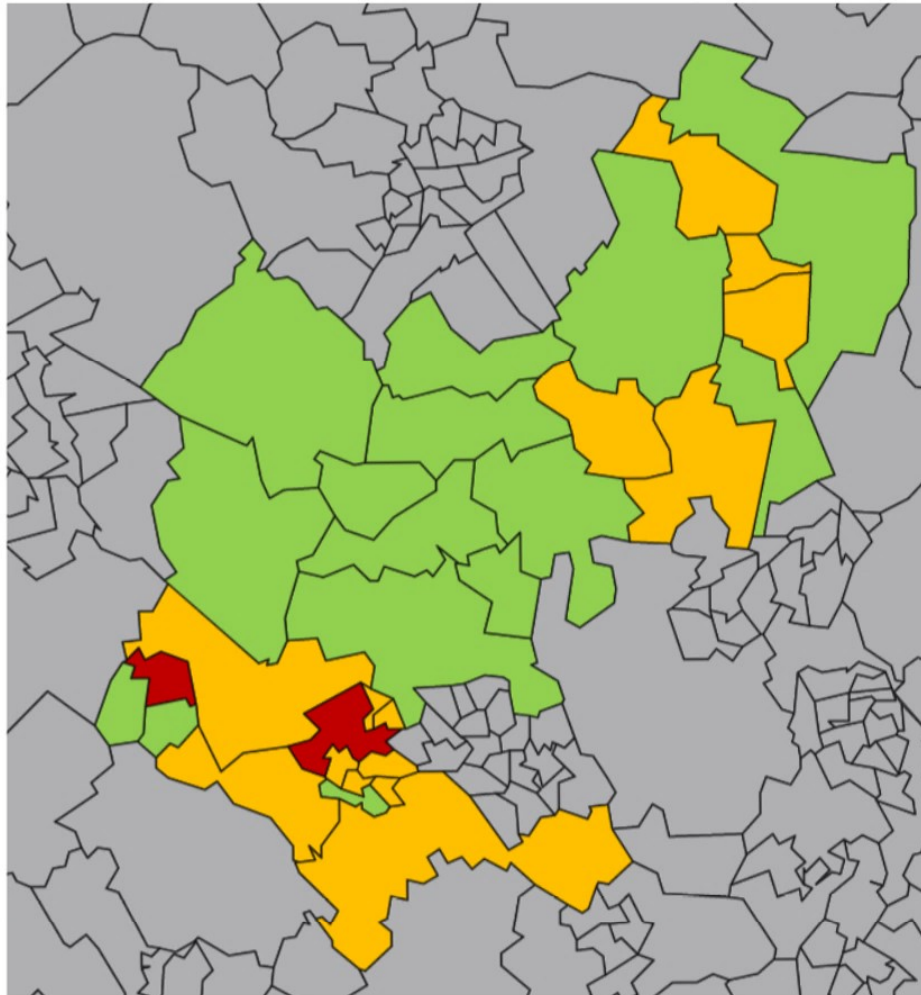
The grounds of Luton Hoo are privately owned and there are no public footpaths through the estate, but the parkland is accessible to staff and guests at the hotel who are able to freely walk the estate to enjoy the parkland. Hotel guests/visitors are able to experience views from the hotel terrace and upper floors of the building. Other receptors include people using Tank Drive (Luton Drive).

[End of document]

Appendix 1



Public Health:
Working together to improve the health
and wellbeing of our communities



Life expectancy at birth, (upper age band 90 and over) (Male) 2016 - 20 Life expectancy - Years

Source: The Office for Health Improvement and Disparities analysis of ONS death registration data and mid-year population estimates. Office for Health Improvement & Disparities. Public Health Profiles. [26/05/2023] <https://fingertips.phe.org.uk> © Crown copyright [2023]

Area	Recent Trend	Count	Value
England	-	-	79.5
Central Bedfordshire	-	-	80.9
Barton-le-Clay	-	-	85.7
Aspley and Woburn	-	-	85.1
Northill	-	-	84.5
Houghton Conquest and Haynes	-	-	84.2
Stotfold and Langford	-	-	83.4
Flitwick	-	-	83.2
Westoning, Flitton and Greenfield	-	-	82.7
Silsoe and Shillington	-	-	82.2
Leighton Buzzard South	-	-	82.1
Dunstable-Watling	-	-	81.9
Toddington	-	-	81.8
Linslade	-	-	81.7
Potton	-	-	81.7
Heath and Reach	-	-	81.6
Biggleswade South	-	-	80.8
Cranfield and Marston Moretaine	-	-	80.8
Arlesey	-	-	80.7
Sandy	-	-	80.5
Eaton Bray	-	-	79.8
Parkside	-	-	79.8
Dunstable-Central	-	-	79.4
Dunstable-Icknield	-	-	79.3
Shefford	-	-	79.2
Caddington	-	-	78.9
Dunstable-Northfields	-	-	78.7
Dunstable-Manshead	-	-	78.7
Biggleswade North	-	-	78.3
Tithe Farm	-	-	78.2
Leighton Buzzard North	-	-	78.2
Houghton Hall	-	-	77.3

Male Life Expectancy

Estimated life expectancy for males is 80.7 years, compared to 79.4 for England as a whole. Contrasted to women in Central Bedfordshire, males are expected to live 3.3 fewer years on average.

Recent Trends

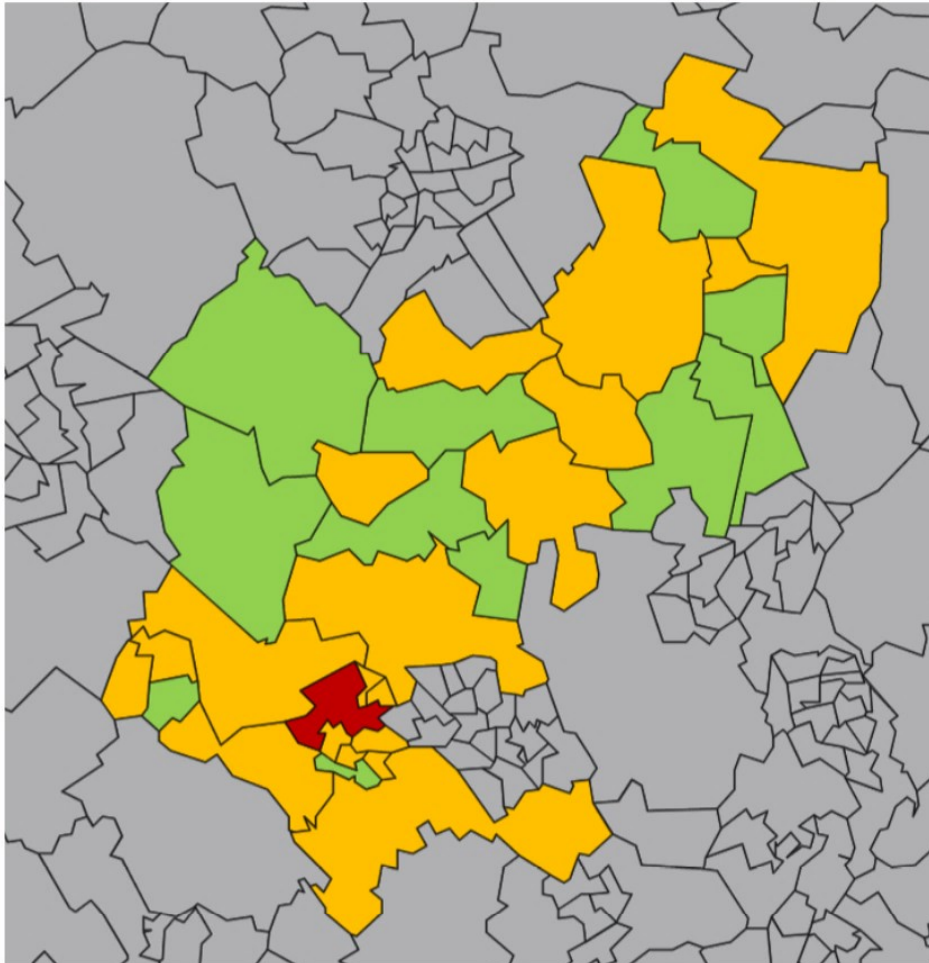
Male Life Expectancy has dropped since a peak in 2013-2015 at 81.3 years, it has been following a similar trend to England's life expectancy.

Comparison within Central Bedfordshire

Male life expectancy differs widely across Central Bedfordshire, with a range of 8.4 years. The lowest male life expectancy is in Houghton Hall ward at 77.3 years and highest in Barton-Le-Clay ward with 85.7 years, two of the most and least deprived wards in Central Bedfordshire.



Public Health:
Working together to improve the health
and wellbeing of our communities



Life expectancy at birth, (upper age band 90 and over) (Female) 2016 - 20 Life expectancy - Years

Source: The Office for Health Improvement and Disparities analysis of ONS death registration data and mid-year population estimates. Office for Health Improvement & Disparities. Public Health Profiles. [26/05/2023] <https://fingerprints.phe.org.uk/> © Crown copyright [2023]

Area	Recent Trend	Count	Value
England	-	-	83.2
Central Bedfordshire	-	-	84.2
Aspley and Woburn	-	-	88.5
Westoning, Flitton and Greenfield	-	-	88.4
Stotfold and Langford	-	-	87.5
Barton-le-Clay	-	-	87.2
Dunstable-Walling	-	-	87.1
Houghton Conquest and Haynes	-	-	86.7
Northill	-	-	86.4
Arlesey	-	-	85.8
Biggleswade South	-	-	85.4
Eaton Bray	-	-	85.4
Amphill	-	-	85.2
Cranfield and Marston Moretaine	-	-	85.1
Toddington	-	-	84.9
Leighton Buzzard South	-	-	84.8
Sandy	-	-	84.6
Silsoe and Shillington	-	-	84.6
Flitwick	-	-	84.1
Potton	-	-	84.1
Dunstable-Manshead	-	-	83.9
Heath and Reach	-	-	83.8
Linslade	-	-	83.7
Tithe Farm	-	-	83.4
Dunstable-Central	-	-	83.3
Dunstable-Icknield	-	-	83.3
Caddington	-	-	83.1
Shefford	-	-	83.0
Dunstable-Northfields	-	-	82.6
Leighton Buzzard North	-	-	82.2
Biggleswade North	-	-	81.4
Parkside	-	-	80.2
Houghton Hall	-	-	79.7

England

Female Life Expectancy

Estimated life expectancy for females is 84 years, compared to 83.1 for England as a whole. Contrasted to men in Central Bedfordshire, females are expected to live 3.3 longer on average.

Recent Trends

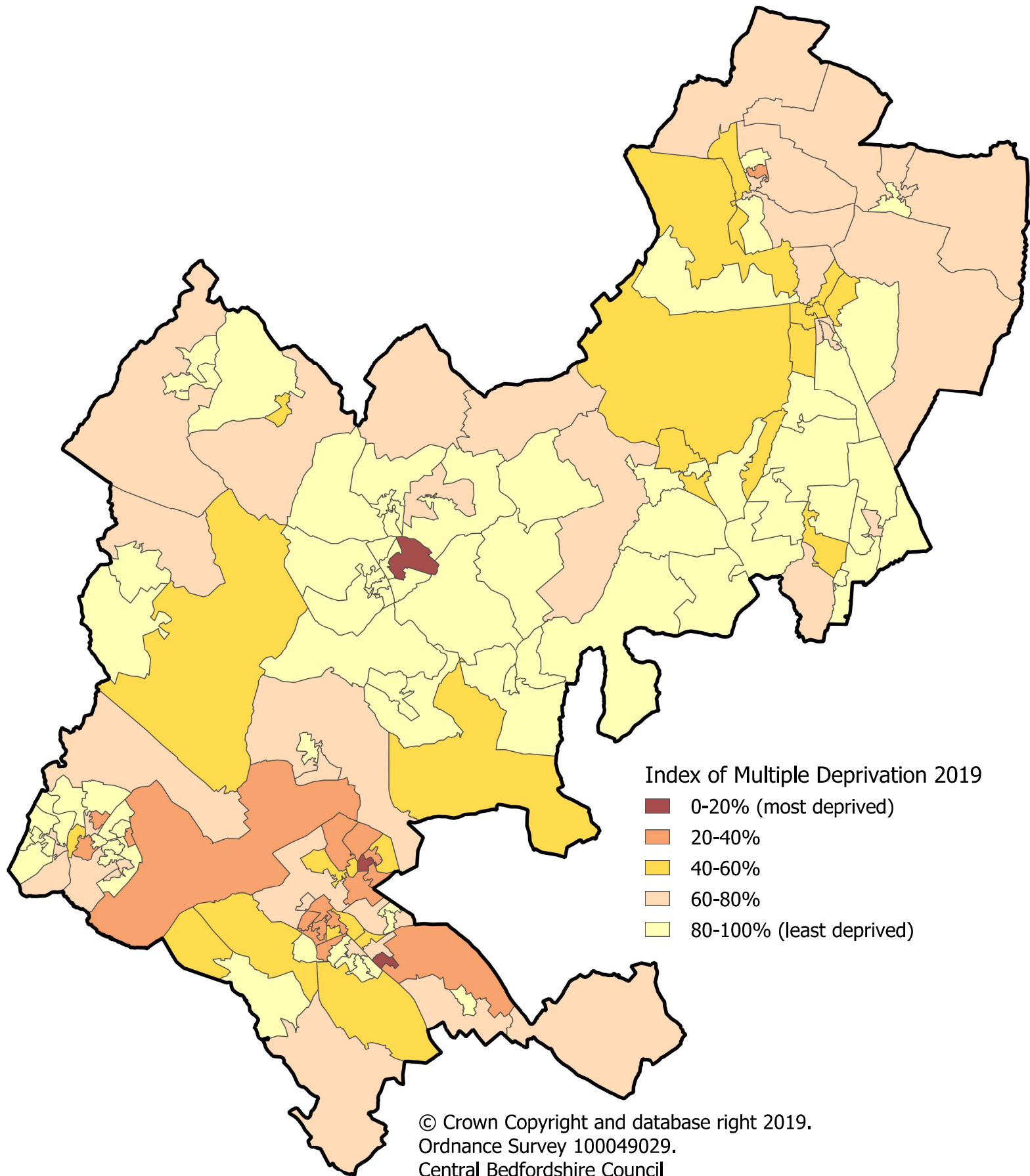
Female Life Expectancy has dropped since a peak in 2017-2019 at 83.6 years, similar to England's life expectancy, and it has been following a similar trend above England.

Comparison within Central Bedfordshire

Female life expectancy differs widely across Central Bedfordshire, with a range of 8.8 years. The lowest female life expectancy is in Houghton Hall ward at 79.7 years and highest in Aspley and Woburn ward with 88.5 years, two of the most and least deprived wards in Central Bedfordshire.

Appendix 2

Index of Multiple Deprivation 2019 in Central Bedfordshire



Each small area shown on the map is a lower super output area (LSOA). These are part of a statistical geography designed by the Office for National Statistics. Each LSOA contains the same number of people - around 1,600.

Source: MHCLG, Index of Multiple Deprivation 2019