SLAE Written Representation Submission for Deadline 7.

Aerodrome Manual

The following documents contain 38 references to the Luton Airport Aerodrome Manual, *TR020001-002207-8.107 Applicant's Response to Deadline 3 Submissions - Appendix D Peter White [REP3-133],* 4 references

TR020001-000612-6.02 Consultation Report Appendix L 2019 Due Regard tables, 1 reference

TR020001-000744-5.02 Environmental Statement Appendix 15.1 Environmental Risk Record, 22 references

TR020001-000670-5.01 Environmental Statement Chapter 15 Major Accidents and Disasters, 11 references

15.8.8 The Aerodrome Manual is the means by which all airport staff and users are informed of the characteristics, policies and operational procedures for the safe operation of the airport. It includes general arrangements in relation to aerodrome management (such as requirements for qualifications and training, details of roles account for safety and safety committees, and details of the safety management system), particulars of the aerodrome, and particulars of the operating procedures, equipment and safety measures. The Aerodrome Manual also lists the Operations Safety Instructions and where they can be accessed. The Operations Safety Instructions provide further information on the rules, regulations and procedures for the safe operation of airside (including but not limited to the management of airside traffic, refuelling, Foreign Object Debris (FOD) hazards, spillages, precautions during strong winds, low visibility procedures, accident and incident reporting etc.).

SLAE Response

SLAE have attempted to reference this manual to be able to submit a Written Representation based upon the documents 000670 & 000744 and recent operational events and those statements in the application that will require an operational input. An internet search and a review of https://www.london-luton.co.uk/corporate/lla-publications/operations (accessed 08/01/2024) could not find the manual. SLAE wrote to LLAOL (Operating company) and have been advised to contact Luton Rising.

SLAE request a copy of the Aerodrome manual to enable a written submission before deadline 8.

SLAE Written Representation Submission for Deadline 7.

Hydrogeological.

There are a lot of estimates and assumptions in the Hydrogeological documents, awaiting a detailed design and based upon literature value. This is too late for the Examiners and Interested parties to review in this process.

TR020001-002162-5.02 Environmental Statement Appendix 20.6 Hydrogeological Risk Assessment Report - Drainage Rev1

2.2.3 Surface runoff from the new aprons will discharge into the existing central soakaway. Live monitoring of contaminants within the drainage system is proposed and any contaminated water will be diverted to the attenuation tanks. Water stored in the tanks will be discharged into the TW foul sewer at an agreed discharge rate.

SLAE response
SLAE ask for further details of the proposed 'live monitoring' system, process and hours / days of monitoring? Live monitoring suggests a 24/7 operation with a person watching and able to react real time.
Where will the results be reported and will these be publicly available and when?
What happens if contaminated water cannot be diverted to the attenuation tanks?
What if an 'agreed discharge rate' is not agreed with TW?

2.8.3 Where there is a possibility of de-icing, the strategy below will be used:
c. Any residual fluids resulting from the de-icing of aircraft and hard surfaces, would be collected by vacuum sweeper or collected by the drainage system, stored in the polluted storage tank, and discharged to the proposed water treatment plant. Monitoring within the drainage system will divert flow to the polluted storage tanks or water treatment plant when glycols are detected;
d. The aforementioned TOC monitor will be integral in diverting any remaining glycol that has been dissolved in rainwater runoff away from the clean water system.

SLAE response
SLAE ask for further details of the proposed 'monitoring', process and operational hours / days of monitoring? Live monitoring suggests a 24/7 operation with a person watching and able to react real time.
Where will the monitoring results be reported and will these be publicly available and when?
What happens if the flow to the polluted storage tanks or water treatment plant when glycols are detected doesn't work?
What if the TOC fails?

2.8.4 An automated water quality monitoring system will be installed within the drainage infrastructure upstream of the WTP. The system will allow any water

which contains elevated levels of contaminants to be diverted to the WTP rather than being discharged directly to Infiltration Tank 2.

SLAE Response
It is assumed that there will be two different monitoring system installed, automated and non-automated. Is this assumption correct and if not, then the application paragraphs should clearly make this clear.

2.8.5 The automated monitoring system will include continuous TOC monitoring (for de-icer contaminated and other organics runoff detection) and a sensor to detect any floating pollutants (such as oil).

SLAE Response
How often will the automated monitoring system be maintained and what mechanisms are in place to identify when there is an issue, such as a failed sensor?

2.9.1 A preliminary assessment of the drainage water quality has been developed based on limited existing airport water quality monitoring data and an understanding of typical drainage systems from other sites.

SLAE Response
What is the ratio of assessment of limited existing airport water and typical drainage systems from other sites. Can this be broken down by Luton airport and each site named / identified? Percentages can be used.

2.9.4 Detailed information of the surface water quality in the existing airport drainage is not available. During detailed design, baseline monitoring will be undertaken to characterise the chemical components in the surface water runoff and determine the specific treatment processes that will be required.

SLAE Response
Why is detailed information of surface water quality not available? It would have been known over 5 years ago that this would be required?

2.9.12 Significant concentrations of fuels and oils, anticipated to predominantly comprise BTEX and naphthalene, will not be present in the discharge to Infiltration Tank 2 as the monitoring system (TOC and product) and Class 1 separators (<5 mg/l) in the drainage are considered sufficient to divert these to the contaminated water system.

SLAE Response
Who has made the assumption that the Class 1 separators in the drainage are considered sufficient?

The Ref 16 EPA Office of Environmental (2012). Guidance on the setting of trigger values for storm water discharges to off-site surface waters at epa ippc and waste licensed facilities. Issue No. 1. Ireland.
(Accessed 10 October 2022). Available at: https://www.epa.ie/publications/licensing--permitting/wastewater/Licensee-Guidance-on-the-setting-of-trigger-values---Final-.pdf

SLAE Response
This reference is not available and returns an Error 404 (date 06/01/2023).
Why is an Irish reference used? Why not an European or UK reference?

TR020001-002138-5.02 Environmental Statement Appendix 20.3 Hydrogeological Characterisation Report Rev 2

1.1.3 The report has been prepared based on the hydrological and hydrogeological data available at this time and should be considered, and if required revisited, during detailed design and prior to commencement of construction activities.

SLAE Response
Which phases will a detailed design prior to the commencement of construction.

1 This is a Government target, for which the precise definition will be subject to further consultation following the Jet Zero Strategy, and which will require further mitigations beyond those secured under the Development Consent Order.

SLAE Response
SLAE ask that any further mitigations be allowed to be applied retrospectively.

*2.3.1 Monthly rainfall records have been obtained from the nearby Runley Wood Pumping Station over the period from January 1989 to July 2022 (Ref. 1). These are shown in **Figure 2** in **Appendix A** to this report. Rainfall varies significantly from month-to-month and year-to-year but is generally observed to be highest during winter months and lower during summer months. Monthly rainfall values from this Station range from 1.2mm (June 2018) to 176.4mm (May 2007).*

SLAE Response
Like LR's definition of 'local' etc, How far is 'nearby'? LU1 1UB, Runley Wood is 4.9 miles away and near Dallow Road. This questions the monthly rainfall values as Runley Wood is on a plateau and Luton Airport is on the top of a Hill. It would be more accurate to measure like for like.

5.7.4 The groundwater levels recorded under the landfill from January 2018 to December 2018 show a maximum seasonal variation of 10.94m, this was observed in borehole LF-BH04 between January and June 2018. This is due to a high groundwater level reading taken in June 2018 that is dissimilar to all other readings at this location and is considered to be an anomalous reading. However, this should be confirmed with further groundwater monitoring. The next highest seasonal variation observed is 7.6m within LF-BH05.

SLAE Response
Have further tests been carried out? It might be wise to undertake further tests following the recent rainfall since November, December (2023) and January (2024) that has been experienced, to confirm if the reading is anomalous?

5.10.2 Trends in the recent past have shown that the UK climate is continuing to warm. The UK Climate Impact Programme 2018 (UKCP18) (Ref. 27) provides the most recent climate predictions, which are as follows:
a. average summer temperatures are estimated to increase by 5oC, whilst the average winter temperatures are estimated to increase by 3.4oC (both 50th percentile);
b. the average summer rainfall rate is estimated to decrease by 30%, whereas the average winter rainfall rate is estimated to increase by 31% (both 50th percentile); and
c. an overall increase in extreme weather events

SLAE Response
Will the tunnel under the taxiway on the approach to the airport cope with these increases as it has a history of flooding?
Will the route of the DART be going from the existing terminal to the proposed Terminal 2 cope?

6.2.32 However, the risk of the Main Application Site affecting conditions at Kimpton could increase if there is an accelerated dispersal rate. This could occur if a significant fracture flow pathway becomes active, although there is no indication that this pathway exists at the Main Application Site. However, additional site investigation works are proposed in advance of construction to assess this risk further and allow mitigation to be deployed if required.

SLAE Response
What mitigation measures would be deployed? does this mean Kimpton could become flooded?
Recent heavy rain, has it changed any of the models, flows and pathways?

Stop Luton Airport Expansion – Written Representation – Tree and Arboricultural

TR020001-000724-5.02 Environmental Statement Appendix 14.2 Tree Survey

SLAE Response
This document forms part of the applicant's airport expansion submission with the version date February 2023. The content title is Arboricultural Survey dated May 2016 and a reference of RE30131V002/B and prepared for Luton Borough Council.

On page 36 there is a drawing titled Eastern Access with a number of KQ30131H038.
SLAE do not believe that this road is shown in any other application documents, it also does not show the Eaton Green Link Road that passes through a small wood. Seeing that this document is a tree survey it should.

The project is called the 'New Luton Airport Perimeter Road'; however, this wasn't the name of the project at the time, it was variations of the Century Park Access Road. The map photograph on page 9 (Figure 2 Site Survey Area) shows a layout of New Century Park, not Century Park or Green Horizons. SLAE ask if this is sufficient evidence that the airport expansion was planned before May 2016?

In evidence elsewhere in this DCO examination, we are sure there were questions around the dates and when Luton Borough Council and Luton Rising announced the expansion? SLAE understand that this was firmly denied at the time.

This document covers Northern options for a New Luton Airport Perimeter Road, however there is no option shown in this document for Southern options. Surely options should have included a Southern option and this would have filtered into the Sift options appraisal. SLAE asks if this again provides evidence that a northern location for expansion was a foregone conclusion.

001065-5.02 Environmental Statement Appendix 14.3 Arboricultural Impact Assessment Revision 1

2nd paragraph on page 6, Executive Summary
865 trees and 445 tree groups, including hedgerows and woodlands are included within the survey area (including trees within the area subject to this application as well as the New Century Park area, for which consent has already been granted). The data for which is presented within the Tree Schedule at Appendix A of this report.

SLAE Response
Green Horizons Park which supersedes New Century Park has a different footprint, does the same Tree schedule in Appendix A still apply?

3rd paragraph
353 trees, 214 tree groups and 2 hedges (jointly referred to as 'tree features') have been identified for removal to facilitate the Proposed Development. Of the tree groups and hedgerows identified to be removed, several are only removed in part, which is shown on the Tree Removal and Retention Plan. One Category A tree (T343) which is a re-grown ancient and veteran coppice, will be re-coppiced and translocated to another area of the site. 98 trees, 67 tree groups and 1 hedgerow are category B, 'trees of moderate quality'. 167 trees, 119 tree groups and 1 hedgerow are category C 'trees of low quality' tree groups. A further 87 trees and 28 tree groups have been assessed as

category U 'those in such a poor condition that they cannot be realistically retained 'and as a result are recommended for removal irrespective of any future land use.

SLAE Response
The tree sum doesn't appear to add up, several (7) + 1 + 98 + 167 + 87 = 360. A difference of 7 trees. What is happening to the 87 trees that are recommended for removal?

Paragraph 4
All remaining trees and tree groups will be retained and integrated into the development. Sufficient space and adequate protection measures will be set out to ensure that retained trees are not damaged during the pre-construction and construction phase and to enable their successful development post-construction. Retained tree protection measures are discussed throughout this report and phased Tree Protection Plans will be provided before each relevant phase. No retained trees are anticipated to require remedial tree work to facilitate the development.

SLAE Response

Can Luton Rising confirm that any tree work (remedial and other) scheduled for phase 2b is as stated in this document, even though phase 2b is not due to start until 2037?

What provision is there for revisions as a result of disease (particularly ash die back) and climate change over the 18 years of development?

Paragraph 8
Works including tree removal and new tree planting are assumed to be phased between 2025 and 2040. The phasing is illustrated on the Tree Removal and Retention Plan at Appendix B of this report.

SLAE Response
Can the arboricultural phased work tie into the three development phases and the work within each phase be clearly clarified, i.e. phase 1, phase 2a and 2b?
a. Phase 1 works would commence in 2025 and be complete by mid-2027;
b. It is currently anticipated that assessment Phase 2a works would commence in early 2033 ending 2036 and would enable a step up in capacity in the first quarter of 2037; and
c. Phase 2b works would commence in 2037, and would deliver incremental capacity increases from 27 mppa to 32 mppa. The works would be completed incrementally with the full capacity provided by 2043.

For clarity the assumption should be amended to 2043.

1.3.1 The Proposed Development builds on the current operational airport with the construction of a new passenger terminal and additional aircraft stands on land owned by the Applicant located to the north east of the runway. This will take the overall passenger capacity from 18mppa to 32mppa.

SLAE Response
Factually incorrect as the land is not owned by the applicant it is owned by Luton Borough Council. Is this further evidence that Luton Rising and Luton Borough Council are one entity all but in legal definition?

1.3.3 The main elements of the Proposed Development include the following:
(h) Landscaping and ecology improvements, including the replacement of existing and planned public open space and amenities.

SLAE Response
Factually incorrect as planned public open space is not a replacement.

Table 1: Trees/Groups in each Retention Category

BS Category	No. of Trees (T)	No. of Groups (G)	No. of Hedges (H)	No. of Woods (W)	Total Features
A	15	0	0	0	15
B	284	111	1	1	397
C	472	296	6	0	774
U	94	30	0	0	124
Total	865	437	7	1	1,310

2.1.7 The scope of the tree survey involved recording the species present within the 335 groups with an estimated count of the number of each species within each group. In some cases, the approximate position of individual tree stems within groups are is plotted, elsewhere, just the approximate numbers are included. As a consequence, for trees in groups, whilst an estimate of the number of trees within the population and the number of trees proposed for removal is provided, an accurate number of trees within groups is not possible to ascertain from the dataset held.

SLAE Response
There appears to be a difference between the table and paragraph 2.1.7 of the number of tree groups.

3.1.5 It is assumed that tree removals would be phased to reflect construction activities between 2025 and 2040. During this time, new tree planting will be introduced and establish which will compensate for those removed.

SLAE Response
Who checks on the establishment of new tree planting, for how long and what happens if the trees don't establish?

3.1.6 All trees other than those in Table 2 will be retained and protected during each development phase (see section 3.3). This results in the retention of 14 category A, 231 B and 482 category C tree features. Eight U category trees can also be retained for habitat value.
However, it should be noted that tree losses associated with the Airport Access Road and off-site highway works have not been assessed within the existing tree surveys.

SLAE Response
Why not as the Airport Access Road forms part of the Airport expansion plans??

3.3.1 ***Root Protection Areas and Construction Exclusion Zones***

Retained trees will be protected during development by establishing a Construction Exclusion Zone (CEZ) around their Root Protection Areas (RPAs). RPAs are a layout design tool, indicating the minimum area around a tree deemed to contain sufficient roots and soil to maintain the tree's viability. RPAs should be treated as a precautionary area within which activities such as ground compaction, excavation, the storing of materials, ground level changes and other construction activity are likely to cause damage to trees and should therefore be excluded. This CEZ can be achieved by the erection of barriers at the locations presented in subsequent, phased Tree Protection Plans. Tree protection barriers must be installed before any demolition or construction works start, and, unless approved by the overseeing authority or by an arboriculturist approved by them, should remain in place until all construction activity has been completed.

SLAE Response
Will the CEZ will remain in place from the start until the end of phase 2b, scheduled in 2043?

3.3.4 The location of tree protection fencing has not been provided on the Tree Removal and Retention Plan. However, detailed Tree Protection Plans will be provided before each phase begins to ensure retained trees within a phase are appropriately protected, before any associated enabling works, earthworks and construction works takes place.

SLAE Response
What happens if a Tree Protection Plan is not provided before each phase? Does the phase stop until one is in place?

3.4 Special Technical Measures

3.4.1 Conflicts between retained trees and aspects of the proposed development that cannot be dealt with by exclusion zones, tree protection or tree work, can be mitigated by the use of special technical measures. Any required special measures will be managed with the use of Arboricultural Method Statements through the life of the project.

SLAE Response
What is a special technical measure?

3.5.2 ***Soft Landscaping***
A suitably qualified Arboricultural Consultant should review any landscape operations that involve any work within the RPAs of retained trees and input additional site-specific methodology where necessary.

SLAE Response
All "should" must be replaced with "will"
Why are trees marked as Early Mature and Good (G1187) being felled and not moved elsewhere?
Although 'Special Engineering Measures' will meet performance criteria, what are 'Special Engineering Measures'?