

## **SLAE Written Representation Submission for Deadline 9 - Construction**

**Summary** (as document is over 2,000 words)

This Written Representation reviews and comments on the five Construction titled documents.

When reading this Construction suite of documents a few identical themes are demonstrated, sloppiness, same ole, same ole and a lack of consideration to those residents that live in the wards adjoining the airport.

This appears to be a deliberate theme running throughout. There is no new or innovated thinking behind what a resident adjoining the airport would like in regards to communications and feedback. The tools that do so suit procrastination, delay, a lack of responsiveness, true engagement and a lack of interest towards the airports nearest resident neighbours. What is even more interesting is that Luton Rising have ignored feedback given to this subject in the Statutory Consultations of how this can be done.

'Reasonable' and similar words are used many times in the Construction documents. This introduces vagueness and avoidance. What might be reasonable to the airport adjoining ward residents may not be to the lead contractor. For example, it might be considered reasonable to plan for an airport expansion that attracts almost half of the population of the UK to Luton and destroys an existing award-winning park to Luton Rising, but to the normal person in the street who day by day is questioning such developments it might be very unreasonable. Please be more specific and remove these words.

The documents that this Written Representation covers are:

- 002894-5.02 Environmental Statement Appendix 4.1 Construction Method Statement and Programme Report
- 002892-5.02 Environmental Statement Appendix 4.2 Code of Construction Practice
- 002897-5.02 Environmental Statement Appendix 18.4 Outline Construction Workers Travel Plan
- 002196-8.92 Applicant's response to Issue Specific Hearing 3 Action 1 - Assessment of night-time construction noise
- 002611-5.02 Appendix 18.3 Outline Construction Traffic Management Plan

### **TR020001-002894-5.02 Environmental Statement Appendix 4.1 Construction Method Statement and Programme Report**

#### **SLAE Response to this document**

As a revised version why is this DCO application un-cohesive, disjointed and difficult to make sense of? There are missing insets references and unsynchronised drawings and text / tables references. Drawings with unclear reference points that the reader is unable to make sense of them. SLAE do not believe this document is fit for its purpose for the following reasons.

*4.3.3 The potential satellite site locations are shown in the phasing diagrams in Appendix B and would include the following:*

- a. Construction Compound 1 (Replacement Open Space Wigmore Valley Park):*
- b. Construction Compound 2 (Earthworks and Airfield):*

- c. Construction Compound 3 (New Surface Car Parks P6 & P7):*
- d. Construction Compound 4 (Green Horizons Warehouse):*
- e. Construction Compound 5 (33kV substation):*
- f. Construction Compound 6 (J10/M1):*
- g. T1 Enhancement: Located within the existing central terminal area.*

#### **SLAE Response**

Why is it not clear when viewing the drawings in Appendix B, which Construction compounds apply to which areas? SLAE ask for clearer detail references in both text and drawings. For example, paragraph 4.3.3a. describes Construction Compound 1, which is to be located on the Replacement Open Space Wigmore Valley Park for year 1 (drawing on page 125), but the estimated Time Operational in Table 4.1 shows 24 months, and this is not shown on the drawing on page 126. It is also not shown on the drawing in Insert 4.1 on page 21.

*4.3.13 An interface schedule would be developed to identify all existing and future services. For each service an owner would be identified to take that service from design, through construction, connection, commissioning, and handover. A representative from the airport operator would be allocated to each service, who along with the design engineer and interface owner would create an interface team.*

#### **SLAE Response**

Public Open Space is referred to throughout this section, however SLAE note that no members of the Public are included in the interface team. Why is this a constant theme throughout this and other construction documents? This is missing the obvious and makes a mockery of all the previous statutory consultation processes and exercises.

*4.3.16 For works that take place on any premises owned or under the control of the operating airport, in addition to the CoCP (Appendix 4.2 of the ES) [TR020001/APP/5.02] they would comply with construction works requirements as defined by the airport operator.*

#### **SLAE Response**

Please make the work requirements as defined by the airport operator available for public review?

*4.3.34 Given the proximity of the cut and fill areas, two main systems are presently envisaged to be feasible to transport the excavated material to the fill area. These comprise:*

- a. traditional trucks/dump trucks; or*
- b. a conveyor system, with a feed screening plant.*

#### **SLAE Response**

Will Eaton Green Road be used to by these and other transport vehicular methods to reach Construction Compound 1 in the 24 months on Phase 1?

Does the 24-month period include start and shut down activities?

*4.3.36 Haul roads would be a temporary construction and would require regular spraying with water to prevent dust during summer months.*

#### **SLAE Response**

Where Haul roads are close to public roads or where the wind direction spreads dust, dirt and waste, will these public roads also be regularly cleaned?

What is the definition of 'regularly cleaned', hourly, half daily, daily?

*4.3.47 The diagrams below show the areas affected by the earthworks planned for Assessment Phase 1. The ground would be excavated down to stable strata and the material would be deposited into temporary stockpiles.*

#### **SLAE Response**

It is not possible to submit a response based upon the diagrams, Inset 4.6: Assessment Phase 1 Earthworks (proposed area of cut) and Inset 4.7: Assessment Phase 1 Earthworks (proposed area of fill). Why are LR using poor reproductions?

Why are there no easily recognised reference points shown on the diagrams.

This also applies to those other diagrams shown in this document such as, Inset 5.3: Assessment Phase 2a Earthworks (proposed areas of cut), 5.3.27 The inset below shows areas of existing ground that excavated material would be deposited, 6.2. and 6.3.

*5.3.48 It is assumed that the terminal building would have a steel frame (Inset 5.10: Steel frame erection of new car park at the airport), alternatives could include a timber frame, or a concrete frame used in whole or in part, however the methods and techniques discussed below could be applied to these methods.*

#### **SLAE Response**

As a result of the recent Airport Car Park fire, how did the steel used in that construction fare and what assurances are there that the terminal building will not suffer the same?

*5.3.49 The structural steel frame would be manufactured off site and delivered to site by articulated low loader vehicle. The steel work deliveries would be planned for just in time delivery to avoid storage on-site. The preference would be to erect the steel direct from the wagon to avoid double handling and storage with associated congestion on-site. Steel erection would be carried out by crane.*

#### **SLAE Response**

Where will the steel frames be manufactured?

Identify and publish the carbon, methane and climate footprints of source, manufacture, transport construction and ongoing lifetime maintenance.

Also, the same for the,

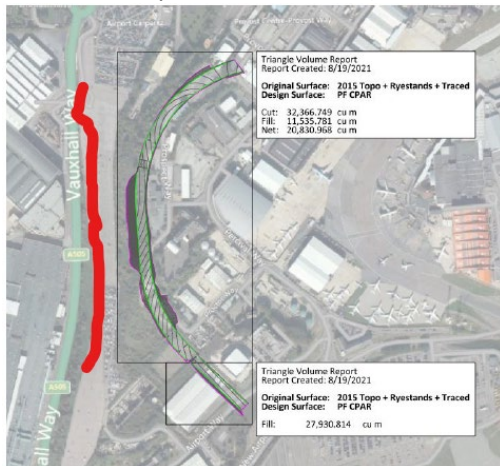
- Basement, Ground, and Intermediate Floors
- Roof and Wall Cladding
- Internal Fit Out
- Construct cut & cover tunnel (Chainage 2+300m to 2+400m). of the DART extension
- Tunnel and station fit out
- Attenuation Tanks
- Water treatment facilities

5.3.109 The AAR is a new access road linking the A1081 (Airport Way) to T2 and is planned to be built in two sections. The drawing below indicates the proposed road alignment (refer to inset 4.33 and 4.34).

#### SLAE Response

It appears that inset 4.33 and 4.34 are missing from this document, could LR identify which Environment Statement document these insets can be found? SLAE will then be able to respond by a future deadline date.

*Inset 5.34: Airport Access Road (estimated cut & fill) Section 1a*



#### SLAE Response

From the picture labelled as Inset 5.34 and then reading the activities associated with this section of the Airport Access Road, there seems to have been no risk assessment in any of the applicant documents for the possible subsidence of the embankment that is on the east (airport) side of the public A505, Vauxhall Way. SLAE indicate on the map in red where previous occasional subsidence has occurred on this road, normally as a result of weather conditions.

Also, could the vibration and work have involved with building the Airport Access Road cause subsidence?

*Inset 5.36: Assessment Phase 2a Car Park Locations, Inset 6.6: Assessment Phase 2b Car Park Locations.*

#### SLAE Response

How can LR justify the destruction of the current Wigmore Valley Park and the County Wildlife Site for the building of so many car parks?

6.3.17 It is not expected that the area would need close boarded hoarding, but it would be demarked by red & white barriers and access routes would be agreed with the airport operator ahead of work commencing on-site.

#### SLAE Response

How will dust arising from such activity at this specific location be stopped from reaching the Public footpath and park?

*7.1.7 Arrangements would be agreed with the local planning authorities, client representatives, airport operator, regulators and the stakeholders including residential and commercial communities.*

**SLAE Response**

What does residential communities mean? Is it airport ward adjoining residents, councillors, or locals (where 'local' could mean anyone up to Milton Keynes (over 20 miles away) as defined elsewhere in other DCO application documents)

*7.2.1 The Proposed Development would adopt a zero-harm policy that would seek to reduce and minimise the risk or death or injury, ill health or incident to airport passengers, the local communities, airport employees and construction workers. This is a central thread in all construction and phasing planning of the works. All contractors shall comply with all relevant health and safety legislation such as the Health and Safety at Work Act 1974.*

**SLAE Response**

Appears to be a contradiction in this paragraph, 'zero harm', 'reduce and minimise' it's either one of another and not then open to confusion.

*7.2.3 The Applicant would require its supply chain to deliver their works to an exemplary standard for health, safety, and welfare performance.*

**SLAE Response**

To 'zero harm', or 'reduce and minimise' standards?  
Define what exemplary standard means, to avoid different interpretations?

*7.3.6 We would expect that a large proportion of operatives would be from London and the Home Counties area and thus anticipate an average 70-mile round trip using a car or van. We also anticipate that there would also be specialist contractors that could be based further away within the UK or mainland Europe.*

**SLAE Response**

Why is a car or van anticipated, when the table in Table 7.1 Estimated Car Parking Numbers and Travel Distances, covers public transport which is the priority as mentioned in numerous other application documents?  
Why is this DCO application document disjointed and not cohesive with other document statements?

*7.5.4 The batching plant could be located within the main construction compound. This would enable both vehicles using the public highway to access the plant for deliveries (cement and aggregate) and by on-site concrete plant using the local site haul roads.*

**SLAE Response**

Why is there a need to use the public highway? There are not enough sufficient haul roads, particularly for phase 1, where a construction compound 1 is located on the new replacement park on Eaton Green Road. LR can build a connecting haul road from those shown in table 7.2 Estimated Temporary Site Haul Road Lengths, to the construction compound 1. The application does not explore or address this in significant detail.

*7.9.1 Non-road mobile machinery is defined as any mobile machine or vehicle that is not solely intended for carrying passengers or good on the road and would typically include.*

**SLAE Response**

It is assumed that the word 'good' should be 'goods'. If not, explain why this machinery is good on the road?

**TR020001-002892-5.02 Environmental Statement Appendix 4.2 Code of Construction Practice**

**SLAE Response to this document**

1. Why is the whole of section 4 heavily biased and weighted towards Luton Borough Council, Luton Rising, London Luton Airport Limited, Lead Contractor and Council political party representatives and not airport adjoining ward residents?
2. When section 4 was written it obviously had not taken input from non and the two rounds of Statutory Consultation along with relevant representations from those opposed to airport expansion submitted to the DCO process. Why not?
3. As previously stated, there is no new or innovated thinking behind what a resident adjoining the airport would like in regards to communications and feedback. The tools to do so suit delay and a lack of responsiveness. It appears that the Community Relations Line (as explained in 4.3.1.) dedicated email address to deal with enquiries and complaints from the public, the phone line, email and website contact facility is a get out of jail card applied to many of the sections and paragraphs in this document. Why are LR so out of touch (including reality), oblivious to forming good customer relations and applying tools that suits their needs without considering those raised in the whole consultation process?
4. For example, have all construction companies / workers sign up to a code of practice as drawn up by local residents before they can start working. Industry codes of practice do not cover local knowledge. This is all part of being a good neighbour.

*1.3.1 This document comprises the following sections:*

*b. Management Approach (Section 3): the mechanisms by which broader environmental commitments and detailed requirements in local community areas are passed from the Applicant to the lead contractor;*

*c. Community relations and stakeholder engagement (Section 4): an overview to engagement with the local community, including the mechanisms for communications, enquiries and complaints;*

**SLAE Response**

In other applicants documents the term local community is used to mean anyone up to 22 miles away, which is meaningless when applied to this and other paragraphs. Is that the intention of LR to use the term 'local'? Would someone living 22miles away consider themselves living local to Luton?

*2.1.1 The lead contractor will have an Environmental Management System (EMS) that is certified to British Standard BS EN ISO:14001. The management systems will set out processes, practices, and plans that enable the lead contractor to manage environmental impacts and increase their operating efficiency.*

**SLAE Response**

How many Lead contractors can there be as SLAE understand that there is a Lead contractor for each phase?

*2.1.6 Management plans and strategies listed below, must be developed by the lead contractor for each part of the authorised development in accordance with the scope provided in this CoCP, and must be approved in writing by the relevant planning authority following consultation with the relevant highway authority, statutory undertakers as appropriate on matters related to their functions, and the relevant water undertaker in relation to (d), (e) and (i) below.*

**SLAE Response**

Why is there no mention of the role that airport adjoining ward residents have with approving in writing?

*3.5.1 For all construction operations, a point of contact will be identified for communication with the regulatory authorities. The lead contractor will provide the regulatory authorities with the details of the contact person(s) prior to the commencement of the construction works.*

**SLAE Response**

The point of contact must also be available to communicate with airport adjoining ward residents

#### 4 COMMUNITY RELATIONS AND STAKEHOLDER ENGAGEMENT

**SLAE Response**

All community engagement to cover airport adjoining ward residents

*4.1.2 The plan will include procedures to:*

**SLAE Response**

Represent the interests of airport adjoining ward residents, where they have equal representation as any majority Luton Borough Council, Luton Rising, London Luton Airport Limited, Lead Contractor and Council political party representatives do.

*4.1.4 The lead contractor will take reasonable steps to engage with the community having due regard for wellbeing and mental health, and communicating in plain English. Engagement will particularly be focused on those who may be affected by construction impacts, including local residents, businesses, landowners and community resources, and the specific needs of protected groups (as defined in the Equality Act 2010). The Community Engagement Plan will refer to the Equality Impact Assessment [TRO20001/APP/7.11] and present strategies for communicating with diverse and hard-to-reach groups, including a strategy for providing translated information where reasonable and upon request.*

**SLAE Response**

Any Community Engagement Plan will represent the interests of airport adjoining ward residents, where they have equal representation as any majority Luton Borough Council, Luton Rising, London Luton Airport Limited, Lead Contractor and Council political party representatives do.

*4.1.4 The lead contractor will take reasonable steps to engage with the community having due regard for wellbeing and mental health, and communicating in plain English.*

**SLAE Response**

What does reasonable steps mean, define them? What might be reasonable to the airport adjoining ward residents may not to the lead contractor.

Luton is considered a multi-cultural society and plain English is not the language of many of Luton's residents. Is this discrimination?

*4.1.5 The Applicant will establish and be a key member of community focus groups providing strategic insight and feedback to and from the Proposed Development. Meetings will be attended by the lead contractor's Community Liaison Officer together with a representative from the Applicant and local authorities as may be necessary to cover the matters to be discussed. The Community Engagement Plan will detail the process for the Applicant's engagement with community focus groups (e.g., the programme and method for community engagement).*

**SLAE Response**

The Applicant may establish community focus groups, however to avoid biases and applicant dictated led initiatives they will not lead or create the agendas for them.

*4.2.1 During the construction operations, a programme of relevant and ongoing communications will be prepared and implemented by the lead contractor or a nominated representative following approval by the Applicant.*

*d. helpline and dedicated email address: a Community Relations Line will be made available 24 hours a day, seven days a week, to handle enquiries during the construction period. This should include acknowledgement of enquiry within one working day, full response within five working days and resolution of official complaints within 21 working days;*

**SLAE Response,**

In these days 24 hours a day, 365 days per year helpdesk number is of no use, there should be a real time centre using online tools with real time construction monitoring and news.

Why do the timelines not suit the need of airport adjoining ward residents and SLAE invite LR to review them and resubmit a revised this document?

Providing advanced notices, reporting in real time, with an acknowledgement at time of reporting and a full response within one day. A one-day acknowledgement and full response is no good for real time events and five working days can stretch to 7 days when including weekends. The timelines as stated in 4.2.1 indicate hiding from responsibilities and a disregard to public interest. Social Media, via tools such as WhatsApp, Instagram, X all cater for real-time communications.

There should be an escalation model provided in this section along with response levels that will be achieved and that the public can understand.

All queries and complaints that are logged are made available on social media with progress on investigating and fixing available to both airport and public.

*4.2.2 Wherever possible, the lead contractor will notify occupiers of nearby or affected properties, businesses, adjacent or affected parish councils, and other elected representatives at least four weeks in advance, and again at least two weeks in advance, of the nature and anticipated duration of*



*planned construction works that may affect them, including both principal and ancillary works. As a minimum, the lead contractor will take steps including direct correspondence and/or mail drops, as well as providing information in local community centres. The notification will also provide details of the enquiries and complaints procedure developed in accordance with the requirements in Section 4.3. Information included in the notifications will include, as appropriate:*

*f. the enquiries and complaints procedure*

#### **SLAE Response**

Four weeks and two weeks advance notice is good, however there needs to also be countdown communications from one week to the day that construction works that may affect them. The enquiries and complaints procedure needs to be fit for purpose and agreed with airport adjoining ward residents. This is to avoid the biases of such procedures currently in place by London Luton Airport Operations Limited, that are biases towards discouraging the public to raise them.

#### *4.3 Enquiries and complaints procedure*

#### **SLAE Response**

This section is not fit for purpose for those in the airport adjoining ward residents as for the reasons as already explained in this and other Construction related responses.

Mechanisms introducing delay are not acceptable, real-time responses must be available by staff working 24 hours a day, whom have the ability and authority to address enquiries and complaints there are then

*4.3.4 The lead contractor will also establish a small claims procedure and an independent complaints commissioner. The small claims procedure will present a positive and transparent platform for minor, construction-related claims from residents, businesses and agricultural landowners*

#### **SLAE Response**

Airport adjoining ward residents to establish an independent complaints commissioner

*5.1.2 To maximise productivity within the core hours, the lead contractor will require a period of up to one hour before and up to one hour after core working hours for start-up and close-down of activities.*

#### **SLAE Response**

This stretches the possible working day by two hours each day outside of the core working day and should fall under the Additional working hours section to make it clear to understand by all.

*5.1.9. Activities outside core working hours that could give rise to disturbance will be kept to a reasonably practicable minimum.*

#### **SLAE Response**

What is reasonable? Define it, get rid of any vagueness? What might be reasonable to the airport adjoining ward residents may not to the lead contractor.

*5.1.11 In the case of work required in response to an emergency or which, if not completed, would be unsafe or harmful to the works, staff, the public or the local environment, the relevant local authority*

*will be informed as soon as reasonably practicable of the reasons for the works and their likely duration.*

**SLAE Response**

What is considered an emergency? This should be defined and published along with response times for the public to digest. The examples given are accepted for this document but are insufficient if the DCO is actioned.

*5.5.9 Particular attention will be paid to minimising sky glow and light intrusion beyond the construction site. The lead contractor will respond promptly to complaints regarding obtrusive light (e.g. from dwellings).*

**SLAE Response**

What is respond promptly? It's too late if promptly means on a Monday morning after a complaint has been lodged the previous Friday. How can a reply after a possible seven days lapsed time, be considered responding promptly?

It is fair to say that a response and fix within two hours of the complaint being received is a prompt response?

*5.6.4 The Worker Code of Conduct will cover general behaviour expected of those involved in construction activities, including their interaction with local communities, in line with the Applicant's values.*

*5.6.5 Particular provision will be included relating to construction workers using temporary workforce accommodation, car parking, use of local community and recreation facilities, anti-social behaviour and communicable diseases.*

**SLAE Response**

Applicant's values to be published to residents in advance.

What happens if general worker behaviour is not in line with the Applicants Values?

Please define what 'local' means? In other documents local reaches as far as Milton Keynes.

*6.3 Pollution prevention and incident control*

**SLAE Response**

There is no start to finish communication flow shown so how and when are the residents informed? If it's assumed that residents don't need to be informed, there are no paragraphs in this section that describe the decision-making process that mentions that, why?

*6.5.3. Where UXO is discovered, the lead contractor will prepare and implement an emergency response procedure, including the preparation of notifications to the relevant local authorities, the airport operator and relevant services.*

**SLAE Response**

Why are the airport adjoining ward residents excluded? The local authorities, the airport operator and relevant services won't be near the UXO, but airport adjoining ward residents will be.

Where is the care for residents and common sense being applied to this paragraph?

## **9.2 Ecological management measures**

### **SLAE Response**

There are residents with intimate knowledge expertise of the park that appears to be missing from the paragraphs in this section. It's all well and good that the applicant consultants have excellent qualifications and data from desk bound knowledge, but it's a shame that LR ignore the input of those that live and walk the land. After 5 years LR still don't know who these residents are.

*14.2.5 Monitoring and management processes will control the impacts from noise and vibration throughout the construction works. This will include the management and monitoring processes to integrate noise controls into the preparation of method statements and ensure proactive links between noise management and community relations activities. In addition, a noise and vibration monitoring protocol will be implemented to check ongoing compliance, improvement and rapid corrective actions to avoid any potential non-compliance.*

### **SLAE Response**

Will the results of a noise and vibration monitoring protocol be available in real-time for residents to view?

Where construction activities are planned, schedule these works on a one day on and one day off rota, during normal working days only, or if the number of complaints reach a certain threshold, then suspend that work for the next day. Many workers work shift patterns and piling during the day time can impact their well-being as well.

*14.2.16 All applications for consent will include a statement advising how and when local residents, businesses or other organisations likely to be affected by the works will be notified of the start date, nature and duration of the works, along with details of a complaint's hotline.*

### **SLAE Response**

Response to this paragraph is covered in other replies to this document.

*14.4.2 Monitoring data will be provided regularly to, and will be reviewed by, the Applicant, and will be made available to the relevant local authorities.*

*14.4.3 Monitoring data will be provided by contractors at minimum on a monthly basis. Where continuous real-time monitoring of noise levels is required (as identified through discussions with the local authorities under the Section 61 process), more frequent sharing of monitoring data will take place, and real-time alerts in case of noise threshold exceedances will be implemented.*

### **SLAE Response**

Response to this paragraph is covered in other replies to this document. What is pleasing is that there is a precedent being set for real-time monitoring.

*15.3.5 An environmental monitoring and audit system with lines of formal communication will be established to report to the Applicant and communicate actions/impacts/monitoring results, to be recorded weekly and provided in a monthly summary report. The report will be provided to the relevant local authority and the Applicant.*

**SLAE Response**

Response to this paragraph is covered in other replies to this document.

*16.4.1 Public access will be maintained, where reasonably practicable, and appropriate measures will be implemented to ensure that the local community, economy and transport networks can continue to operate effectively. Where this is not reasonably practicable, alternative measures will be identified to maintain public access, especially for pedestrians and cyclists, to routes in the vicinity of the sites. The impact of road-based construction traffic will be reduced by implementing and monitoring clear controls on vehicle types, hours of site operation, parking and routes for large goods vehicles.*

**SLAE Response**

A priority system set up with the adjoining ward residents prioritised above all else.

*16.4.3 Where site accesses and at-grade crossings of public roads are required for construction vehicles, the lead contractor will provide traffic management measures as required and design these measures to avoid unnecessary delay to vehicles on the public highway.*

**SLAE Response**

A priority system set up with the airport adjoining ward residents prioritised above all else.

*16.4.4 The lead contractor will keep roads, accesses and the like free from mud and other loose materials arising from the works, as far as reasonably practicable.*

**SLAE Response**

A priority system set up with the public roads serving the airport adjoining ward residents prioritised above all else.

What does reasonably practicable mean?

*17.2.12 To ensure compliance with the requirements of the CoCP and the SWMP, in addition to statutory controls, the lead contractor will conduct frequent and timely audits and inspections of waste management activities. The categorisation, quantities and disposal route of waste generated during construction operations will be identified, measured and recorded in the SWMP. This information shall be reported on a monthly basis to the Applicant.*

**SLAE Response**

Information shall be reported on a monthly basis to the airport adjoining ward residents as well as the applicant.

Real time monitoring systems made available to the public that identifies breaches of targets for the diversion of waste from landfill during construction and operation of our proposed development.

Identification of where that waste will end up along with publication to the local public of activity.

*2.3.3 The core working hours would be from 08:00 to 18:00 on weekdays (excluding bank holidays) and from 08:00 to 13:00 on Saturdays. Most construction worker trips would therefore not occur or impact on the traditional network peak periods. The Applicant will require that the lead contractors adhere to core working hours as far as is reasonably practicable, as described in the Code of Construction Practice (CoCP) provided as Appendix 4.2 to the ES [TR020001/APP/5.02] the adherence to which will be required by the Development Consent Order (DCO).*

#### **SLAE Response**

Where road or other diversion or bottleneck work impacts traditional network peak periods, what's the plan?

If construction workers are starting at 08:00 and leaving at 18:00, then trips would be done before and after those times, especially if parking requires an onward journey to reach their place of work, i.e. walking or other transport mode.

*2.3.2 A Nationally Significant Infrastructure Project such as this could attract construction workers from over a large area. The distances travelled and modes of transport that they use has not been specifically addressed at this stage, particularly as the main construction works would not occur for several years and the lead contractor and origin of workers cannot be fully understood at this stage. It is however assumed that 60% of workers will arrive to site by car and allowance has been made for on-site car parking in construction compounds, as described in Appendix 4.1 of the ES [TR020001/APP/5.02]. Parking demand would vary throughout the construction of the Proposed Development and parking area would be set aside within the Application Site to accommodate parking for construction workers.*

#### **SLAE Response**

Why has the distances travelled and modes of transport that construction workers use not been specifically addressed at this stage, particularly as the first phase is due to start in 2025?

What's the provision if over 60% of workers arrive by car? Will there be charging for parking in construction compounds? Will there be any short cuts or cheaper options for workers to park elsewhere nearer to their actual place of work than the compound? How will adherence be policed (SLAE suggest that a real time contact system where the receiver can action a response within a 30-minute turnaround to public complaints).

SLAE suggest social media technology publishes a daily activity bulletin, that indicates the day's activities and what work is happening along with numbers of people on site.

*3.1.2 This Outline CWTP will sit alongside the Outline CTMP and CoCP (Appendix 18.3 and 4.2 to the ES respectively, and provide guidance on the aims of the CWTP to reduce the impact of construction workers travel to construction sites including any temporary car parking arrangements to minimise the impact on local residents and businesses. The CWTP would seek to reduce the number of trips made to and from the site particularly by single occupancy private cars during the construction of the Proposed Development by promoting sustainable modes including car sharing.*

#### **SLAE Response**

Why can the applicant provide advance notification of any temporary car parking using social media to pass on real-time information? Publication of weekly stats on a publicly available platform of car sharing, single occupancy and the impact of temporary car parking.

*3.1.4 The lead contractor will provide a CTWP to cover the relevant parts of Proposed Development being delivered and any associated compound worksites.*

**SLAE Response.**

It is reasonable for the Lead contractor must be required to engage with residents of the wards adjacent to the airport to input into the CTWP, to avoid bias from LR and LBC?

*4.2.1 The lead contractor's responsibilities will be: a. developing the CWTP for the relevant part of the Proposed Development;*

- b. seeking and gaining appropriate approvals from the Applicant and relevant planning authority, in consultation with the relevant highway authority;*
- c. owning and implementing the CWTP;*
- d. managing worker travel to and from the site including implementing measures such as those described in this Outline CWTP;*
- e. providing a Travel Plan Co-ordinator (TPC) to manage and delivery of the CWTP; and*
- f. managing and minimising single vehicle occupancy trips through encouraging and promoting the use of sustainable transport measures included within the CWTP.*

**SLAE Response**

Proof that LR do not want the airport adjoining ward residents to be a part of the development of the CWTP. Is this a case of you get what your given and not consulted? The current case of Mr.Bates against the Post Office sums up the thinking behind this application document.

*4.3.1 The lead contractor will appoint a TPC to manage and implement the CWTP. The TPC will act as a single point of contact for all parties with an interest in the site, from construction companies through to local planning and transport authority staff, so that concerns can be raised and quickly acted upon. The responsibilities of the TPC would include ensuring the lead and subcontractors adhere to any contractual obligations related to the CWTP; raising awareness of the CWTP to the workforce through promotion of the CWTP; acting as the key point of contact for issues related to construction worker travel; undertaking relevant monitoring and working with the appointed lead contractor to adjust measures where appropriate; and engaging with relevant stakeholders.*

**SLAE Response**

This reads that the TPC appears to be the ideal person to manage and engage with the public. Let's make that happen?

**5 EXISTING SURFACE ACCESS AT THE AIRPORT**

**SLAE Response**

SLAE are unable to respond as there only appears to be headers and sub headers and the content descriptions appear to be missing. It is assumed that this section will be populated and interested parties given the opportunity to respond before the end of the examination period.

*6.1.1 To encourage sustainable travel behaviour by construction staff throughout the period of construction, it is important that an appropriate package of measures is introduced. This section provides an overview of typical measures that can be beneficial in managing and minimising the*

*impacts of worker travel. The appointed lead contractor will develop the CWTP measures which must be substantially in accordance with the measures described in this Outline CWTP or any other measure the lead contractor deems to be beneficial to their workforce to achieve the aims and objectives of this Outline CWTP.*

#### **SLAE Response**

SLAE have already outlined some beneficial measures in previous responses in this document.

*6.1.2 The package of measures would aim to minimise the level of construction worker traffic, and wherever possible, minimise the impact and disruption of the remaining traffic on the local road network. CWTP measures could include:*

*a. Measure to reduce the need to travel – consideration could be given to the use of local hotels and B&B by workers. A construction project of this scale is likely to draw construction workers from across the UK some of whom will stay locally during the working week. This measure would reduce the total number of trips made to and from the site as well as reducing overall vehicle kilometrage on the wider network.*

*c. Car sharing – encouragement of car-sharing by awareness raising measures and help with finding partners with similar journeys (this may include running a bespoke car-share scheme or signing up to car-share schemes operated by the local authority and its partners to enable access to a wider local pool of people travelling within an area). In construction projects, car sharing is already popular amongst workers due to the financial and social benefits it provides. To further encourage car sharing, provision should be made for a guaranteed lift home for car sharers in emergencies, e.g. by use of taxi.*

*D. Working Hours – The working hours are aligned with local authority and airport requirements:*

*i. Core working hours will be from 08:00 to 18:00 on weekdays (excluding bank holidays) and from 08:00 to 13:00 on Saturdays. LLAL will require that its appointed contractors adhere to these core working hours for each site as far as is reasonably practicable or unless otherwise permitted under Section 61 of the Control of Pollution Act 1974.*

*ii. Except in the case of an emergency, any work required to be undertaken outside core hours (not including repairs or maintenance) will be agreed with the local authority prior to undertaking the work under Section 61 of the Control of Pollution Act 1974.*

*iii. Workers start and finish time on site align with public transport provision as the airport is well connected by both bus and rail services. Ensuring that construction worker core working hours coincide with availability of local public transport services will be beneficial in reducing the reliance on private vehicle trips.*

*f. Subsidised public transport – offering discounted season tickets or loans for season ticket purchase can all help to promote the use of public transport.*

*g. Cycling – whilst cycling to the site is likely to have limited appeal due to distance and the need to carry personal protective equipment (PPE), the provision of secure storage should be provided as well as facilities for cyclists to access shower and changing facilities and lockers to store clothing, cycle helmets for example.*

*i. On-site storage – on-site storage facilities are usually provided by contractors to reduce the need for workers to carry their tools/PPE each day and would support those workers who are considering cycling/using public transport.*

*j. Managing car parking – ensuring that only necessary car parking is provided with priority for car sharers in terms of location of car parking spaces. An over-provision of car parking can adversely impact on the use of alternative modes.*

#### **SLAE Response**

a. Can LR confirm that the construction workers will not be staying outside the working week?

c. Luton Rising should provide complimentary car sharing for workers. When searching 'car sharing' on the Luton Borough Council web site, of the four case studies, London Luton Airport do not have car sharing. [https://m.luton.gov.uk/Page/Show/Transport\\_and\\_streets/sustainable-travel/Pages/travel-plans-for-local-businesses.aspx](https://m.luton.gov.uk/Page/Show/Transport_and_streets/sustainable-travel/Pages/travel-plans-for-local-businesses.aspx) (accessed 29/2/14) nor do NEXT PLC Luton, nor does Luton Train Station. The Luton and Dunstable University Hospital states that they operate 'lift shares', whilst the Council and investigating pool cars.

SLAE ask LR and the Lead contractor to supply Cargo bikes and E-Cargo bikes for construction workers to transport their loads / tools from source to destination. Particularly as LBC are asking 'businesses that show an interest in switching vehicle journeys to e-cargo bikes will be given the opportunity to try out the e-cargo bikes in a controlled environment. We will provide training on the safe use, operation and charging of the e-cargo bike along with instructions on how to securely load cargo. Where needed, we will offer cycle training and route planning to support the rider.'

d.iii & f. LR must provide free travel on the Dart for the workers.

g. LR provide Cargo bikes and E-Cargo bikes for construction workers.

i. There is no mention of On-Site Storage being secure.

j. Managing car parking. What provisions are there for those that fall outside of necessary car parking?

For public safety reasons there needs to be management of those vehicles that use the parking to make such that they comply with MOT and Tax legislation. And where they don't will LR confiscate the vehicle?

*7.1.1 The TPC will engage with the relevant local planning authority on appropriate targets and monitoring arrangements. Targets and monitoring will be set out in the CWTP and would be agreed for each construction period which are relevant to the appointed lead contractor, the works and prevailing transport conditions at that time. It is anticipated that 60% of workers will arrive by car. The TPC will work with the relevant local planning authority to measure and monitor this and implement measures to meet or adjust this as required. There is a significant variance in the number of workers across the construction programme and therefore measures and targets should be appropriately set out in the CWTP for the relevant construction activities taking account of the specific needs and transport conditions and infrastructure at the time.*

#### **SLAE Response.**

The TPC must also engage and agree with the airport adjoining ward residents on appropriate targets and monitoring arrangements.

*7.1.4 The TPC will remain responsive to changing circumstances during the construction of parts of the Proposed Development. The TPC will continue to liaise with the relevant local authority to ensure that employees can take advantage of any improvements to local services or local funding opportunities for sustainable transport. If the monitoring finds that targets are not being met, this will result in the implementation of additional measures to help to facilitate the CWTP staying on course to meet its overall objectives. These mitigations may include:*

*a. Reduction of number of parking permits and encouraging use site van/ bus for contractors to get into and out of the construction site(s).*

*b. Dedicated bus service with timetable that suits the shift pattern applied where practicable.*

*c. Potentially make use of site consolidation/delivery centres (to include small delivery) which will be outside of the construction areas and deliveries from this site(s) to the required construction areas.*

*d. The construction site(s) will be managed on a "delivered as per requirement basis".*



*e. Stagger the shift patterns for construction workers to spread the traffic movements caused by the Proposed Development throughout day.*

**SLAE Response**

It is noted that there is a continual and severe lack of proper engagement with residents throughout this document, which appears to be deliberate. It is the residents that will be affected but as demonstrated in the current case of Mr. Bates against the Post Office, residents are being ignored, they are wrong and LR know best. Is this deliberate?

*7.1.5 A review of the success of measures for preceding construction periods should also be undertaken to identify lessons learned which can inform the CWTP arrangements for subsequent construction activities.*

**SLAE Response**

Again, no residents feedback is invited?

**TR020001-002196-8.92 Applicant's response to Issue Specific Hearing 3 Action 1 - Assessment of night-time construction noise**

*2.1.2 Taking the above into consideration, a summary of works that may be required outside of core working hours and which have the potential to result in noise impacts are presented in Table 2-1. In some cases, construction activities commencing during core working hours may extend into evening and night-time hours for reasons of engineering practicability or because they involve activities that cannot be safely stopped once started. Such activities may include but are not limited to major concrete pours. As there is limited information on these potential activities, it is not feasible to undertake a quantitative assessment. However, as noted in paragraph 14.2.10 of the CoCP, there is a requirement to agree with the relevant local authority the approach to Section 61 consents London Luton Airport Expansion Development Consent Order where activities that were originally planned for core hours have to be extended into additional hours.*

**SLAE Response**

Excluding the activities that cannot be safely stopped once started, a mechanism needs to provide the public an awareness in advance if a decision has been made on money, safety or other grounds, and a process to validate that.

*6.1.3 For potential night-time works on Terminal 1 enhancements, Terminal 1 pier and new taxiways; four receptors are predicted to experience noise levels exceeding the night-time LOAEL. One receptor is located in the Someries area to the south of the airport and three receptors are located in the Eaton Green Road area to the north of the airport. For earthworks activities, it is predicted that a maximum of four receptors in the Eaton Green Road area to the north of the airport would experience noise levels exceeding the night-time LOAEL. ... Further details on the predicted construction noise levels and the current ambient noise levels are presented in Table 6-2.*

**SLAE Response**

Advance notice must be available for residents to know the dates and times when noise levels are expected to exceed the night-time LOAEL for all occurrences besides those identified in 6.1.3. If this

detail is down to the Lead Contractor, then it needs to be clearly identified in the DCO that the Lead Contractor is responsible for this.

## **TR020001-002611-5.02 Appendix 18.3 Outline Construction Traffic Management Plan**

### **SLAE Response**

Throughout this document it is apparent that LR are not thinking from an airport adjoining ward resident viewpoint. Why are out of date, tired and old methods being used, rather than embracing resident viewpoints and technology that is appropriate in this day and age?

*1.2.1 This Outline CTMP has been prepared to identify the key matters that will need to be considered by the lead contractor during the logistical planning and execution of the construction works. The approved CTMP will be a 'live' document that will be prepared by the lead contractor, which substantially reflects the Outline CTMP, that will be regularly reviewed and updated to allow all and up-to-date consideration of any necessary changes to the planned works' programme and any comments and/or issues raised by interested parties and directed to the Applicant or the Traffic Management Working Group (see Section 3).*

### SLAE Response

Provide the actual timelines around the meaning of regularly reviewed, hourly, daily, weekly, monthly, yearly, plus output. Are the Interested parties the same Interested parties that are registered under the DCO process?

*1.2.2 It is inevitable that with a development of this scale there will be an increase in the number of vehicle movements in and around the construction site. An important element in the control of any potential adverse environmental effects, during construction, caused through increased traffic movements will be the preparation and implementation of an approved CTMP. This will set out the arrangements and management practices that will be adopted to minimise the impact of increased traffic on the local road network and must be approved in writing by the relevant planning authority following consultation with the relevant highway authority on matters related to its functions prior to the commencement of the Proposed Development.*

### **SLAE Response**

Again, LR use the word 'local', however it is established in other applicant documents that 'local' can include Milton Keynes. Will the CTMP include all local road networks from the airport to locations such as Milton Keynes? In an earlier submission SLAE did ask for a definition of the word 'local' which was turned down.

*1.2.3 The approved CTMP will set out measures that will need to be adopted to manage construction traffic that will be operating into and out of a number of individual sites. The approved CTMP will have to recognise the need for the airport to continue operating without any disturbance from the construction activity. In this document there are references to both 'Site' and 'sites'. The former is used when referring to something that is not specific to an individual site.*

### **SLAE Response**

There is also a need for the approved CTMP to recognise the need for the airport adjoining ward residents to be able to go continue their normal activities without any disturbance from the construction activity.

### **3 TRAFFIC MANAGEMENT WORKING GROUP**

#### **3.1 Composition**

*3.1.1 A traffic management working group (TMWG) will be formed as a forum for stakeholder engagement prior to commencement of the Proposed Development. Representatives from the Applicant, the airport operator, the lead contractor, Luton Borough Council (LBC), Central Bedfordshire Council (CBC), and Hertfordshire County Council who are the local highway authorities, and National Highways would be invited.*

#### **SLAE Response**

As identified in earlier SLAE written submissions, the representatives identified are not familiar with all traffic matters that occur in the airport adjoining ward s to the airport. Why is there no airport adjoining ward resident representation on the TMWG?

#### **3.2 Responsibilities**

- a. The TMWG will be responsible for monitoring the execution of the approved CTMP.*
- b. The Applicant and the lead contractor will have overall responsibility for implementing, monitoring and the enforcement of the approved CTMP.*
- c. The lead contractor will appoint a senior member of staff who will be the designated liaison officer responsible for the implementation, day-to-day management, and monitoring of the approved CTMP. That person's responsibilities would include being the principal point of contact on the site for all local groups, residents, and businesses regarding matters relating to transport. This liaison should also extend to contractors working on nearby sites with which there is the potential for there to be a cumulative impact from construction traffic.*

#### **SLAE Response**

Not sure why the appointed senior member of staff is the principal point of contact for all local groups and residents, but these groups and residents has no TMWG representation?

This suggests a 'arm's length' approach, why?

Will this person be available 24x7 on the helpline, core working hours or all working hours?

More details are required, What can the senior member of staff do for the residents?

Does 'local' mean groups and residents outside of the borough as has been identified in other application documents.

*4.1.3 The number of vehicles serving the Site will vary throughout construction of the Proposed Development depending upon the actual delivery of the works. Although the lead contractor has not yet been appointed, based on work undertaken as part of the Construction Method Statement and Programme Report provided as Appendix 4.1 of the ES [TR020001/APP/5.02], it is anticipated that at the peak of construction traffic activity there will be just over 150 vehicles per day arriving at and departing from the Site which results in just over 300 movements. Around three quarters of these vehicles would be HGVs. This is likely to result in a maximum hourly flow in the order of 30 HGV movements. The movement of construction vehicles will be discouraged during the normal peak traffic periods and the greatest volumes of construction traffic will occur between 10:00 and 16:00.*

#### **SLAE Response**

To go even further SLAE ask that when there are reported accidents and road works on the highways and public roads that add delay to journeys that all HGV movement is stopped. This would demonstrate to Luton residents, and those holiday makers on route to the airport by cars and coaches, that LR are serious about discouraging the disruption caused by construction activities. HGVs fitted with tracker technology for both the airport and public able to view in real time a HGV's movements. Available 24x7 real time and with manned support lines.

*4.1.4 Inset 4.1 shows the profile of the estimated average number of construction vehicles visiting the Site over the anticipated construction period as assumed for the purposes of assessment.*

*4.1.5 As each stage of the construction programme is confirmed by the lead contractor, the approved CTMP will provide revised figures for the predicted HGV movements. It will also include the anticipated start and end dates for each phase of construction together with a description of the key works that will occur in each phase.*

#### **SLAE Response**

Real time info to be made available on public social media on actual against predicted construction vehicles.

*4.1.6 The lead contractor must agree with the Applicant and airport operator the protocol for construction vehicles entering the airside areas.*

#### **SLAE Response**

That is a great idea and why not extend this to construction vehicles travelling when entering adjoining residential areas?

*4.1.7 It will be a requirement that trained and competent traffic marshals will be in full time attendance during the hours of operation of the Site, which in general will be Monday to Friday 08:00 to 18:00 and Saturday 08:00 to 13:00. The traffic marshals will be responsible for ensuring that the arrival and departure of vehicles is managed in an orderly manner and construction related vehicles are not permitted to park on the adjacent public highway.*

#### **SLAE Response**

The traffic marshals can also stop the parking on any verge, pavements or on the park.

#### *4.2 Routeing of Construction Traffic*

*4.2.1 Vehicles making deliveries to the Site or removing spoil or demolition material will travel by designated routes which will be confirmed in the approved CTMP.*

#### **SLAE Response**

Will the designated routes avoid adjoining airport residential roads?

*4.2.2 A principal consideration when identifying designated routes will be the minimisation of travel along any road that does not form part of the Primary Route Network (PRN). It is also likely that when constructed AAR will form part of the designated route so that construction traffic avoids the residential area to the north of the airport as far as practicable. Prior to its completion, construction traffic travelling to and from a location to the east of Terminal 1 will be directed to use Percival Way.*

**SLAE Response**

Are designated routes different to PRN?

Why can't Haul roads be created to avoid any construction traffic using the residential area to the north of the airport?

What does minimisation mean? What does as far as practical mean?

*4.2.3 Subject to agreement by the appropriate authorities it is envisaged the great majority of construction vehicles will approach the Site using the M1 and the A1081 (New Airport Way). For some origins/destinations such as the north Hertfordshire towns (Stevenage, Hitchin, Letchworth, and Baldock) and areas that would use the A505 corridor east of the A1 corridor to access the airport, a restriction on the use of the A602/A505 could require a diversion that would add an additional 60km or more to a round trip. For those vehicles where use of the A602/A505 corridor could be justified, appropriate restrictions, such as limiting the use of this corridor to the period between 10:00 and 16:00, would be agreed with the relevant highway authorities.*

**SLAE Response**

Fines can be introduced for construction vehicles who use the sat nav short cuts and rat runs. SLAE suggest that all construction vehicles must have logos attached with highly visible contact details for residents to report any transgressors.

*4.2.5 Where appropriate, the lead contractor will provide haul routes through the sites for use by construction vehicles, to reduce the need to use public roads. Site access points will be positioned to enable the use of haul routes to be maximised, subject to safety considerations in the design and construction of appropriate access points.*

**SLAE Response**

The word 'eliminate' rather than 'reduce' should be used instead.

*4.2.6 The lead contractor will consult with the relevant highway authority regarding the layout and positioning of site accesses.*

**SLAE Response**

Again, why do the airport adjoining ward residents have no say?

*4.2.8 Where reasonable and practicable, construction vehicles will avoid travelling in convoys on public roads.*

**SLAE Response**

Replace 'Where reasonable and practicable' with 'Not allowed'.

**4.3 Temporary Traffic Management Measures**

*4.3.1 The lead contractor will take appropriate actions, including the design and installation of traffic management schemes that will:*

*a. accommodates the safe passage of traffic through any road works;*

- b. reduce the likelihood of traffic diverting onto alternative routes, which may have negative impacts upon the local community; and*
- c. mitigate potential impacts on the local community and keep delays and disruptions to traffic to a reasonably practicable minimum.*

#### **SLAE Responses**

All words used that suggest vagueness to be replaced with words that remove any vagueness.

*4.3.2 This will include temporary traffic signal control on local roads as may be necessary as part of the traffic management schemes. The lead contractor will avoid leaving traffic management measures in place unnecessarily.*

*4.3.3 The lead contractors will consult with the TMWG regarding the traffic management measures proposed and will undertake Road Safety Audits in accordance with the Design Manual for Roads and Bridges for complex or major traffic management schemes. Regular meetings will be held with the TMWG during the construction period.*

*4.3.4 The lead contractor will operate a CCTV system for use in monitoring temporary traffic management schemes, should this be necessary for the safe and effective monitoring of the schemes, maintaining traffic flow and operation of the vehicle recovery system.*

#### **SLAE Response**

The CCTV footage must be made available in real time and for the public to watch via social media to assist with the in monitoring temporary traffic management schemes, the safe and effective monitoring of the schemes, maintaining traffic flow and operation of the vehicle recovery system.

*4.3.5 The lead contractor will work with the relevant local authorities and police regarding monitoring and appropriate measures to address any issues associated with hazards created by the public parking on roads to view construction of the Proposed Development. This matter will also be considered by the TMWG.*

#### **SLAE Response**

Can LR / LBC / LLAOL provide evidence of when monitoring and appropriate measures have been applied in the past to address any issues associated with hazards created by the public parking on roads?

The lead contractor to provide the funds or employ traffic wardens who sole responsibility to manage public parking on roads to view construction of the Proposed Development.

*4.3.6 The lead contractor will provide advance information to the public of any road closures.*

#### **SLAE Response**

Advance and also in real time via social media

*4.4.2 A central booking system should be used whereby all deliveries to or removals from the Site are to be booked to allocated time slots. Vehicles arriving outside of these arrangements which cannot be accepted onto Site should be refused access and required to re-book. No vehicles should be left unattended. Deliveries and collections during peak periods should be kept to a minimum. As part of the booking system all operators of vehicles that will visit the Site will be advised of the agreed routing arrangements.*

**SLAE Response**

Vehicle marking system for Public to help with reporting on unattended vehicles. SLAE suggest that all construction vehicles must have logos attached with highly visible contact details for residents to report any transgressors.

*4.4.3 The lead contractors will set out the delivery procedures in the approved CTMP.*

**4.5 Abnormal Loads**

*4.5.1 Although Abnormal Indivisible Load deliveries to Site will normally be planned for outside normal working hours, it is possible that some abnormal deliveries, e.g. major items of plant and equipment, may have special delivery requirements that would require the activity to be undertaken during the normal operating hours. In all instances, such deliveries will be planned with appropriate highway authorities and the police and executed in compliance with those requirements.*

*4.5.2 The lead contractor will notify the police, the highway authorities or bridge and structure owners, as appropriate, in moving abnormal loads through the road network. The lead contractor will provide the Applicant with a schedule of abnormal loads prior to the first abnormal load movement being carried out. This schedule will be updated and re-issued to the Applicant as required throughout the construction period.*

**SLAE Response**

SLAE suggest that all construction vehicles must have logos attached with highly visible contact details for residents to report any transgressors via CCTV in real time via social media.

Advanced notice of such loads provided to the public via social media.

*5.1.1 An essential part of the CTMP will be to ensure that highway safety is maintained at all times, for all users.*

*5.1.2 The lead contractor will be responsible for ensuring that all drivers of HGVs undertake awareness training with particular attention paid to the safety of cyclists and other vulnerable road users.*

**SLAE Response**

Why is the safety of pedestrians not considered in awareness training?

*5.1.3 No parking of construction related vehicles will be permitted on roads in the vicinity of the Site; all vehicles must be able to access the Site completely.*

**SLAE Response**

Public to be made aware so that they report vehicles not following this, SLAE suggest that all construction vehicles must have logos attached with highly visible contact details for residents to report any transgressors

*5.1.5 Strict controls are to be in place to ensure that no debris from the Site passes onto the highway. Due to the layout and interfaces within the Proposed Development, the Site will have designated loading areas. These areas will also serve as wheel wash areas for vehicles leaving the confines of the sites during the demolition and substructure works. The lead contractor will ensure that mechanical road sweepers combined with water sprays will be dedicated to clean all access routes including public and airport roads and footpaths.*

**SLAE Response**

What happens when this is not the case? For example, bad weather.

*5.2 Traffic Safety and Control Officer*

*5.2.1 The lead contractor will appoint a Traffic Safety and Control Officer whose responsibilities will cover:*

*e. liaison with the relevant authorities, the traffic safety and control officers on adjacent sites and continued monitoring of the traffic management measures adopted; and*

**SLAE Response**

Again, why is there no liaison with airport adjoining ward residents ?

*6 MONITORING OF CONSTRUCTION TRAFFIC*

*6.1.3 The results of this monitoring exercise should be combined with the results of the monitoring of the CWTP and reported to the TMWG in order to gain an overview of the construction traffic impact of the Proposed Development.*

**SLAE Response**

Again, why is there no liaison with airport adjoining ward residents ? No sharing of construction traffic impact with airport adjoining ward residents?