

London Luton Airport Expansion

Buckinghamshire Council Comments on Further Deadline & Submissions

PINS REFERENCE: TR020001

January 2024



Directorate for Planning, Growth & Sustainability

Planning & Environment

Buckinghamshire Council

King George V House, King George V Road

Amersham, Buckinghamshire, HP6 5AW

CONTENTS

Contents

1	Introduction	4
1.1.	Terms of Reference	4
1.2.	Buckinghamshire Council's Position	4
2	Comments on Further Deadline 7 Submissions	5
2.1.	REP8-001: Deadline 8 Submission – Cover Letter	5
2.2.	REP8-002: 1.06 Guide to the Application (Application Document Tracker)	5
2.3.	REP8-003; REP8-004: 2.01 Draft Development Consent Order (clean and Tracked Change Version)	5
2.4.	REP8-005; REP8-006: 2.02 Explanatory Memorandum (clean and Tracked Change Version)	5
2.5.	REP8-007; REP8-008: 4.12 Airport Boundary Plans (clean and Tracked Change Version)	5
2.6.	REP8-009; REP8-010: 5.01 Chapter 18 - Traffic and Transportation (clean and Tracked Change Version)	6
2.7.	REP8-011; REP8-012: 5.02 Environmental Statement Appendix 4.1 Construction Method Statement and Programme Report (clean and Tracked Change Version)	6
2.8.	REP8-013; REP8-014: 5.02 Environmental Statement Appendix 4.2 Code of Construction Practice (clean and Tracked Change Version)	6
2.9.	REP8-015; REP8-016: 5.02 Environmental Statement Appendix 10.6 Cultural Heritage Management Plan	6
2.10.	REP8-017: 5.02 Appendix 14.7 Accurate Visual Representations - Viewpoints 10B, 13, 14, 17, 17A	6
2.11.	REP6-018; REP6-019: 5.02 Appendix 18.4 Outline Construction Workers Travel Plan (clean and Tracked Change Version)	6
2.12.	REP8-020; REP8-021: 7.05 Employment and Training Strategy (clean and Tracked Change Version)	6
2.13.	REP8-022; REP8-023: 7.09 Design Principles (clean and Tracked Change Version)	7
2.14.	REP8-024; REP8-025: 7.13 Framework Travel Plan (clean and Tracked Change Version)	7
2.15.	REP8-026: 8.09 Statement of Common Ground between London Luton Airport Limited and NATS (Services) Limited	7
2.16.	REP8-027: 8.106 Statements of Common Ground Updates Document	7

- 2.17. REP8-028; REP8-029: 8.118 Applicant's Response to Issue Specific Hearing 4
Action 7- Updates on Road Safety Audits (clean and Tracked Change Version) 7
- 2.18. REP8-030; REP8-031: 8.121 Rail Impacts Summary (clean and Tracked Change
Version) 7
- 2.19. REP8-032; REP8-033: 8.122 Bus and Coach Study (clean and Tracked Change
Version) 8
- 2.20. REP8-034; REP8-035: 8.142 Applicant's Response to Issue Specific Hearing 8
Action 22 - Proposed Odour Reporting Process (clean and Tracked Change Version) 8
- 2.21. REP8-036: 8.173 Applicant's Response to the Examining Authority's Commentary
on the Draft DCO 8
- 2.22. REP8-037: 8.174 Applicant's Response to Written Questions NE.2.1 and NE.2.2 -
Demand Forecasts 8
- 2.23. REP8-038: 8.175 Applicant's Response to Deadline 7 Submissions 9
- 2.24. REP8-039: 8.176 Applicant's Response to Comments From the Highway
Authorities on the 'Accounting for Covid-19 in Transport Modelling Final Report' [AS-159]
9
- 2.25. REP8-040: 8.179 Applicant's Response to Examining Authority's Rule 17 Request
dated 17 January 2024 9
- 2.26. REP8-041: 8.21 Statement of Common Ground between London Luton Airport
Limited and NATS (En Route) PLC 9
- 2.27. REP8-042: 8.54 Summary of Changes to the Draft Development Consent Order 9
- 2.28. REP8-043; REP8-044: 8.97 Outline Transport Related Impacts Monitoring and
Mitigation Approach (TRIMMA) (clean and Tracked Change Version) 9

1 Introduction

1.1. Terms of Reference

- 1.1.1. Buckinghamshire Council (the Council) is a neighbouring authority for the London Luton Airport Expansion Development Consent Order (DCO) referred to as 'the Scheme'.
- 1.1.2. This document provides the Council's overarching comments on the updated application documents submitted after Deadline 8, focusing mainly on the 44 supplied by the Applicant.

1.2. Buckinghamshire Council's Position

- 1.2.1. The Council welcomes the Applicant's approach to continuing to supplement the information relating to the Proposed Development with additional submissions. Notwithstanding this, based on the review of the additional submissions supplied by the Applicant at Deadline 8, the Council maintains that its comments made to date have not been fully addressed. The Council's outstanding issues are set out in its final PADSS submitted at Deadline 8 (**REP8-048**).
- 1.2.2. The Council's latest position remains as per that expressed within its principal submissions - the Council's Written Representation (**REP1-042**) and Local Impact Report (**REP1A-001**), comments previously supplied on Deadline 2 and 2A documents (**REP3-079**), Deadline 3 documents (**REP4-114**), Deadline 4 documents (**REP5-064**), Deadline 5 documents (**REP6-086**), Deadline 6 documents (**REP7-080**), Deadline 7 documents (**REP8-047**). The Council's position has evolved through the examination process and the continuing development of a Statement of Common Ground (SoCG) between the Council and the Applicant. The Council's final PADSS reflects what is likely to be its final position on outstanding matters raised and remains largely unchanged following a review of the Deadline 8 submissions. However, the Council is receptive to continuing to engage with the Applicant on all outstanding matters raised should time constraints allow.

2 Comments on Further Deadline 7 Submissions

2.1. REP8-001: Deadline 8 Submission – Cover Letter

2.1.1. The content of this submission is noted. The Council notes that the Applicant has submitted a SoCG updates document and that the ExA has published a Rule 8(3) letter notifying of changes to the Examination timetable. The Council would draw the ExA's attention to the fact that the Council continues to actively engage with the Applicant and final SoCG progress is anticipated prior to Deadline 11.

2.1.2. The Council notes the Applicant's submission of a response to the ExA's commentary of the dDCO and has provided comments on the Applicant's response below.

2.2. REP8-002: 1.06 Guide to the Application (Application Document Tracker)

2.2.1. This submission has been reviewed. The Council does not have any further comments to make.

2.3. REP8-003; REP8-004: 2.01 Draft Development Consent Order (clean and Tracked Change Version)

2.3.1. This submission has been reviewed. The Council acknowledges the amendments made by the Applicant in relation to requirements 5 (Phasing of authorised development), 14 (Construction traffic management), 15 (Construction workers), 30 (Offsite highway works) and 31 (Travel plans) and welcomes its establishment as a named consultee in relation to the discharge of these matters. Notwithstanding the above the Council would also reiterate its support for other amendments proposed by the Examining Authority's proposed to the draft Development Consent Order, in particular the inclusion of a requirement securing the Employment and training strategy and the establishment of consultation periods within the discharge process. This is of particular relevance to Buckinghamshire Council as it is not a co-signatory of the s106 agreement.

2.4. REP8-005; REP8-006: 2.02 Explanatory Memorandum (clean and Tracked Change Version)

2.4.1. This submission has been reviewed. The Council has no further comments to make.

2.5. REP8-007; REP8-008: 4.12 Airport Boundary Plans (clean and Tracked Change Version)

2.5.1. This submission has been reviewed. The Council does not have any comments.

- 2.6. REP8-009; REP8-010: 5.01 Chapter 18 - Traffic and Transportation (clean and Tracked Change Version)
- 2.6.1. This submission has been reviewed. The Council has no comment to make on the changes to this document.
- 2.7. REP8-011; REP8-012: 5.02 Environmental Statement Appendix 4.1 Construction Method Statement and Programme Report (clean and Tracked Change Version)
- 2.7.1. This submission has been reviewed. The Council does not have any comments.
- 2.8. REP8-013; REP8-014: 5.02 Environmental Statement Appendix 4.2 Code of Construction Practice (clean and Tracked Change Version)
- 2.8.1. This submission has been reviewed. The Council has no further comments to make.
- 2.9. REP8-015; REP8-016: 5.02 Environmental Statement Appendix 10.6 Cultural Heritage Management Plan
- 2.9.1. This submission has been reviewed. The Council does not have any comments.
- 2.10. REP8-017: 5.02 Appendix 14.7 Accurate Visual Representations - Viewpoints 10B, 13, 14, 17, 17A
- 2.10.1. This submission has been reviewed. The Council does not have any comments.
- 2.11. REP6-018; REP6-019: 5.02 Appendix 18.4 Outline Construction Workers Travel Plan (clean and Tracked Change Version)
- 2.11.1. This submission has been reviewed. The Council has no further comments to make other than to welcome its establishment as a consultee on the discharge of requirement 15 of the dDCO relating to the submission of an updated version of the Construction Workers Travel plan.
- 2.12. REP8-020; REP8-021: 7.05 Employment and Training Strategy (clean and Tracked Change Version)
- 2.12.1. This submission has been reviewed. The Council welcomes the additional details provided on the efforts to encourage local procurement. The Council would however, welcome clarification on the definition of 'local' in relation to procurement. Paragraph 1.1.4 refers to 'businesses within the ETS area' whilst Appendix A refers to the previous amount of spend with businesses within 35 miles of the Airport. The Council considers procurement of goods and services should be from the ETS area which includes all of Buckinghamshire. With reference to bullet point G in the appendix, there would be value in extending engagement

to other partner authorities and others on the Local Economic Development Working Group who may provide added value and local knowledge to such discussions.

2.13. [REP8-022; REP8-023: 7.09 Design Principles \(clean and Tracked Change Version\)](#)

2.13.1. This submission has been reviewed. The Council has no further comments to make.

2.14. [REP8-024; REP8-025: 7.13 Framework Travel Plan \(clean and Tracked Change Version\)](#)

2.14.1 This submission has been reviewed. The Council has no further comments to make other than to welcome its establishment as a consultee on the discharge of requirement 31 of the dDCO relating to the submission of travel plans for approval.

2.15. [REP8-026: 8.09 Statement of Common Ground between London Luton Airport Limited and NATS \(Services\) Limited](#)

2.15.1. This submission has been reviewed. The Council has no further comments to make.

2.16. [REP8-027: 8.106 Statements of Common Ground Updates Document](#)

2.16.1. This submission has been reviewed. The Council can confirm that the document is a fair reflection of the progress of discussions with the Applicant up to Deadline 8 with further progress expected ahead of Deadline 11.

2.17. [REP8-028; REP8-029: 8.118 Applicant's Response to Issue Specific Hearing 4 Action 7- Updates on Road Safety Audits \(clean and Tracked Change Version\)](#)

2.17.1. This submission has been reviewed. The Council has no further comments to make.

2.18. [REP8-030; REP8-031: 8.121 Rail Impacts Summary \(clean and Tracked Change Version\)](#)

2.18.1. This submission has been reviewed. BC have no further comments to make on the changes to this document.

- 2.19. [REP8-032; REP8-033: 8.122 Bus and Coach Study \(clean and Tracked Change Version\)](#)
- 2.19.1. This submission has been reviewed. The Council welcomes the specific inclusion of the bus and coach provision to Aylesbury for consideration in the next iteration of the bus and coach studies. It is also welcomed that a minimum service frequency of 1 hour has been included. The Bus and Coach Study must be an integral part of reviews of the Travel Plans. Funding towards bus and coach services will become a matter for the Airport Transport Forum Steering Group to consider in the future through the allocation of the Sustainable Transport Fund. As a member of the Airport Transport Forum Buckinghamshire Council will be able to make representations at the appropriate time. It is vital that the Council's membership of the ATF is secured through the S106 Agreement.
- 2.20. [REP8-034; REP8-035: 8.142 Applicant's Response to Issue Specific Hearing 8 Action 22 - Proposed Odour Reporting Process \(clean and Tracked Change Version\)](#)
- 2.20.1. This submission has been reviewed. The Council has no further comments to make.
- 2.21. [REP8-036: 8.173 Applicant's Response to the Examining Authority's Commentary on the Draft DCO](#)
- 2.21.1. This submission has been reviewed. The Council acknowledges the amendments made by the Applicant in relation to requirements 5 (Phasing of authorised development), 14 (Construction traffic management), 15 (Construction workers), 30 (Offsite highway works) and 31 (Travel plans) and welcomes its establishment as a named consultee in relation to the discharge of these matters, although it would note that the Applicant's acceptance of these changes is not clear within its response. Notwithstanding the above the Council would also reiterate its support for other amendments proposed by the Examining Authority's proposed to the draft Development Consent Order, in particular the inclusion of a requirement securing the Employment and training strategy and the establishment of consultation periods within the discharge process. This is of particular relevance to Buckinghamshire Council as it is not a co-signatory of the s106 agreement.
- 2.22. [REP8-037: 8.174 Applicant's Response to Written Questions NE.2.1 and NE.2.2 - Demand Forecasts](#)
- 2.22.1. This submission has been reviewed. The Council has no further comments to make.

- 2.23. [REP8-038: 8.175 Applicant's Response to Deadline 7 Submissions](#)
- 2.23.1. This submission has been reviewed. The Council has provided comments within an updated version of the table that was included within the Applicant's document. This is provided as a separate Deadline 9 submission.
- 2.24. [REP8-039: 8.176 Applicant's Response to Comments From the Highway Authorities on the 'Accounting for Covid-19 in Transport Modelling Final Report' \[AS-159\]](#)
- 2.24.1. This submission has been reviewed and the Council has no comments to make.
- 2.25. [REP8-040: 8.179 Applicant's Response to Examining Authority's Rule 17 Request dated 17 January 2024](#)
- 2.25.1. This submission has been reviewed. The Council has no further comments to make.
- 2.26. [REP8-041: 8.21 Statement of Common Ground between London Luton Airport Limited and NATS \(En Route\) PLC](#)
- 2.26.1. This submission has been reviewed. The Council has no further comments to make.
- 2.27. [REP8-042: 8.54 Summary of Changes to the Draft Development Consent Order](#)
- 2.27.1. This submission has been reviewed. The Council does not have any further comments to make over and above those made above in relation to the dDCO.
- 2.28. [REP8-043; REP8-044: 8.97 Outline Transport Related Impacts Monitoring and Mitigation Approach \(TRIMMA\) \(clean and Tracked Change Version\)](#)
- 2.28.1. This submission has been reviewed. The Council does not have any comments.