

London Luton Airport Expansion

Buckinghamshire Council Comments on Further Deadline 10 Submissions

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Directorate for Planning, Growth & Sustainability
Planning & Environment
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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 10, focusing on the 47 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 10, the Council maintains that its comments made to date have not been fully addressed.
- 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**), the Updated Principal Areas of Disagreement Summary Statement (PADSS) (**REP2-045**), 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**), Deadline 8 documents (**REP9-060**), Deadline 9 documents (**REP10-049**). 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 PADSS (**REP8-048**) and the signed SoCG reflect its final position on matters raised.

2 Comments on Further Deadline 7 Submissions

2.1. REP10-001: Deadline 10 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 would draw the ExA's attention to the fact that the Council continues to actively engage with the Applicant and further SoCG progress has been undertaken in advance of its submission before the close of Examination.

2.1.2. The Council welcomes the incorporation of the RIF into the STF, as well as the establishment of the STF as an ongoing fund. The Council has raised any other matters of concern against the relative Deadline 9 submission documents, as set out below.

2.2. REP10-002: 1.06 Guide to the Application (Application Document Tracker)

2.2.1. This submission has been reviewed and the Council welcomes its inclusion to assist with navigating Applicant content and relevant versions. The Council does not have any further comments.

2.3. REP10-003; REP10-004: 2.01 Draft Development Consent Order (clean and Tracked Change Version)

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

2.4. REP10-005; REP10-006: 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. REP10-007: 2.04 DCO Validation Report

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

2.6. REP10-008: 4.08 Streets, Rights of Way and Access Plans

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

2.7. REP10-009; REP10-010: 5.01 Chapter 13 Health and Community (clean and Tracked Change Version)

2.7.1. This submission has been reviewed. The Applicant's updates to the Health and Community Chapter are noted, however, the Council's previous concerns

regarding traffic related health and community impacts and the analysis of health implications still remain.

2.8. REP10-011; REP10-012: 5.01 Chapter 21 In-Combination and Cumulative Effects (clean and Tracked Change Version)

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

2.9. REP10-013: 5.02 Appendix 14.7 Accurate Visual Representations - Representative Viewpoints 1, 5, and 6

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

2.10. REP10-014: 5.02 Appendix 14.7 Accurate Visual Representations - Representative Viewpoints 10B, 13, 14, 17, and 17A

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

2.11. REP10-015: 5.02 Appendix 14.7 Accurate Visual Representations – Representative Viewpoints 18, 19, 20, 23, 24 and 25

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

2.12. REP10-016: 5.02 Appendix 14.7 Accurate Visual Representations - Representative Viewpoints 26, 28, 29, 30, 31, 34, 36 and 37

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

2.13. REP10-017: 5.02 Appendix 14.7 Accurate Visual Representations - Representative Viewpoints 46, 48, and 50

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

2.14. REP10-018: 5.02 Appendix 14.7 Accurate Visual Representations - Representative Viewpoints 53, 56, and 61

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

2.15. REP10-019; REP10-020: 5.02 Appendix 16.2 Operational Noise Management (Explanatory Note) (Explanatory Note) (clean and Tracked Change Version)

2.15.1. This submission has been reviewed. The Council notes the Applicant's updates and welcomes the measures to be secured through the Air Noise Management Plan.

- 2.16. [REP10-021; REP10-022: 5.02 Appendix 18.3 Outline Construction Traffic Management Plan \(clean and Tracked Change Version\)](#)
- 2.16.1. This submission has been reviewed. The Council notes the Applicant's updates and welcomes the inclusion of a requirement for the lead contractor to implement a HGV management system to protect sensitive locations. Following positive discussions with the Applicant BC have also been given assurances that, as a named consultee to the discharge of Requirements 14 (CTMP) and 15 (CWTP), the Council will be invited to be a member of the TMWG and that this will be reflected in the CTMP submitted at Deadline 11.
- 2.17. [REP10-023; REP10-024: 5.09 Mitigation Route Map \(clean and Tracked Change Version\)](#)
- 2.17.1. This submission has been reviewed. BC notes the Applicant's updates and welcomes the amendments to the Economics and Employment mitigation detailing that the whole of the ETS is to be secured.
- 2.18. [REP10-025; REP10-026: 7.08 Green Controlled Growth Framework \(clean and Tracked Change Version\)](#)
- 2.18.1. This submission has been reviewed. The Council no further comments to make.
- 2.19. [REP10-027; REP10-028: 7.08 Green Controlled Growth Framework Appendix A - ESG Terms of Reference \(clean and Tracked Change Version\)](#)
- 2.19.1. This submission has been reviewed. The Council has no further comments to make.
- 2.20. [REP10-029; REP10-030: 7.10 Compensation Policies, Measures and Community First \(clean and Tracked Change Version\)](#)
- 2.20.1. This submission has been reviewed. The Council has no further comments to make.
- 2.21. [REP10-031; REP10-032: 8.04 Statement of Common Ground between London Luton Airport Limited and Cadent \(clean and Tracked Change Version\)](#)
- 2.21.1. This submission has been reviewed. The Council does not have any comments.
- 2.22. [REP10-033; REP10-034: 8.12 Statement of Common Ground between London Luton Airport Limited and the UK Health Security Agency \(clean and Tracked Change Version\)](#)
- 2.22.1. This submission has been reviewed. The Council does not have any comments.

2.23. [REP10-035: 8.54 Summary of Changes to the Draft Development Consent Order](#)

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

2.24. [REP10-036; REP10-037: 8.97 Outline Transport Related Impacts Monitoring and Mitigation Approach \(TRIMMA\) \(clean and Tracked Change Version\)](#)

2.24.1. This submission has been reviewed. The Council notes the incorporation of the RIF within the STF and the STFs role in the OTRIMMA and has no further comments to make.

2.25. [REP10-038: 8.106 Statements of Common Ground Updates Document](#)

2.25.1. This submission has been reviewed. The Council can confirm that the document is a true reflection of the current status of discussions and that it has worked with the Applicant to close out all outstanding actions culminating in the submission of a signed SoCG before the close of Examination.

2.26. [REP10-039; REP10-040: 8.119 Sustainable Transport Fund \(clean and Tracked Change Version\)](#)

2.26.1. This submission has been reviewed. The Council notes the Applicant's updates in relation to the funding of Mitigation Type 2 and the reprovision of surplus funds and has no further comments to make.

2.27. [REP10-041; REP10-042: 8.122 Bus and Coach Study \(clean and Tracked Change Version\)](#)

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

2.28. [REP10-043; REP10-044: 8.182 Applicant's Position Paper on Sections 127 and 138 of the Planning Act 2008 \(Tracked Change Version\)](#)

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

2.29. [REP10-045: 8.188 Applicant's Response to Deadline 9 Submissions](#)

2.29.1. 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 11 submission.

- 2.30. REP10-046: 8.189 Applicant's Response to Examining Authority's Rule 17 Request Dated 25 January 2024
 - 2.30.1. This submission has been reviewed. The Council does not have any comments.
- 2.31. REP10-047: 8.190 Applicant's Response to Examining Authority's Rule 17 Request Dated 31 January 2024
 - 2.31.1. This submission has been reviewed. The Council does not have any comments.
- 2.32. OD-002: Section 56 Notice
 - 2.32.1. This submission has been reviewed. The Council does not have any comments.
- 2.33. OD-003: Certificate of Compliance with Section 56, Section 59 of the Planning Act 2008
 - 2.33.1. This submission has been reviewed. The Council does not have any comments.