

# London Luton Airport Expansion

## Buckinghamshire Council Comments on Updated Application Documents

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**PINS REFERENCE:** TR020001

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Directorate for Planning, Growth & Sustainability  
Planning & Environment  
Buckinghamshire Council  
King George V House, King George V Road  
Amersham, Buckinghamshire, HP6 5AW

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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. At Deadline 1, the Council has also submitted its Written Representation which provides the Council's more detailed comments on the DCO application submission as a whole.

### 1.2. Buckinghamshire Council's Position

- 1.2.1. In general terms, having reviewed the updated application documents, nothing has been found that makes a significant difference to the Council's position set out in its Relevant Representation (RR-0166) or its Principal Areas of Disagreement Summary Statement (AS-053). The Council has expanded further regarding its concerns in its Written Representation and Local Impact Report submitted at Deadline 1 and Deadline 1A respectively.

## 2 Comments on Updated Application Documents

- 2.1.1. This section lists the updated application submission documents which have been reviewed and the overarching comments on these documents by topic.

### 2.2. Noise

- 2.2.1. The following updated application submission documents have been reviewed by specialists representing the interests of the Council in relation to Noise:
- 2.2.2. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.01 Environmental Statement Chapter 16 Noise and Vibration Revision 1 (AS-080).**
- 2.2.3. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 16.1 Noise and Vibration Information Revision 1 (AS-096).**
- 2.2.4. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.1-16.4 Revision 1 (AS-103).**
- 2.2.5. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.5-16.10 Revision 1 (AS-104).**
- 2.2.6. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.11-16.16 Revision 1 (AS-105).**
- 2.2.7. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.17a-16.21 Revision 1 (AS-106).**
- 2.2.8. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.22-16.28 Revision 1 (AS-107).**
- 2.2.9. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.29-16.36 Revision 1 (AS-108).**
- 2.2.10. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.37-16.42 Revision 1 (AS-109).**

- 2.2.11. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.43a-16.48 Revision 1 (AS-110).**
- 2.2.12. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.49-16.56 Revision 1 (AS-111).**
- 2.2.13. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.57-16.62 Revision 1 (AS-112).**
- 2.2.14. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.63-16.68b Revision 1 (AS-113).**
- 2.2.15. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.69-16.76 Revision 1 (AS-114).**
- 2.2.16. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.77-16.82 Revision 1 (AS-115).**
- 2.2.17. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.83-16.88 Revision 1 (AS-116).**
- 2.2.18. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.89 - 16.94 Revision 1 (AS-117).**
- 2.2.19. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.95-16.100b Revision 1 (AS-118).**
- 2.2.20. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 16 Noise and Vibration Figures 16.101-16.104 Revision 1 (AS-119).**
- 2.2.21. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.11 Ambient noise monitoring and survey sheets (AS-120).**
- 2.2.22. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.12 Comparison of consented and proposed operational noise controls (AS-121).**

- 2.2.23. The updated application documents have been checked and nothing has been found which makes a significant difference to the Councils' position on noise.

## 2.3. Transport and Highways

- 2.3.1. The following updated application submission documents have been reviewed by the Council Officers as the local Highway Authority:
- 2.3.2. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.01 Environmental Statement Chapter 18 Traffic and Transport Revision 1 (AS-030).**
- 2.3.3. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 18 Traffic and Transportation Figures 18.1-18.3 Revision 1 (AS-044).**
- 2.3.4. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.07 Environmental Statement. 5.09 Mitigation Route Map (AS-047).**
- 2.3.5. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **7.03 Design and Access Statement Volume I Revision 1 (AS-049).**
- 2.3.6. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **7.02 Transport Assessment – Part 2 of 4 (Chapters 5-8) Revision 1 (AS-123).**
- 2.3.7. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **7.13 Framework Travel Plan Revision 1 (AS-131).**
- 2.3.8. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **4.13 Off-site Highway Works (AS-023).**
- 2.3.9. Upon review, the Councils' position on Highways and Transport has not changed.
- 2.3.10. The Council is not in a position to provide further comments on Highways and Transportation matters until the work requested by the Examining Authority in their letter dated 16<sup>th</sup> May 2023 has been completed. The timetable for the receipt of this information as set out in the Applicant's letter of the 27<sup>th</sup> June 2023 is acknowledged by the Council.

## 2.4. Air Quality

- 2.4.1. The additional submissions submitted by the applicant in relation to Chapter 7 Air Quality of the Environmental Statement have been reviewed. It is noted that only minor amendments or corrections have been made.

- 2.4.2. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 7.1 Air Quality Methodology Revision 1 (AS-028).**
- 2.4.3. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.01 Environmental Statement Chapter 7 Air Quality Revision 1 (AS-076).**
- 2.4.4. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 7 Air Quality Figures 7.1 - 7.3a Revision 1 (AS-098).**
- 2.4.5. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 7 Air Quality Figures 7.3b - 7.26 Revision 1 (AS-099).**
- 2.4.6. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 7 Air Quality Figures 7.27 - 7.49 Revision 1 (AS-100).**
- 2.4.7. The Council's Strategic Environmental Protection Team are not in a position to provide any further comments until the traffic data used within the transport modelling is reviewed as requested by the Examining Authority in their letter dated 16 May 2023. The timetable for this review as outlined in the applicant's letter dated 27 June 2023 is acknowledged.

## 2.5. [Landscape and Visual](#)

- 2.5.1. The following updated application submission documents have been reviewed by specialists representing the interests of the Council in relation to Landscape:
- 2.5.2. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.1 LVIA Methodology Revision 1 (AS-036).**
- 2.5.3. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.7 Accurate Visual Representations Viewpoints 1, 5, 6 Revision 1 (AS-037).**
- 2.5.4. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.7 Accurate Visual Representations Viewpoints 10B, 13, 14, 17, 17A Revision 1 (AS-038).**
- 2.5.5. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.7 Accurate Visual Representations Viewpoints 18, 19, 23, 24, 25 Revision 1 (AS-039).**

- 2.5.6. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.7 Accurate Visual Representations Viewpoints 26, 29, 30, 31, 34, 37 Revision 1 (AS-040).**
- 2.5.7. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.7 Accurate Visual Representations Viewpoints 41, 46, 48, 50 Revision 1 (AS-041).**
- 2.5.8. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.01 Environmental Statement Chapter 14 Landscape and Visual Revision 1 (AS-079).**
- 2.5.9. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.4 Detailed Landscape Assessment Revision 1 (AS-086).**
- 2.5.10. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Document Index Environmental Statement Appendix 14.5 Detailed Visual Assessment Revision 1 (AS-087).**
- 2.5.11. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 1-6 Revision 1 (AS-088).**
- 2.5.12. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 7-10 Revision 1 (AS-089).**
- 2.5.13. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 11-17 Revision 1 (AS-090).**
- 2.5.14. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 18-24 Revision 1 (AS-091).**
- 2.5.15. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 25-32 Revision 1 (AS-092).**
- 2.5.16. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 33-41 Revision 1 (AS-093).**
- 2.5.17. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 42-50 Revision 1 (AS-094).**



- 2.5.18. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 51-60 Revision 1 (AS-095).**
- 2.5.19. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 14 Landscape and Visual Figures 14.1-14.17 Revision 1 (AS-096).**
- 2.5.20. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority - **5.02 Environmental Statement Appendix 14.5 Detailed Visual Assessment Rev 2 (AS-139).**
- 2.5.21. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority - **5.02 Environmental Statement Appendix 14.6 Winter and Summer Viewpoint Photography Viewpoints 51-61 Rev 2 (AS-140).**
- 2.5.22. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority - **5.02 Appendix 14.7 Accurate Visual Representations View 10B, 13, 14, 17, 17A Rev2 (AS-141)**
- 2.5.23. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority - **5.02 Appendix 14.7 Accurate Visual Representations View 18, 19,20, 23, 24, 25 Rev 2 (AS-142).**
- 2.5.24. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority - **5.02 Appendix 14.7 Accurate Visual Representations View 26, 28, 29, 30, 31, 34, 37 Rev2 (AS-143).**
- 2.5.25. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority - **5.02 Appendix 14.7 Accurate Visual Representations View 46, 48, 50 Rev 2 (AS-144).**
- 2.5.26. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority - **5.02 Appendix 14.7 Accurate Visual Representations View 53, 56, 61 (AS-145).**
- 2.5.27. London Luton Airport Limited Additional Submission accepted at the discretion of the Examining Authority - **5.13 Glint and Glare Assessment (AS-146).**
- 2.5.28. The updated application documents have been checked and nothing has been found which makes a significant difference to the Councils' position on landscape and visual. The Council is still seeking clarity regarding which parts of the Chilterns AONB and wider Buckinghamshire are anticipated to be affected.

## 2.6. Heritage

- 2.6.1. The following updated application submission documents have been reviewed by specialists representing the interests of the Council in relation to Cultural Heritage:
- 2.6.2. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.01 Environmental Statement Chapter 10 Cultural Heritage Revision 1 (AS-077).**
- 2.6.3. **The updated application document has been checked and nothing has been found which makes a significant difference to the Councils' position on heritage.**

## 2.7. Health and Communities

- 2.7.1. The following updated application submission documents have been reviewed by specialists representing the interests of the Council in relation to Health and Communities assessment:
- 2.7.2. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.01 Environmental Statement Chapter 13 Health and Community Revision 1 (AS-078).**
- 2.7.3. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.02 Environmental Statement Appendix 13.5 Evidence Review for Health Assessment Revision 1 (AS-084).**
- 2.7.4. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.03 Environmental Statement Chapter 13 Health and Community Figures 13.1-13.2 Revision 1 (AS-101).**
- 2.7.5. **Nothing has been found that makes a significant difference to Buckinghamshire Council's position in relation to the Health and Communities assessment. As stated in the Relevant Representation (RR-0166), meaningful comment regarding the impacts on health and communities within Buckinghamshire cannot be made until the weaknesses highlighted in the contributing assessments are addressed. In addition, Buckinghamshire Council asserts within the Local Impact Report and Written Representation that the study area for detailed assessment of traffic derived impacts should be reviewed and expanded to cover relevant receptors that it anticipates will be identified following resolution of the weaknesses in the traffic modelling and downstream assessment.**

## 2.8. Cumulative Effects Assessment

- 2.8.1. The following updated application submission documents have been reviewed by specialists representing the interests of the Council in relation to Cumulative effects assessment:

- 2.8.2. London Luton Airport Limited Additional Submission, accepted at the discretion of the Examining Authority. **5.01 Environmental Statement – Chapter 21 In-combination and Cumulative Effects Revision 1 (AS-032)**
- 2.8.3. London Luton Airport Limited. **5.02 Environmental Statement – Appendix 21.1. Long List of Other Developments (APP-140)**
- 2.8.4. London Luton Airport Limited - 5.02 Environmental Statement – **Appendix 21.2 Short List of Other Developments (APP-141)**
- 2.8.5. London Luton Airport Limited - 5.02 Environmental Statement – **Appendix 21.3 Other Developments Temporal Gantt (APP-142)**
- 2.8.6. London Luton Airport Limited - 5.02 Environmental Statement – **Chapter 21 In-Combination and Cumulative Effects Figures 21.1 - 21.4 (APP-164)**
- 2.8.7. This is the first opportunity that the Council has had to comment on the full Cumulative and In-combination effects chapter of the ES – it was not included within the original submission. As stated in the Relevant Representation (RR-0166), meaningful comment regarding downstream topics, which this type of assessment is considered to be, cannot be made until the weaknesses highlighted in the contributing assessments are addressed.
- 2.8.8. The Council is in broad agreement with the methodology used by the Applicant in undertaking this aspect of the Environmental Impact Assessment. Buckinghamshire Council asserts within the Local Impact Report and Written Representation that the study area for detailed assessment of in-combination impacts involving traffic and noise impacts should be reviewed and expanded to cover relevant receptors that it anticipates will be identified following resolution of the weaknesses in the traffic modelling and downstream assessment. In addition, Buckinghamshire Council asserts that it should be consulted upon the suitability and completeness of the short list of other developments that is used for the assessment of the Proposed Development with third party projects, once there is clarity regarding the zone of influence for traffic and noise impacts.

### 3 Summary of Comments on the Updated Draft Development Consent Order

3.1.1. This section provides a summary of the Council's comments on the updated draft Development Consent Order (AS-067)

*Table 3 – Summary Comments on Updated Draft Development Consent Order*

DCO Wording	Suggested Changes	Comments
Part 1 Paragraph 2, Interpretation  "Relevant highway authority" "Relevant planning authority"	"To which the provision relates" is insufficient to capture all circumstances.	Amend to "provision of the Order, part of development or relevant effects of the development relate" To allow for Buckinghamshire Council Planning Authority/ Highway Authority to be consulted, if required.
Amendments to approved details, Sch.2, paragraph 2	As above, amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.	'Relevant Planning Authority' definition to be expanded to include consultation of neighbouring authorities, such as Buckinghamshire Council, where appropriate; and standard consultation period to apply.  Please see Section 2.10 of Written Representations
Parameters of authorised development, Sch.2, paragraph 6	Make provision for the relevant planning authority to undertake consultation on any changes to the parameters specified.	Absence of consultee specification to inform paragraph 2(4) of Part 1 of Schedule 2 of the dDCO.  Please see Section 2.10 of Written Representations
Code of construction practice, paragraph 8	As above, amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.	To include consultation Buckinghamshire Highways, who would like to be party to details relating to construction matters.  Please see Section 2.2 and Section 2.10 of Written Representations
	Implementation Trigger required.	The construction of the development must be carried out in accordance with The Code of Construction Practice

		Please see Section 2.2 Transport and Highways of Written Representations.
Construction workers, paragraph 15	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.	'Relevant Planning Authority' to include, consultation with Buckinghamshire Highways, who would like to be party to details relating to construction matters.  Please see Section 2.2 Transport and Highways of Written Representations.
Landscaping design, paragraph 9	Implementation Trigger required.	Landscaping to be carried out prior to first use of the development.  Please see Section 2.10 of Written Representations
Landscape and biodiversity management plan, paragraph 10	Implementation Trigger required.	To be carried out prior to construction/ occupation, which ever is most appropriate.
	Amendment to allow consultation with Natural England.	Given the implications of the management plan for protected species Buckinghamshire Council would suggest that paragraph 10, sub paragraph 1 makes provision for the relevant planning authority to undertake consultation on the landscape and biodiversity management plan with Natural England.  Please see Section 2.10 of Written Representations
Construction traffic management, paragraph 14	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.	Relevant Planning Authority' to include consultation with Buckinghamshire Highways, who would like to be party to details relating to construction traffic matters.  Please see Section 2.2 Transport and Highways of Written Representations.
Construction workers, 15	Amendments to wording to allow for sufficient flexibility to	Relevant Planning Authority' to include consultation with

	definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.	Buckinghamshire Highways, who would like to be party to details relating to construction worker travel plan matters.  Please see Section 2.2 Transport and Highways of Written Representations.
ESG, paragraph 20 (2)	Suggested wording changes to Paragraph 20 to include Buckinghamshire Council in the ESG.	Please see Section 2.10 of Written Representations
	The 'representation from an airline industry body' must not be the airport owner/ Luton Rising.	The ESG must remain an independent body, this will be assisted with Buckinghamshire Council being on the panel.  Please see Sections 2.1, 2.2 and 2.3 of Written Representations.
Technical Panel, Paragraph 20 (8-9)	Tighter definition to name the individuals and bodies	Buckinghamshire Council would like to be a named body on the Technical Panel.  Please see Section 2.10 of Written Representations Highways rep
Exceedance of Limit. Paragraph 24	An implementation timeframe for the Mitigation Plan, once approved, needs to be provided.	To ensure that mitigation is carried out in a timely manner.  Sub para (4) insert new (b) must "include a timetable for implementation"  Please see Section 2.2 Transport and Highways of Written Representations.
Review of implementation of this Part, Paragraph 25	Review of implementation should be undertaken annually. Amend sub para (1) from 5 to 1 year	To ensure mitigation is quickly applied, when required.  Please see Section 2.2 Transport and Highways of Written Representations.
Passenger cap for the authorised development, paragraph 26	Amended to address the inconsistency with the Green Controlled Growth Framework (GCGF).	As currently drafted, the Council is of the opinion that these requirements do not adequately deal with the phased approach to increasing passenger numbers to the cap.

		<p>This places the Requirements at odds with the GCGF.</p> <p>Please see Section 2.10 of Written Representations</p>
Night quota cap, paragraph 27	Amend paragraph 20 for Buckinghamshire Council, and other neighbouring authorities, to form part of the ESG.	<p>makes provision for the relevant planning authority to approve a variation to the night quota cap, in consultation with the ESG.</p> <p>Buckinghamshire Council is concerned that its absence from the ESG would prevent it, and other neighbouring authorities, from representing the best interests of their communities on this matter.</p> <p>Please see Section 2.10 of Written Representations</p>
Offsite highways works paragraph 29	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.	<p>Relevant Planning Authority' to include, Buckinghamshire Highways, if off-site highway works fall within Buckinghamshire Council. Or to allow consultation with Buckinghamshire Council, where required; who would like to be party to the transport related impacts monitoring and mitigation approach.</p> <p>Please see Section 2.2 Transport and Highways of Written Representations.</p>
	Trigger required for implementation of mitigation scheme	<p>Within X period. – to ensure timely implementation of mitigation.</p> <p>Please see Section 2.2 Transport and Highways of Written Representations.</p>
Travel Plans paragraph 30	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Highway Authority' and to allow for sufficient consultation period with consultees.	<p>Relevant Planning Authority' to include consultation with Buckinghamshire Highways, who would like to be party to the travel plans.</p>

		Please see Section 2.2 Transport and Highways of Written Representations.
	(3) Updating of travel plans should take place annually.	To ensure mitigation/intervention is quickly applied, when required.
	Mitigation/ successful implementation strategy/ review required.	To ensure targeted intervention should travel plan targets not be met.  Please see Section 2.2 Transport and Highways of Written Representations.
Operational air quality plan paragraph 31	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.	Relevant Planning Authority' to include consultation with Buckinghamshire Environmental Health, who would like to be party to air quality matters.  Please see Section 2.10 and 2.4 of Written Representations
Greenhouse gas action plan, paragraph 32	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.	Relevant Planning Authority' to include consultation with Buckinghamshire Climate Change Officers, who would like to be party to the Greenhouse gas action plan.  Please see Section 2.10 and 2.1 of Written Representations
Operational waste management plan, paragraph 33	Amendments to wording to allow for sufficient flexibility to definition of 'Relevant Planning Authority' and to allow for sufficient consultation period with consultees.	Relevant Planning Authority' to include consultation with Buckinghamshire Council, who would like to be party to the water management plan.  Please see Section 2.10 of Written Representations
Applications made under requirements, paragraph 35	Amendment to allow for statutory 21 day consultation period for consultees and further extension of this period, should it be required.	To make provision for a minimum consultation period for applications made under requirements, akin to the 21 days defined in Paragraph 18, of Part 3, of Schedule 2 of the dDCO. The Applicant should also ensure that an appropriate mechanism is included within the dDCO for extending this consultation period should



		<p>further issues arise or if insufficient information is made available to the consultee.</p> <p>Please see Section 2.10 of Written Representations</p>
Further information, paragraph 36 (3)	Amendments to wording to allow for sufficient flexibility for neighbouring authorities to act as consultees.	<p>Limits consultation on the discharge of DCO requirements to those consultees specified within a requirement itself.</p> <p>Please see Section 2.10 of Written Representations</p>
Paragraph 39 (4) "specified local authority"	Buckinghamshire Council to be named as a specified local authority.	