

London Luton Airport Expansion

Buckinghamshire Council Written Representations

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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. The Order Limits are situated within the administrative areas of the Councils of Luton, North Herts, Central Bedfordshire and Dacorum. No development is proposed within the administrative area of Buckinghamshire Council; however, in a number of topic chapters within the Environmental Statement (ES) that forms part of the DCO application, there is an acknowledgement of the potential for impacts associated with the Scheme to be experienced within Buckinghamshire. This is reflected in the inclusion of parts of the County within topic study areas.
- 1.1.3. This document sets out the Council's Written Representation, submitted at Deadline 1 of the Examination. At Deadline 1, the Council has also submitted a Local Impact Report, alongside responses to the Additional Submissions, where applicable.
- 1.1.4. A summary of the Council's Written Representation and all of the suggested changes and requests in the Council's Deadline 1 submissions are provided in Section 3 'Summary' of this report.

1.2. Buckinghamshire Council's Position

- 1.2.1. The general principle of the Scheme is understood in the context of Government policy on aviation and the Council can see some benefits for Buckinghamshire, particularly in respect of economic development and growth. Notwithstanding this, the Council has some concerns about the conclusions drawn relating to the assessment of the potential environmental, sustainability and social impacts of the Scheme on Buckinghamshire.
- 1.2.2. The Council considers that the Applicant needs to undertake further work to robustly analyse the full extent of the social impacts and environmental impacts. The Council therefore reserves its position on matters such as transport modelling, air quality, noise, heritage, landscape and visual, human health, cumulative effects, and climate change and resilience. The Council is of the strong view that it should be a member of the Environmental Scrutiny Group and the sub-group Technical Panels. These concerns are set out in more details in this Local Impact Report, supported by the Council's Written Representations.

2 Written Representations

2.1. Climate Change and Greenhouse Gases

Greenhouse Gases

- 2.1.1. The Climate Change Act (2008)¹ requires that UK CO₂ and GHG net emissions fall to no more than zero by 2050. The National Planning Policy Framework (NPPF)² states in paragraph 152 that *“The planning system should support the transition to a low carbon future in a changing climate, ... It should help to: contribute to **radical reductions in greenhouse gas emissions...**”* (emphasis added).
- 2.1.2. The following comments are provided in relation to Climate Change and Greenhouse Gases (GHG) and all related elements of the application. Where numbers are entered in brackets i.e. (12.1.8) they refer to the relevant paragraph within the DCO submission Chapter 12 (Greenhouse Gases) of the Environmental Statement document (APP-038).
- 2.1.3. The Applicant references the Jet Zero Strategy (JZS) (12.1.8) and the Transport Decarbonisation Plan. These documents set out UK Government Policy relating to the decarbonisation of aviation and of transport, respectively. The Applicant’s “Need Case”, which forecasts demand and in turn informs the GHG emissions forecasts, is however based upon the Applicant’s own modelling. This is because the national projections do not breakdown demand by airport. This is important because the Applicant has asserted (as will later be relevant) that its modelling for the GHG chapter is based upon policy. While this is correct for the technological pathway to 2050, the same assertion does not apply to the forecast Air Traffic Movements (ATMs), which form a critical part of the GHG chapter and forecasts.
- 2.1.4. The Future Baseline takes into account the future impact of Government policy, including energy grid decarbonisation and the JZS High Ambition Scenario, which includes the increased efficiency of aircraft, take up of sustainable aviation fuels and introduction of zero emission aircraft (12.1.12).
- 2.1.5. The JZS³ outlines current Government policy for decarbonising aviation. The 2050 trajectory recognises that many of the technologies are at an *“early stage of development or commercialisation; their nascent nature means that we do not yet know the optimal technological mix out to 2050”* [3, pp15]. Further details for each of

¹ <https://www.legislation.gov.uk/ukpga/2008/27/contents> (Accessed 22/08/2023)

²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf (Accessed 22/08/2023)

³ <https://www.gov.uk/government/publications/jet-zero-strategy-delivering-net-zero-aviation-by-2050> (Accessed 22/08/2023)

the four scenarios, including the “High Ambition” scenario upon which the trajectory is based, are available in the analytical annex⁴.

- 2.1.6. The analytical annex outlines the challenges and sensitivities related to each scenario, some of the key aspects for the High Ambition scenario are ^[4, pp9]: 2.0% per annum fuel efficiency improvements; 10%, 22% and 50% Sustainable Aviation Fuel (SAF) take up by 2030, 2040 and 2050 respectively; 5% and 27% ATMs zero emission by 2040 and 2030 respectively.
- 2.1.7. The JZS document outlines several challenges in the deliverability of this scenario. The scenario goes beyond the end of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) period up to 2035 and assumes that carbon pricing outside the scope of the UK Emissions Trading Scheme (UK ETS) will converge on the UK ETS price, requiring “*significant international cooperation*”. To achieve the 50% uptake of SAF, a significant amount of feedstock would be required resulting in aviation needing to be “prioritised amongst other competing sectors”. The outline efficiency improvements are recognised as being a “*step up in ... improvement relative to historical trends*”, which may be challenging. Finally, the availability of battery and hydrogen technology by 2035 requires technology readiness by 2027-2030, within the next 5 years^[4, pp10].
- 2.1.8. The Applicant states (12.1.14-15) that the JZS represents committed policy targets and can be relied upon as such. The Applicant has then included these within its core planning case without examining them as part of a sensitivity test.
- 2.1.9. The JZS recognises the inherent uncertainty in forecasting out to 2050 in terms of technology development and the multiple different technological routes that could be taken to arrive there. These different routes may well all converge at the same point but may have significantly different cumulative emissions between now and 2050. It is this key uncertainty, recognised within JZS, that the Council would expect the Applicant to undertake sensitivity studies on.
- 2.1.10. In the Sensitivity Analysis (12.9.17 onward), known risks are dealt with. In Table 12.23 and entry 3. “Faster Growth”, the Applicant states that there would be an “increase in overall emissions”, however this is set out only in a qualitative sense. The overall impact is stated as “small” relative to national carbon budgets and has not been quantified. The impact upon GHG emissions has not been quantitatively assessed. Inset 12.3 shows this scenario in terms of air traffic movements (ATMs), but not the effect upon emissions. The Council considers this to be an inadequate assessment. Given that Faster Growth is a plausible scenario and an increase in emissions recognised as the likely outcome, the impact upon the GHG emissions should also be modelled quantitatively by the Applicant, rather than just a

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1096929/jet-zero-strategy-analytical-annex.pdf (Accessed 22/08/2023)

qualitative statement. Inset 12.4 should be extended to include the same modelling results under the Faster Growth Scenario, as a quantitative assessment.

- 2.1.11. In Table 12.23 outlining sensitivity studies done for GHG emissions the adoption of next generation aircraft has not been assessed or included. The potential impact and change are stated as “There is no change to emissions modelled”. However, the Applicant has included a sensitivity test elsewhere in “other technical aspect assessments”. This inconsistency in adopting sensitivity assessments elsewhere in the DCO Application but not within the GHG & Climate Change section of the Environment Statement (APP-038) appears to be a significant omission and fundamentally undermines the chapter’s conclusions. The Council requires the Applicant to address this by completing the sensitivity analysis described in this written representation and providing a quantitative assessment of the impact on GHGs.
- 2.1.12. Inset 12.4 shows the results, with savings from efficiency, SAF and Zero Emission Aircraft, however, no sensitivity analysis has been conducted. As previously mentioned, the JZS itself recognises that the technological route to net zero 2050 is uncertain. The route taken will significantly impact the cumulative emissions, which is the key figure for the GHG assessment.
- 2.1.13. The Applicant should include a sensitivity analysis of all plausible scenarios upon GHG emissions, recognising the challenges outlined within the JZS Analytical Annex. For example, if efficiency savings are not realised at the 2.0% annualised rate initially, but only accelerate later in the 2030s or 2040s, what will the impact upon cumulative emissions be? Similarly, what if SAF feedstock is available at different levels over time and what would be the impact be of delays to technology development with zero emission aircraft? These questions remain unanswered.
- 2.1.14. It is correct that the Applicant has based its core planning case upon established Government policy as outlined in JZS. However, they have failed to act upon the inherent uncertainty of the technological development up to the year 2050 by conducting appropriate sensitivity analyses, even though the Applicant has conducted such sensitivity analyses elsewhere within the application. This is an inconsistent, incomplete and flawed approach. The sensitivity analyses must be applied to the areas identified within the Council’s submission and the cumulative emissions assessed accordingly.

Climate Change Resilience

- 2.1.15. The Council agrees with the use of 10%, 50% and 90% probability levels, leading to the selection of Representative Concentration Pathway (RCP) 8.5 from UK Climate Projections 18, commensurate with a global temperature increase of approximately 4.3 degrees centigrade by the year 2100. This represents an appropriately conservative case to assess climate change resilience against.

- 2.1.16. It is noted that de-commissioning of the Scheme has been scoped out (para 9.3.18 of Chapter 9 – Climate Change Resilience - of the Environmental Statement (APP-035)). The Council recommends a requirement of the DCO to ensure that a separate assessment is required for future de-commissioning.

Sustainability & Green Controlled Growth

- 2.1.17. As highlighted above the Climate Change Act (2008) requires that UK CO₂ and GHG net emissions fall to no more than zero by 2050. The National Planning Policy Framework states in paragraph 152 that “**152. The planning system should support the transition to a low carbon future in a changing climate, ... It should help to: contribute to radical reductions in greenhouse gas emissions...**” (emphasis added).
- 2.1.18. The Sustainability Statement (APP-216) is heavily reliant upon Green Controlled Growth (GCG) (described in APP-217)). The GCG Framework (APP-218) identified Luton Rising, the Applicant, as a “*business and social enterprise owned by a sole shareholder, “Luton Borough Council”*” while the GCG document outlines how the monitoring approach shall work and the GCG Framework outlines how delivery of the sustainability commitments will be monitored. The heart of the GCG governance will be an Environmental Scrutiny Group (ESG), to provide independent scrutiny and review (APP-217 para. 2.4.2). The ESG will streamline decision making and receive reports from the GHG Technical Panel with respect to greenhouse gas emissions. Currently, the proposed ESG membership includes four local authorities but excludes Buckinghamshire Council. It is the view of the Council that Buckinghamshire Council should be part of the membership of the ESG to support the stated aim (APP-217 para. 2.4.11) of capturing a “diversity of views”. As the administrative area of Buckinghamshire Council is affected by the flight path to Luton Airport, the Council would complement the existing four authorities similarly have flight paths across Hertfordshire and Bedfordshire. The Council also believes that it should have a position within the four Technical Panels relating to Air Quality, GHG, Noise and Surface Access.
- 2.1.19. It must be acknowledged that within Figure 2.13 (APP-217) the approach to enforcement shows that the “relevant local authority” (identified as Luton Borough Council (LBC)) would take enforcement action in the event of a GCG procedural breach. Given that LBC is also the owner of the airport (APP-217 para.2.1.19), and that it sits on all four technical panels and sits on the ESG, this could involve LBC considering the merits of undertaking enforcement action against an asset fully owned by LBC. This potential conflict of interest must be robustly managed and is possibly insufficiently addressed within the current proposals. It also adds further weight to the case for the inclusion of the Council on the ESG and all Technical Panels, which may go some way to addressing these concerns.

2.2. Transport and Highways

- 2.2.1. The Council has reviewed the submissions supporting the DCO application against relevant local and national policies, including the National Planning Policy Framework, Buckinghamshire's Local Transport Plan 4⁵, and the Airports National Policy Statement⁶.
- 2.2.2. The Key policy considerations are the Airports National Policy Statement (ANPS) and the National Planning Policy Framework (2023) (NPPF). Paragraph 104 states “Transport issues should be considered from the earliest stages of plan making and development proposals so that:
- (a) the potential impacts of development on transport networks can be addressed;
 - (b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated.
 - (c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- 2.2.3. Paragraph 110 (b) requires that development should ensure that “safe and suitable access to the site can be achieved for all users”.
- 2.2.4. The Council is unable to conclude its position regarding the highways impacts within Buckinghamshire, until such time as the Applicant has completed the additional work required by the Examining Authority to update the strategic modelling as set out in the letter from the Applicant to the Examining Authority dated 27th June 2023 (AS-064). In addition to addressing these matters, the Council does not consider that the validation and calibration of the strategic model is of an adequate standard within Buckinghamshire to provide certainty of the traffic impacts within the county.
- 2.2.5. Without the certainty of the quality of the modelling as an assessment tool, the exact nature of the impacts within Buckinghamshire cannot be quantified by the Applicant's or the Council, and the Council is unable to agree that the assessment methodology is suitable or appropriate in this location or whether the proposals are compliant with paragraphs 104 or 110 of the NPPF.
- 2.2.6. It is the position of the Council that the B489 between the Aston Clinton Bypass and the B488 at Ivinghoe is a sensitive section of highway that forms a primary route to Luton Airport from the west and identified by the applicant as a long distance commuting route.

⁵ <https://buckinghamshire.gov.uk.s3.amazonaws.com/documents/local-transport-plan-4.pdf> (Accessed 22/08/2023)

⁶ <https://www.gov.uk/government/publications/airports-national-policy-statement> (Accessed 22/08/2023)

- 2.2.7. The Council has sought to protect this sensitive section of its network with the implementation of area wide weight restrictions, traffic calming and shuttle working traffic signals. The area is also subject to the published freight strategy⁷, and the Ivinghoe Neighbourhood Plan⁸.
- 2.2.8. Due to the sensitivity of this route, small changes to traffic volumes will have significant impacts on the operation of the network and the safety of the route. Therefore, it will be necessary for the Applicant to provide highway mitigation works at the junction of the B488 and B489 in Ivinghoe to change the junction priority, as set out within the adopted Ivinghoe Neighbourhood Plan and in accordance with paragraphs 5.5 and 5.16 of the ANPS.
- 2.2.9. Whilst peak hour traffic assessments have been carried out to assess the highways impacts of the development, the Council is concerned that this does not represent the full development peak traffic on the network. A review of the future year passenger schedules Transport Assessment Part 3 of 4, figures 9.8, 9.9 and 9.10 (APP-205) shows that the peak flight times are between 07:00 and 10:00, and 12:00 to 14:00 in year 2027 and this remains the pattern in the future years. This will mean that surface travel will increase in the hours before and after these peak periods and therefore both outside and within the highway network peak.
- 2.2.10. The Council is concerned that in addition to the extension of the peak periods, increases in traffic movements through sensitive receptors will have significant impacts on highway safety (and potential noise implications, which could in turn adversely affect health and communities), contrary to paragraph 5.5 of the ANPS.
- 2.2.11. Whilst the current strategic modelling does not present significant impacts within Buckinghamshire, the Council has significant concerns relating to that modelling. It is noted that in early consultation with Luton Rising, the Council and Aylesbury Vale District Council had requested to be included within the scoping of the Transport Assessment. This request was not taken up by the Applicant. Consequently, the Council is now in a position whereby it has serious concerns regarding the quality of the outputs of the strategic model in Buckinghamshire. Specifically, the Council is concerned that the model contains no calibration or validation data within the Buckinghamshire administrative area.
- 2.2.12. The Applicant acknowledges within the Environmental Statement (AS-030) and the Transport Assessment (APP-205) that local roads to the east of the airport have been considered as a specific concern, however, there is no mention of assessment or consideration of routes to the west under similar conditions.
- 2.2.13. The Council is concerned that the Transport Assessment (APP-205) sets out a trips mode share of 55% by private car by 2039. It is noted that pre 2020 the airport

⁷ <https://www.buckinghamshire.gov.uk/parking-roads-and-transport/road-freight-and-heavy-goods-vehicles-hgvs/freight-strategy-2018-to-2036/> (Accessed 22/08/2023)

⁸ https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/IPNP_Referendum_Version_FINAL-accessible.pdf (Accessed 22/08/2023)

was achieving significant mode share by public transport, however, it is the Council's experienced position that it is not possible to achieve such levels of public transport use for major developments, as proposed, without securing explicit measures and provisions prior to the granting of permission. It is also necessary to ensure that the governance and monitoring of those provisions is agreed prior to permission being granted so that the measures contained within are explicit and can be understood by the decision makers.

- 2.2.14. With such an ambitious public transport mode share, any failure to meet the target mode share will result in significant underestimations being reported in the transport modelling and will lead to significantly greater impacts that would not then be mitigated. Certainty of mode share is required through passenger transport mitigation to be agreed in the Statement of Common Ground and secured through the DCO.
- 2.2.15. The Council is also concerned that off-site airport long stay car parks, local to Slip End village, will be more attractive to individuals approaching from the west than public transport solutions, should an improved frequency high quality public transport provision not be provided. These car parks are located on the well-known western approach, long distance commuting routes and therefore the airport expansion will encourage greater numbers of trips from this western approach to the car parks that are well situated on the western route desire line.
- 2.2.16. As the Council has presented in its previous representations (RR-0166), a robust east-west connection remains lacking within the Surface Access Strategy and therefore access from the west remains car dependant. This is unacceptable to the Council and goes against national policy and in particular paragraphs 5.9 and 5.16-5.17 of the ANPS.
- 2.2.17. In order to form a position in this matter, the Council requires certainty that the Sustainable Transport fund will be secured on the basis of an assessment of the needs of Luton Airport and its relationship with the customers and staff that it intends to serve. The value of that fund should not be set based on other airports without due regard to the individual needs of this Scheme. The value of this fund will need to be secured by S106 Agreement.
- 2.2.18. The Council has fundamental concerns regarding the proposed way in which the Applicant seeks to determine the provision of public transport services. The proposals set out to date do not include any details as to how the governance is to be managed or how the sustainable transport fund value is to be set, or how it is to be used and managed. This is required to be appropriately secured through a DCO requirement or other appropriate means in order to demonstrate compliance with paragraph 5.16 of the ANPS.

Provision of bus services

- 2.2.19. The former Buckinghamshire District Councils during the early stages of the DCO proposals had requested a high-quality bus connection from Buckinghamshire, and this remains a priority for the Council. This is required to be agreed through the SoCG and through a DCO requirement or other appropriate means.
- 2.2.20. The Council considers this bus link imperative to address a lack of sustainable transport options for passengers to approach the airport from the west through a viable alternative to the private car. Without certainty of the provision of public transport services secured through the DCO, the Council does not consider the assumptions of mode share and mode shift to be sound nor reliable and are therefore not in accordance with paragraph 5.17 of the ANPS.
- 2.2.21. Until around 10 years ago, preceding the opening of the Luton and Dunstable Busway, a regular hourly bus service (61) ran from Aylesbury via Tring and Pitstone to Dunstable and Luton Airport. When the Busway opened, non-Busway services were prohibited from accessing the Airport bus terminal, with Aylesbury services terminating at Dunstable instead. This service currently runs approximately every 90 minutes, with no Sunday or later evening services. The lack of public transport access to the airport must be addressed, provided, and secured through a DCO requirement or other appropriate means, noting it is also identified as a priority in Buckinghamshire's Bus Service Improvement Plan. The possibility of the reinstatement of this service contained within the proposals is inadequate to provide certainty that the service will be reinstated, and a suitable connection provided to residents within the catchment of the service being able to reach the airport without unnecessary delay and inconvenience.
- 2.2.22. The Transport Assessment (APP-205) makes clear in paragraph 8.3.3 that the "main priorities are to achieve greater use of public transport by air passengers and staff, and to make the best use of existing highways infrastructure...". It is the Council's position that the existing bus provision forms part of the infrastructure that supports the operation of the network, reducing the need for private vehicle trips and the subsequent reduction in congestion and delay on the network. It is also noted that despite the strong words within the Transport Assessment, the Surface Access Strategy (APP-228), Outline Construction Workers' Travel Plan (APP-131), and the Framework Travel Plan (AS-131) do not provide the same strength of position with regard to the public transport provisions.
- 2.2.23. The Council is not satisfied that there is sufficient certainty of delivery of bus/coach services to connect Aylesbury to the airport with a coach or high quality adapted express bus service. The Council considers this to be a necessary provision, with discussion possible regarding the frequency and hours of operation through the SoCG process.

- 2.2.24. The Applicant states that Bus and Coach provision is a priority area for the surface access strategy (APP-228), and the two themes that they are promoting are (paragraph 6.4.1):
- a. Improve local bus connections for passengers and staff to improve choice for people accessing the airport from surrounding areas by public transport; and
 - b. Strengthen the coach offer at the airport with new routes, more frequent existing routes and a better interchange with other modes of transport.
- 2.2.25. The Council's position is that North-South access to the airport is already well served by public transport, as they are on the East Coast Mainline, and the M1 inter urban coach routes. However, the failure to recognise the lack of provision for connection to/from the west fails to meet the priority areas set out by the Applicant. The subsequent way of determining how those priority areas are to be addressed, as set out previously, also fails to ensure that areas within Buckinghamshire that are not served at all will secure even a basic provision, whilst other areas already well served may indeed stand to benefit from additional services. In its current form the surface access strategy fails to address the needs of local communities that already suffer from a lack of connection to the airport. The proposals as submitted would increase severance with the airport for communities within Buckinghamshire which already suffer from a lack of accessibility. This in turn fails to be in accordance with paragraph 5.14 of the ANPS.
- 2.2.26. It is therefore necessary to secure the local bus provisions through a DCO requirement or other appropriate means as a certainty prior to granting of the DCO.
- 2.2.27. The public transport provisions should run every day and be timed to coincide with the operating times of the Airport. For example, Heathrow Airport runs bus services timed for shift workers to begin their shifts early in the morning. The service should be operated by direct agreement between the Airport and a bus operator, rather than through the Council receiving a financial contribution. Services should be frequent; fares should be attractive and the vehicles of a high quality allowing for luggage storage and WiFi connectivity. Whilst a matter for the bus operators to agree, the Council would be supportive of a "Luton Airport" brand being created for these services and for them to be renumbered to emphasise that connection. These comments are provided with the expectation that details of such services will be established over the course of future discussions and secured through a DCO requirement or other appropriate means.
- 2.2.28. To be clear, the Council requires both a high-speed bus service to be provided from Aylesbury to the airport and the number 61 local service is required to be reinstated to the airport, both provisions to be secured through a DCO requirement or other appropriate means.

- 2.2.29. To this point, the statements Table 5.2 contained within the Framework Travel Plan (AS-131) do not provide the Council with sufficient assurance that this public transport service can be secured in the current form of the DCO. The Council therefore requires this service to be secured through the Framework Travel Plan, Surface Access Strategy and within a Statement of Common Ground or a requirement placed upon the DCO in order for the scheme to be compliant with the relevant sections of the NPPF and ANPS.

Travel Plans

- 2.2.30. Schedule 2, paragraph 30(1) of the dDCO (AS-067) sets the requirement that travel plans must be submitted to and approved in writing by the relevant planning authority, following consultation with the relevant highway authority on matters related to its function. The Council wishes to receive evidence that this has been done, as this is not clear in the current Framework Travel Plan (FTP) (AS-131) or Outline Construction Workers Travel Plan (CWTP) (APP-131).
- 2.2.31. As set out in the detailed Travel Plan Review, the Council notes several weaknesses with both the FTP (AS-131) and CWTP (APP-131). The Council requires that the points outlined in the following paragraphs are addressed.
- 2.2.32. Contextual information on the surrounding area should be provided in the FTP (AS-131), including Buckinghamshire's Local Transport Plan 4, maps of the proposed expansion in relation to the surrounding road network and public transport access points, and journey time maps for both road access and for active travel modes. These are not present in the current FTP or CWTP.
- 2.2.33. The FTP (AS-131) should include an acknowledgement of the lack of public transport provision westwards towards Buckinghamshire, and the possibility for both conventional bus services and Demand Responsive Transport (DRT) options to address this.
- 2.2.34. Confirmation should be provided that Baseline surveys of mode share will be undertaken upon occupation of the site.
- 2.2.35. Management targets set out in the FTP (AS-131) and CWTP (APP-131) should include all modes of travel and must include a commitment to reducing the proportion of single-occupancy vehicle trips to and from the site by at least 10% over the five-year period. Targets should also be set for each mode, and not simply disaggregated into 'sustainable' and 'unsustainable' modes as at present.
- 2.2.36. All targets are expected to be reviewed annually; five year gaps between reports is not sufficient for relevant Local Planning Authorities (LPAs) to respond to whether the measures are resulting in modal shift. The monitoring of impacts proposed to be included within the Outline TRIMMA should form the basis of Travel Plan monitoring.

- 2.2.37. The FTP (AS-131) should set out the monitoring that is to be undertaken once any permission is granted and expansion takes place. This monitoring should be used to demonstrate that the measures set out within the Travel Plan are quantifiable and measure their efficiency.
- 2.2.38. With reference to Buckinghamshire, it is noted that car ownership rates in the areas closest to the airport are significantly higher than the national average rates. It is also noted that the rates sought in the Surface Access Strategy (APP-228) and the FTP (AS-131) are less than 10% lower than the national average rates. Without strong provision of public transport options that are of high quality the current targets will not be expected to secure mode shift to sustainable measures and would not be in accordance with paragraph 5.17 of the ANPS. The commitments of the services required to provide viable options for sustainable travel are required to be in place prior to the DCO being granted to ensure success measures can be implemented.
- 2.2.39. The Councils full Travel Plan review document has been appended to this response – see Appendix A of this Written Representation.

Sustainable transport options

- 2.2.40. The Council considers it necessary to be included within the Airport Transport Forum as a Highway Authority seeking to promote and secure sustainable transport options, and to support the Applicant with respect to reaching the rural communities within Buckinghamshire, and strategic routes to the west of the airport.
- 2.2.41. The Council reserves comment on the final CTMP as it is unclear from the Outline document (APP-130) whether significant construction traffic will be routed through Buckinghamshire. At present there is no indication of the construction plan identifying suppliers and contractors and the locations to determine HGV movements. As such, the movement of spoil and construction material on Buckinghamshire roads is expected. A CTMP is required to be agreed and approved by the Council – this should be secured through a DCO requirement or other appropriate means.
- 2.2.42. As set out in the Executive Summary of 7.08 Green Controlled Growth Framework (APP-218 to APP-224), *‘if the environmental limit placed on growth in ‘unsustainable’ surface access is breached, then further growth of the airport should be stopped until mitigation is put in place’*. Whilst it is understood that limits could be placed in the course of the earlier delivery phases, it is unclear how these limits would apply once ‘full operating capacity’ is reached. The Council requires further information to determine whether the implementation of public transport options for surface access are being withheld until such point as these thresholds are broken, how performance will be measured, and whether this will be disaggregated by origin point (i.e. will this show any differences between those travelling to the airport from Buckinghamshire versus other origin points).

- 2.2.43. The Council considers the monitoring of staff mode share for the purposes of monitoring the Green Controlled Growth limits of every two years to be inadequate to maintain a current understanding of compliance. A one year maximum should be applied to data collection, and reviewed to ensure that remediation measures can be put in place in a timely manner, if required.
- 2.2.44. Staff and passenger surveys should be programmed to coincide as much as possible to ensure a single cohesive data set is provided.
- 2.2.45. It should be made explicit within the documents supporting the Green Controlled Growth Framework and the FTP which bodies are responsible for monitoring the findings of the data collection and authorising changes to the strategy to address any failure to meet the targets set.
- 2.2.46. Schedule 2 Part 3, paragraph 24 of the dDCO (AS-067) sets out the timescales for submission deadlines for ESG Level 2 threshold Mitigation Plans. However, this section does not set out the maximum timescales for delivery of any actions to prevent the exceedances of limits. For example, this does not set out the maximum length of time before 'non-sustainable' surface access transport should return to the thresholds set in the Green Controlled Growth Framework, following the submission of a Level 2 plan. This leaves a large amount of flexibility for remediation proposals to take significant lengths of time, and is not acceptable to the Council, who require certainty of delivery.
- 2.2.47. Mindful of the above comments regarding Highways and Transportation, the Council considers that the application has not fully addressed the requirements of the ANPS with regards paragraph 5.10 and the requirement to consult transport authorities. The Council has consistently requested that the Applicant engages actively with the Council when preparing the Transport Assessment and the public transport provisions.
- 2.2.48. The Applicant has not engaged with the Council to discuss the Transport Assessment scoping or the essential public transport improvements required prior to the submission of the DCO.
- 2.2.49. The Applicant has identified the need for public transport mitigation, in accordance with paragraph 5.15 of the ANPS, however, it has not provided any certainty in the securing of these and so the Council considers that the application falls short of this policy requirement.

2.3. Noise and Vibration

- 2.3.1. Within Buckinghamshire areas most likely to be affected by changes to aircraft noise along existing flight paths are Dagnall, Pitstone and a section of the area east of Aylesbury, including Wendover, which is also overflown by low level northbound traffic from Heathrow.

Chilterns Area of Outstanding Natural Beauty

- 2.3.2. Part of the Chilterns Area of Outstanding Natural Beauty (AONB) lies within the Council's administrative area. The NPPF states that planning policies and decisions should 'identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value'. Further, as set out in section 3.2(e) of the Air Navigation Guidance 2017⁹, where practicable, it is desirable that airspace routes below 7,000 feet should seek to avoid flying over AONBs and National Parks. The expansion of the airport is being promoted at the same time as the wider airspace change process is being progressed. This is known as the Future Airspace Strategy Implementation project South (FASI-S).
- 2.3.3. Given the increasing importance of such areas to community health and wellbeing the Council encourages the Applicant to place particular emphasis on protection of the Chilterns AONB (CAONB). Currently the CAONB is somewhat overflown but radical changes in airspace management could lead to the area being substantially overflown. The Council would like to see overflight of the CAONB formally reviewed by the Noise Envelope Design Group (NEDG). The NEDG themselves recommended that the Noise Envelope should be reviewed if there were to be any significant changes to the airport's operations. Especially as such a change will result from the anticipated modernisation of airspace as a result of the FASI-S. This would be in accordance with paragraph 5.219 of the ANPS which puts great weight conservation and protection of the AONB.

Green Controlled Growth Framework and Noise Envelope

- 2.3.4. The noise and vibration assessment in Section 16.9 of the ES (16 Noise and Vibration Chapter) (APP-042 superseded by AS-080) demonstrates how the Applicant proposes to mitigate and reduce to a minimum potential adverse impacts resulting from noise from the Scheme and avoid noise giving rise to significant adverse effects on health and the quality of life (Noise Policy Statement for England (NPSE) March 2010). The Council understands the arguments presented by the Applicant, that there will be no observed adverse significant effect with Buckinghamshire and therefore no specific Buckinghamshire mitigation is necessary. However, to protect this position the Applicant relies on the mechanisms within its "Green Controlled Growth Framework" (APP-218) to prevent/mitigate impacts. The Council is concerned that this mechanism is not clear or transparent.
- 2.3.5. The Applicant is using a "Noise Envelope" to control the expansion and as part of the proposed Green Controlled Growth (GCG) Framework. Using GCG it will agree to a series of 'thresholds', 'stops' and 'limits' on the size of average summer

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918507/air-navigation-guidance-2017.pdf (Accessed 22/08/2023)

daytime and night-time noise contours, based on indicators proposed by the NEDG. The Applicant claims that GCG provides a more robust and transparent approach to noise monitoring and enforcement than the current planning controls. From a Council point of view, the GCG Framework will only be effective if the body managing it is truly independent and includes the Council as a party to the Environmental Scrutiny Group and its Technical Panels.

- 2.3.6. In its final report the NEDG recognised the attraction of embedding the Noise Envelope in to the GCG Framework but suggested that there is a case for the Noise Envelope to be a discrete entity. The relationship between Green Controlled Growth, Noise Envelope and the ESG are not yet fully defined and the Council is concerned that the Noise Envelope, which is national policy, is not referenced in the dDCO whilst the GCGF and ESG, which are not policy, feature prominently. Additionally, references are made to legal frameworks that are not explained – this explanation should be included. Furthermore, it may assist the Examining Authority and the Secretary of State for Transport to see clearly that the policy requirement regarding a Noise Envelope has been met by having a single document with that title. The Council supports this view.
- 2.3.7. The ANPS requires that suitable Noise Envelope review periods should be set. These are currently five years. The Council is concerned that there could be a disconnect between the NEDG and the operator should the envelope prove ineffective in the short term. In order to ensure the correct application and efficacy of the Noise Envelope, the Council is seeking reassurance that the Noise Envelope will be subject to timely review at such time as changes in airspace are proposed (i.e. through FASI-S). In addition to this, the Council wishes to see a review one year after operation and a mechanism to trigger intervening reviews more frequently than the five years currently proposed within the Terms of Reference for the NEDG. This would be in accordance with paragraph 5.60 of the ANPS.

Governance

- 2.3.8. The NEDG, which includes representation from the Council, should be in a position to check all of the parameters and ensure that these are adopted as appropriate targets within the GCG Framework, on a rolling basis. In addition, the NEDG should continue to operate as an independent entity from the ESG, with this independence secured through appropriate means as part of the DCO.
- 2.3.9. There is understood to be an intention to form a Technical Panel in relation to noise impacts of the Scheme. The Council is seeking representation from suitably qualified and experienced technical officers from within the Council on this panel.
- 2.3.10. The ESG is intended to provide oversight and scrutiny of the ongoing development of the Scheme, and then the environmental performance of the Scheme. The Council is seeking representation from suitably qualified and experienced technical officers from the Council on the ESG.

Construction and Traffic

- 2.3.11. The Council acknowledges that the Construction Noise and Ground Noise Study Area (Figure 16.2) (AS-103) does not extend into Buckinghamshire. However, the Construction Traffic Management Plan does not yet provide clarity on the wider use of the strategic highway network; and information about the placement of construction spoil or other related off-site construction activities is not yet available. On this basis, it is considered premature to rule out any potential construction related impacts resulting in effects within Buckinghamshire. Such impacts could generate adverse effects, especially if they go through sensitive areas, such as small villages. The Council is seeking further information to enable accurate consideration of these potential impacts (see the Transport and Highways section).
- 2.3.12. Furthermore, due to the Council's concerns regarding the robustness of the traffic modelling that underpins the noise assessment (see Transport and Highways sub-section) it is felt to be appropriate that the Council reserves its final position in respect of related noise impacts.
- 2.3.13. To protect residents from local impacts and as far as reasonably practicable, the Council asks that the promoter should work towards compliance with "WHO Environmental Noise Guidelines 2018 for the European Region"¹⁰. It is acknowledged that the guidelines are not adopted UK policy and the ask is aspirational.
- 2.3.14. The paragraphs above are reflected in the Vale of Aylesbury Local Plan (2021)¹¹ Policy S1, the NPPF, the Airports NPS, Noise envelopes CAP 1129 and "WHO Environmental Noise Guidelines 2018 for the European Region".

2.4. Air Quality

- 2.4.1. At this stage, as outlined within the Council's Relevant Representation submission (RR-0166), there is some uncertainty around the traffic data used within the Transport Assessment (APP-200 to APP-206). The Examining Authority has requested that the traffic data used within the transport modelling is reviewed (PD-006). This is following interim advice issued by the Department for Transport regarding the treatment of the COVID-19 pandemic in transport modelling. The Applicant has provided a response in a letter dated 27 June 2023 (AS-064) stating they propose to review the data with the work commencing in July and concluding in December 2023. This traffic data is used for the air quality assessment (AS-076) and therefore a review of any updated data may have an impact on the results of this assessment.

¹⁰ <https://www.who.int/europe/publications/i/item/9789289053563> (Accessed 22/08/2023)

¹¹ https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Aylesbury_local_plan_L46JWaT.pdf (Accessed 22/08/2023)

- 2.4.2. In the letter from the Applicant dated 27 June 2023 (AS-064) it is also stated that it is unlikely that new traffic data accounting for COVID-19 will significantly change the conclusions reported in the ES. However, the Council awaits the conclusions from this review before accepting this statement or accepting the conclusions of Chapter 7 of the Environmental Statement (AS-076) in relation to air quality and confirming its compliance with relevant paragraphs within the ANPS and NPPF. Notwithstanding this fact the Council would raise the following issues in relation to air quality that would be dependent upon both the updates to the traffic data and the Applicant's response to the Council's concerns about the validity of the transport modelling undertaken.
- 2.4.3. There are nine air quality management areas (AQMAs) present within the Buckinghamshire Council area. However, only three of the AQMAs are located on routes where the Council anticipates there to be increases or changes in traffic due to the DCO. These are the Stoke Road AQMA, Friarage Road AQMA and Tring Road AQMA all located within Aylesbury. The Council's Strategic Environmental Protection Team would seek to ensure that these AQMAs are not negatively impacted by the DCO. This is especially as air quality monitoring data collected by the Council in 2022 found exceedances of the National Air Quality Objectives within the Friarage Road AQMA. The results of the air quality monitoring can be found with the 2023 Annual Status Report¹².
- 2.4.4. The Council's highways officers report that the preferential route to access Luton Airport through Buckinghamshire is the A41, B488, B489. This route passes through a number of villages with some properties fronting the highway. On the basis that the Council has concerns about the validity of the transport modelling undertaken by the Applicant to date, there are also concerns that the air quality modelling will be based on inaccurate transport information in respect of the Buckinghamshire highway network. This gives rise to an issue around the accuracy of the air quality assessment findings relating to receptors along the preferential airport access route. Until this issue has been resolved the Council is unable to confirm the proposals compliance with paragraph 5.42 - 5.43 of the ANPS.
- 2.4.5. The Council's Climate Change and Air Quality Strategy¹³ notes the connection between increased use of sustainable transport modes as a proportion of overall modes and improvements in air quality. As such, the availability of sustainable transport options for Buckinghamshire residents to access Luton Airport is an important issue for tackling air quality.
- 2.4.6. The principal impacts on air quality are associated with traffic emissions during construction and operation of the Scheme. The Council has stated within the relevant representations (RR-0166) that the highway network in Aylesbury acts as

¹² <https://www.buckinghamshire.gov.uk/environment/air-quality/air-quality-management-reviews-and-annual-reports/air-quality-annual-status-report-2022/> (Accessed 22/08/2023)

¹³ <https://www.buckinghamshire.gov.uk/environment/climate-change-and-sustainability/view-the-climate-change-and-air-quality-strategy/climate-change-and-air-quality-strategy/> (Accessed 22/08/2023)

a route hub for all directions and is therefore very sensitive to congestion and small changes in traffic have a significant impact on the performance of the network. The Council can see no reference to Aylesbury within the impact assessment. The Council would therefore wish to see the evidence underpinning the conclusion that this location is not going to experience adverse impacts, noting also that as yet the construction traffic management plan is yet to be defined, and this could have implications in terms of HGV movements.

- 2.4.7. In order to address the two impacts referenced above, the Council requests updated traffic modelling, in accordance with the requirements set out in the Transport and Highways sub-section; updated CTMP to include either details of HGV routing through Buckinghamshire or clauses to prevent such movements; and updated air quality modelling that makes use of this updated traffic information. The Council is seeking quantitative data, particularly in relation to impacts on Aylesbury and relevant receptors along the A41, B489, B488 route through the county.
- 2.4.8. It is recognised that public transport options for residents seeking to access Luton Airport from towns and villages within Buckinghamshire could be significantly improved. Any improvement in the form of additional public transport options would also have a positive impact on local air quality generally through enabling a modal shift to a more sustainable form of transport. This is because there would be less reliance on private cars for all journeys to and from the airport for both staff and customers. Therefore, the Council's Strategic Environmental Protection team supports the comments made by the Council as the Highway Authority in relation to this – the Council requests the provision of an express bus service between Aylesbury and Luton Airport; and the reinstatement of service 61 to provide a reliable, frequent and effective connection between Buckinghamshire villages and the airport along the preferential access roads. This would be in accordance with paragraph 5.5 of the ANPS.
- 2.4.9. It is acknowledged that the Green Controlled Growth Framework, as outlined within the DCO (AS-067), will place controls on air quality. The Council request that Buckinghamshire Council be included within the Environmental Scrutiny Group so that it may adequately protect the interests of its residents.

2.5. [Economy, Tourism and Employment](#)

- 2.5.1. The Council's comments on this topic are predicated on the assumption that the forecast employment and GDP figures provided by the Applicant are reasonable and accurate. This has not been investigated by the Council, which does not intend to explore this further unless a reason arises for such examination to be undertaken.
- 2.5.2. Whilst the Council welcomes the activities outlined in the Employment and Training Strategy (ETS) (APP-215) and supports a focus on some of the more deprived areas within Buckinghamshire, it is vital that accessibility is addressed. As

noted above, in section 2.2, in relation to surface access transport, at present there are no realistic public transport connections between Buckinghamshire and Luton Airport that could be utilised by employees of the airport. Without significant improvements in accessibility, the prospect of Buckinghamshire residents taking up employment at London Luton Airport are limited and will undermine the aims of the ETS. It should also be noted that as the airport is to continue operating throughout the expansion it is just as relevant for the immediacy of this issue as it is already disadvantaging the opportunities of people with limited mobility to access employment. The Council would request that consideration be given to accessibility for Buckinghamshire residents in order that they may travel to Luton Airport effectively on public transport.

- 2.5.3. Where the ETS (APP-215) includes an initiative to encourage local employment and local businesses as part of the construction and operation phases of the expansion, the Council would welcome initiatives to support local procurement and look forward to discussions with the Applicant on this.
- 2.5.4. The ETS (APP-215) makes several references to the importance of ongoing engagement with local government, including Goal 1 “Maximise the impact of the Proposed Development through engagement with local government partners who can coordinate with their skills and growth strategies” (paragraph 4.2.1) and the creation of a Local Economic Development Working Group (LEDWG) (paragraph 4.2.4) that includes representation from relevant local authority teams, e.g. economic development. The Council would welcome involvement in this working group, to ensure alignment with local employment and skills strategies and to help facilitate links with other appropriate stakeholders (including, but not limited to, the Bucks Skills Hub, Buckinghamshire College Group, Buckinghamshire New University). The Council would also seek to be part of the working group to help identify and encourage activities that maximise the benefits for Buckinghamshire’s residents and businesses and support the overarching aim of the Employment and Training Strategy “to ensure that, as many of the jobs and economic opportunities generated by the Proposed Development as possible, go to the residents of Luton and the “ETS Study Area”” (paragraph 1.2.3).
- 2.5.5. The ETS (APP-215) helpfully covers both the construction and operation phases. It references engagement with local government and the creation of a LEDWG. The Council would also want assurance that relevant local education institutions from within the ETS study area are included in the local economic development working group. The Council is also seeking further clarity on the way in which local benefits will be realised and the mechanisms that will be used to secure them.
- 2.5.6. According to the ETS (APP-215) (paragraph 2.4.2), 623 FTE jobs are expected to be created in the construction period. It needs to be recognised that with other major infrastructure projects ongoing in Buckinghamshire, including HS2 and EWR, the availability of an adequate construction workforce locally is a challenge.
- 2.5.7. In the operation phase, approximately 6100 additional jobs (direct, indirect and

induced) are forecast to be able to be supported by airport expansion. It is noted that the majority of these jobs will be in air transport, but will also include employment in hospitality and retail, security, warehousing and land transport.

According to the latest Claimant Count report produced by the Buckinghamshire Local Economic Observatory¹⁴.

“London has experienced the largest increase in Claimant Count rates since the start of the pandemic, with edge-of-London areas (particularly those close to Heathrow and Gatwick airports) tending to see higher than average increases in Claimant Count rates”.

- 2.5.8. With a history of employment within the aviation sector, there is potentially a cohort of potential employees on which to draw.
- 2.5.9. Whilst the claimant count rate has been falling in Buckinghamshire and remains below national rates, there are variations across the county, with some persistent pockets of higher unemployment and deprivation. The importance of ‘levelling up’ has been recognised by the Council in the Opportunity Bucks programme¹⁵ which has identified ten priority wards on which to target activity. The programme includes a focus on jobs, careers, skills and learning. In line with references made to inclusivity within the Employment and Training Strategy (APP-215), the Council would welcome opportunities for Employment and Training interventions targeted at the ten priority wards.
- 2.5.10. Generally, skills levels across Buckinghamshire are comparatively high, although there is an issue with the migration of younger people from the area. Many young people leave Buckinghamshire to go to university and choose not to return to the area. Local opportunities, that offer quality employment, with high wages and opportunities for career progression, need to be available and promoted. The Employment and Training Strategy (APP-215) makes reference to career progression and above average wages, as well as to apprenticeships. The Council would welcome opportunities, through engagement with the LEDWG, to promote such opportunities to young people and residents across the county.
- 2.5.11. The focus on local procurement, both at the construction and operational phases is encouraging and again, the Council with appropriate business representative organisations (such as Bucks Business First) would look to work with the Applicant to ensure Buckinghamshire based businesses were informed of, and able to apply for, supply chain opportunities.
- 2.5.12. Based on the above, the Council’s expression of economy, tourism and employment impacts and requests for ways in which the Applicant could seek to

¹⁴ <https://www.buckseconomy.co.uk/jobs-and-skills/jobs-skills-research-reports/#Jobs-and-Skills-Claimant-Count~:text=Bucks%20Claimant%20Count%20%E2%80%93%20July%202023> (Accessed 22/08/2023)

¹⁵ <https://www.buckinghamshire.gov.uk/community-and-safety/opportunity-bucks> (Accessed 22/08/2023)

address them are summarised as follows:

- Maximising beneficial economic impacts for Buckinghamshire residents through securing accessibility to job opportunities – the Council considers the provision of sustainable transport modes to access the airport to be key to addressing this impact. As set out in the Highways and Transport sub-section, an express bus connection between Aylesbury and the Airport is sought, together with the reinstatement of an at least hourly bus service along line 61. This would support the Government’s objectives outline in paragraphs 4.74, 4.76 and 5.5 of the ANPS.
- Realising the beneficial economic impacts of procurement for local businesses – the Council is keen to work with the Applicant to develop specific initiatives for inclusion in the further development of the Employment and Training Strategy, which should also target the ten priority wards listed in the ‘Opportunity Bucks’ programme.
- Tackling adverse impacts of out-migration of skills from Buckinghamshire – the Council is keen to work with the Applicant as part of the LEDWG to exert influence on the way in which employment opportunities are developed. In particular, the Council will look to promote opportunities to young people within the Buckinghamshire communities.
- Maximising beneficial economic impacts and developing transferable legacy skills within the supply chain – the Council wishes to partner with appropriate organisations, such as Bucks Business First, to work with the Applicant on supply chain readiness and accessibility of local businesses to suitable supply chain opportunities.

2.5.13. The dDCO (AS-067) does not include any specific reference to ensuring how the economic benefits associated with expansion will be secured. It is to be assumed that this detail will emerge through further development of, and discussions around, the ETS (APP-215). The ETS includes a commitment to engaging with local authorities so to reiterate, the Council would be seeking a place on the LEDWG to ensure collaborative efforts to maximise economic benefits across the county, in accordance with paragraph 5.266 of the ANPS. This should be reflected in the dDCO as appropriate.

2.6. [Landscape and Visual](#)

2.6.1. The submitted E S Chapter (AS-079) identifies significant adverse effects on the Chilterns Area of Outstanding Natural Beauty (AONB) as a result of ‘a noticeable deterioration to the aesthetic and perceptual characteristics of the AONB’ during both the construction and operation of Phase 2b as a result of increased aircraft movements. The ES is unclear as to the extent of these effects with considerable ambiguity between the submitted elements of the ES. For example, despite identifying that there would be significant effects in the AONB, the assessment

does not appear to identify any significant effects in the Local Character Areas (LCAs) that fall within the AONB in the Study Area. There also seems to be a discrepancy between the extent of the study area and the areas identified as being overflowed by increased flight numbers (the potential source of adverse effects). The Study Area stops at approx. 5km whilst flights below 7,000ft are shown to extend out to approx. 35km. As a result, the ES is unclear whether identified significant adverse effects extend beyond the Study Area and into Buckinghamshire. Whilst these ambiguities and discrepancies still exist it is the Council's opinion that the application, as submitted, would not be in accordance with paragraph 5.219 of the ANPS as the Secretary of State would be unable to have due regard to the continued protection of the AONB.

- 2.6.2. In addition to over flights, it also apparent that there is potential for highway works and increased traffic on rural roads (particularly in the AONB) in the Buckinghamshire area that have not been explored within the ES. There is the potential that further development of the CTMP, which is currently in outline form (APP-130) will identify aspects of the Scheme that could introduce additional landscape and visual impacts within Buckinghamshire. This will particularly be the case should HGV routes or construction activities be sited close to the CAONB or the more rural villages of the County. In the absence of the resolution of these ambiguities and the provision of clearer information, the Council reserves its position on the potential adverse impacts of the Scheme on the Buckinghamshire area. The Council is seeking additional clarity on the controls that will be incorporated within the CTMP as it is developed. Ideally this will include controls preventing mass haul and lorry routes and construction compounds or other sites supporting construction (e.g. spoil disposal) being sited within Buckinghamshire.

2.7. Heritage

- 2.7.1. The Scheme as currently described (AS-074) is reported as not resulting in any direct physical impact to heritage assets in Buckinghamshire. Based on the Noise Contour information submitted with the DCO documents and additional submissions, the Council has no concerns in relation to adverse impacts on setting. This is because the predicted noise levels for Buckinghamshire fall within levels recommended to be scoped out of any such assessment on heritage assets in line with research carried out on behalf of Historic England (Aviation Noise Metric – Research on the potential Noise Impacts on the Historic Environment by Proposals for Airport Expansion in England)¹⁶; Historic England guidance on The Setting of Heritage Assets HEGPA Planning Note 3 (2017)¹⁷ has also been considered.

¹⁶ <https://historicengland.org.uk/research/results/reports/6934/AviationNoiseMetric-ResearchonthePotentialNoiseImpactsOntheHistoricEnvironmentbyProposalsforAirportExpansioninEngland> (Accessed 22/08/2023)

¹⁷ <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/> (Accessed 22/08/2023)

- 2.7.2. However, it is noted that the Council has raised some doubt over the accuracy of the noise assessments submitted with the DCO, due to the Council's concerns regarding the robustness of the traffic modelling that underpins the noise assessment (see Transport and Highways sub-section). Due to this ambiguity, it is felt to be appropriate that the Council reserves its final position in respect of adverse noise impacts to heritage assets.
- 2.7.3. In addition, it is unclear whether there may be further implications to heritage assets in Buckinghamshire as the Scheme is further defined. For example, in relation to construction traffic routes in proximity to sensitive assets or passing through historic landscapes and villages, which could arise following further development of the detail in the CTMP. Potential impacts to setting could also arise if off-Site Highways works sought by the Council are developed, for example, at Ivinghoe.
- 2.7.4. The analysis of the key issues within Buckinghamshire Council enables the identification of the following impacts that are considered relevant to the heritage topic. These impacts are associated with an explanation of the way in which the Council would wish to see them addressed by the Applicant:
- Potential for new heritage impacts to be identified following update to the noise modelling and subsequent analysis – the Council has set out how it wishes the Applicant to address the updates to the traffic modelling. Once this is completed, the Council wishes to receive updated noise modelling and analysis of consequential impacts for the heritage topic.
 - Potential for additional heritage impacts to be identified following further development of the CTMP – the Council is keen to be in a position to influence the further development of the CTMP, as set out in the Highways and Transport sub-section.

2.8. Health and Community

- 2.8.1. At the UK level, the Council is aware of growing precedent for health assessment to be informed by a more granular consideration of the impacts of changes to particulates (e.g. PM2.5) and noise levels than is required through the application of standard methodologies for air quality and noise assessment. This is a matter that is increasingly being raised by the UK Health Security Agency in consultation responses on DCO documents. The underlying issue is that relatively small changes (i.e. below thresholds reported as significant in contributing assessments) in concentrations of particulates and/or noise levels, sources or frequencies can have notable impacts on human health. It is considered that this may be an issue for certain communities within Buckinghamshire where changes in the traffic flow, composition of different vehicle types and/or the time of traffic movements could result in noticeable and potentially intrusive traffic noise and increases in particulate concentrations, to the detriment of human health.

- 2.8.2. The number, size, timing and routeing of Heavy Goods Vehicles (HGVs) (and abnormal load) vehicles is a major and widespread concern of local communities in relation to strategic infrastructure, with communities in Buckinghamshire already experiencing the impacts of East West Rail (EWR) and High Speed 2 (HS2). The Council is aware of the particularly strong feeling on this issue expressed through receipt of complaints and concerns raised by community members. The Relevant Representation made by the Wingrave with Rowsham Parish Council (RR-1592) references the disruptive nature of HS2 construction traffic and concern of repeat and/or additive cumulative impacts with the Scheme. Ivinghoe Neighbourhood Plan includes a policy seeking to ensure that traffic impacts of new development are appropriately addressed.
- 2.8.3. The Council is concerned about potential impacts from HGV traffic movements, which can contribute to noise effects, severance and reduction of amenity. Such impacts may be relevant principally to construction, although it is noted that the Scheme will support an expansion of freight transport in operation. As stated in the Transport and Highways section of this Written Representation, the Council requires clarification of the proposed routeing of HGV movements.
- 2.8.4. There is a need to recognise that at the regional and local level there is a large catchment to the west of the Main Application Site, including across Buckinghamshire. As such, as stated in the PADSS (AS-053) and Relevant Representation (RR-0166), the local road network will continue to provide a preferential route and it is essential that this is adequately assessed and addressed within the DCO. Allied to this need, is the issue of ensuring the growth of Aylesbury, including the Berryfields development, is accurately represented within the traffic modelling and subsequent analysis for the DCO (as raised in the Examining Authority correspondence dated 16th May 2023 and 13th June 2023) (referenced in the PADSS (AS-053) and Relevant Representation (RR-0166)).
- 2.8.5. It is particularly notable that Aylesbury is a route hub for multiple directions of travel and therefore very sensitive to changes in traffic flows and congestion, with consequential health and community issues arising related to air quality, noise, environmental quality, amenity and severance. There are three Air Quality Management Areas (AQMA) within Aylesbury – Stoke Road AQMA, Friarage Road AQMA and Tring Road AQMA, all associated with traffic derived pollutants. The health implications of air quality impacts are a particular issue within AQMAs and the Council would seek to ensure that these AQMAs are not negatively impacted by the Scheme, as outlined in the Air Quality section above. In addition to this, the PADSS (AS-053) raises concerns regarding the availability of accurate baseline data for particulate matter due to faults with the automatic monitor – there is a need for this to be addressed so there is a credible baseline from which to be able to understand the implications of changes to particulates in relation to human health. An update to the assessment is sought and should any significant adverse effects be identified, the Council would wish to be directly involved in developing

proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.

- 2.8.6. The villages of Pitstone, Marsworth and Ivinghoe (particularly the B488 and B489 junction) are very sensitive to changes in traffic movements. At the local scale, these villages are situated on a major route from Buckinghamshire and Hertfordshire to the Airport and the sensitivity of the network should reflect that small changes can create substantial issues associated with congestion, including for the health and well-being of resident communities, which has been raised in the PADSS (AS-053). It is also noted that the Transport Assessment (APP-204, superseded by AS-123) cites the first flight times as 05.00, with a peak between 06.00-07.00, and high frequency until 09.00. Given that passengers are encouraged to arrive typically two hours before flights, there is a concern that residents fronting the preferential access route to the airport may experience noticeable changes (increases) in traffic flows from the early hours of the morning due to the Scheme, when the baseline flows would be typically very low.
- 2.8.7. The relevant representation (AS-053) notes the importance of completing trip profiling from locations in the south of the County, including Chesham, Amersham and High Wycombe where no direct public transport to Luton Airport is currently available. This is to ensure that there is an accurate understanding of impacts, which are considered likely to relate to effects on health and communities. The Council is keen to receive further information and analysis of the potential impacts from increasing Luton Airport traffic demand within the Buckinghamshire highway network, as a preferential route at the county and sub-regional scale: contributing to noise effects, severance, visual intrusion, reduction of environmental quality (particularly where routes are unsuitable for traffic flows and/or vehicle composition) and reduction of amenity. This is especially relevant to operation, although some construction workforce movements may also contribute. The Council requires the issues relating to the confidence and suitability of the traffic modelling relating to Buckinghamshire to be overcome in order to further review this matter.
- 2.8.8. As Buckinghamshire has a substantial proportion of rural communities, connectivity between key centres and through the villages is of great importance, particularly in supporting rural accessibility and connecting people with limited access to private vehicles to key services. This is intrinsically connected to health, on the basis that the ability of people to access and engage in suitable employment is a key determinant of mental health and well-being. The issue operates at two scales – there is a lack of direct express bus or coach service from Aylesbury to Luton Airport; and there is poor connectivity of villages along strategic routes between Aylesbury and Luton Airport.
- 2.8.9. At the strategic scale, it is noted that East West Rail (EWR) has the potential to improve accessibility of the airport for communities in the north of the county. However, the issue will remain for the southern communities and resilience of the transport network and availability of modal options is also an issue. The PADSS (AS-

053) emphasises the need for a more strategic express service to connect Luton Airport to Aylesbury and points further west and notes that Buckinghamshire Council welcomes engagement with the Applicant around route development, with a view to inclusion within the Surface Access Strategy (stated in the Relevant Representation (RR-0166)).

- 2.8.10. Securing enhanced public transport accessibility at the local scale between London Luton Airport and Aylesbury is a key local issue – the restoration of service 61 (referenced in the Council’s RR and PADSS) providing this connection through the villages of Eaton Bray, Edlesborough, Pitstone, Ivinghoe, Marsworth and Cheddington has already been raised as an important means of addressing this issue (AR-053 and RR-0166). It is also important to address accessibility to employment opportunities, including at the airport – consequently, service frequencies of at least 60 minutes are considered essential along this and other comparable public transport routes to provide effective modal options for commuting. This is supported by the Government’s commitment to a more accessible and inclusive transport network, outlined in paragraph 4.74 of the ANPS.
- 2.8.11. The scope of the Applicant’s health and community assessment (AS-078) includes aircraft noise and changes to the character and quality of neighbourhoods due to combined environmental impacts (noise, air quality, traffic, light and visual effects). The Council welcomes recognition of these types of individual and in-combination impacts as meriting assessment and asserts that they are likely to be relevant to a number of the communities within the authority. It is therefore essential that the baseline information relating to existing noise levels and traffic flows can be used with confidence in underpinning the assessment – reservations about these aspects are highlighted in the Transport and Highways and Noise subsection – these need to be resolved for the downstream assessment work to be competed effectively. It will also be essential for the potential sources of these impacts to be clarified – construction traffic routes need to be defined; and further information is needed about the likely routing of aircraft as the phases of the Scheme are implemented. This work is fundamental to correctly identifying relevant receptors within the Buckinghamshire Council area portion of the wider study area – i.e. those that may potentially experience changes due to construction traffic routing, spoil disposal, Off-Site Highways works and aircraft noise. This detail is currently absent from the assessment and as a result the proposals are not currently in accordance with paragraph 4.73 of the ANPS as the Applicant is unable to demonstrate that it has identified all measures to avoid, reduce or compensate for adverse health impacts.
- 2.8.12. The Chilterns AONB is considered an essential and highly valued resource for community recreation, supporting the health and well-being of residents, as well as visitors. The qualities of the AONB include visual amenity from important vantage points, such as Ivinghoe Beacon, as well as tranquillity. On this basis, Buckinghamshire Council views protection of this AONB from potential impacts of

noise and visual intrusion that can affect its key characteristics and enjoyment of users as a key issue for supporting health and communities.

- 2.8.13. The PADSS (AS-053) raised concerns about whether the ETS for the Scheme was sufficiently prescriptive to secure delivery of local benefits to Buckinghamshire. This is of relevance to the topic due to the recognised link between employment and mental well-being. There is a need for improved clarity around the measures and their delivery to provide confidence that the Scheme will be effective in realising the potential for benefits for Buckinghamshire – this clarity is fundamental to enabling an assessment of impact magnitude to be completed. In addition, as stated in the PADSS (AS-053) and Relevant Representation (RR-0166), the Council is seeking involvement in the LEDWG to ensure health and community impacts are included in the consideration of economic development strategy and policy for the Scheme.

Impacts

- 2.8.14. The analysis of the key issues within Buckinghamshire enables the identification of eight combinations of impacts that are considered relevant to the health and community topic. These impacts are summarised in the list below, followed by a fuller explanation of the way in which the Council would wish to see them addressed by the Applicant, either in a general sense, or specifically in relation to construction or operation:
1. Impacts from HGV traffic movements: contributing to noise effects, severance and reduction of amenity. Relevant to construction and operation.
 2. Impacts from increasing Luton Airport traffic demand within the Buckinghamshire highway network, as a preferential route at the county and sub-regional scale: contributing to noise effects, severance, visual intrusion, reduction of environmental quality (particularly where routes are unsuitable for traffic flows and/or vehicle composition) and reduction of amenity. Relevant to operation.
 3. Impacts from increased vehicular traffic within Aylesbury, including the three AQMAs: contributing to congestion and driver delay/stress, reduced air quality from traffic derived pollutants, severance, reduction of environmental quality, modal conflict and reduction of amenity. Relevant to construction and operation.
 4. Impacts from increased vehicular traffic within the villages of Pitstone, Marsworth and Ivinghoe: contributing to noise effects, severance, visual intrusion, reduction of environmental quality (particularly where routes are unsuitable for traffic flows and/or vehicle composition), modal conflict, increased risks to safety of all modes and reduction of amenity. Relevant to construction and operation.

5. Impacts from increased travel demand from south Buckinghamshire including Chesham, Amersham and High Wycombe: contributing to noise effects, severance, visual intrusion, modal conflict, increased risks to safety of all modes and reduction of amenity. Relevant to operation.
 6. Impacts on the ability of rural communities to access employment opportunities: contributing to effects on rural connectivity, social cohesion, mental well-being. Relevant to construction and operation.
 7. Impacts from increased noise (construction and operational traffic and aircraft) on areas valued for tranquillity and/or environmental quality: contributing to effects on tranquillity, reduced amenity, environmental quality and neighbourhood characteristic, and mental health and well-being. Relevant to construction and operation.
 8. Impacts from increased employment opportunities for Buckinghamshire residents: contributing to mental well-being and social cohesion
- 2.8.15. The Health and Community Assessment (AS-078) acknowledges that increased traffic generated from the expanded airport and changes to the highway network will result in adverse impacts on social capital and access to services. Consideration is also given to the direct relationship between air pollutants and mortality rate, leading to a reported minor adverse health effect. However, the analysis of impacts derived from traffic modelling, such as changes in air quality and noise, are focused on the local neighbourhood study area. Detailed consideration of traffic derived impacts on receptors within the wider study area, which is the category that Buckinghamshire County is placed in, is not provided.
- 2.8.16. Given the potential for changes in traffic to affect health determinants, which is acknowledged in the Environmental Statement in the context of health effects associated with pollution, changes in traffic flows and disruptions to access resulting in uncertainty and negative perceptions about potential negative impacts during construction and operation, which may give rise to stress, worry / negative impact on mental wellbeing, citing that this was raised during public consultation. The Environmental Statement does report a moderate adverse temporary effect on mental wellbeing which is significant (for the local neighbourhood of the area and the Wider Area), but in the absence of underlying detail, there is limited scope to propose effective mitigation and this is considered a weakness of the assessment. It relates directly to the impacts listed above at nos. 1, 2, 3, 4, 5, 6 and 7. The Council wishes to see this addressed in the following ways:
- Expansion of the study area for traffic related health and community impacts to include the Buckinghamshire County highway network.
 - Application of traffic modelling for the Buckinghamshire County highway network, to the satisfaction of technical officers in relation to relevant third

party developments and validation, in accordance with the requirements presented in the Transport and Highways sub-section.

- Use of updated traffic modelling to enable a greater confidence to be assigned to downstream topic analysis, particularly noise and air quality assessment, in accordance with the requirements presented in the relevant sub-sections of this document.
- Further development of the detail within the Construction Traffic Management Plan (APP-130), sufficient to allow identification of relevant receptors for health and community impacts from changes to traffic flows within Buckinghamshire.
- Further development of the detail within the Surface Access Strategy (APP-228), sufficient to allow identification of relevant receptors for health and community impacts from changes to traffic flows within Buckinghamshire.
- Updated downstream topic analysis, using modelling as appropriate, to ensure that receptor sensitivity and impact magnitude is updated and the analysis of significance of effects is robust for Buckinghamshire health and community receptors.
- Review of suitable mitigation to address significant effects that may be identified following the updated analysis; including any relevant environmental appraisal of interventions that might be proposed.
- Development of suitable delivery mechanisms and assurances for the delivery of mitigation.

2.8.17. The Outline Traffic Management Plan (APP-130) does not preclude any works traffic/spoil deliveries in the vicinity of the airport passing through Buckinghamshire. The uncertainty that this presents in relation to understanding potential impacts on the communities of Buckinghamshire has been raised as an issue in the Buckinghamshire PADSS (AS-053). This clarity is key to addressing impact no.1 regarding HGV movement; and may subsequently be linked to the need to explore disturbance related impacts on additional communities in Buckinghamshire, depending on whether there are relevant works locations proposed in the County.

2.8.18. In addition to the above list of actions, the Council requires consideration of the impacts of the Scheme on Aylesbury, which relates to impact no. 3. This relates both to the proposals for traffic movement on the highway network in and around Aylesbury and specifically in relation to the impacts on the AQMAs, which are not reported within the health and communities chapter of the ES (AS-078). An update to the assessment is sought and should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals

for mitigation, from the perspective of avoiding adverse effects on health and communities.

- 2.8.19. Impact 4 relates to the rural villages on the preferential route to the Airport. For the villages of Pitstone, Marsworth and Ivinghoe, it is acknowledged that the projected peak hour traffic is expected to be low (AS-078). However, as noted in the transport and highway sub-section of this LIR, the Council has concerns about the level of confidence that can be assigned to the traffic modelling in the county due to reservations about the validity and transferability of the strategic modelling to local issues. The Council asserts that traffic movements through these villages will merit a high level of impact control, noting that they are situated on a direct route to the airport. This should also be reflected within the sensitivity assigned within the health and communities assessment, which the Council would wish to be elevated in recognition of the local transport context.
- 2.8.20. In order to fully address impact nos. 5 and 6, Buckinghamshire Council requires completion of the items listed above in addition to specific trip profiling for the communities within the south of the county; and potential commuting demand for employment associated with the Scheme. It is considered imperative to understand the potential additional trip generation from the Scheme and how people may seek to use the network in order to inform the identification of the potential for impacts and complete the assessment. Should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.
- 2.8.21. Impact 7 relates both to traffic derived disruption, but also aircraft noise. In order to address this issue and impact, the Council requires completion of the items listed above such that the potentially sensitive receptors can be accurately identified – this will inform the assessment of traffic derived impacts on the AONB and other relevant sensitive locations (at present the ES only considers the community recreational assets of Wigmore Valley Park and Prospect House Day Nursery in relation to aircraft noise, both of which are in Luton). In addition, there is a need for the noise baseline concerns to be overcome and additional information supplied and modelling in relation to aircraft noise, including potential changes to flight paths (as set out in the Noise sub-section). The health and communities chapter of the ES (AS-078) reports increased aircraft movements and changes in aircraft noise exposure in the population as a moderate adverse permanent effect on health outcomes across the study population. This is considered very generalised and the health and community assessment should be expanded to assess the impacts on tranquillity of affected parts of the Chilterns AONB, as well as any sensitive community receptors that are scoped in following the updates. Should any significant adverse effects be identified, the Council would wish to be directly involved in developing proposals for mitigation, from the perspective of avoiding adverse effects on health and communities.

- 2.8.22. Impact 8 relates to the potential effects from the implementation of the ETS, which are currently reported in the ES as contributing, generally (not specifically to any section of the population) to a moderate beneficial temporary effect on mental and physical health associated with increased income, skills and job security. The Council is keen to ensure that actions are secured to deliver benefits at the local scale, meeting specific areas of need. In order to correctly assess and underpin such actions, the Council is seeking clarity on the implementation of the ETS, such that impact magnitude can be understood and assessment reviewed. The Council is also seeking involvement in the EDWG, particularly in order to be able to express the local priorities and shape the mitigation and enhancement proposals.
- 2.8.23. It is noted that the Council is seeking specific mitigation proposals at Ivinghoe – these would be developed into an additional Off-Site Highways proposal within the Scheme. It is also possible that upgrades to public transport services may result in physical works within Buckinghamshire. In addition to this, the clarity sought in relation to the freight strategy may reveal additional locations, potentially within Buckinghamshire, where specific Scheme works are required. The Council is keen to ensure that where the Applicant's response includes changes to the physical locations of works, there is sufficient time and resource directed to full analysis of the potential impacts, resultant effects and, if necessary, mitigation. The Council is keen to be engaged in such conversations where they affect the health and well-being of the communities within the county. This includes through membership of relevant working groups and enhanced engagement of the Council in discussions with the Applicant.

2.9. Cumulative Effects Assessment

- 2.9.1. The Council recognises that Buckinghamshire is not a host authority for the geographical scope of the Scheme, as currently described (AS-074). On this basis, the majority of intra-Scheme impacts (i.e. multiple impacts from the Scheme on the same receptor(s)) are unlikely to have implications for Buckinghamshire and the County is principally scoped out of inter-project cumulative assessment (the Scheme plus other developments) due to distance from the Scheme. The principal issues will therefore relate to impacts that have transboundary impacts – surface transportation; aircraft movements; and resource requirements (physical resources and demand for people/workforce). In terms of other projects interacting with the Scheme, HS2 and EWR have relevance.
- 2.9.2. Notwithstanding the above, the Council has set out concerns regarding the exacerbation or existing issues on the highways network due to the Scheme; and the need for the provision of public transport improvements to support effective, reliable and appealing alternatives to the private car for members of communities within Buckinghamshire wishing to access the airport for work or leisure. These would lead to the Applicant including additional Off-Site highways works within the County (e.g. at Ivinghoe); and providing confirmation of freight and HGV movements, as well as securing public transport provision to support operational

and commuting movements that could alter the identification of the distribution of impacts by extending them into Buckinghamshire. In turn, this could merit consideration of not just direct effects, but also cumulative effects. The cumulative effects assessment does not consider the cumulative interactions from the potential reconfiguration of airspace on residents in Buckinghamshire. The relevant representations (RR -0166) raises concerns that there is no consideration of the potential cumulative impacts of aircraft noise for residents under Heathrow, Stansted and Luton flight paths. The Council PADSS (AS-053) also raises concerns surrounding the change required to allocate more airspace for safe departures and arrivals across the south-east of England airports to allow expansion. It is acknowledged that this is a separate regulatory process from the DCO; however, there is a need for the ES to consider how these changes will impact residents and review whether there are potentially significant cumulative effects that would then require mitigation.

- 2.9.3. It is recognised that that the assessment includes proposed development at Stansted, Heathrow, Gatwick and London City airports. However, it has been identified that would be no overlap with the core Zone Of Influences (ZOI) for Scheme and therefore the cumulative effects with other airport expansions are not considered further. The Council considers this conclusion to be premature and wish it to be kept under review pending further clarification of how airspace and flight paths may be altered in order to accommodate planned expansion.
- 2.9.4. The Relevant Representation (RR-0166) notes that Buckinghamshire communities are already experiencing issues associated with groundworks and spoil destinations linked to HS2 and EWR; and this is also highlighted as a parish concern within the health and communities issues outlined previously. These are manifesting as issues of disturbance, anxiety, mental health and, for residents with pre-existing conditions, some instances of physical health impacts. The potential addition of similar impacts due to the Scheme raises issues around cumulative impacts. The Relevant Representation (AS-053) cites the need to check last mile locations for groundworks such that this issue and the cumulative interactions are correctly articulated and addressed.
- 2.9.5. The Council notes that the Relevant Representation from BMKALC (RR-0165) asserts that cumulative impacts on ecological connectivity have not been accurately portrayed – it claims that the sum of numerous 'minor adverse effects' (not significant) are not commented on. The Council is of the view that this is an essential requirement of the cumulative effect assessment and would wish to see further justification of this approach by the Applicant. The Council notes that explanation offered presently – that ecology has not been assessed further in the in-combination effects assessment as interactions of different aspect effects upon these receptors are provided in relevant ES chapter (interactions between AQ, noise upon ecological receptors). The CEA chapter considers the impact the combined impact on different ecological receptors. The Council would like to see confirmation that this combined impact assessment considers all impacts on

ecological receptors, rather than narrowing scope to those that only record significant effects from single impacts.

2.10. Draft Development Consent Order

- 2.10.1. The Council makes the following recommendations for changes to the draft Development Consent Order DCO (dDCO) (AS-067). Appendix B provides a summary of the changes to the dDCO (AS-067) and this table is also duplicated in the LIR and the Council's report 'Comments on Updated Application Documents'.

Schedule 3

- 2.10.2. The Schedules' contents page refers to Schedule 3, Parts 1 and 2. Part 1 should detail those public rights of way that are to be stopped up and where a substitute is to be provided, Part 2 where a substitute will not be provided. As presented in the latest revision of the dDCO neither part appears to be present in Schedule 3 with no indication of whether a substitute provision will be made or not. The Council would expect any updated version of the dDCO to address this omission or to amend the contents page accordingly. In its current form the dDCO does not provide sufficient information with regard to the stopping up of public rights of way.

Article 6 – Limits of Works

- 2.10.3. 'Limits of Works', Article 6, sub-paragraph 3, makes provision for the undertaker to carry out works in excess of the defined limits, subject to certification by the relevant planning authority that they would not give rise to any materially new or materially different environmental effects to those reported in the environmental statement.
- 2.10.4. Given the broad parameters to which this article could apply, the Council is concerned that its wording does not stipulate consultation outside of the relevant planning authority for works in excess of the limits. It is suggested that neither the Applicant nor the relevant planning authority could rule out, at this stage, works outside the limits that would have potential impacts requiring input from external consultees into the decision-making process.
- 2.10.5. Given the unknowns associated with works being undertaken outside the limits of works there are concerns over the ability to certify such a change without the requirement to consult key external consultees, where relevant. The Council would expect sub-paragraph 3 to make provision for the relevant planning authority to undertake appropriate consultation on any works in excess of the limits.
- 2.10.6. On the basis that sub-paragraph 4 requires any application to be made and determined in accordance with Part 5 of Schedule 2 of the dDCO, the Council's

comments in relation to Part 5, of Schedule 2 of the dDCO, detailed below, are also relevant here.

Procedure for discharge of Requirements

- 2.10.7. As outlined in its LIR, submitted at Deadline 1, the Council has concerns regarding the implications of paragraph 36 (3) of Part 5 of Schedule 2 of the dDCO on consultation. Paragraph 36(3) would appear to limit consultation on the discharge of DCO requirements to those consultees specified within a requirement itself.
- 2.10.8. Given the wording of this requirement the Council would emphasise the need to ensure that relevant consultees are stated within the wording of each requirement, where considered necessary, to ensure that an appropriate assessment of the associated impacts is made.
- 2.10.9. Whilst not an exhaustive list these concerns would apply to the following requirements as a minimum:

Amendments to approved details

- 2.10.10. Paragraph 2, sub-paragraph 1, of Part 1, of Schedule 2 of the dDCO allows the undertaker to apply to the relevant planning authority for approval to amend the parameters specified in paragraph 6, of Part 2, of Schedule 2 of the dDCO. Sub-paragraph 3 limits any approval to one where it can be demonstrated that it would not give rise to any materially new or materially different effects to those reported in the environmental statement and sub-paragraph 4 limits consultation on such an application to those consultees specified within the requirements contained in Part 2 and Part 4 of the dDCO.
- 2.10.11. As paragraph 6 of Part 2 of Schedule 2 of the draft DCO is a compliance requirement Buckinghamshire Council would have concerns regarding an absence of consultee specification to inform paragraph 2(4) of Part 1 of Schedule 2 of the dDCO. It is suggested that the Applicant should make provision for the relevant planning authority to undertake consultation on any changes to the parameters specified in paragraph 6.

Code of Construction Practice

- 2.10.12. Paragraph 8, sub-paragraphs 1-2, of Part 2, of Schedule 2 of the dDCO makes provision for the Code of Construction Practice and its associated management plans to be approved by the relevant planning authority, following consultation with the relevant highway authority on matters related to its functions. Whilst this may not apply to all management plans Buckinghamshire Council has concerns that some management plans could be approved without consultation with the appropriate technical authority. For example, the pollution incident control plan has clear links with paragraphs 12 and 13 of Part 2, of Schedule 2 of the dDCO which require consultation with the Environment Agency in relation to

contaminated land and groundwater and surface and foul water drainage respectively.

- 2.10.13. In view of the above Buckinghamshire Council would suggest that paragraph 8, sub-paragraphs 1-2 of Part 2 of Schedule 2 of the dDCO should make provision for the relevant planning authority to undertake wider consultation on management plans that require the input of external consultees.

Landscape and biodiversity management plan

- 2.10.14. Paragraph 10, sub paragraph 1, of Part 2, of Schedule 2 of the dDCO makes provision for the landscape and biodiversity management plan to be approved by the relevant planning authority without consultation. 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.

Environmental Scrutiny Group

- 2.10.15. Paragraph 20, sub paragraph 2, of Part 3, of Schedule 2 of the dDCO details the individuals and officers of the proposed authorities to attend the Environmental Scrutiny Group (ESG). The authorities are named as Central Bedfordshire Council, Hertfordshire County Council, Luton Borough Council and North Hertfordshire Council. Whilst Buckinghamshire Council acknowledges the importance of the host authorities in the scrutiny of environmental impacts it is concerned that other neighbouring authorities have been excluded from attendance.
- 2.10.16. Paragraph 20, sub paragraph 6 of Part 3 of the dDCO lists air quality, greenhouse gas emissions, noise and surface access as matters to be considered by the ESG. Given that the Applicant, in its Environmental Statement, has identified that these matters have impacts that are experienced outside of the host authorities' boundaries Buckinghamshire Council is concerned that the exclusion of neighbouring authorities from the ESG prevents them from effectively representing the best interests of their local communities.
- 2.10.17. On that basis Buckinghamshire Council suggests that the Applicant makes provision within Paragraph 20, sub paragraph 2, of Part 3, of Schedule 2 of the dDCO for the inclusion of Buckinghamshire Council, and any other neighbouring authority, where air quality; greenhouse gas emissions; noise or surface access impacts are identified as being experienced within their administrative boundaries.

Requirements Pertaining to Other Operational Matters

- 2.10.18. Paragraphs 26 and 27, of Part 4, of Schedule 2 of the dDCO make provision for the relevant planning authority to approve variations to the passenger cap for the authorised development and the night quota cap, respectively. 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. This places the Requirements at odds with the GCGF proposed by the Applicant and the Council wishes to see this amended to address the inconsistency.

- 2.10.19. Paragraph 27, of Part 4, of Schedule 2 of the dDCO makes provision for the relevant planning authority to approve a variation to the night quota cap, in consultation with the ESG and provided that the relevant planning authority is satisfied that the variation would not give rise to any materially new or materially different effects than those reported in the environmental statement. As outlined above, in relation to paragraph 20, sub paragraph 2, of Part 3, of Schedule 2 of the dDCO, 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.
- 2.10.20. Buckinghamshire Council also has concerns regarding the wording of paragraphs 31, 32 and 33, of Part 4, of Schedule 2 of the dDCO that make provisions for the approval of an operational air quality plan, greenhouse gas action plan and operational waste management plan by the relevant planning authority without consultation. Given that these matters are intrinsically linked to the topics to be scrutinised by the ESG Buckinghamshire Council would expect that provision is made for consultation with the ESG, as a minimum, due to the broader, regional implications of the associated plans for potential environmental impacts.

Procedure for Discharge of Requirements

- 2.10.21. Whilst Buckinghamshire Council recognises that there are prescribed consultees stipulated in relevant requirements the Council would expect paragraph 35, of Part 5, of Schedule 2 of the dDCO 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 further issues arise or if insufficient information is made available to the consultee.

3 Summary of Written Representation

- 3.1.1. A summary of the suggested changes and requests set out in this Written Representation and the Councils other Deadline 1 submissions is provided in the following table.

Table 3--1 Summary of suggested changes and request

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
Climate Change and Greenhouse Gases	Need to reflect the uncertainty and variables around delivering and achieving the Government's JZS for decarbonising aviation by 2050 within the GHG assessment.	Sensitivity testing for Faster Growth and Next Generation Aircraft scenarios to be undertaken; GHG emissions to be assessed on a quantitative basis; and the cumulative emissions assessed accordingly.
	Need to ensure the independence of the ESG and address potential conflict of interest in LBC's role as owner and enforcer.	The Council to have a seat on the ESG and to have a position for a suitably qualified and experienced technical officer within the four Technical Panels relating to Air Quality, GHG, Noise and Surface Access. ESG to have a right of appeal to the Secretary of State.
	Ensuring that impacts from future decommissioning are taken into consideration as appropriate.	A requirement added to the DCO to ensure that a separate assessment is required for future de-commissioning.
Transport and Highways	The Council does not consider that the validation and calibration of the strategic model is of an adequate standard within Buckinghamshire to provide certainty of the traffic impacts within the County.	Journey time data and calibration and validation data required to confirm the model's appropriateness for the purposes of assessing development proposals within Buckinghamshire.
		Confirmation that long-stay survey data was included in the CAA trip rate data.
		A Forecasting Model Report that confirms how growth has been calculated and

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
		applied within the model to ensure that growth within Buckinghamshire has been taken into account appropriately.
		An updated Local Model Validation Report (LMVR) that addresses the above points.
	Concerns regarding the level of confidence that can be applied to the assessment of the A41/B489/B488 route by the Applicant.	Details of the link flows for the base year and future years with and without development for the B489, B488 and A41.
		Select link analysis of development traffic only for the B498, B488 and A41.
		Reassessment of the A41/B489/B488 route using the updated and validated traffic model.
		Mitigation and/or enhancement at the B488/B489 junction and other parts of the principal airport access route through Buckinghamshire.
	Inadequate public transport provision, which will not support the Council's requirements for sustainable transport and modal shift.	The provision of a high speed, high quality, high frequency bus service between Aylesbury and the airport.
		The reinstatement of the number 61 local service to the airport, on at least an hourly service frequency.
		Certainty of an appropriate Sustainable Transport Fund (STF), supported by detail of how the STF will be calculated.

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
		Certainty of mode shift, linked to specific targets and hold points and embedded in the STF.
		Update to the Framework Travel Plan (FTP ((APP-229, superseded by AS-131) to provide certainty of governance of the STF.
	Uncertainty of the full extent of the impacts of construction traffic and activities from the Scheme on the Buckinghamshire highway network.	Consultation on the further development of the CTMP, which should incorporate specific targets for each mode to expand on the current division between sustainable and unsustainable modes. 'unsustainable' modes.
		Consultation on freight routing and suitable controls to be included within the CTMP.
		The Outline Construction Workers Travel Plan (APP-131) to be updated to show how the Buckinghamshire highway network is to be affected; with subsequent testing within the updated traffic modelling.
		The Council to be included within the Airport Transport Forum as a Highway Authority.
		The draft DCO Schedule 2 Part 3, paragraph 24 should set out the maximum timescales for delivery of any actions.
		Highlight which bodies are responsible for monitoring the findings of the Green Controlled Growth

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
		framework and the Framework Travel Plan the data collection and authorising changes to the strategy to address any failure to meet the targets set
Noise and Vibration	Need to ensure that there is a process for the Noise Envelope to be reviewed when/if FASI-S leads to a change in airspace usage; and for all parameters to be pushed through into targets in the GCG Framework.	The NEDG should be a separate entity from the ESG, tasked with reviewing the Noise Envelope after one year of operation and then more frequently than the five years currently proposed within the terms of reference.
	The Council will resist further noise disturbance to the Chilterns AONB.	Overflight of the Chilterns AONB to be included within the terms of reference of the NEDG in respect of future development of the Noise Envelope.
	The need to secure binding noise limits.	Work towards compliance with WHO Environmental Noise Guidelines 2018 for the European Region.
		the Council asks that the NEDG guarantees that the Noise Envelope and review process provides certainty that the noise impact from any airspace changes under the FASI-S will be no greater than that relied on should the DCO be granted.
	Concern about the independence of the Environmental Scrutiny Group due to the independent chair initially being nominated by the airport operator, following consultation with the London Luton Airport operator.	The Council to have a seat on the ESG, with particular involvement in the Green Controlled Growth Framework and governance of the Noise Envelope.

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
	Confirmation of the noise impacts of Scheme construction on receptors within Buckinghamshire.	The Council is seeking additional clarity on the controls that will be incorporated within the CTMP as it is developed.
		Noise and vibration impact of construction movements within Buckinghamshire to be scoped into the ES.
Air Quality	Lack of confidence in the air quality assessment conclusions relating to the air quality impacts on Aylesbury, including to the three AQMAs, due to the concerns regarding suitability of the traffic modelling outputs used.	Updated traffic modelling, in accordance with the requirements of the Council's Transport and Highways officers.
		Updated CTMP, in accordance with the requirements of the Council's Transport and Highways officers.
	Need to review the potential air quality impacts on sensitive receptors along the preferential access route to the airport – A41, B488, B489 – due to the concerns regarding suitability of the traffic modelling outputs used.	Updated air quality assessment, on a quantitative basis, for Aylesbury and sensitive receptors along the A41, B488, B489. Also, confirmation of any additional locations on the Buckinghamshire transport network where changes in traffic flows significantly affect air quality.
	Desirability of enhanced public transport provision to connect Buckinghamshire residents to the airport both for leisure and commuting, to support modal shift in the interests of reduced traffic derived air pollution.	Delivery of an express public transport service between Aylesbury and the Airport, in accordance with the requirements of the Council's Transport and Highways officers.
		Reinstatement of bus service 61, in accordance with the requirements of the

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
		Council's Highways and Transport officers.
Economy, Tourism and Employment	Need to provide accessibility to employment opportunities at Luton Airport via sustainable modes.	Delivery of an express public transport service between Aylesbury and the Airport, in accordance with the requirements of the Council's Transport and Highways officers. Reinstatement of bus service 61, in accordance with the requirements of the Council's Highways and Transport officers.
	Need to develop specific initiatives to support local procurement within the Employment and Training Strategy (ETS).	The Council is keen to work with the Applicant to develop specific initiatives for inclusion in the further development of the ETS, which should also target the ten priority wards listed in the 'Opportunity Bucks' programme.
	Need to tackle out-migration of skilled workers from Buckinghamshire, particularly young people.	Buckinghamshire Council to be involved in the Local Economic Development Working Group, in order to be able to be part of the coordination of employment, training and skills strategies covering the ETS Study area. In particular, the Council will look to promote opportunities to young people within the county.
	The need to maximise benefits to the supply chain, including securing a legacy of transferable skills.	The Council wishes to partner with appropriate organisations, such as Bucks Business First, to work with the Applicant on supply

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
		chain readiness and accessibility of local businesses to suitable supply chain opportunities.
Landscape and Visual	Clarification of the nature and extent of the impacts resulting in reported significant adverse effects on the Chilterns AONB as a result of 'a noticeable deterioration to the aesthetic and perceptual characteristics of the AONB' during both the construction and operation, as a result of increased aircraft movements.	The ES needs to be clear whether identified significant adverse effects to the AONB extend beyond the Study Area and into Buckinghamshire, taking into account flight height and LCAs. The Council requires additional detail on these matters for inclusion in the ES.
	Potential for additional landscape impacts to be identified following further development of the CTMP	Construction landscape and visual impact should be scoped into further consideration in the ES (particularly in the AONB).
Heritage	The Council has some doubt over the accuracy of the noise assessments submitted with the DCO, as well as, the construction impact, with traffic routes undefined. Due to this ambiguity the Council reserves its final position in respect of adverse noise impacts to heritage assets.	Update traffic modelling, in accordance with the requirements of the Council's Transport and Highways officers.
		Update noise modelling and consequential analysis of the data from the perspective of the heritage topic.
		Update CTMP, in accordance with the requirements of the Council's Transport and Highways officers.
		Confirmation of the heritage impacts of the Scheme, following the above requested updates.
Health and Community	Concerns regarding the lack of confidence in the application of strategic traffic modelling to the Buckinghamshire highway network and its consequential implications for the	Update traffic modelling, in accordance with the requirements of the Council's Transport and Highways officers.

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
	robustness of conclusions drawn from downstream analysis that informs the health and community assessment. Analysis to also reflect precedent for qualitative assessment of the impacts of small changes in air quality and noise (as determinants of health) on human health.	Update CTMP and Surface Access Strategy, in accordance with the Council's Transport and Highways officers. Information to be used to identify potentially sensitive health receptors in Buckinghamshire.
		Use of the traffic modelling for updated air quality assessment and noise assessment for receptors in Buckinghamshire. Qualitative assessment of the health implications of changes in noise and particulates, specifically in the context of impacts on human health.
	Impact of severance, noise, air quality and reduction of amenity caused by construction and operation traffic, in-particular associated HGV movement within Buckinghamshire. Particular focus required on the Aylesbury AQMAs and receptors along the preferential access route to the Airport (A41, B488, B489).	Expansion of the study area for traffic related health and community impacts to include Buckinghamshire County highway network, following application of traffic modelling for the Buckinghamshire County highway network, in accordance with the requirements presented in the Transport and Highways sub-section
		Mechanism for the consideration of impacts from FASI-S on noise impacts to then be duly considered in the health assessment.
		Review of suitable mitigation to address significant effects that may be identified following the updated analysis; including any

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
		relevant environmental appraisal of interventions that might be proposed (e.g. Off-Site highways works at Ivinghoe).
	Need to support Buckinghamshire rural communities' accessibility and connecting people with limited access to private vehicles to key services and employment.	The Council seek involvement in the LEDWG to ensure health and community impacts of Buckinghamshire residents are included in the consideration of economic development strategy and policy for the Scheme.
	Impacts from increased noise (construction and operational traffic and aircraft) on areas valued for tranquillity and/or environmental quality: contributing to effects on tranquillity, reduced amenity, environmental quality and neighbourhood characteristic, and mental health and well-being.	Development of suitable delivery mechanisms and assurances for the delivery of mitigation, in collaboration with the Council through inclusion in relevant working groups and direct Applicant engagement.
		Updated downstream topic analysis, using modelling as appropriate, to ensure that receptor sensitivity and impact magnitude is updated and the analysis of significance of effects is robust for Buckinghamshire health and community receptors
Draft Development Consent Order	Inclusion of Buckinghamshire Council as a Relevant Authority.	Suggested Changes relating to: <ul style="list-style-type: none"> • Consultation periods; • Definitions tweaks to include Buckinghamshire Council as a Relevant
	Inclusion of Buckinghamshire Council on the ESG	
	Inclusion of Buckinghamshire Council on the Technical Panels	
	Implementation mechanism defined.	
	Adequate consultation periods provided.	

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
	<p>The draft DCO does not provide sufficient information with regards to the stopping up of public rights of way.</p> <p>The ESG to remain as an independent body from Luton Council.</p>	<p>Authority and part of ESG;</p> <ul style="list-style-type: none"> • Defining monitoring and enforcing bodies/groups; • Provision for sufficient consultation with consultees, where required; • Defining triggers for delivery of mitigation and other work. <p>Please see Appendix B for detailed list of requested Draft DCO changes.</p>
Cumulative effects	There is no consideration of the potential cumulative impacts of aircraft noise for residents under Heathrow, Stansted and Luton flight paths.	Address the gap in the assessment relating to cumulative interactions from the potential reconfiguration of airspace on residents in Buckinghamshire, including cumulative aircraft noise for residents variously beneath flight paths for Heathrow, Stansted and Luton.
	The Council raises concerns surrounding the change required to allocate more airspace for safe departures and arrivals across the south-east of England airports to allow expansion.	
	Buckinghamshire communities are already experiencing issues associated with groundworks and spoil destinations linked to HS2 and EWR.	Further analysis of the potential cumulative impacts of construction activities with EWR and HS2.
	Ecology has not been assessed in the in-combination effects assessment as interactions of different aspect effects upon these receptors (interactions between AQ, noise upon ecological receptors).	Assess Ecology in relation to in-combination effects assessment with different receptors, such as AQ, Noise and ecology.
	Emphasis on the need to ensure that the scope of the CEA is revisited to ensure that information relating to other developments is updated as close to decision making as practicable;	

Topic	Summary of Key Issues Raised	Suggested Changes and Requests
	and to capture any changes that the Applicant proposes to the Scheme that introduce new areas of works (e.g. at Ivinghoe).	

Appendices



Appendix A – Buckinghamshire Council Framework Travel Plan Comments



Travel Plan Review

Planning Ref Number	APP-131 and AS-131
Development Name	London Luton Airport Expansion
Development Type	Development Consent Order (DCO)
Address	London Luton Airport, London Rising
Date of Travel Plan	February 2023
Date of Review	10/08/2023
Contact	travelplanning@buckinghamshire.gov.uk
Travel Plan Status	Subject to Amendments

Summary of Proposals

The Proposed Development builds on the current operational airport with the construction of a new passenger terminal and additional aircraft stands to the northeast of the runway. This will take the overall passenger capacity from 18 mppa to 32 mppa. In addition to the above and to support the initial increase in demand, the existing infrastructure and supporting facilities will be improved in line with the incremental growth in capacity of the airport

This Travel Plan Review covers both the Framework Travel Plan (TP) and Outline Construction Traffic Management Plan (CTMP) from the Luton Airport Expansion's draft Development Consent Order.

The Framework Travel Plan has covered some key aspects of what we would expect to see in a Travel Plan. Further details are needed for the Framework Travel Plan (TP) to be a comprehensive document. Comments are made below on the suitability of the content of the Framework Travel Plan/Travel Plan and areas where amendments and/or additions are required.

1. The Framework TP includes planning policy context from NPPF and DfT's Aviation Policy Framework. However, there is no inclusion of Local Policy Documents. Due to

the impact on Buckinghamshire, we would expect the TP to include an overview of [Buckinghamshire's Local Transport Plan 4](#).

2. The Framework TP summarises the development proposals clearly. A map should be provided showing the proposed expansion in relation to the road network, and the site boundaries.
3. The Framework TP should include details on pedestrian and cycle accessibility, preferably including maps or tables showing accessibility within 5, 10 and 15 minutes (walking and cycling) from the site, giving a sense of access to key amenities.
4. The Framework TP does not include information on current public transport accessibility. The TP should include maps of the locations of the nearest bus stops and railway stations in relation to the site, supported by information on bus and rail services, routes and frequencies at these stations, presented in a tabular format.
5. Buckinghamshire Council (BC) welcomes discussions with Luton Rising to investigate bus and coach services. However, these discussions have not yet taken place and there is no plan for when this will occur. BC would welcome and strongly encourage engagement on developing public transport links. Our concern is there are no current local bus or coach services westwards towards Buckinghamshire and Oxfordshire. Please include the lack of provision westwards in the TP, suggesting options/actions to improve these services. In particular securing a coach service to Aylesbury and points further West. BC strongly advises the local bus route (service 61) connecting Luton and Aylesbury via the communities of Eaton Bray, Edlesborough, Pitstone, Ivinghoe, Marsworth and Cheddington to be restored. With the service running hourly and having its operational hours extended.
6. Please include in the Framework TP details on the possible implementation of a Demand Responsive Transport service (DRT) to meet the connectivity needs of the surrounding communities.
7. We welcome having management targets and monitoring targets. We endorse the management targets being separated into passenger and staff mode share.
8. We note no baseline passenger or staff travel data has been given in the Framework TP and that it has been subject to considerable variation over recent survey years. We welcome baseline targets being set with reference to the latest CAA air passenger travel data, along with the most recent staff survey. The TP should include an assessment of the projected baseline conditions for the site, i.e. the expected modal split of journeys to and from the occupied development.
9. The TP should state that Baseline surveys will be undertaken upon occupation of the site, and survey data should then be used to review the baseline modal split and set SMART targets.

10. We welcome section 4.1.3 and what targets must include. Please note that the management targets should include all modes of travel. Targets must include a commitment to reducing the proportion of single-occupancy vehicle trips to and from the site by at least 10% over the five-year period.
11. Table 4.1. in the Framework TP shows the required targets, their purpose and application to both passenger and staff surveying method and frequency. Please see comments on table 4.1 below:
 - a. The table should state clear timescales of when the targets will be achieved by and what measures/incentives will be implemented to ensure the successful delivery of the target (this could be cross referenced to table 5.1).
 - b. For each target in table 4.1. specific targets should be given, this could be added as an additional column e.g., staff survey response will be 40%.
 - c. As stated above please break down each of the management targets into separate modes and state in the TP a target for each. E.g., Single Occupancy Vehicle trips to and from the site will reduce by 10%, Cycling to and from the will increase by 5% etc.
12. We would expect all targets to be reviewed annually, five years in between reporting isn't sufficient to respond/react to whether the measures are resulting in modal shift.
13. Please confirm that if targets cannot be met, the review and revised interventions will be shared with all interested stakeholders, including BC.
14. We endorse the implementation of a Travel Plan Coordinator (TPC). Please provide contact details to BC when appointed. The TPC should be an individual with an ongoing interest in the site who is expected to remain in the post for the duration of the TP. They should be appointed at least three months prior to first occupation.
15. With the large number of measures/interventions and targets being put forwards we would like the TP to confirm there is adequate resource being put into deliver them successfully. Please confirm this will be monitored and actions taken if there isn't sufficient resource.
16. We support staff travel surveys being undertaken annually. Please provide information on how the surveys will be circulated. We endorse the survey being undertaken at the same time each year.
17. Please provide more information on what a snapshot survey is and who is the target audience to collect data from.
18. We support the roles of the TPC included in the Framework TP, the TPC roles and responsibilities should include the below:
 - a. Promotion of the Travel Plan to site users

- b. Organising personalised Travel Planning as required
 - c. Developing and distributing a Travel Information Pack / Travel Welcome Pack
 - d. Provision of Travel Information Noticeboards (including online version)
 - e. Liaising with local bicycle shops and public transport providers to investigate potential opportunities to secure discounts and/or vouchers for site users
 - f. Submit annual monitoring reports
 - g. Identifying any additional measures that may be needed to meet targets
 - h. Liaising with BC Travel Plan Officers with regard to progress
19. The TP must include details on the provision of parking within the proposed development. This includes:
- a. Total number of parking spaces including car sharing spaces
 - b. Blue Badge parking spaces
 - c. Electric Vehicle (EV) parking spaces, with charging facilities
 - d. Cycle parking, which must be secure, sheltered and well-lit.
 - e. How the parking spaces will be managed
20. A toolbox stating a wide range of interventions and measures has been identified in section 5. The TP must specify the interventions and measures that will be implemented and timescales against delivery of them, including when they will be reported on.
21. Both the Framework TP and CTMP should address soft measures to facilitate modal shift to achieve targets. The TP should address - communication measures, including noticeboards, online noticeboards, and Travel Information Pack. Please note, information relevant to BC should be shared before distribution.
22. Please include in the measure *setting up of an Airport Transport Forum with key stakeholders: Local Authority, encourage partnership between airport operators, transport operators, local people and businesses and other relevant parties as stated in section 1.1.4.*
23. The Framework TP refers to a funding budget, please provide information on the funding that will be allocated and how this is to be spent. Please state how the funding is being justified in terms of what needs to be achieved.

Actions for Travel Plan approval:	Completed
Please include in the TP an overview of Buckinghamshire's Local Transport Plan 4 .	

Please provide a map showing the proposed expansion in relation to the road network, and the site boundaries.	
The TP should include details on pedestrian and cycle accessibility, preferably including maps or tables showing accessibility within 5, 10 and 15 minutes (walking and cycling) from the site, giving a sense of access to key amenities.	
The TP should include maps of the locations of the nearest bus stops and railway stations in relation to the site, supported by information on bus and rail services, routes and frequencies at these stations, presented in a tabular format.	
BC would welcome engagement on developing public transport links. Our concern is there are no current coach services westwards towards Buckinghamshire and Oxfordshire. Please include the lack of provision westwards in the TP, suggesting options/actions to improve these services. Please include the lack of provision westwards in the TP, suggesting options/actions to improve these services In particular securing a coach service to Aylesbury and points further West. BC strongly advises the local bus route (service 61) connecting Luton ad Aylesbury via the communities of Eaton Bray, Edlesborough, Pitstone, Ivinghoe, Marsworth and Cheddington to be restored. With the service running hourly and having its operational hours extended.	
Please include in the TP the possible implementation of a Demand Responsive Service (DRT) to meet the connectivity needs of the surrounding communities.	
We welcome baseline targets for surface access mode share being set with reference to the latest CAA air passenger travel data, along with the most recent staff survey. The TP should include an assessment of the projected baseline conditions for the site, i.e. the expected modal split of journeys to and from the occupied development.	
The TP should state that Baseline surveys will be undertaken upon occupation of the site, and survey data should then be used to review the baseline modal split and set SMART targets. Please confirm this in the TP.	
Please note that the management targets should include all modes of travel. Targets must include a commitment to reducing the proportion of single-occupancy vehicle trips to and from the site by at least 10% over the five-year period.	
<p>Please see comments on table 4.1 below:</p> <ol style="list-style-type: none"> The table should give clear timescales of when the targets will be achieved by and what measures/incentives will be implemented to ensure the successful delivery of the target (this could be cross referenced to table 5.1). 	

<ul style="list-style-type: none"> b. For each target in table 4.1. specific targets should be given, this could be added as an additional column e.g., staff survey response will be 40%. c. As stated above please break down each of the management targets into separate modes and state in the TP a target for each. E.g., Single Occupancy Vehicle trips to and from the site will reduce by 10%, Cycling to and from the will increase by 5% etc. 	
All targets are expected to be reviewed annually; five year gaps between reports is not sufficient to respond/react to whether the measures are resulting in modal shift.	
Please confirm that, if the proposed targets are not met, the review and revised interventions will be shared with all interested stakeholders, including BC.	
Please provide contact details to BC when appointed. The TPC should be an individual with an ongoing interest in the site who is expected to remain in the post for the duration of the TP. They should be appointed at least three months prior to first occupation.	
Please confirm in the TP there is adequate resource being put into deliver them successfully. Please confirm this will be monitored and that actions will be taken if there is insufficient resource at any stage of delivery.	
Please provide information on how the surveys will be circulated.	
Please provide more information on what a snapshot survey is and who the target audience is aiming to collect data from.	
<p>The TPC roles and responsibilities should include the below:</p> <ul style="list-style-type: none"> a. Promotion of the Travel Plan to site users b. Organising personalised Travel Planning as required c. Developing and distributing a Travel Information Pack / Travel Welcome Pack d. Provision of Travel Information Noticeboards (including online version) e. Liaising with local bicycle shops and public transport providers to investigate potential opportunities to secure discounts and/or vouchers for site users f. Submit annual monitoring reports g. Identifying any additional measures that may be needed to meet targets 	



h. Liaising with BC Travel Plan Officers with regard to progress (this could be via the Airport Transport Forum)	
<p>The TP must include details on the provision of parking within the proposed development. This includes:</p> <ul style="list-style-type: none"> f. Total number of parking spaces including car sharing spaces g. Blue Badge parking spaces h. Electric Vehicle (EV) parking spaces, with charging facilities i. Cycle parking, which must be secure, sheltered and well-lit. j. How the parking spaces will be managed 	
The Framework TP and CTMP must specify the interventions and measures that will be implemented and timescales against delivery of them including when they will be reported on.	
Both the Framework TP and CTMP should include address soft measures to facilitate modal shift to achieve targets. The TP should address - communication measures, including noticeboards, online noticeboards, and Travel Information Pack. Please note, information relevant to BC should be shared before distribution.	
Please include in the measure <i>setting up of an Airport Transport Forum with key stakeholders: Local Authority, encourage partnership between airport operators, transport operators, local people and businesses and other relevant parties</i> as stated in section 1.1.4.	
The Framework TP refers to a funding budget, please provide information on the funding that will be allocated and how this is to be spent. Please state how the funding is being justified in terms of what needs to be achieved.	

Conclusion

Whilst the Framework Travel Plan has identified some good measures, we require additional information to be added into the TP to clarify and clearly set out how the targets will be achieved.



Appendix B – Draft DCO Recommended Changes Table

Table B-1 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 Sections 2.2 and 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.	<p>'Relevant Planning Authority' to include, consultation with Buckinghamshire Highways, who would like to be party to details relating to construction matters.</p> <p>Please see Section 2.2 Transport and Highways of Written Representations.</p>
Landscaping design, paragraph 9	Implementation Trigger required.	<p>Landscaping to be carried out prior to first use of the development.</p> <p>Please see Section 2.10 of Written Representations</p>
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.	<p>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.</p> <p>Please see Section 2.10 of Written Representations</p>
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 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 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.	To ensure mitigation is quickly applied, when required.

	Ament sub para (1) from 5 to 1 year	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. This places the Requirements at odds with the GCGF. Please see Section 2.10 of Written Representations
Night quota cap, paragraph 27	Amend paragraph 20 for Buckinghamshire Council, and other neighbouring authorities, to form part of the ESG.	makes provision for the relevant planning authority to approve a variation to the night quota cap, in consultation with the ESG. 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. Please see Section 2.10 of Written Representations
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.	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. Please see Section 2.2 Transport and Highways of Written Representations.

	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> <p>Please see Section 2.2 Transport and Highways of Written Representations.</p>
	(3) Updating of travel plans should take place annually.	To ensure mitigation/intervention is quickly applied, when required.
	Mitigation/ successful implementation strategy/ review required.	<p>To ensure targeted intervention should travel plan targets not be met.</p> <p>Please see Section 2.2 Transport and Highways of Written Representations.</p>
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.	<p>Relevant Planning Authority' to include consultation with Buckinghamshire Environmental Health, who would like to be party to air quality matters.</p> <p>Please see Section 2.10 and 2.4 of Written Representations</p>
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.	<p>Relevant Planning Authority' to include consultation with Buckinghamshire Climate Change Officers, who would like to be party to the Greenhouse gas action plan.</p> <p>Please see Section 2.10 and 2.1 of Written Representations</p>

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