

London Luton Airport Expansion

Buckinghamshire Council Written Representation – Summary

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Planning & Environment
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1 Introduction

- 1.1.1. This document sets out a brief summary of the Council's Written Representation relating to the London Luton Airport Expansion DCO. The full Written Representation was submitted at Deadline 1 of the Examination.

2 Topics

2.1. Climate Change and Greenhouse Gases

- 2.1.1. The Council state that there is a need to reflect uncertainty over delivering and achieving the Government's Jet Zero Strategy (JZS) for decarbonising aviation by 2050. This would be addressed through sensitivity testing for Faster Growth and Next Generation Aircraft scenarios and assessing GHG emissions on a quantitative basis.
- 2.1.2. The Council consider it important to ensure the independence of the Environmental Scrutiny Group (ESG) and address potential conflict of interest in LBC's role as owner and enforcer. The Council request having a seat on the ESG and a position for a suitably qualified and experienced technical officer.
- 2.1.3. The Council also suggest a requirement is added to the DCO to ensure that a separate assessment is required for future de-commissioning.

2.2. Transport and Highways

- 2.2.1. The Council recommends various inputs to fully consider traffic impacts. This includes the provision of journey time data and calibration and validation data to inform the traffic model, as well as the production of a Forecasting Model Report and a Local Model Validation Report (LMVR) for the purposes of assessing development proposals within Buckinghamshire.
- 2.2.2. The Council also cite inadequate public transport provision which will hinder the Council's requirements for sustainable transport modes. A high frequency bus service between Aylesbury and the airport is suggested, alongside the certainty of a Sustainable Transport Fund (STF), supported by how this will be calculated.
- 2.2.3. Construction traffic impacts are also cited as a key issue. It is suggested that further consultation is undertaken relating to the Construction Traffic Management Plan (CTMP).
- 2.2.4. The Council also request to be included within the Airport Transport Forum as a Highway Authority. Furthermore, the Draft DCO should set out the maximum timescales for delivery of any actions.

2.3. Noise and Vibration

- 2.3.1. The Council cite a 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. It is recommended that the Noise Envelope Design Group (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.
- 2.3.2. The Council have advised that they will resist further noise disturbance to the Chilterns AONB. They have requested that the avoidance of overflight of the Chilterns AONB should be included within the terms of reference of the NEDG in respect of future development of the Noise Envelope.
- 2.3.3. The need to secure binding noise limits has also been stated. It is recommended that the Scheme should work towards compliance with World Health Organisation (WHO) Environmental Noise Guidelines 2018 for the European Region. The Council have also requested the NEDG to guarantee 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.
- 2.3.4. The Council have raised concern over 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. As such, the Council have requested to have a seat on the ESG, with particular involvement in the Green Controlled Growth Framework and governance of the Noise Envelope.
- 2.3.5. The Council have requested confirmation of the noise impacts of Scheme construction on receptors within Buckinghamshire. This would be confirmed through the receipt of additional clarity on the controls that will be incorporated within the CTMP as it is developed, as well as including the noise impact of construction movements within Buckinghamshire into the scope of the ES.

2.4. Air Quality

- 2.4.1. The Council have indicated a 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. The Council recommends updated traffic modelling and an updated CTMP, as set out in Section 2.2.
- 2.4.2. There is a need to review the potential air quality impacts on sensitive receptors along the preferential access route to the airport due to concerns regarding suitability of the traffic modelling outputs used. An updated air quality assessment on a quantitative basis is recommended for Aylesbury and sensitive receptors along the A41, B488 and B489, as well as confirmation of any additional locations

on the Buckinghamshire transport network where changes in traffic flows significantly affect air quality.

- 2.4.3. The Council recommends an express public transport service between Aylesbury and the Airport, as well as the reinstatement of bus service 61, to connect Buckinghamshire residents to the airport both for leisure and commuting, and to support modal shift and improve air quality.

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

- 2.5.1. The Council cite a requirement to provide accessibility to employment opportunities at Luton Airport via sustainable modes. This is particularly apparent for those with limited mobility to access employment sites. The requirement for an express public transport service between Aylesbury and the Airport is reinforced here.
- 2.5.2. The Council highlight a need to develop specific initiatives to support local procurement within the Employment and Training Strategy (ETS). The Council state a desire 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.
- 2.5.3. The Council state a requirement to invest in the creation of a Local Economic Development Working Group (LEDWG) that includes representation from relevant local authority teams. The Council would like to be involved in the creation of this group in order to ensure alignment with local employment and skills strategies and to help facilitate links with other appropriate stakeholders.
- 2.5.4. The Council have set out a need to tackle out-migration of skilled workers from Buckinghamshire, particularly young people. It is recommended that the Council are involved in the Local Economic Development Working Group, to be able to be part of the coordination of employment, training and skills strategies covering the ETS Study area.
- 2.5.5. It is suggested that there is a need to maximise benefits to the supply chain, including securing a legacy of transferable skills. As such, 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.

2.6. [Landscape and Visual](#)

- 2.6.1. The Council have requested clarification on the nature and extent of the impacts on the Chilterns AONB as a result of 'a noticeable deterioration to the aesthetic and perceptual characteristics of the AONB'. It is stated that the Environmental Statement (ES) needs to be clear on whether identified significant adverse effects to the AONB extend beyond the Study Area and into Buckinghamshire, taking into account flight height and Local Character Areas (LCAs).

- 2.6.2. Another key issue raised is the potential for additional landscape impacts to be identified following further development of the CTMP. The Council requests that construction landscape and visual impacts should be scoped into further consideration in the ES, particularly in the AONB.

2.7. Heritage

- 2.7.1. The Council seeks clarity regarding the noise assessments submitted with the DCO as well as the construction impact on its heritage assets. The Council recommends confirmation of the heritage impacts of the Scheme once the aforementioned transport recommendations in Section 2.2 are implemented.

2.8. Health and Community

- 2.8.1. The Council raises concerns over the lack of confidence in the application of strategic traffic modelling to the Buckinghamshire highway network and its consequential implications for the robustness of conclusions drawn from downstream analysis that informs the health and community assessment. The Council recommends updated traffic modelling and an updated CTMP, as set out in Section 2.2. A qualitative assessment of the health implications of changes in noise and particulates, specifically in the context of impacts on human health, is also recommended.
- 2.8.2. The issue of impacts of severance, noise, air quality and reduction of amenity caused by construction and operation traffic, in-particular associated HGV movement within Buckinghamshire are noted. The Council recommends the 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.
- 2.8.3. The Council also recommend a 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.
- 2.8.4. The Council cite a need to support Buckinghamshire rural communities' accessibility and connecting people with limited access to private vehicles to key services and employment. The Council will seek involvement in the LEDWG to ensure health and community impacts of Buckinghamshire residents are considered.
- 2.8.5. The impacts from increased noise on areas valued for tranquillity contributing to reduced amenity, and mental health and well-being are noted. The Council recommend the 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, as well as an 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.

2.9. Cumulative Effects Assessment (CEA)

2.9.1. The Council raise the issue of a lack of consideration for cumulative impacts of issues such as aircraft noise for residents under flight paths, as well as issues associated with groundworks and spoil destinations linked to HS2 and EWR. Further assessment of cumulative interactions relating to these issues are requested.

2.9.2. An overall suggestion is to revisit the scope of the CEA to ensure that information relating to other developments is updated as close to decision making as practicable, and to capture and changes that introduce new areas of works.

2.10. Draft Development Consent Order

2.10.1. The Council request to be included:

- As a Relevant Authority.
- On the ESG.
- On the Technical Panels.

2.10.2. The Draft DCO 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.

2.10.3. It is requested that the ESG should remain as an independent body from Luton Council.

2.10.4. The Council state that the Draft DCO does not provide sufficient information with regards to the stopping up of public rights of way.

2.10.5. The Council also request provision for sufficient consultation with consultees, including adequate consultation periods. Consultation periods should be extended should further issues arise or if insufficient information is made available to the consultee.