



**Directorate for Planning, Growth & Sustainability  
Planning and Environment**

Service Director: Steve Bambrick  
Buckinghamshire Council  
Walton Street Offices  
Walton Street  
Aylesbury  
HP20 1UA

devcontrol.av@buckinghamshire.gov.uk  
01296 123456  
www.buckinghamshire.gov.uk

The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6P

22 August 2023  
**Ref:** Planning Inspectorate Ref. TR020001

Dear Ms. Dowling,

**Application by London Luton Airport Limited for an Order Granting Development Consent for the London Luton Airport Expansion – Rule 8 Letter: Deadline 1 Submission**

I write in respect of the above-mentioned Development Consent Order.

Please find attached the following documents submitted on behalf of Buckinghamshire Council:

- Written Representation (WR).
- Summary of the WR.
- Comments on Updated Application Documents submitted by the Applicant.
- Summary of the Relevant Representation (RR-0166).

In response to the other submissions made by the Council in respect of Deadline 1, please see below:

**Accompanied Site Inspection (ASI)**

We would be grateful if the Examining Authority (ExA) could carry out the ASI from the following locations, as Buckinghamshire Council considers that it may assist the ExA in its understanding of the issues raised in the Council's WR and the Local Impact Report to be submitted at Deadline 1A.

1. The route shown on the map at Appendix A of this letter – B489 between the A41 and its junction with the B488 at Ivinghoe. Travelling from the West along the B489 the road names are Lower Icknield Way, onto Marsworth Road, then High Street and finally onto Church Road. The B488/B489 junction at Ivinghoe is of particular concern to the Council, along with traffic through the village of Ivinghoe, and the canal bridge at Marsworth.

In the Transport Statement Part 3 of 4 (Chapters 9-10) (APP-205) figures 9.8, 9.9 and 9.10 show the daily aircraft arrivals and departures for October 2027, 2039 and 2043. The Council

would be grateful if the ExA could visit this route within 2-3 hours of the peaks hours for aircraft travel.

2. Ivinghoe Beacon Representative Viewpoint 45, reference Environmental Statement Appendix 14.6 Winter and Summer Viewpoints Revision 1 (AS-094) – from the Chilterns Area of Outstanding Natural Beauty.
3. The villages of Dagnall, Wing, Pitstone and Wendover – from an aircraft noise perspective, we would be grateful if the ExA visited these settlements during the daytime and night-time.

### **Issue Specific Hearings (ISH)**

The Council wishes to attend all the ISHs as set out in the Rule 8 letter dated 17<sup>th</sup> August 2023.

### **Rule 6 Annex F Information**

The Council wishes to comment on the following matters:

#### Overarching Aviation Noise Policy Statement

The Council considers the 'Overarching Aviation Noise Policy Statement' to be a preliminary statement which does not change our position on noise as set out in the WR.

#### Environmental Improvement Plan Interim Target

The Council is aware of the new legal targets and interim targets for PM2.5 as outlined within the Environmental Improvement Plan. Luton Rising, the Applicant, acknowledge the introduction of the new targets within the following documents:

- Green Controlled Growth Explanatory Note (APP-217); and,
- Green Controlled Growth Framework (APP-218).

These documents state that in response to the new target for PM2.5 levels, as required by the Environment Act 2021, two Limits and associated Thresholds are specified for PM2.5 concentrations: one up to 2040, and one from 2040 onwards, when the new target takes effect. These are illustrated in Table 3.5 – Green Controlled Growth Limits and Thresholds for air quality within the Green Controlled Growth Explanatory Note Document (APP-217) and Table 4.3 – Green Controlled Growth Limits and Thresholds for air quality within the Green Controlled Growth Framework document (APP-218). There is also the assumption that the new limits will come into force during Phase 2b of the development.

However, Luton Rising have made no reference to the interim target of 12 µg/m<sup>3</sup> which is required to be met by the end of January 2028 for PM2.5. This interim target must also be taken into consideration within the Growth Control Growth Limits and Thresholds for air quality. The Council therefore request that Luton Rising amend the Green Controlled Growth Limits and Thresholds for air quality to include the interim target of 12 µg/m<sup>3</sup> by the end of January 2028 for PM2.5.

With regards to the impact the new legal targets and interim targets for PM2.5 will have on the conclusions of the air quality impact assessment, as outlined within Chapter 7 Air Quality Revision 1 of the Environmental Statement (AS-076), there is evidence that the new legal target of 10 µg/m<sup>3</sup> which is to be achieved by 2040, has been considered. However, there is no reference to the interim target of 12 µg/m<sup>3</sup> which is required to be met by the end of January

2028. The Council request that Luton Rising provide comment on the impact this new interim target will have on the conclusions of the air quality assessment.

### **Electronic Correspondence**

The Council confirm that it is happy to receive further correspondence electronically.

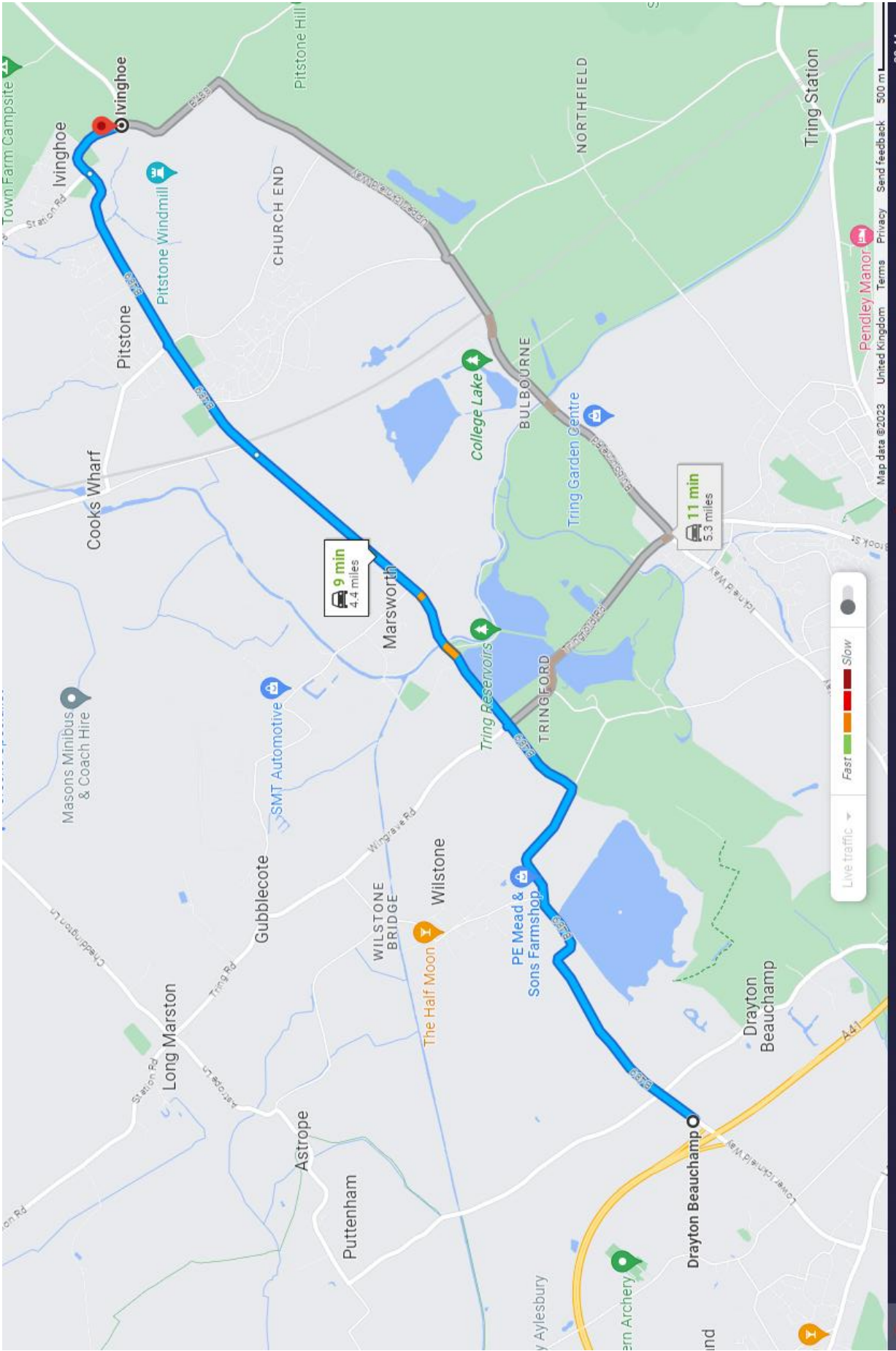
There are no other matters relating to Deadline 1 that the Council wishes to raise with the ExA. I trust that this submission for Deadline 1 clearly sets out the position of Buckinghamshire Council in respect of this Development Consent Order for the expansion of London Luton Airport.

Yours sincerely

*Steve Bambrick*

**Steve Bambrick**

Service Director – Planning and Environment, Planning, Growth & Sustainability



Source: [www.google.co.uk](http://www.google.co.uk) (dated 22/08/2023)