

August 2023

# London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

## **8.31 Applicant's Response to Relevant Representations - Part 2B of 4 (Members of the Public)**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.31

**The Planning Act 2008**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

**London Luton Airport Expansion Development Consent  
Order 202x**

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**8.31 APPLICANT'S RESPONSE TO RELEVANT REPRESENTATIONS  
PART 2B OF 4 (MEMBERS OF THE PUBLIC/BUSINESSES)**

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### 3.3 Members of the Public/Businesses

Table 3.2: Responses to Relevant Representations made by members of the public/businesses

Interested Party and Examination Library Reference	Topic	Matters Raised in relevant Representation (Verbatim)	Luton Rising's Response
John Michael Wilkinson RR-0718	Noise and Vibration	<p>The noise contours are made up of a combination of arrival and departure noise and because departure noise levels are greater, any reduction in departure noise will result in a disproportionate reduction in the noise envelope area. Consequently, it is quite feasible that the overall noise envelope could reduce in area even with more ATMs, but those additional ATMs will result in an extension of the contours over the final approach paths. This effect is shown quite clearly on the noise contour plots included in the consultation documents, where the western and eastern extremities of the contours have both been extended. Take for example the LOAEL night contour (45dB) where the western 2019 night-time baseline extends as far as the eastern edge of Whipsnade Zoo. The 2043 night-time 45dB contour corresponding to the 32mppa level of traffic would extend into Buckinghamshire as far as Dagnall. Kensworth would be within the 48dB contour instead of just the 45 dB one. So whilst the overall noise levels might reduce as predicted, there is a certainty that those villages under the final approach path will see a worsening of the current situation if there is an increase in ATMs, regardless of the</p>	<p>It is acknowledged that the pattern of noise increases and decreases will vary for different communities depending on where they are positioned relative to arrival and departure flight paths.</p> <p>Assessment location results for Dagnall and Kenworth (see Table 7.14 and Table 7.23 of <b>Appendix 16.1</b> of the Environmental Statement [<b>AS-096</b>]) show that <math>L_{Aeq}</math> noise increases would be no greater than 1.2dB, rather than the 3dB increase as suggested in the representation.</p> <p>The impact of noise increases from the Proposed Development has been assessed and all reasonably practicable measures have been explored to reduce noise impacts. Further details can be found in <b>Chapter 16 Noise and Vibration</b> of the ES [<b>AS-080</b>].</p>

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		anticipated noise improvements that are being attributed to the new generation of aircraft.	
John Michael Wilkinson RR-0718	Noise and Vibration	The principal metric being used by Luton Rising is mppa. Whilst this is an important parameter for areas close to the Airport, for those towns and villages beneath the approach and departure flight paths the critical parameters are the number of ATMs and the size and shape of the corresponding noise contours. There are current limits for the permitted areas of 57dB daytime and 48dB night-time contours, a maximum of 9,650 per annum night-time ATMs and a maximum of 7,000 per annum ATMs between 6:00am and 7:00am. Even if all these limits were to be retained unchanged, this could still leave those villages under the final approach flight path exposed to a very significant and unacceptable increase in daytime overflying. If an increase in mppa is to be allowed, there must be a corresponding cap on the total number of ATMs, as well as a cap on the total passenger numbers and night-time ATMs.	<p>The Noise Envelope contains daytime and night-time noise contour area Limits, as part of the legally-binding <b>Green Controlled Growth Framework [APP-218]</b>. In addition, the Applicant has committed to retaining the current 9,650 movement limit in the night-time quota period (23:30 – 06:00) which will be secured through Requirement 27 of the <b>Draft Development Consent Order (DCO) [AS-067]</b>.</p> <p>Whilst movement numbers have been included as monitoring and reporting metrics, they have not been included as Noise Envelope Limits. To have a clear and unambiguous measure of compliance with the Noise Envelope, it is necessary to use a single indicator for daytime and night-time Limits (i.e. the daytime and night-time <math>L_{Aeq}</math> contour areas) in line with policy and CAA guidance, and that indicator should best describe aircraft noise</p>

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			annoyance and health impacts on the communities (Ref 1, Ref 2).
John Michael Wilkinson RR-0718	Noise and Vibration	Also in addition to the maximum permitted areas of the critical noise envelopes, the extremities of those contours must not be allowed to extend beyond the 2019 baseline contours in any direction. Finally since the levels at which adverse effects start to be observed (the LOAEL) are 51dB daytime and 45dB night-time, those should be the critical contours and not the somewhat arbitrary 57dB daytime and 48dB night-time contours that the current planning consent refers to. Expansion must not be allowed to increase/extend beyond any of those individual caps.	<p>The Noise Envelope contains daytime and night-time noise contour area Limits, as part of the legally-binding <b>Green Controlled Growth Framework [APP-218]</b>. It has been developed in consultation with local stakeholders and local communities through the Noise Envelope Design Group (see <b>Chapter 16 Noise and Vibration</b> of the ES [AS-080] for further information).</p> <p>The choice of noise contour for the Noise Envelope Limits was defined by the Noise Envelope Design Group based on the current planning consent (which is based on 57dBL<sub>Aeq,16h</sub> and 48dBL<sub>Aeq,8h</sub> contours) and with reference to research by the Civil Aviation Authority (Ref 1) which notes that “The same percentage of respondents said by ANIS to be highly annoyed at 57 dB LAeq,16h now occurs at 54 dB.”. It is important to note that the Noise Envelope is a noise control mechanism, rather than a</p>

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			measurement of all adverse health effects attributable to noise.
London Southend Airport RR-0858	General	Overall, LSA supports the notion of allowing UK airports to grow to serve their markets (in line with current aviation policy) and, in turn, to contribute to both their local communities and "UK plc" as a whole. We are making this submission to share various observations with the Planning Inspectorate which we respectfully request to factor into its consideration when reviewing the proposed expansion at Luton Airport (LTN).	Noted.
London Southend Airport RR-0858	Need Case	the environment / airspace congestion: London currently operates a highly congested airspace. The Planning Inspectorate is asked to consider the impact of placing yet more flights into this "spaghetti junction" of London airspace and the effect on additional slot waiting and holding times (each of which will cause an increase in overall noise and emissions), for London's aviation market at a time while the industry is seeking to move towards Net Zero and is making great strides in doing so. LSA's location means it can offer many of the greenest and fastest routes to Europe into/out of the UK, without the need to further impact London's already congested airspace. Operating outside of this congestion and complemented by its rail access and location close to the coast as well as its own airspace, LSA is part of the environmental solution for local and national aviation growth.	<p>As part of its Jet Zero Strategy (Ref 3), the Government has made clear its intention that air space be modernised to improve its performance with a view to reducing environmental impacts and increasing capacity to enable growing demand to be accommodated.</p> <p>It is the Applicant's view that London Southend Airport (LSA) does not provide a viable alternative for passengers that would choose to use London Luton Airport now and in the future.. With the Proposed Development, as illustrated at Figure 5.10 of the <b>Need Case [APP-213]</b>, the airport's catchment area is heavily</p>

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		<p>Customer convenience: With regard to the growing population in the South East, we support the premise that customers should have a diverse choice of airports to travel from and be able to travel from those closest to them, and with the most sustainable transport routes. Over the past 20 years, the area to the east of London has been the fastest growing part of the UK with over 210,000 new homes and over 350,000 jobs created since 2001. And with over 8 million passengers living within 1 hour of the airport, LSA is ideally situated to sustainably service this rapidly growing population by comparison to all other London airports. With LSA's own railway station, just 100 steps from platform to check-in, LSA is a short distance from London with up to six trains an hour. Journeys take just 43 minutes from London Stratford and 53 minutes from London Liverpool Street. By way of interest, London Stratford station is now one of the best-connected stations in the UK, with currently 136 trains per hour that serve over 200 stations across London, the South East and the East of England. These strong rail links, both positively impacted by their Elizabeth Line connectivity, allow LSA to be both convenient and to enable the most environmentally friendly way to travel. In addition, these links can (and do) materially mitigate passenger driving miles around the South East, particularly the already congested M25 and M1.</p>	<p>focussed on the counties around it and the Thameslink corridor.</p> <p>For the vast majority of passengers, LSA is simply not an alternative for passengers wishing to use London Luton Airport. In 2019, only 1.5% of the passengers using the airport had a surface origin or destination in Essex, with less than 0.1% of passengers coming from Southend or Rochford, where LSA is located.</p> <p>Even for those passengers with a surface origin in Greater London, many of those using London Luton Airport came from north London or close to the Thameslink line.</p> <p>LSA is served by 3 trains an hour, other than in the commuter peaks, with a journey time to Liverpool Street of just under 1 hour. In contrast, London Luton Airport is served by 2 fast trains (22 minutes) per hour with a further 6 trains most hours with a journey time of 32-42 minutes to St Pancras and onwards to other termini across central London. The Luton DART provides access to the terminal in 4 minutes</p>



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			<p>direct from Luton Airport Parkway Station.</p> <p>On this basis, LSA is simply not considered to be a realistic alternative for the vast majority of passenger demand expected to use the airport with the Proposed Development. If passengers that would otherwise have used the airport were required to use LSA, this would come at considerable inconvenience to passengers, with increased surface access journeys adding to congestion on the surface access network.</p>
London Southend Airport RR-0858	Need Case	Contributing to the Levelling Up agenda: LSA is located in Southend-on-Sea (recently made a city) which has been designated a Tier 1 priority area as part of the government's Levelling Up agenda. Accordingly, the city needs and is seeking investment to drive the economic and employment growth required to deliver on that ambition. Southend-on-Sea presents an opportunity to make Levelling Up a reality by supporting existing infrastructure and unlocking business opportunity to drive forward growth. Utilising and accelerating capacity at LSA would deliver growth in the region and bring further investment, facilitating more jobs in an area where the	<p>Luton is also a Tier 1 Priority Area for levelling up and the Proposed Development will make a material contribution to realising the aims of the Government's Levelling Up agenda in respect of Luton.</p> <p>Based on provisional data for 2022 from the Office of National Statistics (Table 8.7a), the median gross annual pay for employees in Southend was £28,717 and £32,685 in Rochford,</p>

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		median salary stands at £28.3k, compared to the UK median of £33k.	compared to the national average of £27,756 (Ref 4). The median gross pay for employees in Luton was £25,402, which further highlights the importance of 'levelling up' Luton.
London Southend Airport RR-0858	Need Case	In conclusion, LSA has the availability, facilities, and the readiness to deliver the growth in capacity required in the short term, without additional development. It is ready to go. We firmly believe utilising LSA offers a sustainable, effective, and timely way to increase the overall capacity of the South East's airport network. As a cornerstone of the South East's growth proposition, LSA provides: ? Immediate passenger capacity availability and facilities ? Enabler of aviation / GDP growth without the need for disruption ? Environmental benefits owing to its geographical location, acting as the direct gateway to Europe ? Mitigating congestion of an already crowded London airspace ? Meeting demand of the fast-growing population east of the capital ? Contribute to levelling up by powering growth in a key strategic region We ask that these observations are considered when examining the case for expansion and to be reassured that LSA has the capacity, infrastructure, and ability to meet the untapped demand in the Southeast and represents a viable and sustainable solution.	<p>It is understood that LSA has a planning condition that limits the total number of annual movements to 53,300 and, whilst this would theoretically enable LSA to accommodate up to 8 million passengers per annum, this would require the displacement of other non-commercial aviation activity.</p> <p>The number of night movements is limited to 120 per month (less than 4 per night). An additional planning consent may be required to extend the passenger terminal and aprons to enable such growth to be handled.</p> <p>It is the Applicant's position that , LSA does not provide an alternative to meeting the growth anticipated for London Luton Airport.</p>

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Holiday Extras Ltd RR-0565	General	Holiday Extras Ltd support the DCO application which will deliver significant socio-economic benefits both regionally as well as nationally. They also appreciate that there is a need for a comprehensive package of measures to mitigate the environmental effects derived from the Airport's expansion, seen in the context of the Government's specific net zero strategy for aviation.	Support noted.
Holiday Extras Ltd RR-0565	Surface Access	number of concerns surrounding the topic of airport surface access, with particular reference to on-airport passenger related airport car parking provision.	<p>Noted. The <b>Transport Assessment [APP-203 to APP-206]</b> provides a significant amount of detail on surface access, including the proposed mitigation measures which are designed to accommodate airport-related traffic growth, together with growth associated with background traffic and consented developments.</p> <p>The proposed passenger and staff parking numbers are defined using a combination of CAA data, existing parking numbers, projected busy day timetables and mode share aspirations as set out in <b>Section 8 and 9</b> of the Transport Assessment.</p>
Holiday Extras Ltd		Holiday Extras Ltd's subsidiary company Airparks operate a traditional long term off-airport car parking business	Noted

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RR-0565		<p>from Slip End based on the park and ride model, where cars are parked before the customer is transported by bus to and from London Luton Airport.</p> <p>The total number of car parking spaces available at Slip End varies between 3,500 and 5,300 spaces, being dependent on market conditions, which in turn dictates the extent to which customers' vehicles are either self-parked or block-parked.</p> <p>In order to appreciate the scale of Airparks' business, the maximum capacity in terms of car parking spaces at their Slip End site is greater than the provision of existing long stay passenger on-airport car parking at London Luton Airport in 2019, prior to the construction of the Luton DART; being equivalent to 81% of all anticipated long stay on-airport car parking in 2043 at which time the Luton DART will serve the two terminals, and when passenger throughput is expected to reach 32mppa.</p> <p>Previous Discussions Involving LLAL During the period from mid-November 2019 through to the end of February 2020 discussions took place between my clients and representatives of LLAL over the provision of a new satellite long term off-airport car parking facility, to be run by both parties to meet the needs of air passengers relying on the private car mode as part of a future DCO</p>	<p>There was discussion in late 2019, early 2020 in which the Applicant sought to facilitate a separate private arrangement between Holiday Extras and the owners of a nearby development site. This was in connection with the possibility of a temporary off-airport car park being brought forward for a limited period before the site was developed in accordance with the owners' extant planning permission.</p> <p>The Applicant was clear that any such temporary development would need its own planning permission, would be outside the scope of its own proposed application for development consent, and would need to be brought forward by Holiday Extras and/or the third-party site owner.</p>

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		<p>application. No reference was made in the subsequent consultation exercise carried out between February and April 2022 to the same proposal, and no reasonable assessment has been conducted of this option, especially given the comments made by LLAL at paragraph 2.6.23 of the Surface Access Emerging Transport Assessment (SAETS) entitled "Getting to and from the Airport – Emerging Transport Strategy", where it formed part of the 2022 consultation exercise: "2.6.23 For those passengers that have no reasonable alternative choice to driving, we want to ensure that the overall number of vehicle movements at the airport is minimised, and their environmental impact is reduced where possible. We will do this by encouraging more efficient use of the road network that will lead to less vehicle mileage overall by ensuring passenger trips to the airport made by car and taxi are as clean as possible in terms of vehicle emissions.</p>	
Holiday Extras Ltd RR-0565	Consultation and Stakeholder Engagement	<p>To fail to engage with my clients, who have raised representations to previous consultation exercises leading up to the current DCO application is unhelpful, particularly at a time when a key principle throughout the SAS's 20-year duration is the need for flexibility given the levels of uncertainty which exist, along with the requirement for the same document to remain effective in the long term. Since discussions surrounding a possible satellite long term off-airport car parking site were terminated at the end of February 2020, no attempts have</p>	<p>As is clear from comments from the respondent in the preceding comment there has been engagement between the parties.</p> <p>There was discussion in late 2019, early 2020 in which the Applicant sought to facilitate a separate private arrangement between Holiday Extras</p>

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		<p>been made by Luton Rising to contact my clients and hold open, meaningful and transparent discussions over the contribution which they can make to the SAS's vision, objectives and the priority area relating to vehicle access, parking, private hire vehicles and taxis. This priority area is particularly pertinent to the business conducted by Airparks, who as a major existing long term off-airport car parking provider are in a position to make a positive contribution.</p>	<p>and the owners of a nearby development site. This was in connection with the possibility of a temporary off-airport car park being brought forward for a limited period before the site was developed in accordance with the owners' extant planning permission.</p> <p>The Applicant was clear that any such temporary development would need its own planning permission, would be outside the scope of its own proposed application for development consent, and would need to be brought forward by Holiday Extras and/or the third-party site owner.</p>
Holiday Extras Ltd RR-0565	Surface Access	<p>The definition of "Passenger non-sustainable travel" as part of an "unsustainable mode" is defined in paragraph 3.5.17d. of the Green Controlled Growth Explanatory Note [TR020001/APP/7.07] as comprising "travel by car, taxi (Hackney carriage), private hire vehicle (minicab/Uber, etc) motor cycle and any other modes with the exception of minibus, bus, coach, rail and tube (also referenced as metro, subway, tram in the CAA survey),</p>	<p>The response has conflated two separate definitions. For the purposes of passenger travel and the associated GCG Limit, all car travel is considered to be a 'non-sustainable' mode.</p> <p>For staff travel however, the definition is slightly different and considers only</p>

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		walking, wheeling, cycling and other active modes (e-bikes, e-scooters, etc)". This definition relating to passengers does not sit comfortably with the view expressed by the applicant and operator that members of staff comprising part of a car share are to be classified as a sustainable trip.	<p>the passenger(s) in multi-occupancy cars to be considered sustainable.</p> <p>This difference has been introduced as there is a greater proportion of single-occupancy vehicle trips for staff, compared to passengers, and increasing the occupancy of staff car trips to reduce single-occupancy car trips is one of the existing objectives of the airport's surface access strategy (which also seeks to reduce passenger private car travel).</p>
Holiday Extras Ltd RR-0565	Surface Access	The document comprising Appendix F – Surface Access Monitoring Report relies on the "main mode" of a particular trip, despite the dataset being recognised as having fewer survey records, with its results being inconsistent. Relying on the "main mode" is at variance with CAA records which is determined according to the final mode of travel, being the last mode used to access the airport, whilst at the same time appearing inconsistent with the approach to monitoring passenger mode share, which as indicated in the FTP [TR020001/APP/7.13] is dependent on CAA passenger survey data, particularly the final data sets published at Easter time.	<p>As stated in paragraph F2.1.8 of the <b>Green Controlled Growth Framework Appendix F – Surface Access Monitoring Plan [APP-224]</b> <i>"the full CAA dataset should be used with appropriate adjustments to take account of main mode of travel (rather than the currently reported summary of 'main mode')"</i>.</p> <p>This definition has been utilised in response to the specific issue raised in the Relevant Representation related to the limitations of the data collected</p>

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			<p>during the CAA's Departing Passenger Survey.</p> <p>Utilising the full dataset in this way ensures that limitations of fewer survey records for main mode can be overcome and is consistent with the approach used when analysing baseline mode shares for the Transport Assessment.</p>
Holiday Extras Ltd RR-0565	Surface Access	<p>What the SAS does not grapple with in any comprehensive way is the accepted least sustainable means of passenger access to London Luton Airport, being what has been termed "kiss and fly" along with taxis/minicabs and private hire vehicles. These modes involve a doubling of trips to the same airport. It is counter-intuitive to set up a charging mechanism at the airport's car parks which on the one hand seeks to discourage the "kiss-and-fly" mode, whilst on the other, simultaneously proposes a steep increase in the number of drop-off and taxi spaces over the three phases of the DCO development, along with an additional pick/drop off area provided in car park 12 in Phase 2b.</p>	<p>For taxis, minicabs and private hire vehicles, the Framework Travel Plan sets out a number of possible interventions and measures to improve the efficiency of their operations. This includes the possible introduction of new measures which encourage more efficient use of taxi and private hire trips, ensuring where possible vehicles are occupied in both directions, thus reducing the number of empty vehicle trips coming in and out of the airport.</p>
Holiday Extras Ltd RR-0565	Surface Access	<p>The management of vehicle demand through the use of access and parking charges, whilst a key component associated with incentivising sustainable modes, vehicle choice and protecting surrounding communities from potential negative impacts; has the ability to give rise to</p>	<p>Noted.</p>



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		unintended consequences in terms of parking in surrounding residential streets, in order to avoid having to pay costly on-airport car parking charges. In this respect, the pricing strategy adopted by Luton Rising towards all passenger car parking products, including use of the Luton DART, is strongly correlated to the demand for on-airport passenger car parking products, including the extent to which passengers will then rely on the least sustainable access modes to the same airport.	
Holiday Extras Ltd RR-0565	Surface Access	No framework forming part of the DCO application assesses the costs and benefits of surface access interventions to ensure investment decisions maximise the opportunity of reaching set Targets, seen in terms of the choice of modal access share generally. Any aim of incentivising the use of cleaner greener vehicles serving the airport as part of a move to zero emissions has an opportunity cost; with the passenger asking themselves the question of whether there are alternative more reliable cheaper options, an important consideration to those households who are confronting cost of living difficulties or other financial challenges.	<p>The <b>Framework Travel Plan (FTP) [APP-229]</b> sets out the longlist of interventions and measures that the operator could draw upon when the Travel Plan Coordinator (TPC) is developing a new Travel Plan.</p> <p>The longlist, or toolbox, will be deployed flexibly to respond to changing circumstances and the results of ongoing monitoring and stakeholder feedback, to ensure that the Targets are achieved and will have the greatest impact on travel behaviour and mode choice.</p> <p>It is not an exhaustive list, and other interventions will be considered where required, but it represents those considered most appropriate by the</p>

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			Applicant at the point of submission of the application for development consent.
Holiday Extras Ltd RR-0565		<p>The 2019 passenger modal split survey at a throughput of 18mppa reveals that 45% of those accessing London Luton Airport relied on a taxi/minicab and private car (drop-off/pick-up), being a far higher percentage than passengers relying on either public transport modes, or those passengers dependent on combined long term on- and off-airport car parking provision .</p> <p>The number of passenger person trips in the AM and PM peak periods reflect reliance placed on these two least sustainable modes . These figures are required to be seen in the context of the toolbox of interventions relating to vehicle access, parking, private hire vehicles and taxis, which seek to introduce measures to encourage more efficient use of taxi and private hire trips, ensuring where possible vehicles are occupied in both directions, thus reducing the number of empty vehicle trips coming into and out of the airport.</p> <p>Both taxis and private hire vehicles along with the “kiss-and-fly” modes are required to be examined from a wider locational context, with surrounding residential streets revealing an absence of parking restrictions, and where in recent years there has been a rise in the number of technological platforms matching drivers with car parking spaces through their websites and apps, representing</p>	<p>As set out in the <b>Transport Assessment [APP-203 to APP-206]</b> and <b>Surface Access Strategy [APP-228]</b>, the Applicant proposes to undertake monitoring to enable the impacts of the Proposed Development to be able to be considered during implementation such as parking in residential areas.</p> <p>The Applicant and the airport operator will work with the local highway authorities and support appropriate measures in the event that there are impacts which occur as a consequence of the implementation of the Proposed Development.</p> <p>The Applicant and Operator are currently developing a suitable and effective funding mechanism that best responds to the vision and objectives of the Surface Access Strategy, and realising Sustainable Transport Opportunities. Further details will be shared during the course of the</p>

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		part of what has been referred to as the “sharing economy”. JustPark is one of a number of technological platforms whose mission is to transform the way drivers look for parking spaces, whilst delivering cash to home owners who rent out their driveway. The same platforms enable other businesses such as hotels to maximise their income from airport related car parking.	examination, following further consultation with relevant stakeholders on the details of the Sustainable Transport Fund.
Holiday Extras Ltd RR-0565		Exploring More Sustainable Approaches to Surface Access These aspects of access mode to London Luton Airport do not seem to have been assessed as part of the DCO application despite their increasing popularity. When combined with the need to carry out improvements to the highway network throughout the duration of the proposed development to ensure its efficient use; the same factors collectively point to the requirement to explore a more sustainable approach to surface access. In the opinion of Holiday Extras Limited it requires further consideration to be given to satellite long term off-airport park and ride facilities which (i) have the added benefits of reducing trips and vehicle emissions on the highway network close to London Luton Airport, (ii) minimising the propensity for indiscriminate passenger car parking on surrounding residential streets, (iii) ensuring valuable space on-airport is utilised for alternative purposes, and (iv) avoiding on-airport passenger car parking encroaching onto Wigmore Park and the Green Horizons Park development, the latter required to meet its own parking needs. The fact that multiple interventions are associated with the	As previously noted, the Applicant is not pursuing off-site third-party parking options as part of the DCO, This approach provides additional flexibility in responding to the limits set out within the <b>Green Controlled Growth Explanatory Note [APP-217]</b> .  Despite the mode share targets which have been set, the proposed Airport growth means that there will inevitably be increases in traffic associated with the airport, in addition to growth in traffic associated with consented developments and background traffic. As such, the highway mitigation included within the <b>Transport Assessment [APP-203 to APP-206]</b> is designed to mitigate against

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		applicants' surface access toolbox supports the importance to be attached to a detailed assessment of available alternative access strategies.	<p>congestion and delay associated with this growth.</p> <p>As noted above, the Applicant proposes to undertake monitoring to enable the impacts of the Proposed Development to be considered.</p>
Holiday Extras Ltd RR-0565	Surface Access / Consultation	<p>The Framework Travel Plan (FTP) The submitted Framework Travel Plan (FTP) [TR020001/APP/7.13] sets out a framework for the content of travel plans which should be produced every 5 years following the current DCO application, whose purpose is to set out the structure and approach for developing the 5 year TP. For vehicle access, a key priority is progressing measures which support the uptake of electric vehicles through supporting infrastructure and incentives.</p> <p>TPs will contain the results of on-going monitoring and consider comments and views from stakeholders including the Airport Transport Forum (ATF) and the London Luton Airport Consultative Committee (LLACC) on their content and level of ambition, although as previously indicated, no role has been set aside for the largest private long term off-airport car parking operator to effectively engage in this process.</p>	<p>Noted. The primary role of the airport transport forum is to serve local communities through:</p> <ul style="list-style-type: none"> <li>- identifying short- and long-term targets for increasing the proportion of journeys made to airports by public transport;</li> <li>- devising a strategy for meeting these targets; and</li> <li>- overseeing implementation of the strategy.</li> </ul> <p>The forum's focus on public transport reflects its purpose to date. The future form of the ATF is under discussion and the comments provided are noted.</p>

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		<p>Airparks have been operating from Slip End for a continuous period approaching 25 years and at no time has an opportunity been extended to my clients to join the ATF, neither have their views been sought by the LLACC, or the associated dedicated Passenger Services Sub-Committee. With these facts in mind, they have been excluded from taking a pro-active role as part of these important airport access related organisations in the future development of the airport. This is a significant omission given that the primary purpose of ATFs as confirmed in paragraph 2.1.2 of the FTP [TR020001/APP/7.13] is to “encourage partnership between airport operators, local authorities, transport operators, local people and businesses, and other relevant parties, to improve public transport access to airports, and reduce reliance on private, road-based transport, congestion, and pollution on nearby roads”.</p>	<p>Membership of the LLACC is through applications to join the committee, following the processes set out in the LLACC constitution<sup>1</sup>, with applications determined quarterly by the committee. The Applicant is not responsible for inviting organisations to join the LLACC, the eligibility criteria for organisation to be allowed to join, or approving any decision where an application has been made.</p>
Holiday Extras Ltd RR-0565		<p>The ATF is intended to summarise current surface access across six priority areas in any five year period, including consideration relating to “vehicle access, parking, private hire vehicles and taxis”, together with the specific matters relating to drop-off and pick-up locations, car parking locations and quanta.</p> <p>My clients as the only major private long term off-airport car parking operator have both a role to play in these</p>	Noted.

<sup>1</sup> Constitution and Standing Orders, London Luton Airport Consultative Committee, April 2015. Available from: <https://www.london-luton.co.uk/LondonLuton/files/e0/e0c9a621-b266-4f67-b777-d51cc0641352.pdf> [Accessed 18 August 2023]

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		<p>important airport access related issues, at a time when the airport operator accepts its sustainability aspirations are reliant on third parties. In this respect, the toolbox of interventions and measures in the FTP where it concerns the same topic have implications, and are pertinent to the running of a long term off-airport car parking operation, particularly in those areas of</p> <ul style="list-style-type: none"> <li>i) promoting EV charging points for passengers and the uptake of electric vehicles;</li> <li>ii) improving forecourt operations especially limiting queueing and anti-social drop-off;</li> <li>iii) incentivising a change from diesel/petrol to electric/hybrid service vehicles;</li> <li>iv) contributing to a feasibility review associated with the opportunity to support luggage delivery from/to the airport to/from the passengers home destination, and</li> <li>v) improving an understanding of passenger travel behaviour as part of more comprehensive surveys to robustly monitor progress in achieving airport targets.</li> </ul>	
Holiday Extras Ltd RR-0565	Green Controlled Growth – Surface Access	My clients have carefully considered the GCG Framework where it is directed at surface access and the various limits and thresholds surrounding future growth at London Luton Airport, alongside the approach to the preparation of Monitoring Reports and the trigger mechanism for the submission of a Mitigation Plan. It is acknowledged that	The magnitude of the GCG Limits are aligned with the assumptions used in the Environmental Impact Assessment (EIA) process for the assessment of a reasonable 'worst case' scenario, which is aligned with the 'faster growth

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		<p>the approach is innovative and far reaching in seeking to enable the sustainable expansion of London Luton Airport, particularly in circumstances where mitigation is necessary with reliance placed on the slot co-ordination process, and capacity declarations. To what extent this mechanism ensures sustainable growth at London Luton Airport along with the extent to which it will impact on the ability and decision of passengers to switch airports remains an unknown factor. This aspect of passenger behaviour does not appear to have been considered. The situation depends, in part, on the extent to which passengers regard services at different airports as reasonably close substitutes, and the costs they face in switching demand to the next best alternative. The availability of suitable alternative flights to the same destination as well as the willingness of passengers to follow an airline to an alternative airport is likely to be important in deciding to switch.</p>	<p>case' sensitivity test, as set out in <b>Chapter 5</b> of the <b>Environmental Statement – Approach to the Assessment [AS-075]</b> and the <b>Green Controlled Growth Explanatory Note [APP-217]</b>. The GCG Limits therefore seek to ensure the environmental effects associated with this reasonable 'worst case' scenario cannot be exceeded in practice, and growth could not continue if the Limits were exceeded, and the resultant environmental effects were worse than forecast.</p> <p>The passenger forecasts set out in the <b>Need Case [AS-125]</b> reflect a range of factors, including the airport's catchment, passenger characteristics, destinations served, as well as those of competing airports.</p> <p>The GCG Framework is considered to represent an appropriate balance between enabling sustainable growth at Luton to the deliver the significant socio-economic benefits associated with the Proposed Development, whilst</p>

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			providing certainty to local communities around the extent of the environmental effects they will experience as a result of the expanded airport.
Holiday Extras Ltd RR-0565	Green Controlled Growth	There are other associated implications surrounding this process based around reducing harmful pollutants from vehicle emissions and issues of air quality. Holiday Extras Limited have reservations concerning the governance of the Environmental Scrutiny Group (ESG) whose independent chair will initially be nominated by the airport operator, following consultation with the Applicant and Secretary of State, and where the majority of parties represented on the ESG comprise local authorities with a tendency to pursue common goals, without the added diversity of views from private organisations with surface access business interests. To the extent that representatives from local authorities should be suitably qualified senior planning professionals; so too should the requirement be the same for those private bodies with access business interests.	<p>One of the central principles of the proposed governance arrangements for the GCG Framework, including the membership of the Environmental Scrutiny Group (ESG) is around the need for independent scrutiny and oversight.</p> <p>In this context, independent also means independent of individual business interests or private organisations, as those interests may not align with the wider sustainability ambitions of the airport. It is for this reason that the airport owner (Luton Rising), the airport operator (London Luton Airport Operations Ltd), and the airlines operating at Luton are not proposed as members of either the ESG or the associated Technical Panels.</p>



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			<p>The inclusion of Holiday Extras Ltd, or other businesses, as a member of the ESG (assuming that it what is suggested, but not stated explicitly in the Relevant Representation) would not be consistent with these principles, and would not be supported by the Applicant.</p>
Holiday Extras Ltd RR-0565	Green Controlled Growth – Surface Access	<p>Equally relevant is the remit of the Surface Access Technical Panel, where Holiday Extras Limited have a wealth of experience as a successful long term off-airport business, yet again no private organisations with surface access interests are expected to comprise this Panel, despite it being accepted that “not all of the organisations listed above have this in-house capacity”.</p>	<p>Where it is stated in paragraph 2.4.27 of the <b>Green Controlled Growth Explanatory Note [APP-217]</b> that “<i>It is however acknowledged that at present, not all of the organisations listed above have this in-house capacity</i>”, this was a general statement spanning the four topics of the GCG Framework, rather than relating to surface access explicitly, where each of the three Local Highway Authorities are proposed as members along with National Highways, which has statutory responsibilities relating to transport matters, and has the in-house technical capability required.</p> <p><del>Discussions are ongoing between the Applicant and those potential members</del></p>

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			<p><del>regarding the resourcing requirements of the roles, including how that would be funded where it goes beyond their existing statutory functions.</del></p> <p>As set out in the previous response, providing independent scrutiny of the airport free from specific private businesses' interests is an essential principle of the GCG Framework, and that equally applies to the Technical Panels as the ESG.</p> <p>The inclusion of Holiday Extras Ltd, or other businesses, as a member of the Surface Access Technical Panel would not be consistent with these principles, and would not be supported by the Applicant.</p>
Holiday Extras Ltd RR-0565	Planning	<p>Passenger Modal Share Although local development plan documents are not the starting point for consideration of a DCO application, they are, as previously acknowledged by the Applicant, an important and relevant consideration. Policy LP6C forming part of the adopted Luton Local Plan 2011-2031 indicates where airport related car parking is to be located within the Airport Strategic Allocation on the Proposals Map.</p> <p>In these areas the airport is required to demonstrate that the proposals meet an objectively assessed need; do not</p>	<p>The <b>Planning Statement [AS-122]</b> considers the Proposed Development's compliance with all relevant planning policy.</p> <p>Car parking is discussed in Section 8 of the <b>Transport Assessment [APP-203]</b>.</p>

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		adversely affect the adjoining highway network, and will not lead to detriment to the amenity of the area and neighbouring occupiers. New Century Park, renamed Green Horizons Park, along with Wigmore Valley Park, although situated in the Airport Strategic Allocation, are excluded from providing airport related car parking in Policy LP6C. In effect this means that in development plan terms, the only real difference between sites lying within the Airport Strategic Allocation but excluded for airport related car parking purposes; and other sites situated outside the Airport Strategic Allocation, is that in the case of the latter they are required to accord with the sustainable principles defined in the Local Plan as a whole, as well as the current requirements of the current approved ASAS.	
Holiday Extras Ltd RR-0565	Surface Access	<p>The broad split between public transport and private modes of travel, relying on the modified version of the Central Bedfordshire Luton Travel Model, amended to take into account Hertfordshire County Council COMET transport model is provided at Table 18.7 of the Document TR020001/APP/5.01 Chapter 18 Traffic and Transportation Volume 5 Environmental Statement and Related Documents.</p> <p>Equivalent figures for total public transport modal share by passengers of 45% in 2043 at a throughput of 32mppa is provided in Table ES.2 reproduced in Document 7.02</p>	Table 9.5 of the <b>Transport Assessment [APP-203 to APP-206]</b> further breaks down the detailed passenger mode splits between Private Car drop off / pick up, Private Car (On-site Parking) and Private Car (Off-site Parking), which were used for the purposes of the highway modelling at all Assessment Phases. Of the total private car usage at Assessment Phase 2b (2043), some 23.5% are related to private car pick up / drop off.

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		<p>Transport Assessment – Part 1 of 4 [TR02001/APP/7.02]. Table 18.7 shows that in 2043, at a 32mppa throughput, 39% of the modal share will be by car, which is the same as the drop-off figure in the same year derived from those various sources set out in Table 1. It is not clear whether the 39% in Table 18.7 includes both drop-off and passengers leaving their car at on-airport car parks. In the event that the 39% includes drop-off, there remains a need to calculate the proportion of passengers accessing London Luton Airport leaving their cars in an on-airport car park.</p>	
Holiday Extras Ltd RR-0565	Surface Access	<p>Two important aspects should be taken into consideration when considering public transport modal share. Firstly, it is largely dependent on non-UK business and leisure passengers compared with UK based business and leisure passengers, which falls outside the direct control of the airport operator.</p>	<p>Noted. Whilst the applicant has no direct control over the provision of public transport, significant improvements are being proposed to public transport related facilities at the airport, and the Applicant would continue to work with public transport providers in order to provide improvements to services through the Sustainable Transport Fund.</p> <p>In addition, the passenger forecasts set out in the <b>Need Case [AS-125]</b> reflect a range of factors, including the airport's catchment, passenger</p>

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			characteristics, destinations served, as well as those of competing airports.
Holiday Extras Ltd RR-0565	Surface Access	Secondly, the information provided in Document TR020001/APP/5.01 reveals in terms of rail passengers that the greatest share in terms of the distribution of additional passenger loading over each phase of the DCO application is in locations situated to the south of the airport in the section extending from Luton Airport Parkway station to West Hampstead, occupying a relatively small part of the catchment population of the airport.	The <b>Need Case [APP-213]</b> sets out the anticipated catchment area for the Airport, and highlights that the Airport is expected to expand the area it draws passengers from into the south. Figure 6.6 of the <b>Need Case [APP-213]</b> provides a map of passenger demand growth by district, from 2018 to 2050.
Holiday Extras Ltd RR-0565	Surface Access	It should be noted that where staff car parking was previously located on-airport within the Operational Area Boundary, it has been decanted outside the Operational Area Boundary of London Luton Airport, onto two separate sites east and west of the Luton Airport Parkway railway station.	Noted. Whilst new areas of staff parking are proposed within Car Parks P1 and P2, an additional staff parking facility is proposed within Car Park P9 which seeks to rationalise and extend the current parking provision in this area.
Holiday Extras Ltd RR-0565	Surface Access	Car Park P1 is to comprise a new multi-storey to accommodate 1,000 car parking spaces for airport staff only, with Car Park P2 being a surface level car park previously used as a trailer park site occupied by HGV parking and coaches, again for staff car parking purposes only. In this way, Car Parks P1 and P2 are reserved for staff parking to be provided in Phases 2a and 2b. These two proposed staff car parking sites lie in close proximity to Bartlett Square which was previously the subject of an	It is the intention of The Applicant to utilise land which lies within their ownership and control, where possible, desirable, or feasible.  The two sites of Car Park P1 and P2 are located relatively close to the airport and are considered to lend themselves to staff related parking.

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		application (Luton BC Ref. No. 18/00271/EIA) for “combined-long/short/staff/mid stay car parks, car hire and valet”, despite an earlier proposal preventing the use of the same land for airport related car parking.	
Holiday Extras Ltd RR-0565	Surface Access	All future mid and long-stay on-airport car parks in Phases 1, 2a and 2b are required to have shuttle buses to transport passengers to the respective terminals, in the same way as is the case with the long term off-airport car parking site operated by Holiday Extras Ltd at Slip End. The locations of the various on-airport passenger car parking products over the three phases of the DCO application are based on information set out in Figure 8.8, Figure 8.9 and Figure 8.10 taken from Document [TR020001/APP/7.02] Transport Assessment – Part 2 of 4. Short stay on-airport car parking in Phases 1 and 2a is provided in the Operational Area Boundary of the existing airport at car parks P3 and P4, the latter comprising two multi-stories. Increased provision for this parking product is provided in Phase 2a at a throughput of 27mppa on a new decked car park on land at P5, which itself results in a reduction in car parking capacity on the same land of 1,250 spaces, having previously been used in Phase 1 for long term passenger block parking, where approximately 2,450 spaces were available.	Noted.
Holiday Extras Ltd RR-0565	Surface Access	In Phase 2b commencing in the first quarter of 2037, additional short stay car parking is provided in a new multi storey car park P12 lying outside the Operational Area	Noted.

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		Boundary of the existing airport providing approximately 2,225 car parking spaces to meet the needs of Terminal 2, but where it is also intended to be used for pick-up/drop-off use including valet parking. Mid stay on-airport passenger car parking during Phases 1 and 2a is provided on existing car park P3 within the Operational Area Boundary of the airport along with the short stay product. Car park P7 constructed on land forming part of Wigmore Park, beyond the airport's Operational Area Boundary, is also used for mid stay on-airport passenger provision in Phases 1 and 2a.	
Holiday Extras Ltd RR-0565	Surface Access	Car park P7 fundamentally changes shape as a consequence of the construction of the second terminal, and the Green Horizons Park development, resulting in a reduction in the number of spaces from 3,090 to 1,230 over the two phases, having previously been used for long stay passenger parking in Phase 1.	Noted. Parking facilities are proposed in a phased approach to accommodate changes in available area between the three development phases, and to accommodate the Green Horizons Park buildout.
Holiday Extras Ltd RR-0565	Surface Access	Two new car parks P10 and P11 meeting both mid and long stay car parking are constructed on land beyond the Operational Boundary of the airport during Phase 2a, catering for 1,150 and 2,700 spaces respectively. In Phase 2b, mid stay passenger car parking is concentrated on car park P3; at car park P10 where the capacity is increased to 3,165 spaces, and on existing decked car park P5 which accommodates 1,200 spaces.	Noted. Parking facilities are proposed in a phased approach to accommodate changes in available area between the three development phases, and to accommodate the Green Horizons Park buildout.
Holiday Extras Ltd	Surface Access	Long stay on-airport passenger car parking in Phase 1 is retained on car park P5 as well as on extended car parks	Noted.

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RR-0565		<p>P6 and P7 beyond the Operational Area Boundary of the airport. In the same way as car park P7, car park P6 changes shape primarily as a consequence of the construction of the second terminal, and the Green Horizons Park development, being used for long stay purposes in Phases 1 and 2a, but altering from a self-park to a block parking format in Phase 2a with a resultant increase in capacity from 1,250 to 1,620 available passenger spaces.</p> <p>In Phases 2a and 2b, all long term on-airport car parking is provided outside the Operational Area Boundary of the airport on car parks P6, P10 and P11. Car park P10 is devoted to both mid and short stay passenger car parking being subsequently extended in Phase 2b to 3,165 spaces but where 505 spaces are also used for staff car parking. The capacity of car park P11 used for long stay purposes increases from 2,700 to 5,530 spaces in Phase 2b.</p>	<p>However, Car Park P10 is proposed to be used for Mid / Long parking as opposed to Short / Mid stay, and Car Park P11 will have up to 5,350 spaces as opposed to 5,530 as stated in the raised matter.</p>
Holiday Extras Ltd RR-0565	Surface Access	<p>Important Conclusions Five conclusions arise from this exercise when analysed in conjunction with the contents of Table 2 along with Inset Maps 4.10, 5.36 and 6.6 where they comprise part of Document TR00001/APP/5.02 Appendix 4.1 Construction Method Statement and Programme Report 2 Assessment Phase 1, 2a and 2b Car Park Locations.</p>	<p>There have been material change in spaces since 2021, considering the MSCP facilities constructed adjacent to T1.</p> <p>The number of parking spaces proposed at each phase of development have utilised the number of parking spaces surveyed in 2019 as</p>



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		<p>A. There has been no material change in the number of short and long term on-airport passenger car parking spaces since the time Application No. 12/01400/FUL was submitted to Luton Borough Council in December 2012. The number of mid-stay on-airport passenger car parking spaces since the date of submission of same application has declined as a consequence of the subsequent construction of the Luton DART linking the Airport to Luton Parkway railway station. The number of long-term on-airport passenger car parking spaces has remained static over the last 11 years at around 4,500.</p> <p>Put into perspective, a passenger throughput of 19mppa equates to 52,000 passengers per day but there is less than 10,000 on-airport car spaces to service their needs. These conclusions are required to be assessed alongside the contents of paragraph 7.32 of the Statement of Case prepared on behalf of Luton Borough Council to Application No. 21/00031/VARCOM called in by the Secretary of State which sought variations to earlier conditions, as well as to accommodate a throughput of 19mppa: "7.32 The provision of available car parking at the airport is below that which was envisaged in the 2012 application and the rapid growth of the airport has resulted in a greater under provision of available spaces."</p>	<p>a 'base' position, as this represents the consented number of parking spaces at the Airport.</p> <p>It is considered inappropriate in the context of the mode share limits which have been set, and the sustainable travel aspirations underpinned by GCG, to propose a significant uplift to the base condition parking spaces with the intention of increasing the parking stock above the levels that are currently proposed.</p>
Holiday Extras Ltd RR-0565	Surface Access	B. The DCO application reveals that from Phase 1 there is a requirement for the airport to use land outside its Operational Area Boundary to accommodate mid stay and long stay on-airport passenger car parking	The proposed parking numbers are defined using a combination of CAA data, existing parking numbers, projected busy day timetables and

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		<p>requirements, and this continues with further extensions westwards during Phases 2a and 2b. Short stay on-airport passenger parking also has to rely on land outside the existing Operational Area Boundary of the airport in Phase 2b. There is no indication of how the key modelling input in calculating the number of on-airport passenger car parking spaces required at London Luton Airport at a passenger throughput of 21.5mppa, 27mppa and 43mppa has been calculated, including whether it has considered the occupancy/demand ratio, being the number of cars wishing to park at London Luton Airport, and the volume of spaces required to service that demand on a monthly basis. Similarly, no study appears to have been undertaken of anticipated changes in customer behaviour where emphasis has been placed on customer profiling based on the popularity of certain destinations; flying frequency; trip duration and trip frequencies as part of a greater understanding of the cyclicity of passenger parking demand throughout the year.</p>	<p>mode share aspirations as set out in <b>Section 8 and 9 of the Transport Assessment [APP-203 to APP-206]</b>.</p>
Holiday Extras Ltd RR-0565	Surface Access	<p>C. An examination of Table ES.1 Proposed Car Parking in Document [TR02001/APP/7.02] Transport Assessment – Part 1 of 4 and Table 8.2 Proposed Assessment Phased Car Parking Provision taken from Document [TR02001/APP/7.02] Transport Assessment – Part 2 of 4 set out in columns 4, 5 &amp; 6 in Table 2, is required to be considered in the light of Inset Maps 4.10, 5.36 and 6.6 where they comprise part of Document TR00001/APP/5.02 Appendix 4.1 Construction Method</p>	<p>Whilst the total number of parking spaces provided within proposed Car parks P6 and P7 reduces from Phase 1 to Phase 2a to accommodate the Green Horizons Park development, the assertion that there would be a loss of parking provision is not correct. Additional areas of parking are proposed at Phase 2a (Car Parks P10</p>

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		Statement and Programme Report 2 Assessment Phase 1, 2a and 2b Car Park Locations. The relevance in carrying out this exercise lies in the fact that in Phase 1 at an anticipated passenger throughput of 21.5mppa, a total of 2,485 spaces comprise relocated mid and long stay car parking on car parks P6 and P7, whilst in Phase 2a as a consequence of the further reconfiguration of the shapes and capacities of car parks P5, P6 and P7, a total of 2,740 spaces are lost when compared with the same car parks present at the earlier Phase 1.	and P11) which provide a net uplift in spaces (Total Mid / Long spaces at Phase 1: 7,275. Total Mid / Long spaces at Phase 2a: 8,400).
Holiday Extras Ltd RR-0565	Surface Access	D. It is therefore important when considering the intended use of on-airport car parks for short, mid and long-term passenger parking purposes, to have regard to the same Inset Maps, to the extent that they reveal that the entirety of certain car parks are not devoted to on-airport passenger car parking use. By way of example, car park P7 at a passenger throughput of 21.5mppa is not used solely for mid and long stay, whether in terms of either new or relocated provision. The same car park is to cater for relocated car hire and for new employee car parking. In a similar vein, car park P10 in Phase 2b at a throughput of 32mppa reveals a capacity of 3,165 spaces, of which 700 spaces are to be used for car hire purposes and 505 spaces for staff. In the case of staff car parking, this is in addition to additional staff car parking amounting to 1450 spaces provided on land to the east and west of Luton Parkway railway station in Phase 2a.	Noted. The car parks referred to in the comment have been designed to provide sufficient space to accommodate the multiple uses specified, through segregation where relevant.

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Holiday Extras Ltd RR-0565	Surface Access	E. It is contended that 16,000 car parking spaces which are to cater for short, mid and long-term passenger car parking purposes in 2043 at a throughput of 32mppa, is insufficient for the above reasons and particularly when considering alternative airports displaying similar modal share characteristics to those at London Luton Airport. In the case of London Stansted Airport, the total number of short, mid and long-term spaces in 2017 was 26,800 spaces, equivalent to a doubling of spaces per million terminating passengers at a throughput of 24.2 mppa.	<p>The proposed parking numbers are defined using a combination of CAA data, existing parking numbers, projected busy day timetables and mode share aspirations as set out in the <b>Transport Assessment [APP-203 to APP-206]</b>.</p> <p>It is noted that there are inevitably proposed to be increases of on-site parking to cater for increased passenger demand, despite the mode share targets which increasingly favour public transport.</p>
Holiday Extras Ltd RR-0565	Surface Access	These considerations place increasing importance on companies such as my clients in meeting any future shortfall in supply at London Luton Airport, irrespective of the interventions that are to form part of the GCG and the provisions of the FTP. A further important attribute of long term off-airport car parking companies such as Airparks Services Ltd, operating from lawful uses in the vicinity of London Luton Airport, extends beyond issues of demand and supply. They provide a welcome choice for passengers where, if left to be dominated by the airport company, there would be an absence of competition in the market for airport related car parking. The importance of this issue becomes apparent from the document	<p>As previously noted, it is not the intention of the Applicant to provide additional car parks in off-site locations as this would negatively impact on the mode share targets which are set within the <b>Transport Assessment [APP-203 to APP-206]</b>, and which in turn help to define the proposed numbers of on-site parking spaces.</p> <p>However, it is not within the gift or control of the Applicant to prevent any independent companies from</p>

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		produced by the Civil Aviation Authority CAP 1473 entitled "Review of Market Conditions for Surface Access at UK Airports – Final Report" published in 2016, paragraph 4.9 of which is noteworthy. "4.9 Under such a market definition, it follows that airport operators generally are present in both the upstream (access to the airport) and downstream (services to get to the airport) levels of the surface access sector. As such the airport operator provides third parties access to facilities that are necessary for them to supply surface access services to passengers, whilst at the same time competing with those third parties in the downstream market. This may mean that airport operators have incentives to favour their own services in granting access to facilities needed by their rivals.	submitting planning applications in relation to new or extended off-site parking facilities, which the relevant planning authority would assess on a wholly separate and independent basis to the DCO application.
RR-0953 RR-1015 RR-1152 RR-0459 RR-1223 RR-1259 RR-0269 RR-0615 RR-1267 RR-1566	Compensation	I think Luton Rising should prepare Community Area Collections in relation to the application. Luton Rising should also inform residents in the ENTIRE flightpath area how they are affected by the proposed development and what compensation is available to all those it has written to inform them that may be entitled to make a claim for compensation. Can you please require them to do this?	<p>The Applicant has included in its application a range of compensation measures which can be found in <b>Draft Compensation Policies, Measures and Community First [AS-128]</b>.</p> <p>This document includes detailed plans with noise contours to assist understanding of where and what compensation would be made available.</p>

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RR-0953 RR-1015 RR-1152 RR-0459 RR-1223 RR-1259 RR-0269 RR-0615 RR-1267 RR-1566	Compensation	Having looked at the Draft Compensation Policies, Measures and Community First document, the base level on plan on page 28 of that document (Appendix A – Indicative Noise Map) is so unclear it is not possible for me to identify whether I am within the boundary for Scheme 2, 3 or 4. I would like Luton Rising to prepare a clear plan on a OS background, which enables individual properties to be identified so they can consider what Schemes they fall in and whether the proposed mitigation is adequate. I would also like a contractual commitment to provide appropriate mitigation and its maintenance. · It should be noted that I have not seen any consideration of how noise insulation would operate in the summer months when windows are open for ventilation. What proposals does the applicant have in mind for this? ·	<p>An updated figure with a higher resolution Ordnance Survey base-map has been submitted as an additional submission, see <b>Draft Compensation Policies Measures and Community First Appendix A Part 1 [AS-126]</b>. However, as these plans are for indicative purposes only, and are based on forecast noise contours, inclusion within the boundary of the plans does not definitively mean that a property would be eligible for noise insulation under the proposed scheme. Similarly, being outside of the boundary of the plan does not definitively mean that a property would not be eligible.</p> <p>If development consent were granted, updated noise contour plans would be published every five years to determine eligibility for the noise insulation schemes.</p> <p>As set out in <b>Draft Compensation Policies Measures and Community First [AS-128]</b>, suitable ventilation may be provided as part of the</p>

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			<p>insulation schemes so that windows can be kept closed in warm weather.</p> <p>The noise insulation schemes would be secured through a Section 106 legal agreement.</p>
RR-0953 RR-1015 RR-1152 RR-0459 RR-1223 RR-1259 RR-0269 RR-0615 RR-1267 RR-1566	Noise and Vibration	The applicant also needs to consider and assess how those who work outside will be affected by the additional noise. No such assessment appears to have been carried out. Will the applicant be imposing respite periods for the residents under the proposed flightpaths, including the stack approach from St Neots? The NTS and ES chapter on noise does not make that clear.	<p>The noise assessment considers 'residential' receptors which is defined as follows in Table 16.7 of <b>Chapter 16</b> of the ES <b>[AS-080]</b>: People, primarily where they live ('residential receptors'), in terms of individual households, nursing homes and care homes and on a wider community basis. This includes any shared community open areas (e.g. parks) as well as private open space (e.g. gardens).</p> <p>Community areas where significant effects are identified therefore includes effects on public/private open space which would capture the effects on people working outside. The mitigation hierarchy, as set out in <b>Section 2</b> of <b>Appendix 16.2 Noise and Vibration Information [APP-111]</b> starts with mitigation at source and mitigation by</p>

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			<p>intervention (which benefit both indoor and outdoor exposure).</p> <p>Changes to airspace design and flight paths, such as the introduction of respite routes and periods, are outside the scope of the Proposed Development and any changes would be assessed as part of the Civil Aviation Authority's environmental assessment process for airspace change (Ref 5).</p>
RR-0953 RR-1015 RR-1152 RR-0459 RR-1223 RR-1259 RR-0269 RR-0615 RR-1267 RR-1566	General	I wish to be able to speak at any examination considering noise, environmental pollution and climate harms.	<p>. The Examining Authority is responsible for the Examination process. Respondents who submitted a relevant representation are interested parties and will be contacted by the Planning Inspectorate with regards hearings to discuss issues.</p> <p>Respondents are encouraged to contact the Planning Inspectorate directly or to access the Luton Airport Expansion project page on the Planning Inspectorate's website for further information.</p>
RR-0953 RR-1015	Need Case	The application has not clearly set out why the additional capacity is needed. As a result it is not possible to	The <b>Need Case [AS-125]</b> clearly sets out the requirement for the Proposed



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RR-1152 RR-0459 RR-1223 RR-1259 RR-0269 RR-0615 RR-1267 RR-1566		balance the true need for expansion with the environmental impacts of the proposed development. · For example, the Planning Statement refers to the Need Case but this appears to be based on business travel. Luton Airport is not a business travel airport but a leisure airport. Only Heathrow and City Airport can be truly considered as a business airport. The proposed business case based on socio-economic facts for Luton are also nor adequately set out.	Development based on all travel purposes and reasons why the additional capacity is needed at London Luton Airport.  It is incorrect to characterise the Need Case as being based solely on business travel. The socio-economic circumstances applicable to Luton are thoroughly described in Section 4 of the Need Case.
RR-0953 RR-1015 RR-1152 RR-0459 RR-1223 RR-1259 RR-0269 RR-0615 RR-1267 RR-1566	General Environment	The proposed development may benefit residents of Luton Borough Council as it is the owner but is that a valid reason for the expansion if it is at the expense of the wider environment.	The need for the Proposed Development is addressed in the <b>Need Case [AS-125]</b> .  A full and robust Environmental Impact Assessment in line with relevant legislation, policy and guidance has been undertaken to determine the adverse and beneficial effects of the Proposed Development. This has been reported in the Environmental Statement submitted as part of the application for development consent.  This reports the assessment of effects on the wider environment where

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			<p>relevant, for example the wider economic benefits and impacts on receptors where they are likely to occur and is not limited by authority boundaries.</p> <p>The Applicant also proposes to implement the Community First scheme which will be open to neighbouring communities as described in the <b>Draft Compensation Policies, Measures and Community First document [AS-128]</b>.</p>
RR-0953 RR-1015 RR-1152 RR-0459 RR-1223 RR-1259 RR-0269 RR-0615 RR-1267 RR-1566	General	<p>Given the scale of the proposed expansion and the fact that Luton Borough Council owns the airport there needs to be a clear set of legal safeguards to deliver and maintain the proposed mitigation measures and requirements of the DCO. This should include third parties such as Bedfordshire and Hertfordshire County Councils as well as other authorities being able to require performance and not authorise further operations or development in the event of breaches. · For example, flight numbers should not be increased above carefully assessed thresholds until it can be demonstrated to those bodies that the mitigation has been delivered and is working.</p>	<p>The separation between The Applicant and Luton Borough Council is set out in <b>Role and Responsibilities of Luton Borough Council [TR020001/APP/8.29]</b>.</p> <p>The development of the <b>GCG Framework [APP-218]</b> has taken place through engagement with a range of stakeholders including local authorities impacted by the Proposed Development. The proposed approach to GCG was also set out as part of the 2022 Statutory Consultation, which included the proposed membership</p>

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			and functioning of the Environmental Scrutiny Group (ESG). Changes have been made in response to this feedback, and the framework will be subject to further independent scrutiny throughout the DCO examination.
RR-0953 RR-1015 RR-1152 RR-0459 RR-1223 RR-1259 RR-0269 RR-0615 RR-1267 RR-1566	Health	With for example arriving flights proposed every 3 minutes between 10pm and 11pm, and then every 10 minutes until 2am, this will plague affected areas almost continuously during the night, with the only noise respite being offered between 3am and 5am. The World Health Organisation said in 2009 "sleeping satisfies a basic need and the absence of undisturbed sleep can have serious effects on human health". The WHO's 2018 Environmental Noise Guidelines indicate that noise can cause Critical health outcomes such as Cardiovascular disease, Annoyance, Effects on sleep, Cognitive impairment; and Important health outcome such as Adverse birth outcomes, Quality of life, well-being and mental health, Metabolic outcomes, Hearing impairment and tinnitus. What provisions have Luton Rising made to stop unnecessary health effects to the population living underneath the flight paths.	A Health Impact Assessment was undertaken and is reported in <b>Chapter 13 Health and Community</b> of the ES [AS-078]. This assessment includes an assessment of noise related health effects and consideration of the WHO guidance referred to.  Measures to avoid, reduce, manage, and/or mitigate effects are described in relevant sections of that assessment or cross references provided to other documents in the Environmental Statement where they are described, for example, <b>Chapter 16 Noise and Vibration</b> [AS-080] and <b>Appendix 16.2 Operational Noise Management (Explanatory Note)</b> [APP-111].
Miranda Folds RR-1006	Land and Property	I would also like to ask why our field has been highlighted separately on the location plan map?	The Applicant has written to the Interested Party to explain what is

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			proposed at the location and has offered a meeting.
Nicol Taylor Consulting Ltd RR-1095	Flightpaths	The information shared as part of the planning request does not seem to include enough detail or forecasting on how each departure route will be used and as a consequence what impacts this might have for delays and flights departing the airport. We know from experience that the rates of departing flights change on an hourly basis and it would seem that this information should be provided to help understand what delays will be like at the really busy hours. The application should also make clear whether the expected delays will have an impact on the attractiveness of the airport to airlines, whether the airlines have been consulted about the expected delays and whether there are potential implications for the forecast aviation traffic levels if delays are predicted to rise over today's levels.	<p>Information about the expected use of departure flightpaths is given in Table 6.19 of the <b>Need Case [AS-125]</b>.</p> <p>Information about the capacity of the proposed development and the anticipated implications for delays to flights is set out in <b>Appendix D of the Need Case [APP-214]</b>.</p> <p>The delay rates remain within acceptable levels of 10 minutes average delay in peak periods as commonly used in airport capacity assessment at major UK airports. It is not considered that delays at this level would have implications for the attractiveness of the airport to the airlines.</p>
Nicol Taylor Consulting Ltd RR-1095	Flightpaths	I also believe that the delay question extends beyond the area for which Luton is responsible and into the area for which NATS is responsible. Luton also has in progress an airspace change for airspace modernisation (FASI-S?) to help increase airspace capacity and is working with NATS on that project. I am not sure which order these changes	One of the aims of the Government's airspace modernisation strategy is to increase capacity to meet demand across all of the London airports. As the main Phase 2 capacity expansion at the airport is not anticipated to be in

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		are planned to happen, but if the Luton DCO plan comes in to play first will the airspace for which NATS has responsibility across London and the south-east have the capacity to accommodate Luton's plans and the increase in flights from other airports which I understand are also anticipated?	use until 2037, it is considered likely that the increase in airspace capacity around the airport will have been delivered over that timeframe.
Nicol Taylor Consulting Ltd RR-1095	Need Case	Unconstrained demand forecasts (Figure 6.2) What line was actually assumed for the central case forecasts including all economic work? How does the assumed line align with the Jet Zero forecasts from Government? What is the growth in ATMs implied by this, split between Long Haul and Short Haul? Is the profile of demand front end weighted?	<p>The central demand growth scenario is based on the 50<sup>th</sup> percentile as stated in the <b>Need Case [AS-125]</b>.</p> <p>The econometric inputs used for modelling underlying passenger demand are very similar to those used in the <i>Jet Zero</i> forecasts.</p> <p>The carbon cost assumptions are identical. As such the central demand growth scenario results in very similar overall market growth rates as the Jet Zero scenarios.</p> <p>The projected fleet mix is set out in Table 6.12 of the <b>Need Case</b>. A350, B787 and A321-LR aircraft are those expected to be used on long haul services.</p>

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			<p>The profile of the demand forecasts has not been front end weighted but faster unconstrained growth, in the earlier years, reflects the underlying economic assumptions as set out in Section 6 of the Need Case and the fact that, over the longer term, the market is expected to become more mature meaning that demand growth becomes less responsive to underlying economic growth.</p>
Nicol Taylor Consulting Ltd RR-1095	Need Case	<p>Constrained demand What assumptions have been made about constrained demand at Heathrow, Gatwick and Stansted? Do the assumptions on Gatwick demand align with materials published in Gatwick's Autumn 2021 consultation? What is the new runway assumed in the south-east (6.4.8) – is this Gatwick or Heathrow? These projects would give rise to very different effects at Luton and cannot be equated in one downside scenario. Please explain the detailed effect of a third runway at Heathrow on the Luton forecasts and particularly the need case at Luton – is this expansion really still required if there is a third runway at Heathrow? This cannot be equated to a slower growth scenario or even to growth at Gatwick. Lumping all the sensitivities together does not seem appropriate. Please split these out. Please explain the detailed effect on the economic benefit case at Luton of a third runway at Heathrow? One would expect this to be</p>	<p><b>Figure 6.3 of the Need Case [AS-125]</b> illustrates the unconstrained forecasts for London Luton Airport individually under different assumptions about capacity at the other London airports, in combination with variant demand growth scenarios. As stated at paragraph 6.4.8, the Core Planning Case is a hybrid of the scenario where there is a new runway at Heathrow or the north runway at Gatwick is brought into use.</p> <p>The assumptions regarding the capacity that could be delivered at Heathrow in the 2040s is taken to be 135 mppa and, for Gatwick, it has been</p>

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		<p>significant but there does not seem to be any evidence provided on this. In answering the questions above, can you explain the spill model that has been assumed – traditionally in the London market Heathrow fills first, then Gatwick then Stansted and Luton. Does your case assume that this continues to be the case? The historical spill model would indicate that if Heathrow third runway is in place and the Luton additional capacity proposed is taken up as you forecast, then Gatwick would be expected to be full too. Is this what you have assumed? If not, why does your spill model work differently to the historical approach and where is the evidence for this new model being credible? If you are assuming the traditional approach, why have you only assessed one new runway in the south east? Can you evidence that the take up of additional capacity at Gatwick has no effect on Luton's predicted levels of traffic – both with and without a third runway at Heathrow? Or explain why it has not been thought necessary to do any of the above – i.e. explain why the Heathrow third runway does not need to be accounted for. Is it because it is not likely to come forward as a development?</p>	<p>assumed an achievable capacity of around 70 mppa with the North Runway in use given considerable doubts about the ability of the runways in the operating configuration proposed to support higher capacity.</p> <p>Other than Stansted at its consented 43 mppa, all other airports are assumed not to be capacity constrained.</p> <p>The Slower Growth Case takes into account that additional runway capacity may be brought on stream at both airports but, if overall market demand growth was lower, it is considered less likely that this would be the case.</p> <p>It is considered that expansion at London Luton Airport would be required whatever additional runway capacity is delivered at either Heathrow or Gatwick, albeit the timing when particular passenger throughputs would be reached might be deferred.</p>

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			<p>The effect of an additional runway being in use at Heathrow or Gatwick is already factored into the economic assessment of the Proposed Development.</p> <p>The spill model is fully described in Section 6.3 of the Need Case. <b>[AS – 123]</b>. It considers demand in the specific catchment area at each airport and the nature of airline services at each airport and is calibrated on the specific performance of each airport in attracting demand from each catchment area district. It is considered more realistic and robust than a simple cascade spill model which fills each airport in turn and is similar in construct to the passenger allocation model operated by the Department for Transport.</p> <p>To reiterate, consideration of additional runways at Heathrow and/or Gatwick have been fully accounted for in the range of demand forecasts presented.</p>



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Openwide Investments Limited  RR-1129	Draft DCO	<p>Article 13 of the dDCO relates to 'Temporary stopping up and restriction of use of streets'. This article would enable the Applicant to temporarily stop up, alter, divert or restrict the use of any street and may for any reasonable time divert traffic from the street, and prevent all persons from passing along the street. This is subject to the Requirement to provide reasonable pedestrian access to and from premises abutting such a street. It is acknowledged that the Statement of Reasons DCO document explains that this power would only be exercisable for the purpose of constructing the Proposed Development.</p> <p>However, it is not clear from our review whether this will apply to roads falling outside of the Order Limits. Clarification is sought on this matter i.e., if this power does apply to roads outside of the Limits then the Applicant has the potential to temporarily stop up Airport Way and with it, the access to the hotel – particularly noting that Airport Way could be viewed by the Applicant as a direct route to the works sites.</p>	<p>Whilst we are not proposing to stop up roads outside of the Order Limits, it is acknowledged that there would likely be temporary disruption along Airport Way during construction of Airport Access Road (AAR), given that a new bridge link across Airport Way forms part of the design. As such, it is likely that a section of Airport Way would need to be temporarily closed to enable construction works, however this remains within the Order Limits, and access to the hotel would be retained through traffic management measures.</p> <p>Detailed construction impacts- including temporary access arrangements- are set out in <b>Appendix 18.3 Outline Construction Traffic Management Plan (OCTMP)</b>, which would be developed in detail by the appointed contractor during the detailed design stage.</p>
Openwide Investments Limited	Surface Access	It is noted that the DCO documents state that any person who suffers loss by the suspension of any private right of way under this article is entitled to compensation. The	It is acknowledged that there is predicted to be an increase in traffic along Airport Way. As noted above,

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RR-1129		<p>new AAR will link to the new Terminal 2 and east of the airport from the A1081 New Airport Way. It is acknowledged that this would be a benefit to the Hotel as it would provide its customers with a direct link to the new terminal, placing the hotel in close proximity to the terminal.</p> <p>However, following the implementation of Phases 2a and 2b (which includes construction of the new AAR), there is expected to be an increase in traffic. The section of Airport Way between A505 Vauxhall Way and Percival Way, where the hotel's access is located, is estimated to see an increase in daily traffic flow from just over 4,200 vehicles per day to around 8,500 vehicles per day.</p>	<p>whilst there is no intention to permanently suspend any private rights of way to the Ibis hotel, temporary disruption may result as part of the works associated with AAR construction.</p>
<p>Openwide Investments Limited</p> <p>RR-1129</p>	Noise and Vibration	<p>In particular, the following is noted within the Noise ES chapter:</p> <p>1 Construction noise and vibration: the assessment of Phase 1 only looks at receptors located to the north and south of the wider area of the DCO boundary. It is considered that there could be impacts on the hotel during Phase 1 and 2a of the construction works when the AAR is being constructed adjacent to the hotel. Further information is requested in relation to this to better understand implications for the hotel.</p>	<p>The methodology for the construction noise assessment is based on current industry standard approach and is presented in Section 16.5 <b>Chapter 16</b> of the Environmental Statement <b>[AS-080]</b> and details of the works that are included in the assessment are presented in Section 5 of <b>Appendix 16.1</b> of the ES <b>[AS-096]</b>. As set out in this appendix, the assessment is based on reasonable worst-case activities that are likely to generate the highest noise levels during construction. Noise effects due to construction of the Airport Access</p>

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			<p>Road has not been assessed explicitly at the Ibis Budget hotel due to the distance to the construction site, which is approximately 50 m away. At this distance, significant noise effects are not expected, and measures included within the <b>Code of Construction Practice [APP-049]</b> will be sufficient to manage noise and vibration emissions from Airport Access Road construction activities.</p>
<p>Openwide Investments Limited</p> <p>RR-1129</p>	<p>Noise and Vibration</p>	<p>the ES chapter states that while the hotel will experience an increase in road traffic noise from the increased use of Airport Way once the proposed expansion is operational, the hotel was designed and built to mitigate against aircraft noise such that the road traffic noise impacts would not be significant (EIA terminology) to the internal noise levels of the hotel. 3 Air noise: the chapter states that effects will be non-significant impacts on non-residential receptors (including hotels). While this may be the case, it is not clear from the Noise Chapter or associated figures and appendices, whether the Ibis budget hotel falls within the hotels screened into the assessment for assessment Phase 1 (40 hotels), 2a (38 hotels), and 2b (39 hotels). From our experience coordinating EIAs, it is standard practice to identify clearly the receptors assessed. Clarification is sought on this point i.e., a figure identifying the receptors assessed and</p>	<p>As described in Section 16.5 of <b>Chapter 16</b> of the ES <b>[AS-080]</b>, the assessment of non-residential receptors takes a two-stage approach due to the relatively large study area. Only receptors that exceed the screening and assessment criteria, and hence have the potential to be subject to potential adverse likely significant effects, are listed in the chapter. The Ibis budget hotel exceeds these criteria for surface access noise in Phase 2a and Phase 2b and hence is named in paragraphs 16.9.236 and 16.9.248 of <b>Chapter 16</b> of the ES <b>[AS-080]</b>. Relevant contextual information has been considered in the assessment of</p>

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		whether this includes the hotel. The Noise ES chapter does not propose any compensation or further mitigation, in relation to non-residential receptors assessed. Clarification is sought on this point.	this receptor and the conclusion for both assessment phases is that the effects are predicted to be not significant.
Openwide Investments Limited  RR-1129	Compensation	It is noted that the Applicant has submitted a Draft Compensation Policies, Measures and Community First document, which appears to be the only mechanism proposed to address compensation. The document outlines draft compensation policies, including in relation to noise insulation and compensation, which would be secured in a Section 106 agreement. It is also noted that other matters addressed within the document include residential hardship, business relocation, and statutory compensation claims. From review, this document is tailored to residents, local community groups and causes, buildings, and businesses which are required to relocate to enable the delivery of the Proposed Development. The document does not directly refer to compensation mechanisms for other businesses, or hotels. Further information on compensation options for identified 'Category 3 Parties' i.e., a Person with Interest in the Land with a right to make a relevant claim is sought, particularly given that the Applicant has identified Openwide Investments as such. ... 3 It is likely that there could be a knock-on of temporary impacts, delays or road closures creating difficulties of staff and guests gaining access to the Hotel when the AAR is being constructed overtop of Airport Way. Clarification is sought on this	The Compensation Policies, Measures and Community First document is focused on the discretionary measures being proposed by the Applicant. It does make reference to statutory entitlements to compensation and provides a link to Government Guidance for landowners and occupiers affected by compulsory purchase (Ref 6). The guidance explains what is available for those who do not have land acquired under compulsory acquisition and are impacted during construction of the authorised works, and or by physical factors emanating from the operation of those works. Professional advice should be sought on statutory compensation.

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		matter i.e., if the dDCO includes powers to temporarily stop up Airport Way and with it, the access to the hotel – particularly noting that Airport Way could be viewed by the Applicant as a direct route to the works sites. It is noted that the DCO documents state that any person who suffers loss by the suspension of any private right of way under this article is entitled to compensation.	
Openwide Investments Limited  RR-1129	Noise and Vibration	4 The Hotel has been identified as a noise sensitive non-residential receptors, sensitive to impacts arising from construction noise, surface access noise (i.e., increased transport movements on the highway), and air noise – however compensation or further mitigation, in relation to non-residential receptors assessed, has not been proposed. Openwide Investments would welcome having a discussion with LLAL on potential mitigations to address harmful noise impacts arising.	The adverse noise effects of the Ibis budget hotel have been assessed in <b>Chapter 16</b> of the ES <b>[AS-080]</b> (see paragraphs 16.9.236 and 16.9.248). Relevant contextual information has been considered in the assessment of this receptor and the conclusion for both assessment phases is that the effects are predicted to be not significant. Therefore, no additional mitigation is proposed over and above the embedded mitigation for the Proposed Development (see Section 16.8 of <b>Chapter 16</b> of the ES <b>[AS-080]</b> ). The Applicant is happy to continue to engage with the respondent throughout the examination process.

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RR-1395, RR-1035, RR-0185, RR-0384, RR-0463, RR-1391.	Economic case and job creation	Luton Rising has stated it anticipates creating 12,000 jobs from the expansion. However, it has not provided details on how many jobs will be temporary (e.g. construction), ongoing operations (or the full-time/part-time/occasional split) or in the supply chain outside of the area (e.g. production and shipping of building materials).	Projected job growth across the UK with the Proposed Development compared to 2019 is expected to be 10,800 jobs as set out in Table 8.5 of the <b>Need Case [AS-125]</b> .  Full details of the employment associated with operation of the airport set out in <b>Appendix 11.1</b> to the Environmental Statement (ES) <b>[APP-079]</b> . Information about construction employment is provided separately in Chapter 11 of the ES.
Prologis UK Limited RR-1222	General	Prologis is therefore supportive of the principle of the application, and hopeful that it will be approved.	Support noted.
Prologis UK Limited RR-1222	Planning	In May 2023, Luton Borough Council ("Luton BC") granted hybrid planning permission (ref. 22/01334/HYBEIA, "the Permission") for the comprehensive, employment-led redevelopment of the site to provide up to 34,250 sqm of modern industrial and logistics floorspace, an on-site training facility ("the Hub"), and all associated infrastructure works, access arrangements, internal road network, parking, and hard and soft landscaping. The Permission is anticipated to generate up to 540 direct on-site employment opportunities once fully operational. Our client is in the	Noted.

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		<p>process of dealing with the pre-commencement conditions and once these issues are discharged intends to commence with the construction works of the first development phase in 2024.</p> <p>It is important to note that the principal access to the site is located off Windmill Road, which connects to Kimpton Road via a three-arm mini-roundabout adjacent to the north-east corner of the site. As part of a wider package of off-site highways interventions required to accommodate the expanding airport capacity, the Proposed DCO seeks to convert the existing mini-roundabout into a three-arm signalised junction (identified as 'Work No. 6(e)a' of the Proposed DCO). The Proposed DCO, any associated changes to the traffic flow (along Windmill Road and surrounding road network) resulting from the proposed works, and required works to the Windmill Road/Kimpton Road and the mini roundabout at Osbourne Road all have the potential to (significantly) affect the day-to-day operations of Prologis' future tenants.</p>	
Prologis UK Limited RR-1222	Planning	The fact that the site benefits from hybrid planning permission means that the scheme is a committed development and will need to be included as part of the DCO assessment to be undertaken. Our client therefore needs to ensure that the assessment of the highways and transport impacts of the Proposed DCO as well as the detailed highway interventions, and with this any mitigation measures proposed, are thoroughly planned,	The Applicant would continue to work with the local planning authority in developing the designs through detailed design stage. These designs would be required to take account of any consented developments.

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		robust and do not lead to adverse impacts on the road network, potentially affecting both the delivery of the Permission and the site's future operation.	
Prologis UK Limited RR-1222	Surface Access	1. Walking and cycling improvement proposals must properly connect with those on the ground and serve the areas of need, such as designated employment sites including the site;	As set out in the <b>Framework Travel Plan [AS-131]</b> Table 5.3, there are a toolbox of interventions and measures for walking and cycling, which include the identification of suitable commuter cycling corridors and routes to be improved. The Applicant proposes to undertake monitoring to enable the impacts of the Proposed Development to be able to be considered during implementation such as cycle parking provision and usage for staff. The Applicant and the airport operator will work with the local highway authorities and support appropriate measures in the event that there are impacts which occur as a consequence of the implementation of the Proposed Development. There are ongoing discussions with regards to further clarity on the particular arrangements for funding of surface access related measures and interventions identified in the <b>Framework Travel Plan [AS-</b>



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			<b>131]</b> , and these will be shared in due course.
Prologis UK Limited RR-1222	Surface Access	<p>2. The proposed works to Windmill Road/Kimpton Road Phase 1 (Drawing No. LLADCO-3C-ARP-SFA-HWM-DR-CE-006/P01) shows a signal arrangement at Kimpton Road and a mini roundabout at Osborne Road. Our client's transport consultant, WSP, would comment thus: • Kimpton Road is close to the main access serving the site (an area currently occupied by BWI Group) and to manage the anticipated traffic flows in Phases 1 and 2 of the Permission - while mitigating any new issues of blocking back as a result of the signals at red - it is recommended that the Designer/Applicant consider the implementation of signals at the existing access into the site combined with the adjacent signals to form a single coordinated junction; Whilst it is understood that the signal design is at a preliminary stage, the locating of offside primary and secondary signals will need further consideration; and • The proposed northern kerb realignments at the Osborne Road mini roundabout do not appear to achieve anything in terms of utility at the junction.</p>	<p>The proposed mitigation has been designed around relevant standards including Design Manual for Roads and Bridges (DMRB), Manual for Streets (MfS) and other applicable documents. The mitigation has been demonstrated to successfully mitigate issues with congestion and delay associated with increased volumes of traffic associated with the airport, together with traffic associated with consented developments- at the time of modelling- and projected growth in background traffic flows.</p> <p>The amendments shown at Osborne Road are indicated to provide sufficient width to accommodate a two-lane exit onto Gipsy Lane, which is required for traffic capacity purposes.</p> <p>Whilst the Applicant has not considered a coordinated signalised junction with the BWI Group site, the Applicant would continue to work with</p>

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			the local planning authority in developing the designs through detailed design stage.
Prologis UK Limited RR-1222	Surface Access	It is understood that the model used will probably report higher capacity as a result of the very slight realignment, but the reality is likely to be somewhat different and lead to nothing more than inconvenience and disruption to our client, their future tenants and the public while construction takes place. Moreover, these apparently unnecessary works give rise to a negative environmental impact in terms of wasted materials and carbon spend. We would wish to understand more about these works before giving our support to this element of the Proposed DCO.	As noted above, the proposed highway improvements have been designed to mitigate issues with congestion and delay associated with increased volumes of traffic associated with the airport, together with projected growth in background traffic flows.
Prologis UK Limited RR-1222	Surface Access	although supportive of the principle of the Proposed DCO, our client seeks to ensure that all of its transport-related impacts are thoroughly assessed and robustly mitigated against. At present, it is considered that this element of the Proposed DCO may require a further review and/or coordination with surrounding landowners and Local Highway Authority, and Prologis therefore urges the Examining Authority to consider the content of this Relevant Representation at Examination stage. Our client is further willing to arrange direct discussions with those parties to ensure the proposed detailed highway interventions are comprehensively planned and implemented. A full Written Representation may be	Support noted. The Applicant would continue to work with the local planning authority in developing the designs through detailed design stage.

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		formally submitted when the Examination commences. Please ensure that our client/we are contacted on any further updates on the Proposed DCO	
Charles Simpson Organisation Limited RR-0214 and RR-0217	Compensation	We currently own and operate Woodside Residential Mobile Park Home site, Woodside, Luton. LU1 4LP. This site is occupied by elderly and in many cases vulnerable residents most of which are retirement age. The attraction of the site for many prospective purchasers is the country side location, which brings with it peace and tranquility. The airport expansion and near doubling of aircraft volumes will have a dramatic impact on the quality of life for our residents. It will also have a dramatic effect on our business in terms of the value of properties that we sell and this will have a knock on for many years to come, in terms of the resale values of the homes. The blight that will be caused by this will also significantly impact the pitch fees that we can charge residents as well. So we will be losing out on all avenues of income within our business, which has been operating since the 1960's. This could have an impact on jobs and certainly further capital investment in the site in the future. We therefore look forward to seeing your proposed compensation package for this Government backed expansion at your earliest convenience.	The Applicant has included in its application for the Proposed Development the <b>Draft Compensation Policies, Measures and Community First [AS-128]</b> .  The Applicant will be pleased to enter a dialogue with the business owner should the detail provided in the application not address the concerns raised.
Charles Simpson	Compensation	We have been sent information about the proposed London Luton Airport expansion as someone who maybe entitled to make a claim for compensation. We currently	The Applicant has included in its application for the Proposed Development the <b>Draft Compensation</b>

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<p>Organisation Limited</p> <p>RR-0213</p>		<p>own the property address shown above. This site is occupied by elderly and in many cases vulnerable residents most of which are retirement age. The attraction of the site for many prospective purchasers is the country side location, which brings with it peace and tranquility. The airport expansion and near doubling of aircraft volumes will have a dramatic impact on the quality of life for our residents. It will also have a dramatic effect on our business in terms of the value of properties that we sell and this will have a knock on for many years to come, in terms of the resale values of the homes. The blight that will be caused by this will also significantly impact the pitch fees that we can charge residents as well. So we will be losing out on all avenues of income within our business, which has been operating since the 1960's. This could have an impact on jobs and certainly further capital investment in the site in the future. We therefore look forward to seeing your proposed compensation package for this Government backed expansion at your earliest convenience.</p>	<p><b>Policies, Measures and Community First [AS-128].</b></p> <p>The Applicant will be pleased to enter a dialogue with the business owner should the detail provided in the application not address the concerns raised.</p>
<p>Charles Simpson Organisation Limited</p> <p>RR-0215</p>		<p>Dear Sir/Madam, We have been sent information about the proposed London Luton Airport expansion as someone who maybe entitled to make a claim for compensation. We currently own the plots at the above addresses, and have invested significant money in putting in new infrastructure for new homes that will arrive shortly, ready to rent out. The attraction of the site for many prospective renters is the country side location,</p>	<p>The Applicant has included in its application for the Proposed Development the <b>Draft Compensation Policies, Measures and Community First [AS-128].</b></p> <p>The Applicant will be pleased to enter a dialogue with the business owner should the detail provided in the</p>

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		<p>which brings with it peace and tranquility. The airport expansion and near doubling of aircraft volumes will have a dramatic impact on the quality of life for our tenants. The blight that will be caused by this will have a dramatic effect on our business in terms of the rents that we can charge for our properties, both now and for many years to come. We have invested considerable money into our business over recent years to ensure that our affordable housing offering is one of the best around. Such capital investment is paid back by rental income and this expansion will have an adverse affect on the rents that we charge and therefore our return on capital. The rental income reduction could have an impact on jobs and certainly further capital investment in the site in the future. We therefore look forward to seeing your proposed compensation package for this Government backed expansion at your earliest convenience.</p>	<p>application not address the concerns raised.</p>
Charles Simpson Organisation Limited RR-0216		<p>Dear Sir/Madam, We have been sent information about the proposed London Luton Airport expansion as someone who maybe entitled to make a claim for compensation. We currently own and are renting out the properties at the addresses above. The attraction of the site for many prospective renters is the country side location, which brings with it peace and tranquility. The airport expansion and near doubling of aircraft volumes will have a dramatic impact on the quality of life for our tenants. The blight that will be caused by this will have a dramatic effect on our business in terms of the rents that</p>	<p>The Applicant has included in its application for the Proposed Development the <b>Draft Compensation Policies, Measures and Community First [AS-128]</b>.</p> <p>The Applicant will be pleased to enter a dialogue with the business owner should the detail provided in the application not address the concerns raised.</p>

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		<p>we can charge for our properties, both now and for many years to come. We have invested considerable money into our business over recent years to ensure that our affordable housing offering is one of the best around. Such capital investment is paid back by rental income and this expansion will have an adverse affect on the rents that we charge and therefore our return on capital. The rental income reduction could have an impact on jobs and certainly further capital investment in the site in the future. We therefore look forward to seeing your proposed compensation package for this Government backed expansion at your earliest convenience.</p>	
RR-0245	Passenger experience	<p>I am totally against the proposed expansion of the airport. It is quite large enough as it is. I have lived near the airport for over 40 years and have used it for 40 years. My experiences of the airport get worse. The left hand does not appear to know what the right hand is doing. I travelled back through the airport last week and had asked for assistance, which was provided to take me and my friends down from the aircraft. That is where the assistance stopped. We had to struggle to get into the building, wait in a queue to get through passport control etc. Had to make our own way to the taxi rank, which is a considerable distance from the terminal and walk round a long line of barriers to reach the waiting taxi. One of the things that is used as a plus for expansion is that it will create more jobs. In my opinion more jobs could be created a present as at other airports the assistance staff</p>	<p>Concerns regarding the day-to-day operation of the airport should be directed to the airport operator.</p> <p>Changes were made in 2022 to the arrival flightpath to reduce the interaction with Stansted arrivals. In 2018, the Government rejected options to build a new airport serving the South East of England in favour of adding a runway at Heathrow and encouraging all airports, including London Luton Airport, to make best use of their existing runways as set out in the <i>Airports National Policy Statement</i>.</p>

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		<p>are waiting to take passengers requiring assistance to the building, through passport control and beyond. Disabled parking at Luton is a joke. I also suffer with almost continuous planes flying overhead, day and night despite planes not supposed to be flying at night. The compensation scheme, as currently offered is inadequate and not suitable. Expansion would only increase this, plus air pollution and air space congestion. I understand that much of the airspace in this area is also used by aircraft from Stanstead and that near air collisions are frequent. Surely a new airport , if it is absolutely necessary to increase air travel, which I doubt, should be seriously considered to be built in a more suitable part of the South of England.</p>	<p>The Applicant has developed compensation policies so that they offer compensation to those most affected by the Proposed Development.</p> <p>Eligibility is based on noise contours and as contours may change so will eligibility. The compensation policies and measures have been developed fully in line with the requirements of the Compensation Code and in some cases, include voluntary policies which go beyond those statutory standards. <b>Draft Compensation Policies, Measures and Community First [AS-128].</b></p>
RR-0139	Land and Property	<p>Plot 6-06 falls within the ownership of Bartholomew Pleydell-Bouverie, with proposed landscaping and access rights. We have asked that this plot is removed from the DCO as access can be taken along the current public footpath route, which is an existing track and falls within plots 6-07 and 6-08, to the east. This would prevent a a new access route being created with associated detrimental impacts to this field.</p>	<p>The proposal outlined in this representation has been discussed with the landowner and would require consent from the neighbouring landowner in order to ensure the commitments in the DCO could be delivered if granted consent. The Applicant has agreed to engage with</p>

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			the adjoining landowner to discuss the changes and these discussions are ongoing.
RR-0899	Land and Property	Site 8-08 from the Book of reference is less than 150m from my property. There's no indication what that space is going to be used for, and if as i expect that it is to be used as a storage site for the M1 roadworks, I'd love to see how the proposed area is suitable given the access point and small local road network isn't suitable for heavy goods vehicles. Primary access to that site is from a small gate aside Half Moon Lane, which, travelling down towards the A1081 is the primary route to get round to the motorway junction. This road is massively unsuitable for increased traffic as it is not wide enough for 2 lorries to meet each other on, and is a bus route used by many local elderly residents.	<p>The <b>Draft Development Consent Order [AS-067]</b> describes the purpose for which the land can be temporarily taken as 'Offsite highway works, including works at M1 J10, including widening to the A1081 westbound carriageway, associated laydown areas, access, working space to support construction'.</p> <p>Whilst it is unlikely that Half Moon Lane would be used as a construction route for significant volumes of HGVs and is more likely to be used for contractor vehicle access, the detailed routes of construction traffic will be set out by the appointed contractor as part of a Construction Traffic Management Plan (CTMP) at detailed design stage.</p>
RR-0660	Design	3.2. Threats from hostile agents: Breachwood Green and its surrounds are surrounded by open countryside, with a few wooded areas and similar. If any individual or group was really intent on causing harm from the ground to incoming and outgoing aircraft when they are in flight, it	The airport is an existing operational facility, and the Proposed Development is proximate to the existing site.



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		would not be difficult to figure out how this could be achieved and how easy it could be to get away from the area undetected if you knew the roads, tracks, and footpaths well. A couple of uniformed policemen taking a stroll along a nearby footpath or an occasional patrol along the lanes by a marked police vehicle is hardly a deterrent.	<p>The Proposed Development has been discussed with government bodies who have oversight of aviation security and local police and no issues relating to off-site security risks have been raised.</p> <p>By locating the new car parks to the east of the proposed airfield expansion this increases the buffer to the aviation assets.</p>
Stonewater Limited and associated companies RR-1446	Land and property	Objection in response to notification of decision to accept an application for Examination for an Order Granting Development Consent for the London Luton Airport Expansion project ("the Order") by the Secretary of State for Business, Energy and Industrial Strategy Our clients: Stonewater Limited and associated companies Properties:- Land and roads surrounding A505 Luton, Land and properties at Albert Road, Surrey Street and Queens Close, Luton, Land to the East of Albert Road, Land at Chobham Walk, Luton, Land at Barn Owl Close, Luton, Land and properties at 1-18 Jephson Court, Holly Street, Luton.	Noted
Stonewater Limited and associated companies	Land and property	This letter is an objection to the Order being promoted by London Luton Airport Limited trading as Luton Rising for the expansion of London Luton Airport ("the Proposed Scheme"). Please note that Shakespeare Martineau LLP	Noted

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RR-1446		are appointed to act on behalf of Stonewater Limited and any other associated Stonewater companies ("SW") affected by the Proposed Scheme.	
Stonewater Limited and associated companies RR-1446	Land and property	By way of background and as already communicated to the Promoter, the previous section 42 consultation letter did not identify the postal addresses for our client's properties that resulted in Luton Rising ("the Promoter") identifying SW as a potential Category 3 Statutory Consultee.	The Applicant has corresponded with the owner which resulted in a list of its properties included in the <b>draft Development Consent Order [AS-067]</b> . The correspondence was dated 28 September 2022.
Stonewater Limited and associated companies RR-1446	Land and property	Our client has chased the Promoter for further details regarding the properties impacted by the Proposed Scheme, but such information has not been forthcoming.	The Applicant provided a list of property addresses known to be owned by Stonewater and included in the <b>Book of Reference [APP-011]</b> to support the Application. The further requested detail including HMLR title numbers was not provided at the time but has been now.  The Applicant has made contact with Stonewater and offered a meeting to progress matters raised in this relevant representation.
Stonewater Limited and associated companies RR-1446	Land and property	Given the timeframes involved, our client's formal objection to the Order is currently put forward on the basis that it does not have sufficient information to determine whether the Proposed Scheme will have adverse impacts on its land interests. Please note that	Noted.

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		whilst SW does not at this stage object to the principle of the Proposed Scheme it reserves its position in relation to the specific impact that the Scheme will have on its assets.	
Stonewater Limited and associated companies RR-1446	Land and property	It is understood that no substantive discussions between the Promoter and SW have, to date, taken place. In light of this: - We would be grateful if, as a matter of urgency, the Promoter could for each and every Property, confirm which indicative noise contour (if any) applies. - We note that there is extensive consultation material in the public domain. Given the circumstances it would be helpful if the Promoter could confirm where impacts, mitigation measures and safeguards that might be of interest to our client are dealt with in the consultation documentation, giving precise references to the page numbers and schedules of the relevant documents.	The Applicant has provided indicative noise contours based on predictions made at various milestones through the Proposed Development. The plans are appended to the <b>Draft Compensation Policies, Measures and Community First [AS-128]</b> . The Applicant will contact Stonewater to progress discussions and make sure all the information available is provided to help the review of the Application.
Stonewater Limited and associated companies RR-1446	Land and property	- Our client is the registered proprietor of the Properties which we understand will be impacted by the Scheme. However, our client has been provided with no detail in terms of the potential impact of the Scheme on its land holding/assets. We therefore reserve the right to make further representations in the event that it becomes apparent that the Scheme will have an adverse impact on our client's interests. In addition the right is reserved to object to the Proposed Scheme in respect of SW's other interests in the vicinity of the Properties listed above. In particular, we are concerned that the Land Interest	The Applicant will contact Stonewater to progress discussions and make sure all the information available is provided to help the review of the Application. The Land Interest Questionnaires have been sent out to all properties falling within Category 3 of the <b>Book of Reference [APP-011]</b> . Category 3 includes parties that the Applicant understands that, if the DCO were made and fully implemented, the party

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		Questionnaires only cover a fraction of the properties within the vicinity of the airport in which our client has an interest.	would or might be entitled to make a relevant claim for compensation under section 10 of the Compulsory Purchase Act 1965 and/or Part 1 of the Land Compensation Act 1973 and/or the Planning Act Section 152(3).
Stonewater Limited and associated companies RR-1446	Land and property	In particular, it is noted that the questionnaires do not relate to our client's properties that are actually closest to the airport – these being at Colwell Rise, Thaxted Close and Cutlers Green. SW is an Affordable Housing Provider with a variety of products and interests. Given the large number of properties that SW have interests in in the vicinity of the Proposed Development boundary, the tenure of some of the affected properties is thought likely to be shared ownership. Accordingly, the calculation of compensation may involve complex calculations with the interests of private individuals/SW customers feeding into the calculation. With that in mind, early and meaningful engagement between our client and the Promoter is considered essential.	The Land Interest Questionnaires have been sent out to all properties falling within Category 3 of the <b>Book of Reference [APP-011]</b> . Category 3 includes parties that that the Applicant thinks that, if the order sought by the application were made and fully implemented, the person would or might be entitled to make a relevant claim for compensation under section 10 of the Compulsory Purchase Act 1965 and/or Part 1 of the Land Compensation Act 1973 and/or Planning Act Section 152(3). The property addresses referenced in the representation are all located beyond the 54dB LAeq 16h Daytime Contour and are not included within the schedule of properties expected to be worst affected by the Proposed Development and therefore eligible for compensation.

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			<p>The comments on tenure are noted and can be addressed through apportionment of compensation when all the details are understood at the point it is due to be assessed.</p> <p>The Applicant will continue meaningful engagement with Stonewater with a view to resolving concerns about the entitlement to compensation being offered and as set out in the <b>Draft Compensation Policies, Measures and Community First</b> document [AS-128].</p>
Stonewater Limited and associated companies RR-1446	Land and property	For that reason, it is critical that our client understands which of its interests the Promoter has identified as potentially affected and the potential impact of the Proposed Scheme. Our client would therefore welcome a discussion with the Promoter as soon as possible. We would be grateful if you could acknowledge receipt of this objection.	The Applicant has made contact with Stonewater and offered a meeting to progress matters raised in this relevant representation.

## REFERENCES

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Ref 1 Civil Aviation Authority (2021), CAP1506 Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition

Ref 2 Civil Aviation Authority (2021) CAP2161 Survey of Noise Attitudes 2014: Aircraft Noise and Sleep Disturbance

Ref 3 Department for Transport (2022) Jet Zero Strategy: Delivering net zero aviation by 2050

Ref 4 <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/placeofresidencebylocalauthorityshetable8>

Ref 5 Civil Aviation Authority (2021) CAP1616 Airspace Change Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information

Ref 6 <https://www.gov.uk/government/collections/compulsory-purchase-system-guidance>