Luton Rising
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August 2023

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

8.23 Green Horizons Park Additional Information - Appendix A Committee Reports

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.23

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

London Luton Airport Expansion Development Consent Order 202x

8.23 GREEN HORIZONS PARK ADDITIONAL INFORMATION APPENDIX A COMMITTEE REPORTS

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APPENDIX 1 – LIST OF CONDITIONS

AGENDA ITEM
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COMMITTEE: **DEVELOPMENT CONTROL**

DATE: **27 MARCH 2019**

NEW CENTURY PARK PLANNING APPLICATION

APPENDIX 1: List of Conditions

General conditions

(01) **The development hereby permitted shall be begun not later than the expiration of three years beginning with the date of this permission.**

Reason: To limit the duration of the permission in accordance with the provisions of Sections 91-96 of the Town and Country Planning Act, 1990.

(02) **Applications for approval of the access, appearance, landscaping, layout and scale (herein after called the "reserved matters") for the first phase of the outline development hereby permitted shall be made to the Local Planning Authority before the expiration of three years from the date of this permission. Thereafter, applications for approval of all reserved matters relating to subsequent phases of the development shall be made to the Local Planning Authority before the expiration of two years from the date of approval of the last of the reserved matters of the preceding phase.**

Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(03) **Full details and particulars of the reserved matters referred to in condition 02 above shall be submitted to and approved in writing by the Local Planning Authority before any development of the outline element of the scheme is commenced (phases 2, 3 or 4).**

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Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(04) The development hereby permitted shall not be carried out other than in complete accordance with the approved plans and documents listed in Appendix 2, or as shall have been otherwise approved in writing by the Local Planning Authority before the buildings are occupied.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP2, LLP6, LLP13, LLP14, LLP31, LLP32, LLP36, LLP37 and LLP38 of the Luton Local Plan* 2011-2031 (November 2017) *and the aims and objectives of the NPPF.

(05) The development hereby permitted shall be limited to the following:

- **29,400sqm B1(a) office floorspace;**
- **13,000sqm flexible office/industrial floorspace;**
- **11,700sqm B2 general industrial and B8 storage;**
- **2,950sqm Technical Services Building;**
- **685sqm sui generis use comprising two buildings, one an energy centre and the other a recycling centre;**
- **7,200sqm (145 bedroom) hotel;**
- **225sqm ancillary retail;**
- **Between 3,200 and 3,500 car parking spaces within New Century Park, the extended long stay car park and the relocated car hire facility in the Central Terminal Area;**
- **New and enhanced park (including refurbished Pavilion Building, children's play areas, skate park, parkland, footpaths, ancillary park furniture, orchard, woodland and shrub planting, and habitats); and**
- **Associated access, highways, structures (including bridge, retaining walls and embankments), public realm, landscaping and ancillary works.**

Reason: To ensure the development is carried out in accordance with the planning permission and to ensure that any development that is carried out is that which has been assessed. To accord with the objectives of Policies LLP1, LLP25 and LLP31 of the Luton Local Plan 2011-2031 (November 2017).

<u>Archaeology condition</u>

(06) No development shall take place until a written scheme of heritage asset resource management (SHARM) has been submitted to and approved in writing by the Local Planning Authority. The SHARM shall include provision for preservation and management in situ

(where possible); archaeological investigation and recording and an outline strategy for post excavation analysis and publication. The development hereby approved shall only be implemented in full accordance with the approved archaeological scheme.

Reason: This condition is pre-commencement as a failure to secure appropriate archaeological investigation in advance of development would be contrary to paragraph 141 of the National Planning Policy Framework (NPPF) that requires developers to record and advance of understanding of the significance of any heritage assets affected by development before they are lost (wholly or in part) and Policy LLP30 of the Luton Local Plan 2011-2031 (November 2017).

Demolition/construction conditions

(07) No development shall commence until a detailed Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority, and the plan shall include the following:

a) The construction programme and phasing;
b) Hours of operation, delivery and storage of materials;
c) Details of any highway works necessary to enable construction to take place;
d) Parking and loading arrangements;
e) Details of piling operations and mitigation measures to be employed (including the acoustic screen adjacent to the Holiday Inn);
f) Details of hoarding;
g) Traffic Management Plan to reduce congestion (including route signage and travel demand management);
h) Materials Management Plan (to include topsoil removal, storage and re-use);
i) Provision of a Dust Management Plan (including control of dust during demolition, construction, earthworks and the control of dust and dirt on the public highway);
j) Details of consultation and complaint management with local businesses and neighbours;
k) Site Waste Management Plan;
l) Mechanisms to deal with environmental impacts such as noise, air quality, light and odour.

The development shall be carried out in accordance with the Construction Environmental Management Plan as approved.

Reason: To enable the Local Planning Authority to exercise proper control over the development proposed, in the interests of securing a satisfactory standard of work and of highway safety and the control of environmental impacts. To accord with the objectives of Policies LLP1, LLP25, LLP31 and LLP38 of the Luton

Local Plan 2011-2031 (November 2017) and to ensure the M1 Motorway continues to serve its purpose as part of a national system in accordance with section 10 of the Highways Act 1980.

(08) No impact piling shall commence until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to control noise and measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: To ensure adequate safeguards are taken during construction of the development, having regard to existing ground conditions, and to prevent pollution of the water environment and risk to other receptors. To accord with the objectives of Policies LLP1, LLP36 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

Air quality conditions

(09) No development shall commence until a scheme of air quality mitigation measures has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme prior to the first occupation of any buildings.

Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(10) No development within Phase 3 or Phase 4 (as shown on drawing 089916_050_40 RevPL02) shall commence until a suitable Air Quality Assessment has been undertaken, submitted to and approved in writing by the Local Planning Authority to address the inclusion of any combined Heat and Power plant or similar installations. The assessment shall be undertaken in line with all current relevant guidance and standards. The report shall identify suitable measures to mitigate the impacts to any sensitive receptors identified. The development shall be carried out in accordance with any approved plant or mitigation.

Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

Unexploded ordnance condition

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(11) No development shall commence until an Unexploded Ordnance (UXO) site safety and emergency procedures plan has been submitted to and approved in writing by the Local Planning Authority.

The Development shall only be carried out in accordance with the approved UXO site safety and emergency procedures plan.

Reason: To reduce risk from Unexploded Ordnance to an acceptable level, as the site lies within an area that has been identified as being at potential risk from buried explosive ordnance due to wartime bombing.

<u>Contamination/remediation conditions</u>

(12) No phase of development shall commence until a remediation strategy to deal with the risks associated with contamination of the site for that phase has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. **A preliminary risk assessment which has identified:**
   - i. **all previous uses;**
   - ii. **potential contaminants associated with those uses;**
   - iii. **a conceptual model of the site indicating sources, pathways and receptors considering both the current condition and proposed future usage of the site; and**
   - iv. **potentially unacceptable risks arising from contamination at the site.**
2. **A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors (current and future) that may be affected, including those off site. This must include a detailed hydrogeological risk assessment using site specific groundwater level and quality data to assess risks to controlled waters considering the current site conditions and the anticipated conditions post development. In addition, the hydrogeological risk assessment must assess the potential for leachate mobilisation / expulsion caused by disturbance and changes in loading in the historical Eaton Green landfill area that may occur as a result of the development.**
3. **The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.**
4. **A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.**

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Any changes to these components require the written consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses. This condition is required to ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with and in order to protect human health. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF.

(13) Before each phase of development is brought into use a verification report demonstrating the completion of works set out in the approved remediation strategy for that phase, and the effectiveness of the remediation, shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses that may have resulted in soil and or groundwater contamination. Where such contamination is identified to present an unacceptable risk to groundwater within the context of the conceptual site model (CSM), controlled waters risk assessment, remediation strategy and verification plan, a verification report is required to demonstrate the remediation of the site has been successful and that residual contamination at the site no longer presents a risk to controlled waters. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF

(14) The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority.

Reason: The Addendum to the Environmental Statement (GL Hearn Ltd, August 2018) submitted in support of this application indicates that groundwater beneath the proposed development site is already impacted with contaminants associated with the historical usage of the site. The groundwater monitoring and

maintenance programme will provide data to demonstrate that no further deterioration of groundwater quality beneath the site has occurred as a result of the proposed development. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(15) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: No site investigation can completely characterise a site and contamination may exist or in areas where contamination was not expected and therefore not included in the original remediation proposals. To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF.

(16) No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: The previous use of part of the proposed development site as a landfill receiving mixed inert, industrial, commercial and domestic wastes presents a high risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS) leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(17) Piling and other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority with details to be submitted to and approved in writing by the Local Planning Authority (including details of a piling risk assessment to detail steps to prevent overlying contaminated materials from impacting the chalk aquifer). The development shall be carried out in accordance with the approved details.

Reason: Piling using penetrative methods can result in risks to groundwater from by introducing pollutants / turbidity, mobilising contamination, drilling through different aquifers and creating preferential pathways. Groundwater is particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and with paragraph 170 of the NPPF.

(18) A scheme for managing any redundant boreholes, shafts, tunnels and adits, including boreholes installed for the investigation of soils, groundwater or geotechnical purposes, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of how redundant boreholes, tunnels, shafts and adits are to be decommissioned and how any boreholes that need to be retained, post development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to of each phase of development.

Reason: To ensure that redundant boreholes, shafts, tunnels and adits are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and Position Statement A8 of the Environment Agency's Groundwater Protection: Principles and Practice. If these ground penetrations are not decommissioned correctly they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

<u>Drainage conditions</u>

(19) Before each phase of the development commences, a detailed surface water drainage design for that phase shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. The design should include a maintenance and management schedule for the lifetime of the development.

The surface water scheme should be generally in accordance with the submitted flood risk assessment and drainage strategy with subsequent amendments and associated drawings as follows: New Century Park, Luton Flood Risk Assessment by Pell Frischmann, dated Dec 2017; London Luton Airport Century Park Access Road and New Century Park Drainage Strategy by Pell Frischmann, dated Dec 2017; Century Park Access Road Proposed Drainage Layout KQ30131H146 and KQ30131H147,

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Wigmore Valley Park Drainage Layout 083075 CA 0 GF DR CE 001 P02; New Century Park Outline Drainage Strategy Revised surface water layout KQ30131H182, Revision P4; Wigmore Valley Skate park Surface Drainage Plan WGMR-DLP01; Addendum to Century Park Access Road and New Century Park Drainage Strategy, August 2018; New Century Park, Luton Addendum to Flood Risk Assessment, RE30131/V006/P4A, July 2018.

Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the NPPF.

(20) Before each phase of the development is brought into use, a set of 'as built' drawings of the above drainage scheme together with a written statement by a suitably qualified person should be submitted to the Local Planning Authority, confirming that the scheme operates as designed.

Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the National Planning Policy Framework (NPPF).

(21) The proposed strategy incorporates sustainable urban drainage systems (SUDs) in the form of infiltrative drainage for parts of the site. Where there is a risk of hydrocarbons being present in surface water, run off appropriate pollution prevention techniques should be incorporated. The drainage strategy refers to by-pass separators which would be effective as long as they are maintained and do not allow cleaning detergents (e.g. from car washes) into them. This reduces the separators ability to remove the oil from the water. There should be no infiltrative drainage in the former landfill area due to the risk of mobilising contaminants within the landfill body. The siting of soakaways should also be mindful of the presence of clay with flints at the site as the low permeability of this strata is not suitable for infiltrative drainage.

Reason: To ensure adequate safeguards are taken during construction of the development and following its completion, having regard to the existing ground conditions, and to prevent pollution of the water environment and risk to other receptors. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(22) No phase of the development shall be occupied until confirmation has been provided that either:- all wastewater network upgrades required to accommodate the additional flows from that phase of

the development have been completed; or - a commercial buildings and infrastructure phasing plan has been agreed with the Local Planning Authority (in consultation with Thames Water) to allow additional buildings to be occupied. Where a commercial buildings and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed commercial buildings and infrastructure phasing plan.

Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any networky reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017),

Noise conditions

(23) Noise emitted from any fixed plant on site shall be at least 10dB lower than the existing background noise level as measured at the nearest noise sensitive location outside the site and the measurement should be made in accordance with BS4142:1997.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(24) No development shall commence until details of the acoustic screen associated with the proposed New Century Park Access Road to the west of the Holiday Inn hotel (illustrated on drawing D-Q30131-H-0101 have been submitted to and approved in writing by the Local Planning Authority. Such details shall include acoustic reduction properties, height, materials and colour. The scheme shall be implemented in accordance with the approved plans and thereafter permanently retained and maintained.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

Design and sustainability conditions

(25) Details of a Design Code for the light industrial quarter (Phase 2), the office quarter and the hybrid quarter (both Phase 3), as shown on drawing 089916_050_01 RevPL02, shall be submitted to and approved in writing by the Local Planning Authority prior to the submission of the details reserved for subsequent approval for

each phase. The Code shall identify all details to maximise the quality and legibility of the spaces, to help reinforce local character and accessibility, the details should ensure that these areas would be high quality. The construction of the proposed development shall then be carried out in accordance with the details set out within the approved Design Code.

Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017).

(26) No above ground works associated with the New Century Park access road shall take place until details of all structures (including embankments, retaining walls, bridges, fences and walls) have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017).

(27) No above ground works within a phase of the development shall take place until a detailed scheme of feasible on-site sustainability measures covering:

(a) The sourcing of materials to be used in the construction of and fitting out of the buildings (involving reuse, recycling and other sustainable sourcing);
(b) Certification that the hotel, industrial units and offices would achieve a BREEAM Very Good rating and that the Technical Services Building would achieve at least a BREEAM Good rating;
(c) The use of passive ventilation and other passive measures;
(d) Reducing carbon emissions from the total energy needs (heating, cooling and power) by 25% from the 2010 Part L Building Regulations Standards for the overall outline phases (including from the on-site generation of renewable energy);
(e) Details of arrangements to allow future connection to a centralised energy centre either on the site or in the locality (district heating network); and
(f) Rainwater harvesting
has been submitted for each phase and approved in writing by the Local Planning Authority. The scheme as approved for

each phase shall be implemented prior to occupation of that phase unless otherwise approved in writing by the Local Planning Authority and retained and maintained thereafter.

(g) Within 3 months of first use of the buildings a BREEAM Post Construction Certificate for the relevant buildings, issued by the BRE or equivalent licensing organisation, must be submitted to the Local Planning Authority to demonstrate that BREEAM targets in (b) above have been achieved. All the measures integrated shall be retained for as long as the development is in existence.

Reason: To prevent an unsatisfactory form of permanent development. To accord with the objectives of Policies LLP1, LLP25 and LLP37 of the Luton Local Plan 2011-2031 (November 2017).

(28) No above ground works within a phase of the development shall take place until a scheme has been submitted to and approved in writing by the Local Planning Authority, giving details of how the buildings, open spaces and car parking address 'Secured by Design' principles. Each phase of the development shall be carried out in full accordance with the approved details and maintained thereafter.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(29) No above ground works within a phase of the development shall take place until an external lighting strategy and details of CCTV for that phase of the development have been submitted to and approved in writing by the Local Planning Authority. Lighting and CCTV for each phase shall be completed in accordance with the approved strategy for each phase prior to occupation of that phase, and shall be maintained in accordance with the approved details permanently thereafter.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(30) No above ground works within a phase of the development shall take place until details of the arrangements for storage and collection of refuse and recycling for the approved buildings and uses, have been submitted to and approved in writing by the Local Planning Authority. The development shall be completed in accordance with the approved details prior to occupation of each phase, and shall be maintained permanently thereafter.

Reason: To ensure adequate provision is made for storage and management of refuse and recycling, and to ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

Landscaping and tree conditions

(31) Before any building or engineering works within a phase are commenced on site the existing trees, shrubs and/or hedges to be retained shall be safeguarded against damage or injury by the erection of fencing or other suitable protection at a distance of not less than 2 metres from the tree trunk(s) or shrubs or hedging, and no plant, materials or other objects shall be stored or placed against any of the trees, shrubs or hedges. The protection measures referred to above shall be maintained during the whole period of site excavation and construction.

Reason: To safeguard the existing trees, shrubs and/or hedges on the site. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(32) The Wigmore Valley Park landscaping shown on the approved drawings (series WVP-CAP-DR-L-101 to WVP-CAP-DR-L-109) shall be undertaken within the first planting season following commencement of development and shall incorporate the tree, hedgerow, groundcover and grassland species and quantities set out in the submitted Planting Schedule and Specification (ref; WVP-CAP-DR-L-210).

If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.

Reason: To enable the Local Planning Authority to monitor the implementation of the approved landscaping scheme. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(33) The landscaping reserved matter for each phase (referred to in condition 02) shall include full details of all hard surfaces, grassed areas, tree and shrub plantings and the proposed times of planting. The landscaping scheme approved for a phase shall be

carried out by a date not later than the end of the full planting season immediately following the completion of building operations within that phase. If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(34) A landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for each phase of the areas covered by the outline permission for all hard and soft landscape areas shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of above ground works in that phase. The maintenance schedule shall be for a minimum period of ten years (for each phase) and include details of the arrangements for its implementation. The landscape management plan shall be carried out as approved.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

<u>Transport and parking conditions</u>

(35) No above ground works within a phase of the development shall take place until details of cycle parking in accordance with the Local Plan cycle parking standards for that phase have been submitted to and approved in writing by the Local Planning Authority. The approved cycle parking shall be implemented prior to occupation of buildings within that phase and maintained in perpetuity afterwards.

Reason: To maximise cycling as a mode of travel to the site. To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP32 of the Luton Local Plan 2011-2031 (November 2017).

(36) No occupation of any phase of the development shall commence until details of parking in accordance with the Local Plan parking

standards for that phase has been submitted to and approved in writing by the Local Planning Authority. Parking shall be provided in accordance with the approved details prior to the first use of the approved phase, with these facilities to be permanently maintained thereafter.

Reason: To avoid the creation of traffic congestion on the highway in the interests of safety and convenience of pedestrians and other road users. To accord with the objectives of Policies LLP1, LLP2 and LLP31 of the Luton Local Plan 2011-2031 (November 2017).

(37) No phase of the development shall be brought into use until a Travel Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be broadly in line with the Framework Travel Plan prepared by Pell Frischmann (December 2017) and shall be in line with the prevailing policy and best practice and shall include as a minimum:

- **The identification of targets for trip reduction and modal shift;**
- **The methods to be employed to meet these targets;**
- **The mechanisms for monitoring and review;**
- **The mechanisms for reporting;**
- **The penalties to be applied in the event that the targets are not met;**
- **The mechanisms for mitigation;**
- **Implementation of the Tavel Plan to an agreed timetable and its operation thereafter; and**
- **Mechanisms to secure variations to the Travel Plan following monitoring and review.**

The Travel Plan shall be implemented as approved before occupation of the development.

Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017).

(38) No part of phase 3 or 4 (as shown on drawing 089916_050_40 RevPL02) shall be occupied until the New Century Park access road and the link to Eaton Green Road have been completed and are ready for use. The link road between the New Century Park access road and Eaton Green Road shall not be provided and available for use in advance of the completion and opening of the New Century Park access road.

Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians

and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017).

(39) No buildings within the Office Quarter, the Hybrid/Industrial Quarter or the Hotel, identified on drawing 089916_050_01 RevPL02 (proposed illustrative masterplan), are to be occupied until such time as the effects of traffic generated by such development and any identified relevant mitigation measures have been submitted to and approved in writing by the Local Planning Authority (in consultation with the Highways Authority and Highways England). The mitigation measures shall be carried out in accordance with the approved scheme.

REASON: To ensure the M1 Motorway continues to serve its purpose as part of a national system of routes for through traffic, to satisfy the reasonable requirements of road safety on the M1 Motorway and connecting roads in accordance with section 10 of the Highways Act 1980.

APPENDIX 2 - APPROVED PLANS AND DOCUMENTS

AGENDA ITEM

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COMMITTEE: **DEVELOPMENT CONTROL**

DATE: **27 MARCH 2019**

NEW CENTURY PARK PLANNING APPLICATION

APPENDIX 2: APPROVED PLANS AND DOCUMENTS

PLANS

Century Park Access Road plans:

Car Parking Strategy Properties Demolished And Lost KQ30131H120 Rev9
Car Parking Strategy Properties Demolished And Lost KQ30131H120A Rev9
Car Parking Strategy Properties Demolished And Lost KQ30131H121 Rev8
Car Parking Strategy Areas Affected KQ30131H121A Rev8
Parking Strategy Reprovision (1 of 2) KQ30131H122 Rev9
Parking Strategy Reprovison (2 of 2) KQ30131H123 Rev8
CPAR Scheme Layout KQ30131H141 Rev6
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CPAR Highway General Arrangement Sheet 1050 - 1400M Rev3
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New Century Park plans:
Proposed Illustrative Masterplan 089916_050_01 RevPL02
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Proposed Building Types 089916_050_10 RevPL2
Proposed Building Heights 089916_050_20 RevPL2
Proposed Land Take 089916_050_30 Rev PL2
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Wigmore Valley Park plans:
Existing Pavilion Plan 02910-FA-00-00-DR-A-10P02 Rev0
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Wigmore-Valley-Park-Surfacing-Groundworks PLAY_PARK_Scheme_G.W IN-SITU Rev0
Wigmore-Valley-Park-Finalised-Drawing-July18 PLAY_PARK_Scheme Isolated View Rev0
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Technical-Plan-Wigmore-Valley-Park PLAY_PARK_Scheme_T.D. Rev0
Mound Area - Sketches & Photos PLAY_PARK_Scheme M.A Rev0
Wigmore-Valley-Park-Toddler-Foundation-Plan-July18 PLAY_PARK_Scheme_T.F.P Rev0
Wigmore-Valley-Park-Junior-Foundation-Plan-July18 PLAY_PARK_Scheme_J.F.P. Rev0
Surface Drainage Plan WGMR-DLP01 RevA
Existing Site Conditions WGMR-ESC01 RevA
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Setting Out Plan WGMR-SOP01 RevA

Landscaping plans:
Detailed Landscaping Masterplan (1 of 9) WVP-CAP-DR-L-101 T5 Rev5
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Detailed Landscaping Masterplan (5 of 9) WVP-CAP-DR-L-105 T3 Rev3
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Soft Landscape Plan 5 of 9 WVP-CAP-DT-L-205 Rev0
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Soft Landscape Plan 9 of 9 WVP-CAP-DT-L-209 Rev0
Planting Schedule & Specification Notes WVP-CAP-DR-L-210 Rev0

DOCUMENTS

Arboricultural Survey (Perimeter Road) ref: RE3013V002B (dated May 2016);
Extended Arboricultural Survey (Enterprise Zone) ref: RE3013V003A (dated September 2016);
BREEAM (Hotel) Design Strategy and Pre-Assessment Report ref CS/089916-06 Rev01 (dated November 2017);
BREEAM (Industrial Units) Design Strategy and Pre-Assessment Report ref CS/089916-06 Rev01 (dated November 2017);
BREEAM (Offices) Design Strategy and Pre-Assessment Report ref CS/089916-06 Rev01 (dated November 2017);
BREEAM (Technical Services Building) Design Strategy- Pre-Assessment Report ref CS/089917-05CAP-Z1-XX-RP-ES-P2 (dated November 2017);
Consultation Statement (dated 13 December 2017)
Consultation Statement Addendum (received 15 August 2018)
Design and Access Statement ref: CS_089916 RevPL02 (dated July 2018)
Drainage Strategy (CPAR and NCP) RevP3 (dated December 2017)
Addendum to Drainage Strategy (CPAR and NCP) (dated August 2018)
Wigmore Valley Park Drainage Strategy ref: CS-08305 Rev R03 (dated 8 June 2018)
Flood Risk Assessment ref: RE30131/V006/P3 (dated December 2017)
Addendum to Flood Risk Assessment ref: RE30131/V006/P4A (dated July 2018)
Framework Travel Plan ref: Q30131/TP/R01 (dated December 2017)
Lighting Strategy ref: RQ30131H015-4 (dated June 2018)

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Planning Statement (dated December 2017)
Planning Statement Addendum (dated August 2018)
Outline Site Waste Management Plan ref RQ30131/H050-3 (dated December 2017)
Car Parking Strategy ref: Rq30131H013-9 Rev 10 (dated July 2018)
Transport Assessment ref Q30131/TA/R02 (dated December 2017)
Supplementary Transport Assessment ref: Q30131/STA/R01B (dated June 2018)
Hard and Soft Landscape Material Palettes RevA (dated August 2018)
Landscape Mark-ups SK-002-180703 RevA (received 15 August 2018)
Landscape Management Plan ref: 083075-L-RP01 RevA (revised 18 July 2018)
Amenity Grass Maintenance Informal Soft Play Area ref TOHA/18/3101/TW (dated 31 January 2018)

Updated Environmental Statement Volume 1: Non-Technical Summary (dated August 2018)
Updated Environmental Statement Volume 2: Technical Chapters (dated August 2018)
Environmental Statement (Volume 3): Technical Appendices (dated December 2017) with additional technical chapters provided on 14 August 2018 as follows:

- **INT1 - LBC Scoping Opinion**
- **INT2 - LBC Letter, Advice Note and Regulation 22)**
- **INT3 – Reg 22 Responses**
- **INT4 – Stakeholder Comments & Responses**
- **ECO14 - Barn Owls**
- **ECO15 - Great Crested Newts**
- **AQT5 - Energy Plant Specification**
- **AQT6 - Construction Mitigation**
- **ARC1 – Revised Geophysical Report**
- **ARC3 - Correspondence**
- **GCC7 - Construction Effects Input**

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
1.	Yes 15.1.18	Thanks for your letter dated 9 Jan, sending me details of the above planning application. You said you would be grateful for any observations. Unlike LLAL, I assume that you are a public servant, and write to you in that spirit. I see that a notice was placed in the Herald which although dated Thu 11 Jan, is delivered to me on Fridays. It asks for comments by 12 February, a little longer than your letter, which gave the date of 8 February. Further I note that there is a related application of which you did not inform me, 17/02219/FUL. This is a huge project, with over 180 documents, some very lengthy. All the same, some crucial documents remain unavailable, such as a detailed report from the applicant to the Environment Agency. I noted in the scoping report their concern about the possibility of irreversible contamination of groundwater due to disturbance of what had been the main landfill site for the town at a time when environmental controls were fewer, and all grades of toxic material were dumped here. Methane is a dangerous gas which can be explosive and also make people ill if it accumulates in confined spaces such as offices. I made an earlier request to the Environment Agency for information. If they had this, they would have supplied it. However, the landfill predates the setting up of the EA, so Luton Council had responsibility for and supposedly, knowledge of the site. They have carried out testing for at least 2 years, and their findings and the figures and implications of this should be made available to the public. One of the fundamental principles of developing at all on Wigmore Park depends on this. If testing for safety is not complete, the application should not have been submitted. The precautionary principle should be applied. To say that this is an outline application, and such a crucial safety issue can be sorted out later, is unacceptable. Luton has already had a serious leak from the Guildford Street petrol station, which nearly contaminated the town's water supply - we should have learnt and applied lessons from this. Could you let me have documentation to confirm, as several longstanding residents have told me, that Wigmore Park was gifted to the people of Luton when the Wigmore estate was built. When the landfill was closed, the park was created, landscaped and planted with a great many trees for residents by council officers, and managed until now, like other parks, by the council on their behalf. If the council wished to allow building on the park to further airport interests, it should first have asked the people who have used it for three generations. I also assume, in view of the crash in insect populations, and its remarkable numbers of orchids (5 species) that the County

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
		Wildlife Site occupying the southern half of Wigmore Park would be treated as sacrosanct, meaning it would not be sacrificed for a car park, which could be sited in a great many other places, including ground-level car parks which could be changed to multi-storey. The proposal, which conflicts with the new Local Plan, to destroy a large number of trees, which help to provide a pollution and noise barrier, and to build a new road into Wigmore Park and a large roundabout near the current Tidy Tip entrance, as well as unnecessarily removing an attractive and convenient area of park nearest to where people live, appears full of flaws in traffic-flow assumptions. The present road network cannot cope, thanks to a 6 million passenger increase at the airport in the last 3 years having brought nearly the same number of extra vehicles. The new road and Eaton Green access, coupled with a continued increase in airport traffic, would combine to make the present degree of congestion and frequent gridlock much worse and unsustainable. The application is of such major status, with knock-on effects throughout, and far outside, the borough, that following deliberations by your department, it will have to be called in by the government. Various organisations and individuals who work full-time will need time to read and absorb this considerable documentation, to seek opinions within their own membership and also liaise with other organisations. I therefore ask that you extend the time that people have to consider the implications of this application from 4 weeks to at least 6 weeks. I will be in touch further when you have responded to this letter.
2.	Yes 1.1.18	This is acquisition of public space by stealth. How can Luton Airport apply for planning permission from itself? You must think Lutonians' heads zip up the back.
3.	Yes 18.1.18	Luton has become so overcrowded and what with more houses being built near Vauxhall motors it's a nightmare driving in and out of Luton and will get worse. The jobs that are highlighted as being made at the new century park will attract outsiders, who obviously will have to travel in and out of Luton. Has anyone on your planning committee ever tried getting on or off the M1 recently, it is virtually at a standstill most days. Also planned is passenger increase. There are so many holiday makers clogging up residential streets as they then get free parking, that now is making our once nice streets into nothing more than eyesores, along

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
		with being dangerous for anyone trying to cross roads etc. There also isn't any parking left at Wigmore Valley Park due to office workers parking there all day. This project of yours will cripple Luton completely.
4.	Yes 19.1.18	i feel that the very nature of the proposal is inappropriate and that the use of land/property should not change. - Local, strategic, regional and national planning policies. Remember this application is in breach of the Luton Local Plan which was only published in November 2017. The local plan is a major document that dictates future policy for 20 years and they have broken it by using Eaton Green Road as an access point. - Previous planning decisions (including appeal decisions) The original permission for Century Park banned access from Eaton Green Road. - Nature conservation - Overlooking - Visual amenity (but not loss of private view) - Adequacy of parking. ie The TUI car park will be much further away tempting more employees to park in the street - Highway safety - Traffic generation - Noise and disturbance resulting from use - Hazardous materials in that the site is a recognised unregulated toxic tip so should be left alone with its clay cap. - Smells through disturbance. - Loss of trees - Layout and density of building - Design, appearance and materials - Landscaping - Road access - Road Safety - The development may lead to a significant impact upon road safety due to more cars and lorries using local roads for access. - Proposals in the Development Plan
5.	Yes 21.1.18	I would like to object to this planning application. There are so many empty business sites in and around Luton how can you justify the need for this site. If there where not so many empty sites one could understand the need for it.

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Ref.	Objection	Comments
		Wigmore valley park and the surrounding area is such a valuable and loved green space, why must any of it be built on? The traffic on the route you have suggested is already heavy and I fail to see how this will be a benefit to the community. I hope you have learned from the mistakes made with capability green which has only one access road and one exit road. It feels like you will leave the bear minimum of skate park and childrens park, do we really need a cafe here? Energy recovery center sounds great and very eco friendly but what benefit is this to near by resident? Is this really what Luton needs? Should we not look to improve and use what we already have?
6.	Yes 21.1.18	I wish to lodge a planning objection to the following points: 1. The planning application is in breach of the newly adopted local plan, as the local plan states in policy LLP6 that there should be no vehicle access from Eaton Green Road to Century Park except for buses and taxis. The planning application has a new link road from Eaton Green Road by Kimble Close to Century Park and the airport so breaches this policy. 2. Document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF makes the following comments on two diagrams of the landfill. … REPEAT OF REP 11. … As the planning application has stated the dangers of building on this landfill, including further subsidence, deadly gases and odours that could affect the health of residents the application should be turned down for all of the above reasons
7.	Yes 21.1.18	I am writing to oppose the development of the Wigmore Park area for the following reasons: 1. The land you want to build in is contaminated full of methane gas which is inflammable. We already have a problem with smells and aviation fumes. 2. We also have a major traffic problem in this area already and the proposed development is likely to make this much worse. 3. Residents in this area already have problems with cars, such as workers from TUI First Fort who use our streets as a company car park. 4. My other worry is that my house is opposite the park entrance and I will be looking out on these buildings, whereas now I have a nice view of trees and parkland.

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
		5. The final concern is the noise from these buildings as the proposal is to build these close to the residential area. All in all, this land should not be built on but left as it is.
8.	Yes 21.1.18	Further to my previous objection, I would like to object more specifically on the grounds of the information contained in document DAS_Part2, section 5.8. Every point listed is alarming, but I would like to highlight the following in particular: "During construction waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas". This would be an unacceptable risk to public health. "Waste may contain volatile contaminants which produce vapours. Potential risk to future users of the site." This would also be an unacceptable public health risk. "As waste decomposes gases e.g. methane, which can build up to explosive levels in confined spaces." This is also clearly unacceptable, and a massive risk to local residents and anybody involved in construction. "Piling through landfill can potentially cause downward migration of contaminants. [...] As waste decomposes, it produces "leachate" which can contains elevated levels of contaminants which can get into groundwater" This is also a huge risk to public health, and one which may only come to light in decades to come. The potential risk to public health in Luton as a result of this development is clearly enormous.
9.	Yes 22.1.18	Clear breach of the local plan adopted in November 2017 in terms of Policy LLP6 which says the link between Percival Way and New Century Park shall be designed so as to ensure no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in the case of emergency. The plans show a link. This will put considerable strain on the local road network which is only designed to handle local traffic and will increase the dangers to

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
		children in the local schools and the general public.
10.	Yes 22.1.18	I wish to lodge an objection to the above planning application on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 - London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: *Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to* *provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency.* *Planning document KQ30131H168 shows a link with Eaton Green Road, which is also in breach of a planning condition when outline planning permission was granted to the original Century Park some 20 years ago.* *This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested.* *This will put considerable traffic on the local roads including Eaton Green Road, Wigmore Lane and Crawley Green Road that were only designed to handle local traffic. These named roads all have schools on them, namely Wigmore Infant and Primary School, Someries Infant and Junior School and Ashcroft Secondary School and the new proposals will increase the dangers of these roads to the general public including children.*[1]
11.	Yes 22.1.18	I wish to register my objection to planning application 17/02300/EIA on the following grounds. The application is a breach of the local plan as a route has been added from Eaton Green Road to the business park. I also wish to object to the principle of building on Wigmore Park, as the planning application includes the following text in document 17_02300_EIA DAS_Part 2-686521:

[1] Section used elsewhere in reps

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
		During construction waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas. *Waste may contain volatile contaminants which produce vapours. Potential risk to future users of the site.* *As waste decomposes gasses e.g. methane, which can build up to explosive levels in confined spaces.* *Piling through landfill can potentially cause downward migration of contaminants.* *In the 1970's dilute and disperse landfill was considered acceptable i.e no liner on bottom of landfill so contamination can seep out of the base of the landfill.* *Ground water in chalk is highly protected in the area as it is the main source of drinking water.* *Settlement waste is uncompacted and has a high potential for immediate and long term settlement.* *Settlement could impact upon the integrity and proper falls of drains and other services.* *Pilling over and against the landfill will cause it to settle.* *Stability of chalk- the top of the chalk may be weathered and weak. Therefor may not be suitable for founding in.* *Large obstacles in the landfill could prevent piling to full depth.* *Sulphates in the landfill may attack and degrade the concrete in the piles.* *Development of site could change gassing regime.*[2]
12.	Yes	I wish to register my objection to the above planning application on the grounds of the following

[2] Section picked up and used in Rep 19 and other reps

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
	22.1.18	Nature conservation - Wigmore Park is an area of natural beauty & offsets pollution from the airport . It offers facilities for a vast cross section of the local community and people from further afield, numerous different routes around the park and neighbouring fields and the opportunity to see the wild orchids in summer along with observing the local wildlife including deer, foxes, a large variety of birds and rabbits. I know the planned road and proposed business park will destroy a vast amount of this wildlife habitat. A promise of a replacement park will take years to develop and may never replicate the same precise environment that has attracted the current rich mix of nature and British wildlife at its best. I appreciate that airport development does have to happen but the current plan is totally inappropriate for the area. Adequacy of parking - The parking from workers in the TUI building is already completely inconsiderate and dangerous in places. The fact that the new TUI car park will be further away will only tempt more employees to park in neighbouring streets. Effects on local residents – I note in the planning application the following statements REPEAT OF ELEMENT FROM REP 10. The site is a recognised unregulated toxic tip so without any doubt should be left alone with its clay cap.
13.	Yes 22.1.18	I would like to submit my objection against this proposal as I believe the land should not be changed, as we will suffer the loss of the trees and nature around the area plus the side effects on this will create a toxic environment and also will generate an increased traffic flow for the residents. Noise levels will also increase whilst the parking will still remain an issue as it seems the numbers are not adequate. We will also suffer from noise and disturbance resulting from use!
14.	Yes 22.1.18	1. The proposed site is at present open space which is used by the people of the area for recreational purposes. (Luton has one of the lowest amount of green belt land in England, 2%). 2. The traffic in the area, especially at peak times, has the second largest congestion problem in the Anglia area. 3. It is the stated policy of Luton Council to double the throughput of London Luton Airport, which is adjacent to this site. This will obviously create more pollution in addition to the increase of traffic to this business park. 4. This being a business park, the traffic using it will be predominately diesel powered with resultant increase of harmful emissions. Diesel emissions are particularly harmful to children and the elderly.

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
		5. In addition to this proposal there is in the pipework more proposals to build additional 2000+ housing units in the area from Hertfordshire Council, which is adjacent to the site of this proposal. This will add to the congestion and pollution in the area. There is at the moment no proposal for extra roads to cope with is increase in housing. 6 There is extensive wildlife in this area including deer and in the last few years the red tailed kite has started to return to the area. These developments would see this wildlife wiped out. 7 The proposed re-vamp of Wigmore Park in no way compensates for the loss of the present recreational area. As can be seen from the above the increase in pollution and traffic density from all these additional inputs will have a very detrimental effect on the area. I have to ask, when, and if this all comes to be will we be, in a few years' time, introducing congestion and environmental charges because of the amount of congestion and pollution.
15.	Yes 22.1.18	This is Luton Council treating its residents with utter contempt.
16.	Yes 22.1.18	Wigmore Valley Park is a special park for me. I regularly walk there with my dogs and appreciate the wild, and varied routes, and the opportunities to see the many wild orchids in summer, the deer, foxes, birds, and the many rabbits in the early morning. I know the planned road and proposed business park will destroy a vast amount of this wildlife habitat. A promise of a replacement park will take years to develop and may never replicate the same precise environment that has attracted the current rich mix of wild life. I appreciate that airport development does have to happen but to plan a car park on top of a designated County Wildlife Area can only have been chosen by individuals with little understanding of the importance of preservation of nature.
17.	Yes 22.1.18	This application is in breach of the Luton Local Plan which was only published in November 2017. The local plan is a major document that dictates future policy for 20 years and they have broken it by using Eaton Green Road as an access point. Previous planning decisions. The original permission for Century Park banned access from Eaton Green Road. *Loss of Trees and Wildlife. * The TUI car park will be much further away tempting more employees to park in the street. The local roads will have a higher number of cars parking on them which has already been a issue in the past. * Much higher traffic generated the area.

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Ref.	Objection	Comments
		* More pollution in the area. * Smells through disturbance. * Road Safety – More cars, lorries, delivery vehicles using the local roads for access. *Buried in the planning application are the following statements which will be a horror story to the residents... … REPEAT OF REP 11. …
18.	Yes 22.1.18	I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 – London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency. I wish to object against any incursion of Wigmore Valley Park. The new road & development will mean the landfill will be disturbed during construction and waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas. I object also that the development will mean the destruction & loss of much of the current park, the destruction of many mature trees & much of the CWS that holds significant local value due to it's rich biodiversity. The destruction of much of this is unacceptable. It would mean the loss of habitat that had taken decades to mature & reach its current status, home to so many species of flora & fauna. There are no guarantees that current bio diversity numbers/conditions can be replicated by other prepared sites nearby as compensation. Local authorities have an obligation to respect & protect County Wildlife Sites & not to do the opposite by building on them!

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		I look forward to your reply confirming my objections have been logged & registered. If I can any assist further please don't hesitate to contact me.
19.	Yes 22.1.18	… REPEAT OF REP 11. …
20.	Yes 22.1.18	I oppose planning ref: 17/02300/EIA on the grounds that building on a former landfill site is very dangerous to the public and surrounding areas. As it states on page 36 or page 16/24 of the PDF in the attached planning application document: … REPEAT OF REP 11. … This is a shocking revelation and only one reason why this land should be left untouched .To put peoples lives at risk is an unacceptable situation. If problems did occur and there was an environmental disaster ,what then ? Huge compensation for disaster victims as in the recent Grenfell fire ?
21.	Yes 22.1.18	I disagree with the principle of this proposal. I feel it is inappropriate and that the use of this land should not change.
22.	Yes 22.1.18	1. The Luton Local Plan, adopted and published in November 2017, is being broken by the above planning application by using Eaton Green Road as an access point. The Luton Local Plan stated that Eaton Green Road should NOT be used. 2 Additionally the original permission for Century Park banned access from Eaton Green Road. 3 Nature conservation: Wigmore park is an area of natural beauty & offsets the airport pollution. It is home to several species of wild orchid, bats and birds to name but a few. The development would also cause the loss of many trees - trees give us oxygen, store carbon, stabilise the soil and give life to the area's wildlife. 4 Hazardous materials - the site is set on top of a hazardous tip. …COPIED AND PASTED FROM REP 19… 5 Adequacy of parking: The TUI car park will be much further away tempting more employees to park in the streets. This is

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		already a major problem. Additionally, there are also already problems with holiday makers using local roads to park and this would only likely become more of a problem. 6 Traffic generation - traffic is already extremely heavy along the routes from residential areas around the airport, leading to town and the M1. The increase in traffic to be generated would cause added air pollution and cause severe travel congestion 6a The increase in traffic will impact on the safety and health of the children using the local schools: Wigmore Infant and Primary School, Someries Infant and Junior School and Ashcroft Secondary School.
23.	Yes 22.1.18	I totally object to the said plans that LBC propose. It seems that this whole area is being heavily built but not for the community's benefit. I have walked my dog on Wigmore park for 12 years and love to go at weekends with my children to walk around, look at the wildlife and to watch the planes land and take off. Yes LBC are offering a new community centre and park as a token gesture but there is a major road going through the park and it totally unsure for children. Will you be providing traffic wardens 7 days a week during sunlight hours? Will there be speed bumps and traffic cameras set up? There was nothing wrong with our old community centre in the grounds of Wigmore Park until funding stopped and it is now in a state of disrepair. Wouldn't it be cheaper to invest in repairing the building?. Plus why have the council taken away our local library and now letting it turn into another restaurant. it seems the council are not listening to local residents, we are having everything taken away from us and we don't want the expansion of the airport, the new business park and the new houses. We want open landscape and fields and a safe area for our children to carry on enjoying and to play in rather than being cooped up at home, being unhealthy and unsociable. My biggest concern with all this expansion is the building on top of a landfill site. What health issues will our families suffer in the future? I have 2 small young children, I do not want them to be in their school playgroup or the park breathing in harmful gases which could be cancer inducing in later life. I do not want my husband and myself to get ill and leave behind two small children. Have the council carried out proper health and environmental studies? Have you considered the possible and likely consequences where hundreds of children could be taken into care because they no longer have their parents due to health risks of building on a landfill site? Why when LBC had a survey carried out at the park where the people wearing safety closing and had specialist showers to make sure they were not covered in anything untowards yet our families won't be protected? It's time LBC looked at other ways to regenerate the town rather than building on a health hazard. It seems LBC are only interested in bringing in new business and people moving out of London rather than looking after their residents who have lived here all their lives. I also ask about this incinerated mentioned in the documents. You haven't been specific to explain what this is for, being vague points to the fact you are hiding something from residents.

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		I feel as though local residents are not having enough sessions with the council to ask questions and to be completely and honestly informed about the plans. Are LBC going through the correct channels and following guidelines for planning or is it already a done deal with lots of 'back handers'?? I've seen the unjustness of LBC who have granted planning permission against their guidelines because the property owners were friends with someone from the council. People put up and shut up but we're fed up with it. You need to start listening to people's opinion and look after your residents
24.	Yes 23.1.18	This application MUST BE DECLINED hidden in the depths of this application clearly demonstrates a danger to nearby residents and its community. Wigmore Park Buried in the planning application are the following statements which will be a horror story to the residents: COPY OF REP 10
25.	Yes 23.1.18	I wish to object to planning application 17/02300/EIA on the following grounds: Firstly, it is in breach of the Luton Local Plan by using Eaton Green Road as an access point to Century Park. Creating an access point here would turn Wigmore Lane into a major route into the park for people coming from, for example, the Hitchin direction. Wigmore Lane is already close to capacity at peak times, and would be unable to cope with the extra traffic. It is also regularly in a very poor state of repair - particularly near the Ashcroft Road junction, as is the section of Ashcroft Road leading to the Jansel House roundabout. This problem would be further exacerbated by the considerable increase in traffic. This will also have an impact on road safety. The increase in traffic on Ashcroft Road and Wigmore Lane in particular, which would undoubtedly be made up of taxis, minibuses and coaches to the airport, would turn these local roads into dangerous rat runs, especially considering the amount of school children which use them, such as those walking to Someries Infants and Primary Schools, Wigmore Primary, Putteridge Primary and Putteridge High. In addition, the unknown quantity of building on a former landfill site is of particular concern due to the risk of toxic emissions, and the instability of the land (which has already settled by quite a degree in some places). I realise some testing has been done in this area, but it is far from conclusive, and there are still too many unknowns, making it a dangerous undertaking not only for

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		local residents, but also for anybody involved in the construction. I also object due to the loss of accessible green space. The new areas being provided on former arable land will be much further away from inhabited areas, making them less accessible to a lot of people. The park was also originally designed as a buffer between the airport and local residences, but the Century Park development would bring the airport very much closer to local housing estates, potentially raising noise levels to unacceptable levels Furthermore, the lack of clarity on the "Energy [Recovery] Centre" in unacceptable. As far as we know, this could end up being an incinerator. The loss of TUI / First Port parking, forcing even more employees to park in local streets, blocking driveways and pavements (as they do presently) is another concern. In addition, the amount of parking being provided for a business park which is meant to be bringing over 3000 jobs, is simply inadequate. There is not room to provide enough parking for this many jobs, meaning local streets would once again be swamped with employees' cars. The loss of trees and plant species, including orchids, which have taken decades to be established, would be a travesty. It will take many years before any newly planted trees reach maturity, and much longer for any other species to return (if at all). In addition, I object to the loss of direct access to the Tidy Tip. This could lead to fly-tipping along the peripheries of Century Park, as people would be less inclined to find their way to the Tidy Tip itself.
26.	Yes 23.1.18	As a resident of the Wigmore and Stopsley area I object to the Century Park development for the following reasons: The roads in the area are already extremely congested and I believe the proposals would further add to the congestion on these roads. As a local resident I use Eaton Green Road, Wigmore Lane, Crawley Green Road, Ashcroft Road and Vauxhall Way and these roads are bad enough already. This proposal would only make things worse. We would lose a valuable area of green space that as a family we use for walking, running and taking the grandchildren out. The council would be better served making changes to what is there already at Wigmore Valley Park. The proposal for Century Park would involve digging up an old landfill site. This would not be a good idea for the environment as it would expose us to waste and toxic gases. Surely this would be a very dangerous environmental issue.

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		There is also road safety issues with the increase in traffic in the area we have to remember the local schools and school children walking to school as well as people walking to work and having to negotiate busy roads. The proposals for Century Park and the airport itself bring the added nuisance of even more noise than there is at present for local residents. Also even more pollutants in the air. Just looking at our window sills in the summer and the airborne dust and dirt from the aircraft and vehicles. Just think about what we are all breathing in on a daily basis. I ask Luton Borough Council to consider these proposals again. Better still let an independent body look at the plans. I feel there is a conflict of interest here!!!
27.	Yes 23.1.18	I am becoming increasingly concerned about the council's proposal of plans to build Century Park on what is now Wigmore Valley Park. The reasons are; * The depletion of valuable green space in an already cramped and industrialised town. The government is encouraging us to get fit and healthy by getting outdoors, but how is that possible when the council is eroding away all our green space by building on every available space we have. * The increase of traffic on already congested roads in the area. With the proposal to build thousands of new homes in the Cockernhoe area as well as Century park, how will the roads cope with all the extra traffic. This will also make it extremely hazardous for local children walking to and from the schools in the area. There is also already a problem with parking on roads around the airport and this will become worse with the proposals unless there is sufficient parking provided. * The most alarming point is the fact that Century Park is being built on a landfill site which is dangerous to the health of the local residents by releasing dangerous chemicals with the excavation of the site.
28.	Yes 23.1.18	I wish to object to a road and a business park development on Wigmore Valley Park. I will appreciate a cafe especially if it has a toilet with disabled facilities. I do have [redacted] my needs are simple but I do enjoy sitting in the car in the car park watching the green area, the trees and the families and children enjoying the open space as I no longer have a garden. A business park and access road on the park will destroy the outlook for me and I understand there might be a possible danger

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		from toxins released from the old landfill, which could make the area polluted and damage both the wildlife, and more worrying visitors to the park. I do hope you will consider my objections seriously
29.	Yes 23.1.18	I wish to register my objection to planning application 17/02300/EIA My major concern, although by no means the only one, is the detail contained within 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF Building on a former tip will cause conditions dangerous to the population and hazardous materials in that site,as a recognised unregulated toxic tip, should be left alone with its clay cap. I appreciate that the path of progress cannot be halted and your wish is for the airport and Luton to grow, however, to built anything on this park will be a matter of concern and hazardous to anyone using any new facilities you build. In addition this application is in breach of the Luton Local Plan which was only published in November 2017. The local plan is a major document that dictates future policy for 20 years and you have broken it by using Eaton Green Road as an access point, the original permission for Century Park banned access from Eaton Green Road. Wigmore Valley Park is an area of natural beauty, a buffer between residents and the airport, a natural area to absorb pollution. The scale of proposed building in the whole area from Butterfield Green through to the housing development planned for Wigmore/ Cockenhoe, Napier park & the DART system is huge and open space in Wigmore Valley Park must be retained as an essential area of nature conservancy and recreation.
30.	Yes 23.1.18	We wish to lodge an objection to the planning application 17/02300/EIA. We as local residents, have serious concerns over the increased traffic this development will bring to the area and along with the congestion this will cause on routes that are already frequently congested heading towards the airport, we are concerned about the decline in local road safety as more vehicles use the route. These roads were only ever meant to cope with local traffic and we believe this will have a significant impact locally. We use Wigmore park regularly as do many of our neighbours and are disgusted that there is a plan to build on it and move our

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		only green space further away. Local residents already have major parking issues caused by employees from Wigmore Place parking on residential streets, as their car park will be moved even further away, this problem will increase significantly. We have concerns about buildings been on a former landfill site and the possible health hazards this could cause to local residents. … REPEAT OF REP 11. … The park is well established, home to wildlife and plants that has taken years to establish and you seem to think it's fine to destroy that. Well it's not. The majority of local residents are opposed to this planning application, our local council is supposed to work for the local people, not bulldoze over their opinions and park.
31.	Yes 23.1.18	I am writing to lodge my objections to this planning application. There are many and I will highlight them as bullet points below. • First is a point of principle. This is a greenfield space that benefits the community and is in constant use by the families and dog walkers in the local area. I simply do not understand how it can be that in a time of enhanced concern for nature conservation, that the council could be so indifferent to parkland and the local community that it serves. This is a much loved resource that provides a valuable buffer from the ever encroaching airport. I am unable to comprehend the thinking in regard to destroying such a valuable natural asset. It is my opinion that this land should not have its use changed at all. • I'm extremely concerned about the pressure this will apply to already overstretched car parks in the area. The employees of local business are already causing great parking nuisance by parking in side roads within Colwell Rise and surrounding areas. • We have ALREADY experienced noise nuisance from the pile driving works that were taking place at the Airport. This is where the construction company saw fit to perform extremely loud hammering during the late evening and early morning. This continued for days. The fact this was allowed to happen AT ALL ,while people were trying to sleep, only illustrates to me that the council could not be trusted to manage noise from the construction of such a large development situated on peoples doorsteps going forward. • I am concerned that this development is intended to take place over a capped landfill site that, being from a time when Health and Safety regulations were not as strict, could contain all manner of hazardous waste. I see no way that construction on top of this will not release either foul smells or worse toxic particles into the surrounding area. • I am surprised and dismayed by the projected changes to the road layout. I believe this will add pressure to Wigmore Lane.

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		This is a road which cannot cope with the amount of traffic at rush hour at the moment, let alone when this becomes effectively an A505 link road. Moreover ,it seems the planners have completely overlooked the amount of pressure that is currently applied to Eaton Green road, with traffic Jams at rush hour regularly stretching from Kimpton Road right the way to the roundabout between Eaton Green road and Wigmore Lane.This will only be exacerbated when the plethora of new traffic lights erected for the housing development on Kimpton Road become active. Naturally the addition of more vehicles and in particular heavy construction vehicles is a safety concern in close proximity to such a densely populated location. • I am also lead to understand that by using Eaton Green road as the access point for the development, it is in contravention of the November 2017 Luton Development Plan.
32.	Yes 23.1.18	I am writing to object to the plans for Century Park, Planning application number 17/02300/EIA, on the grounds of Hazardous materials. The site is recognised as an unregulated toxic tip and should therefore be left alone with its clay cap in place and not built on. Hundreds of families with young children will be at risk in the local area and it is not acceptable to build on this land at a detriment to their health. I refer to the diagrams in document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF and the following statements within the planning application. … REPEAT OF REP 11. …
33.	Yes 23.1.18	I strongly object this development - particularly to the disturbance of contaminated land (previously the tip as I remember it as a Lutonian of 63 years) in view of the dangers to drinking water and health.
34.	Yes 24.1.18	The proposed site was formerly used as landfill in an era with very little (if any regulation) on what was deposited. The presence of heavy metals, poisons, explosives and other potential risks are known, and currently protected by the existing landscaping. The development of this site will result in these substances polluting the atmosphere and water table, with potentially disastrous consequences. The location is inappropriate for the proposed development. Eaton Green Road is already overburdened, and the proposal to create an access to this is in contravention of the Local Plan. Furthermore, there is already inadequate parking for the existing business development, resulting in employees parking in residential streets, a problem which will only be exacerbated by the proposed development. An increase in road traffic gaining access to the proposed development will also increase pollution and have a detrimental effect upon road safety.

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		The proposal will destroy an established park that is a much used (and cherished) local amenity, and the home to local wildlife and flora, some of which is very rare.
35.	Yes 24.1.18	I believe that the park has fantastic wildlife and is a real benefit in the days of obese people and especially children. The chance to walk in an area that has a natural not manufactured habitat and let children imagine their adventures cannot be replaces. My son and I followed the red Indian trail and hunted the baddies and i was looking forward to doing this with my grandchildren.
36.	Yes 24.1.18	I am writing with regards to the recent planning application reference 17/02300/EIA for the new century park (Wigmore Park). I've lived here for 17 years and noticed the increase in traffic particularly when travelling in rush hour and have strong concerns on the 'U Turn' regarding access from Eaton Green Road for all traffic when the local plan you published back in November 2017 stated there would be no access except for buses and taxis. This will enormously generate more traffic in the area and further increase travel times for the local residents not mentioning the increased pollution we will endure. I also have strong objections to building on land fill sites to my health as this would emit harmful gases for adding to health concerns. Please, I urge you to ensure local residents are heard and review this application appropriately.
37.	Yes 24.1.18	I am writing to oppose your extremely disappointing plans and changed proposal concerning the above plan reference. I moved to this quiet location in 2015 to live on the outskirts of this village. I now find myself living in a road which will be directly in between this proposed business park with a dual carriage way, and 4000 houses the other side at Wandon. My road, Wigmore lane and Eaton Green road will become a major through way before you are done. This application is in breach of the local plan published in 2017 which states there should be no access except for buses and taxis from Eaton Green road. Why are the goal posts being changed all the time? I strongly object to the use of Eaton Green road as an access road, this would turn wigmore lane into a major route from Hertfordshire Hirtchin area.

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		Loss of green land, trees, shrubs including orchids. Loss of wildlife, foxes, deer, rabbits, rare birds. WHY BOTHER BUILDING THIS PARK AND GIVING IT TO THE NEIGHBOURHOOD IF YOU WERE GOING TO TAKE IT AWAY. Loss of access to the tip. Loss of accessible greenspace for everyone locally, especially those who older and with physical disabilities. They will not have an accessible area by foot. I guess this the future, the OLD do not matter. Building on an former landfill site, risk of gas emissions. As for some of the small print in the planning application " during construction waste and contamination may be exposed ...could cause health effects to people in neighbouring areas"
38.	Yes 24.1.18	I am writing to object strongly to the proposed development at Wigmore Park. The park is a valued asset to the surrounding area and is used by many people for enjoyment. I do believe that this application is in breach of the Luton local plan that was only published in November 2017. The local plan is a major document that dictates future policy for 20 years and they have broken it by using Eaton green road as an access point. Previous planning decisions (including appeal decisions) had banned access from Eaton green road. What's changed?? The area is already at a standstill in peak time. How will an increase in traffic help? Hazardous materials which have been identified should be left alone with its clay cap. How can this be allowed to go through by the council?? Another appalling decision about to be rail roadbed through
39.	Yes 24.1.18	I object to the proposal to alter wigmore park for the following reasons, • on Principle - I feel that the very nature of the proposal is inappropriate and that the use of land/property should not change. • because this application is in breach of the Luton Local Plan which was only published in November 2017. The local plan is a

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		major document that dictates future policy for 20 years and they have broken it by using Eaton Green Road as an access point. • Because The original permission for Century Park banned access from Eaton Green Road. • high buildings Overlooking private homes. • Visual amenity as will be an eye sore. • Adequacy of parking. ie the business park is meant to employ 1000's of people yet has just over 1500 parking places, meaning more nuisance parking for local residents. • Highway safety • Traffic generation • Noise and disturbance resulting from use • Hazardous materials in that the site is a recognised unregulated toxic tip so should be left alone with its clay cap. • Smells through disturbance and possible health effects. • Loss of trees and wild life • Road Safety - The development may lead to a significant impact upon road safety due to more cars and lorries using local roads for access. • The fact that unexploded ordnance has also been found after a bore hole was dug. This was found on page 289, Factual report on Ground Investigation.
40.	Yes 24.1.18	I object to the planned works in Qigmore valley park for various reasons, including loss of wildlife and habitats. Risk or water contamination and public health risks. I also object because of infrastructure and the lack there of before, during and after the works should they go ahead.
41.	Yes 24.1.18	I object to this plan, not only because it is in breach of the Luton Local Plan, which was only published in November 2017, but because the very nature of this proposal is inappropriate. This piece of land is very important for not only local wildlife but for the health and wellbeing of local people and children. The loss of trees and hazardous materials in this site, which is an unregulated toxic tip should be left well alone. Also the fact that an unexploded ordinance was found (pg 289 factual reported ground investigation) makes this an unsafe place to dig and build. There is also a lack of adequate parking (only 1500), road access and thoughts to road safety.
42.	Yes 24.1.18	I object to this due to the noise, traffic increase, loss of our wildlife.
43.	Yes	I oppose these plans due to the loss of natural established countryside and wildlife. Not to mention robbing my children of a safe and accessible park to go to. What happened to the government's bid to try and protect established woodlands and nature

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	25.1.18	reserves. Our roads will become congested and unsafe. In addition... At bore hole co-ordination E:512595.2 N:221451.1 they had to stop digging as they found unexploded ordnance 2.8m below the surface. On instructions from the the client they abandoned the bore hole. Seeing that hardly any bore holes were dug how many more bombs were dumped in the tip after the WW2?
44.	Yes 25.1.18	Wigmore Valley Park is unique green space for the people of luton. The area of the planned development covers a wild area that is unmatched by other Luton parks. It is the only place I have ever seen, wild orchids, green woodpeckers and weasels living in the wild since moving to Luton over 30 years ago. There are also bats, dragonflies and lots of other insects and wildflowers thriving in the area that is planned to be developed. These populations take decades to establish and cannot be moved to an empty field. A new building on the other hand can be placed in an empty field.
45.	Yes 25.1.18	I think it is ridiculous to purchase an empty field, with the intention of moving a public park onto it, so that you can then build on where the park was, and (promise to) rebuild the park further away from where people live. Moving established trees that are over 30 years old is going to be very expensive. Why not just put the new buildings in the empty field instead?
46.	Yes 25.1.18	I wholly object to the building of century park at Wigmore valley park. Not only will its creation cause more traffic in the Wigmore area ,as the new proposal seems to have added a junction on Eaton Green Road with access into century park. Along with extra traffic comes pollution ,noise and congestion. The area is already "log jammed " at certain times so surely this proposal will only make things worse. Also the stripping back of open green spaces for the local community has to be detrimental for all, and moving the new green space further away isn't going to help either. I'm sure an alternative site could be found to regenerate an existing area of unused concrete, or somewhere that wouldn't cause so much upheaval and destruction. Allowing the construction of century park really is not progress.!
47.	Yes	I object to this planning application

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	25.1.18	I am concerned about the loss of accessible green space. The new area being provided is much further away from the majority of housing making it less accessible to a lot of people. The park was also originally designed as a buffer between the airport and local residences, but the Century Park development would bring the airport very much closer to local housing estates making them more vunerable to noise and pollution. Creating an access point at Eaton Green Road would turn Wigmore Lane into a major route into the park for people coming from, for example, the Hitchin direction. Wigmore Lane is already close to capacity at peak times, and would be unable to cope with the extra traffic. I am also concerned about disturbing a landfill site during building works and the possible hazards this could bring.
48.	Yes 25.1.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. Not only does this business park mean extra traffic but it will add more noise /pollution and will make the area generally a less safe environment for my young family. I also wish to object to any development on Wigmore Valley Park, as this is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement. I also wish to object to the piling and disturbance of the former council tip as the planning application has provided the following statements in document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF I am concerned on the potential exposure of the waste and the possible contamination of the local area this may bring. Furthermore, I think turning this green belt land into a business park, whilst it will bring jobs to Luton, will impact a lovely bit of countryside and it would be a real shame to lose the land. (Why not build on areas around the M1?)
49.	Yes	I am writing to object to the proposed plan 17/02300/EIA

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	25.1.18	Firstly, the site is set on top of a tip and the disruption of the land has the potential of releasing unpleasant, and at worst dangerous, substances at a potential risk to future users of the site & local residents. Secondly, considering the emissions from the airport, the park serves to offset some of the polluting effects of the airport, while also being home to a great deal of wildlife. The construction proposed is likely to destroy much of this wildlife and to achieve this diversity of wildlife in a new location will take many years, with no guarantee of recreating the parks current beauty and diversity. Of course, residents accept that some concessions must be made for airport expansion, a great deal of the frustration that residents feel is rooted in the lack of consideration for the local area this plan displays. While the possibility of an access road from Eaton Green Road were initially denied by the council representatives at consultation meetings, the updated proposal shows plans for such a link road. This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested. The road infrastructure already struggles at peak times and the proposal shows a disregard for its potential effects on the road. Also, park is already an issue for the local area. The parking from the TUI building is already overflowing into residential streets to the detriment of residents. By moving the TUI carpark further away, it only increases the temptation to park on local roads. Finally, I do not want this change to the park but what is most frustrating is the feeling of voicelessness and impotence these plans gives to local people. The consultations begin only after the plans are in motion and the concessions and promises (e.g. no Eaton Green Road access) are broken. The suggestion that the park will be replaced before we are affected is disingenuous, as children's play facilities are slowly stripped away under our noses and tests and ground works wreck parts of the green space. I want a green space as an escape from the seemingly omnipresent airport, a place to walk my dog and appreciate the beauty of a town that people insist doesn't have any. But Luton Borough Council seem determined to strip away what is special about Wigmore as residents fail to be heard over the jangling pockets of the airport, though we still hope our objections don't fall on deaf ears again.
50.	Yes 25.1.18	I wish to lodge an objection to planning application 17/02300/EIA My reasons for objecting are as follows

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		I attended a consultation evening at Wigmore School where it was stated that there would be no access from Eaton Green Road however on the current plan a route has been added from Eaton Green Road to the business park. Furthermore, The Luton Local Plan, adopted and published in November 2017, is being broken by the above planning application by using Eaton Green Road as an access point. The Luton Local Plan stated that Eaton Green Road should NOT be used. This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested. This will lead to more traffic on the local roads in this area that are already congested at peak times. The new road & development will mean the landfill will be disturbed during construction and waste and contamination may be exposed which could cause odour nuisance and health effects to people in the area. Parking concerns - the TUI car park will be much further away which could mean more employees parking in residential streets, which is already an issue in the area. The development will mean the destruction & loss of much of the current park, the destruction of many mature trees and the loss of habitat that had taken decades to mature & reach its current status
51.	Yes 25.1.18	REPEAT OF REP 58 (AND REP 11)
52.	Yes 25.1.18	I write to object in the strongest possible terms about the proposed application cited above. I am frankly disgusted that Luton's elected representatives could imagine that building over well established parkland, of vital environmental importance to the local community, would be acceptable to those they represent. I object specifically on the following grounds: - it is not safe to build on toxic landfill. Doing so could pollute the air and water sources. - the green space is a buffer between the airport and the community. If it is built on, residents' air quality will go down and noise pollution will increase - the park is a significant amenity for local people to use for leisure. There is no comparable space within walking distance. The farmers' fields are not comparable, having rights of way issues, and in any case are under threat from development also. - the park was given to the people of Luton in the 1970s for the reasons above, and has been used as parkland ever since.

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		Therefore, under common usage laws, it should remain in public ownership of the people as a green space. I am privileged to work in a local high school. During a recent lesson about voting and who represents us in government, I informed the students about this planning application. Many touching anecdotes about the park ensued ('I learnt to ride my bike there!' 'but we walk our dog there every morning!') accompanied by disbelief that their own council could take such action. I have encouraged them to make their own objections to this ridiculous plan.
53.	Yes 25.1.18	I wish to object to any development on Wigmore Valley Park, as this is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement. Wigmore Park has become an established wildlife haven over the years, which has been recognised as the status of a County Wildlife Site has been awarded to the park. It is essential green space in what is becoming a rapidly developed area. Crucial for fresh air and freedom of space for the physical and mental well being of residents. REPEAT OF REP 58 (AND REP 11) Finally the road and park development will result in the loss of current car parking spaces for TUI office, First Port and airline workers. This will result in unacceptable parking in residential streets which is an inconvenience for local residents and may result in parking permits being issued at a cost to those residents.
54.	Yes 25.1.18	REPEAT OF REP 53 ABOVE
55.	Yes 25.1.18	I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 - London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percival Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to

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		provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency. Planning document KQ30131H168 shows a link with Eaton Green Road, which is also in breach of a planning condition when outline planning permission was granted to the original Century Park some 20 years ago. This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested. This will put considerable traffic on the local road network including Eaton Green Road, Wigmore Lane and Crawley Green Road that were only designed to handle local traffic. I strongly object to any incursion of Wigmore Park that includes destruction of mature parkland or any incursion into landfill which would result if the development goes ahead. Landfill disturbance risks hazardous & toxic materials being released & ground water being contaminated so I fully object to any road or development on Wigmore Valley Park for these reasons. Wigmore park was gifted to locals as compensation because of large scale housing development at the time & was intended as a natural buffer between Wigmore & the airport & containing the landfill as a result. I strongly object to any development or road in Wigmore Parks place for the reasons given. The park should stay as is other than improvements to just the skate, pavilion & play areas only.
56.	Yes 26.1.18	SAME AS REP 1 FROM PETITION SHEET
57.	Yes 26.1.18	REPEAT OF REP 32 AND REP 11
58.	Yes 26.1.18	I wish to strongly object to the planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads.

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Ref.	Objection	Comments
		I also wish to object to any development on Wigmore Valley Park, as this is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement. Wigmore Park has become an established wildlife haven over the years, which has been recognised as the status of a County Wildlife Site has been awarded to the park. During summer months at dusk Bats are very often sighted flying across the park! The alternate location proposed in the planning application for the new Wigmore Park is a ploughed farmer's field that is devoid of any wildlife value and is located too far from the homes of the majority of park users. I also wish to object to the piling and disturbance of the former council tip … REPEAT OF REP 11 …
59.	Yes 26.1.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads. Anyone living near Wigmore Lane/Eaton Green Road will know how difficult it is to drive around this area- especially in rush hour. A lot of the smaller roads are only able to be used for single lane traffic due to cars parked on every available kerb - yellow lines ignored. It has already been reported in national newspapers about vandalism caused to cars parked inconsiderately - something which could increase with the increase of traffic. … REPEAT OF REP 58 (AND REP 11)
60.	Yes 26.1.18	We wish to strongly object to the proposed use of part of Wigmore Park for the development of "Century Park". Wigmore Park was given to the people of Luton in 1982 when the Wigmore Estate was built, and it should not now be used for development. The park has matured over the last few decades, and we consider it to be one of the best wildlife sites in Bedfordshire.

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		There are now many wild-flowers including five species of orchid one of which is the county flower the Bee Orchid. There are also foxes, rabbits, deer, bats, plus many birds and insects. The park provides a welcome retreat from the urban environment for both adults and children. Replacing the publicly accessible park with a cultivated field, that will take many years to recover from the weed killers and chemical fertilizers that have been applied over the years, is not a recompense. The extra traffic to the business park both in construction and afterwards will cause more pollution, and inconvenience to the residents of this area. The road surface in Ashcroft Road is already in a poor state of repair, so it's unlikely to cope well with even more traffic thundering down it. Having read that ordinance was found in one test bore hole, it makes you wonder what else is lying unknown on that site.
61.	Yes 26.1.18	REPEAT OF REP 58 (AND REP 11)
62.	Yes 27.1.18	Following your letter of 9 Jan in which you asked for my comments, to which I sought clarification (below) on several matters, I am surprised not to have heard back yet from you or a colleague about these important matters. I understood that council policy was to respond to queries within 5 working days, and this is a major issue for the town. Time is crucial, particularly my request for an extension of the consultation period from 4 to 6 weeks. Further, I attach a response I sent on Wed 24 on behalf of Friends of Wigmore Park, who I am advising, to the notice placed in Luton News on 3 January. These comments are quite clearly directed to Luton Council (who still own the park land, and propose to continue with its management, although it may have been leased or licensed to LLAL) whose address appeared at the foot of the notice, not to the applicant, LLAL. Yet the planning officer seemed unable to decide who they should go to, and passed them to the applicant. As I believe you are the case officer scrutinising proposed developments on Wigmore Valley Park, could you please reply to these comments as well as those below? Friends of Wigmore Park has requested: 1) details of the date and the process by which a publicly owned park was passed to a private company without notifying its users, the public

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		2) assistance from the council to declare our park Local Green Space, and an Asset of Community Value 3) help in setting up a Neighbourhood Forum. It concerns me and others greatly that the council, which should impartially determine all planning applications, seems unable to separate itself from the applicant, which consists of Luton Council personnel. I should be grateful for clarification of your position on this, and how your role can be separated from the strong views of your superior officers, as I cannot now expect an impartial response from the council leader or CEO, who have been promoting all activities relating to airport expansion.
63.	Yes 29.1.18	I object to Century Park on the ground that Wigmore Valley Park was given to the people of Luton. It is also an old landfill site so there is a potential threat if this land is disturb. There would also be a considerable increase in traffic and it is already congested
64.	Yes 29.1.18	I object to the application due to the significant environmental impact and damage that would be caused. Disturbing a landfill site isn't going to be good for anyone. Site surveys conducted on behalf of the application clearly show nasties such as arsenic, asbestos, medical waste and unexploded ordnance. Piling through this two the bed rock will likely pollute the water table as stated within the application. Other reasons would be the significant traffic increase on already choked roads. Because of the significant charges in place at the airport the surrounding roads are becoming churned up and hazardous to pedestrians. Regularly walking home from work im forced into either the mud or road to get around the cars parked on airport way, completely blocking the pavement, surely any form of airport business expansion will make such issues worse.
65.	Yes 29.1.18	I wish to object to the proposal due to the following reasons; -The loss of wildlife space that the proposal will result in. Hundreds off trees will be lost as well as other well established shrublands. -The additional traffic flow that the plan will bring and additional dangers in terms of road safety. -The inevitable increase in parking issues in the surrounding areas. A parking consultation was recently conducted in the area. While the result of this consultation have not yet been published, it was conducted without the full facts of the planned development yet being available to the residents. The change to Frank Lester Way no longer being accessible to standard traffic will mean that even if TUI and other companies sharing the building by Wigmore Library obtain replacement parking spaces in the new development, it is unlikely the employees will opt to park there and instead flow out even more onto the surrounding roads.
66.	Yes 29.1.18	I am totally against the planned development of Wigmore Park, (new century park) It will totally destroy the habitat, I am vehemently against the destruction of tree's and wildlife purely for profit! The planned proposals will bring a massive amount of traffic and more noise pollution to the area. Along with the noise comes the fumes that

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		the traffic brings. Luton borough council keep harping on about air quality and in the next breath deem it acceptable to plan roads and dual carriageways through this area probably at the thought of generating money. There is plenty of derelict building land on the outskirts of the town centre that could be used. The park is extremely well used by residents of Luton and surrounding areas. I would like to remind Luton council that it's members are democratically elected and can be easily de elected! Listen to what your constituents are saying! I VOTE NO TO THE PLANNED DEVELOPEMENT!!!!!!!
67.	Yes 29.1.18	I strongly oppose these plans particularly the new road that will cause more congestion and pollution to an already busy area.
68.	Yes 30.1.18	REPEAT OF REP 58 (AND REP 11)
69.	Yes 30.1.18	I wish to object in the strongest possible terms to the planning application 17/02300/EIA. Despite repeated assurances to the local community in the past that access to the planned Century Park would not be via Eaton Green Rd, this is now what is planned! This is in total breach of the local plan policy LLP6. The local residents already have to suffer extremely congested roads at peak times mainly due to the totally unsuitable siting of Wigmore Place next to a large residential estate. The parking provision for this building is totally inadequate and moving one of the existing car parks as part of this development will naturally mean longer journeys for workers and simply mean local residents will find more inconsiderate parking occurring in estate roads in the area. Wigmore Park is a valuable asset enjoyed by many local residents. It is well established and the removal of such an important outdoor recreation area is an extremely concerning prospect. The proposed replacement "Park" is totally unsuitable both in its location and the fact that it will be nothing more than a farmers field! REPEAT OF REP 11
70.	Yes 30.1.18	I wish to strongly object to the planning application 17/02300/EIA and to any development of Wigmore Valley Park. The park was a gift the people of the area and is a valued asset to the community. It has flourished over the years and has trees,

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		that have taken decades to mature, and wildlife that will be completely destroyed by this development. The planned replacement park is far away and currently devoid of any life. The proposed development completely goes against the Luton Local Plan 2011 to 2031, strategic objective 10 - to improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the river lea corridor, the chilterns area of outstanding natural beauty (AONB) and areas of local landscape value (ALLV). Wigmore park is designated as an ALLV in the policies map that supports this local plan The proposed site also used to be a landfill containing heavy metals, poisons, explosives and other potential risks that are protected by the current landscaping but which, if disturbed by building work, risk polluting the atmosphere and water table. This could potentially be disastrous for the area and the residents The location is completely inappropriate for any planned development. Eaton Green Road is already heavily congested and the plan to build an access road into it will only add to the burden on the area, as will plans to close off Frank Lester Way to through traffic. Parking issues are already a concern, with people in the current office premises (used by TUI and First Port) already using local side roads and wigmore valley park to park. The plans will close their current parking at the tidy tip (more traffic wars on the side streets!) and do not provide sufficient provision for the new office premises being built on the park (1000's of jobs to be created, but not 1000's of parking spaces!) The extra cars and lorries/trucks required to use to roads to build the business park will add to the air pollution In summary, the development will ruin the local area, destroy wildlife and vital green space, cause traffic and parking chaos and have the potential to cause environment disaster!
71.	Yes 30.1.18	REPEAT OF REP 58 (AND REP 11) … I have lived in Wigmore in excess of 10 years and feel your plans will ruin the society that us homeowners live in.
72.	Yes 31.1.18	I oppose the proposal to build on the new century park due to the hazardous materials in the site which is a recognised unregulated toxic tip which fills me with worry if it is disturbed
73.	Yes 31.1.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton

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		Green Road, which are all already extremely busy local roads. In addition this would turn Wigmore Lane into a major route into the park for people coming from, for example, the Hitchin direction. Wigmore Lane is already close to capacity at peak times, and would be unable to cope with the extra traffic. It is also regularly in a very poor state of repair - particularly near the Ashcroft Road junction, as is the section of Ashcroft Road leading to the Jansel House roundabout. This problem would be further exacerbated by the increase in traffic. I also wish to object to any development on Wigmore Valley Park, as this is a superb community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement, also providing a 'green' buffer between residents and the Airport. Wigmore Park has become an established wildlife haven over the years, which has been recognised with the status of a County Wildlife Site being awarded to the park, including thriving Orchids which have taken years to get established. The alternate location proposed in the planning application for the new Wigmore Park is a ploughed farmer's field that is devoid of any wildlife value and is located too far from the homes of the majority of park users. REPEAT OF REP 11 The lack of clarity on the "Energy [Recovery] Centre". As far as we know, this could end up being an incinerator. The loss of TUI / First Port parking, forcing even more employees to park in local streets, blocking driveways and pavements (as they do presently). The loss of direct access to the Tidy Tip. This could lead to fly-tipping along the peripheries of Century Park, as people are less inclined to find their way to the Tidy Tip itself."
74.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
75.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) I walk my dogs in this park with my wife and granddaughter which we all enjoy very much. It would be a disaster to lose this. I would not be able to walk In the new proposed park as it would now be too far away from my house.
76.	Yes	REPEAT OF REP 58 (AND REP 11)

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	31.1.18	
77.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
78.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
79.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
80.	Yes 31.1.18	I strongly object planning ref: 17/02300/EIA, building on a former landfill site is very dangerous to the public and should be the main reason why this Century Park project should not go ahead. The effects from gases omitted and possible polluted drinking water could cause long term health effects and cancers to innocent Luton residents. This planning application is also in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads and very congested at times. Also worth noting, many quiet residential roads in this area have already become 24hr carparks for holiday makers, causing all sorts of problems and parking issues.
81.	Yes 31.1.18	1. The proposed development goes against the Luton Local Plan 2011 to 2031 - Strategic Objective 10: Improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity. 2. Wigmore Park is designated as a ALLV in the policies map that supports the Local Plan. REPEAT OF REP 58 (AND REP 11)
82.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) With all of the above included, I have the benefit of utilising Wigmore Valley Park every day of the week (sometimes twice a day) along with my husband and dogs.

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		On are walks we been fortunate to have seen badgers, deer, foxes and rabbit and are aware of the mole hills and even seen frogs along our route, what is to become of all of all of them! With great sadness, we have already seen some considerable changes over the last couple of years including the desolation of walking routes, shrubs, hedges and brambles which enabled our wildlife to flourish. In our opinion the bramble and hedges also helped dull some of the activity at the airport and since their removal along with the noise, we have even noticed an increase in the smell of aviation fuel even from our house!
83.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
84.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
85.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
86.	Yes 31.1.18	As a former Stopsley inhabitant I have been closely following the developments in the neighbourhood and am greatly worried, especially as I have many friends and relatives still living in close proximity to Wigmore Park. REPEAT OF REP 58
87.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) I no longer live in Luton after spending 40 years in Stopsley and Wigmore I still have a lot of family living in these areas.
88.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) The new access road opposite Keeble Close will also cause considerable traffic problems. Wigmore Lane is already having traffic issues due to Schools being located on this road so more traffic will only exacerbate the situation. Whilst noting about the traffic problem it will also cause more frustration with the local residents as already the Wigmore Place employees are parking around the residential areas and it will only get worse with a new business park.

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Ref.	Objection	Comments
89.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) I am informed that unexplored items were found during recent exploration of the proposed site I quote page 289 of Factual Report on Ground Investigations: At bore hole co-ordination E:512595.2 N:221451.1 they had to stop digging as they found unexploded ordnance 2.8m below the surface. On instructions from the the client they abandoned the bore hole. Seeing that hardly any bore holes were dug how many more bombs were dumped in the tip after the WW2? Am I right in thinking that this is unknown. Once again I cannot believe that the council is prepared to put its residents safety at risk.
90.	Yes 31.1.18	I object to this proposal due to the loss of green belt land, the issues this will cause with traffic congestion and also parking which we already have a problem with in the area.
91.	Yes 31.1.18	Loss of country side. added Pollution. Zero trust in LBC with regards to these plans
92.	No and Yes 31.1.18	Whilst I do not object to the plan as a whole I do object to the junction which has now appeared on Eaton Green Road, as I live in Keeble Close. If there really is a need for access from Eaton Green Road then why on earth can you not use the current roads already in place. You can use the junction for the tidy up, up the road being used for access for the Tui car park and join to the roundabout from there. Even a slip road could be added where the current footpath is, and use a small amount of the grassy hill rather dig a massive amount of it. This option would surely allow the traffic to flow more efficiently rather than installing traffic lights on an already congested, and during morning rush hour stand still road.
93.	Yes 31.1.18	My property backs on to Eaton Green Road, where I have lived for the past 30 years, and I am most definitely in full agreement with the objections listed below. If you had lived here you would have become aware of the ever increasing volume of traffic into this area. And now you want to develop Wigmore Park, and bring even more traffic here! We already have a severe problem with the number of people working in the local offices, parking itheir vehicles in our streets.

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Ref.	Objection	Comments
		"I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 - London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: REPEAT OF SECTION IN REP 10
94.	Yes 31.1.18	I wish to object to the plans to develop Century Park, application number above, on the grounds of Hazardous Materials. As the site was previously an unregulated toxic tip, the area should be left as it is and not built on. My children and grand children live in close proximity to the proposed development and you can not reassure me that this proposed development would not impact on their health and well being. According to your own documents and statements within the planning application, waste and contaminants may be exposed which may cause odour nuisance and/ or health effects to people in neighbouring areas. The build up of vapours by volatile contaminants could cause potential risk to future users of the site. You do not know what is under the clay cap that is keeping the area safe at the moment. How can we be reassured? An unexploded ordnance at a bore hole has caused digging to stop and to be abandoned in that area. I am sure the area in proximity to the airport was bombed during WW2. How much more ordnance is under the area? This site is too dangerous to be developed for many reasons.
95.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) I don't believe wrecking our beautiful country side will be the best option for my family. The disturbance this week alone has been awful I don't think I could bare it when it's a full scale building site.

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96.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
97.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
98.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
99.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) The danger to life due to the presence of unexploded items as detailed with various reports, couple this with the presence of dangerous gases, it would be reckless of the council to allow such a development, especially so close to the run-way of a major airport. How can the council condone agreeing to this, it will make them responsible should anyone get hurt, are they prepared to accept this responsibility. The construction of the relief road will also pass through areas which in the past were very close the clay pits used in the manufacture of bricks, building a main road on such land could put the public at risk of sink holes opening up. The traffic around the Wigmore area is already overloading roads and the pollution caused is growing, which will be made worse by this development and the resulting traffic. Junction 10 of the M1 already cannot cope the amount of traffic in the mornings and evenings, more traffic will lead to greater disruption impacting on the other businesses and individuals in the area. The need for a further business park has not been demonstrated to the local community, how can the council be sure that these building will be used and not turn into a white elephant. The impact on local residents will be huge, especially with regard to parking on residential roads, which the council has not taken any action on.

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Ref.	Objection	Comments
		In summary the need to concrete over a beautiful open space full of wildlife is something i am totally opposed to especially in view of the danger to the local community.
100.	Yes 31.1.18	I wish to object to planning application 17/02300/EIA as it will mean the destruction of Wigmore Park and Nature Reserve . The park is an essential asset to the area,used by hundreds of people for many activities ,including sports and exercise, families, picnics, dog walkers, plane enthusiasts,& nature lovers. It is the only green space in this part of Luton, serving a huge area as public space ,that actually belongs to the people of Luton. I also object the plans for a huge car park to be installed on the wildlife conservation site. I also object to the car park not being multi storey (minimising area destroyed) and the slaughter of hundreds of species of flora and fauna. Since its creation over 30 years ago the park has become established and nature flourishes, bringing joy and happiness to many, many people that use the park
101.	Yes 31.1.18	I wish to object to the planning application 17/02300/EIA. My objections are: Loss of the majority of Wigmore Park which is a place of immense beauty, enjoyed by a great many people from Luton and surrounding areas. It has also been a place for organised sports, for example Football and county running events. The park is an important buffer from the noxious fumes and noisy Airport and the local housing. Loss of habitat for wildlife which always gets ignored and overridden when planning applications are presented. Wigmore Park was gifted to the people of Luton in the 1980's so why can it just be taken away without proper consultation when a planning application is filed. Part of this area used to be a refuse tip so any disturbance of the land would be dangerous to the local residents, the local airport and any workers in these areas, despite some land surveys which have taken place. The planned new road would not solve any traffic problems we are already suffering at peak times daily in fact it would just move the majority of the traffic onto other local roads. It is already difficult to leave the Wigmore Estate at peak times on the Eaton Green Road and Crawley Green Road junctions. This panning application goes against the Luton Local plan 2011-2031 which states ‘Improve, protect & enhance biodiversity of natural areas with the town, including the quality, accessibility, health & recreational value of Green Space’.
102.	Yes	I would like to put forward my objection to the destruction of Century Park and Wigmore Park in Luton. The proposed

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Ref.	Objection	Comments
	1.2.18	Development on precious green spaces in the borough of Luton is wrong. Doing away with mature trees and green land is detrimental to our health and the health of the Planet. Trees and plants absorb and hold onto pollution such as Carbon making the air cleaner for us to breath. The proposal to increase Air traffic AND build on green field land makes a Complete Mockery of the Governments Environmental future targets. Please Do Not build on these Parks or Old Un safe land fill sights. We must protect established parks and green spaces. Wild life needs and must have somewhere to live. Without wild life We All Die! The South East of England has a huge amount of Aviation pollution, we do not need or want more. We must encourage people to fly Less not more.
103.	Yes 1.2.18	I am raising my concerns about this new road, business park, expansion of airport for trying to achieve capacity of 36m in future. I am a keen user of Wigmore park, which will be destroyed to make way for new business park. The local road network is absolutely busy during peak hours and still more traffic will be added because of this new proposed development. I would like to express my objection to planning application 17/02300/EIA as a local resident. I am raising my concerns about this new road, business park, expansion of airport for trying to achieve capacity of 36m in future. I am a keen user of Wigmore park, which will be destroyed to make way for new business park. The local road network is absolutely busy during peak hours and still more traffic will be added because of this new proposed development. I also wish to express my objection to any development on Wigmore Valley Park, as this is community asset that was gifted by Hitchin Hones to the people of Luton. I wish that Luton council will listen to people of Luton and stop this development.
104.	Yes 1.2.18	REPEAT OF REP 58 (AND REP 11)
105.	Yes	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
	1.2.18	
106.	Yes 1.2.18	REPEAT OF REP 58 (AND REP 11) Wigmore valley park has been a lovely green space for so many years so to disrupt this & all its wildlife this is something that will most certainly upset the community. And REPEAT OF REP 167
107.	Yes 1.2.18	REPEAT OF REP 58 (AND REP 11)
108.	Yes 1.2.18	REPEAT OF REP 58 (AND REP 11) The amount of traffic generated both during construction and once the road is in use as planned will bring Wigmore & the surrounding areas to a complete standstill. The resulting gridlock will blight every resident physically, mentally & emotionally. Business's in Wigmore and the surrounding areas will suffer as customers from the area and outside will stop coming to the area to use those businesses because of the gridlock. The pollution resulting form the gridlock will affect everyone's health and well-being. As [redacted] I am dreading the impact that will have on me and other [redacted].
109.		
110.	Yes 3.2.18	We have lived in the Wigmore area for thirty five years and have seen the area develop and it has been a very good area to live unfortunately over recent years it has deteriorated. These are some of the reasons why this has happened: 1. Traffic has reached maximum levels thus lowering the quality of life in the area 2. Speeding traffic in Wigmore Lane 3. HGV vehicles using Wigmore Lane en route to the airport 4. Litter strewn around the grass verges 5. The brick planters towards Eaton Green Road are crumbling into the road 6. Fallen tree branches blocking the footpaths 7. High level of noise pollution from the airport 8. Air pollution some days you can smell aviation fuel in the atmosphere

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		9. Cars parked outside residents houses whilst the owners go on holiday from the airport 10. Cars parked on the footpath restricting its use 11. Cars double parked on the entrance to Wigmore Hall estate restricting the entrance and exit No more development in the Wigmore area. No more houses. Leave Wigmore Park alone it is for the residents of the Wigmore area.
111.	Yes 6.2.18	I wish to strongly object to the proposal to add a new access road to the Century Park development from Eaton Green Road on the grounds that this will further add to the traffic using the Ashcroft Road and Wigmore Lane which is effectively becoming the Luton East Ring Road. Given that there are already proposals to build hundreds of new homes on the East Luton border then a genuine Link road connecting the A505 Hitchin road to the housing development then onto Century Park and ultimately the M1 needs to form part of a joined together proposition by both Luton and Hertfordshire Authorities in order to avoid the already substantial amount of traffic which is using these roads as short cuts due to the fact that that many of the existing routes are already gridlocked at certain times of the day. I should point out that I am not against either of these plans in principal only against the fact that development is, as is often the case, once again preceding the provision of suitable and sufficient infrastructure.
112.	Yes 6.2.18	REPEAT OF REP 58 (AND REP 11) I'm strongly object to any part of the park & landfill being compromised for the reasons stated above & the potential dangers associated with it.
113.	Yes 7.2.18	REPEAT OF REP 58 (AND REP 11)
114.	Yes 7.2.18	The proposals do not take the opportunity to improve connection to and through the new park for walkers, cyclists and horseriders. A linked footpath and bridleway runs south from Eaton Green road, across the new park, becoming a bridleway where it swings East. Shortly after swinging South again, it leaves the park and runs along the airport perimeter, ultimately joining a minor road near Netherfield Spring. The Luton Definitive Map shows this stretch as FP38, FP29, BW28 and BW37. As the park is being redeveloped, Luton should take the opportunity to upgrade access along the whole length to Bridleway and the development should cover the cost of improving the whole route. This section of Bridleway will provide a valuable link through the park to the countryside south of Luton, avoiding the dangerous narrow, twisting section of lane around Winch Hill.

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		The information provided to support the application is misleading in that plans do not show footpaths and bridleways through the application accurately. Most of the plans exclude footpaths/bridleways altogether, even though they are public highways with strict procedures attached to modification. For example "17_02300_EIA-089916_050_02_Proposed_Masterplan_ Rev_PL01-686446" does not show public ROW even though it includes planned new pedestrian and cycling routes. In "17_02300_EIA-DAS_Part2-686521", page 40, the existing footpath/bridleway is shown partly as a proposed pedestrian route. In "17_02300_EIA-DAS_Part2-686521" Figure TVI8, public rights of way, the route south from Eaton Valley road to near Netherfield Spring is shown as a footpath. More than half of it is a bridleway. Providing consistent, quality information for the public to respond to is an important part of the democratic process. At the very least the masterplans should be updated to show the existing Rights of Way through the development.
115.	Yes 9.2.18	The consultation plans show that where the buildings for Century Park are to be sited is to be on the old refuse tip, this will entail digging/excavating down into the rubbish deposited there. No one knows exactly what all the substances are there. It is known that asbestos and chemical trade waste was dumped, but there are no records of all the contaminants on site. Disturbing these substances would release these carcinagous materials into the air, to the detriment of residents health. This would result in London-Luton airport, Luton BC, and the Developers in Legal action for years. Would the committee like to be held personally responsible for cancer causing chemicals released into the air affecting thousands of people. The consultation plan also shows an entrance to Century Park from Eaton Green Rd, near Keeble Close. This was not on the original submission. If this was allowed it would make Wigmore Lane a rat fun for traffic from the A505, Hitchin/Stevenage and villages, travelling to Jct 10A of the M1. This would make the air quality even worse than it is now. Jet fuel fumes from aircraft on the runway, taxiways and engine test/run up area that are blown by winds from the southerly quadrants that push the fumes into the Wigmore Housing estates. The air quality monitors are shown as all on the airport site, the monitor no LLA13 is shown as on Eaton Green Rd, near to the Raynham Way community centre, not that anyone I know of has yet found the monitor, and a lot of people have looked for it. I believe that the airport authority and Luton BC are failing in their Duty of Care, as the air quality is well below the standards set by the EU.

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Ref.	Objection	Comments
		I thought that when the Luton Local Plan 2011/31 was with the Government Inspector he had expressly forbidden access to Century Park fron Eaton Green Rd. I know Capita, the management company involved in this Development is in financial trouble, but if it is correct that this access is forbidden, they should know this. They seem incompetent as well. To me the Logical alternative would be to site the Century Park buildings on the proposed green area shown on the development map CS-089916, on the eastern side of the development. The proposed dual carriage what from the airport approach road from Jct 10A could be directed straight over to this area. This would negate the problems of disturbing the soil of the old refuse tip, and leave the flora and fauna of the site relatively undisturbed. Local residents would welcome this alternative as it would bring employment to the area and leave our Green Space alone. It may cost the Developers more in the short term, but the Long term benefits would be for all, and stop the Developers and Local and Airport Authorities being involved in costly Legal Cases. I am strongly against this Development, unless this alternative site is used.
116.	Yes 12.2.18	1 Breach of the Luton Local Plan The access from Eaton Green road is in clear breach of the new Luton Local Plan, which was only approved in November 2017, Particularly Policy LLP6 which prohibits access via Eaton Green Road to New Century Park except for bicycles, buses & taxis. 2 Traffic and pollution Local roads were designed for local anticipated traffic conditions only. The proposed access via Eaton Grenn Road would encourage traffic away from teh A505 and on to Wigmore Lane, Crawley Green Road, Ashcroft Road & Lalleford Road. The access from Eaton Green Road would generate a considerable amount of extra traffic on these already congested roads making them far less safe and adding to the air pollution, affecting peoples's health.
117.	Yes 12.2.18	I write to object to the above planning application on the following grounds 1. Traffic from the site ending up on Eaton Green Road. The local road structure is insufficient to cope with the volume of traffic that will be created by the extra volume created by the direct route planned opposite Keeble Close. Wigmore Lane and Eaton Green Road are congested at the present and will simply come to a standstill by the implementation of these plans. 2. The loss of mature trees caused by the construction of a slip road from Eaton Green Road but also around the park where commercial development is planned. There appears to be little addition of semi mature trees to compensate for the loss planned. Given that the landscaping was provided for the benefit of close residents and also users of Wigmore Valley Park it seems that this planning application is totally contrary to past agreements reached between your department and local housing developers.

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		3. The loss of wildlife habitation on the park with the planned construction of a long stay carpark. It seems that the loss of this habitation will not be replaced given the "additional" park land that has previously been farmland that is unsuitable for wildlife habitation. 4. The loss of business properties in the building of a dual carriageway through the north and west side of the airport will result in an initial loss of employment and if the development on the park is aimed at compensation for business premises loss in the airport it does not mean that there will be the gain to overall employment suggested by these proposals. 5. The car parking issues already common to most of the south and east side of Wigmore will be exacerbated by these developments. The business and commercial properties both existing and planned will mean vehicles far in excess of the 1647 car parking spaces planned. This will result in even more local street parking by non-residents and be a greater detriment to those residing in the local area. 6. The planned roads, buildings and parking are mainly on land that was once a waste tip and contains materials that may well be toxic. Disturbance in laying foundations, making roads and cuttings into rises will probably disturb what was originally dumped there and create a hazard to residents and to those subsequently employed in the new business properties. For the above reasons I believe this development is unlikely to be of benefit to those that live in the area or who use the local roads in the East of Luton. I would request that you bring these reasons and this objection to the attention of the Development Control Committee
118.	Yes 12.2.18	REPEAT OF REP 58 (AND REP 11) This is a precious open space, and Luton is already well below the national average, our council should hold on , and even increase, such amenities.
119.	Yes 14.2.18	Concerns regarding the destruction and development of Wigmore Valley Park. Place was a former rubbish dump but has recovered and become a wild and natural space enjoyed by many. Outdoor natural places offer benefits to physical health as well as mental health and provide social interaction, quiet contemplation, exercise and enjoyment. The park is use by people of all ages, dog walkers, photographers, children nature lovers and plane spotters as well as many others. Until recently it was used as a sports field. Wigmore Valley Park is the only wild and natural place in Luton and offers respite from the already congested roads, airport noise and pollution. The perimeters of the park have been planted and now provide habitat for birds, butterflies, rabbits, bats, newts, frogs and toads as well as wild flowers such as orchids. To me it is crucial that this wild space is protected from further

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		development. Human beings need access to open space and with further housing planned in the surrounding area it is of utmost importance that this space is protected. There must be a balance between the needs of the local people and further development. This area is already congested with traffic, causing respiratory illness and premature death. We must first and foremost consider the health and well being of the local community, We must really take into account the impact on the wildlife in the park. Whilst I understand the need for jobs in the area, I don't believe the benefits of development twill outweigh the needs of local people. Wignore Valley Park is a unique place, it is a place that should be protected, studied and nurtured. I would like to see studies carried out to ascertain the impact of the former rubbish dump in the long term effects on nature. Also the high water table in the area will be affected and no research has been carried out. I also want to see a study of the loss of the habitat will have on the wildlife.
120.	Yes 16.2.18	I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. Luton is already a nightmare for traffic jams. Also more people working in the area means when car parks are full people park on our roads. That site also has hazardous materials which should not be disturbed due to health and safety of people in the vicinity. Keep Wigmore green.
121.	Yes 17.2.18	REPEAT OF REP 58 (AND REP 11) Wigmore Valley Park is a well used asset by the local community and by people from surrounding areas (as I did 30 years ago before I moved to the area). Luton has very little green space sadly therefore this park should be left alone . REPEAT OF REP 167
122.	Yes 17.2.18	I object to the outline planning application for New Century business park and full planning application for an access road, both of which are proposed on Wigmore Valley Park, for the following reasons: The loss of this valued open space which has taken 35 years to mature, this area was given to the people of the East of Luton as part of the planning application for the development of further housing in Wigmore in 1982.

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		The traffic increase, traffic in the East of Luton is already over capacity in some locations and will be greatly increased if this proposed development on Wigmore Park and the proposed development on the Luton/ Hertfordshire border were to go ahead. Journey times at the moment are greatly increased during the morning rush hour, a 5 minute can take half an hour during busier periods. The contravening proposed link road, the proposed road from Eaton Green Road cannot be created as it contravenes LLP6 in the Luton Local Plan 2011 -20314Di page 32 which states "such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport". This local plan was agreed through consultation between the council and local people and has only recently been published, November 2017. The landfill, the proposed development would take place on the currently capped landfill site, which was used to take much of Luton's waste from 1937 until its closure in 1978. The tip would have been used to take waste from the airport, Vauxhall plant and from places such as LaPorte Chemicals. This unlined site (at the base) sits above the chalk aquifer, which provides drinking water for the local area. Any drilling or pilling and building (compressing) on this landfill layer could cause dangerous liquids to permeate into the vital source of drinking water below. One of the landfill soil sample reports in the planning application stated that the sampling borehole LF-BHG was stopped at 2.8m due to a high UXO reading. Luton was involved in manufacturing of munitions and tanks during WW2 and the airport was an airbase at the time. There are reports that hundreds of WW2 ordinance were dropped on Luton during air raids and many of these devices can lay dormant until disturbed for building works. The contravening of the local plan to build on an Area of Local Land Value. As well as being a well-used park for people, Wigmore Valley Park has also gone from being the local dump, to being an Area of Local Land Value (ALLV) as detailed in the Luton Local Plan 2011 - 2031 proposal map. The planning application goes against the 2011- 2031 local plan (November 2017) page 78 "Strategic Objective 10. This proposed development would do the opposite to strategic objective 10, it would not protect and enhance biodiversity it will reduce the size and quality of this much needed ALLV site. Accessibility, the development would reduce the accessibility to open space for people, the proposed park area is not as accessible for those like me who have walking difficulties, as the gradient of the land proposed for the new park is much steeper than the current park area. I have real concerns that I will be unable to use much of the proposed park as the land is too steep for me to walk up. The park would be more remote so people would need to travel further to access the open area of parkland. CWS The Wigmore park area contains a valued County Wildlife Site with many species of birds and five different species of wild

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		orchid (numbering in their hundreds). The proposed development would reduce this CWS habitat which goes against the local plans aims to improve and enhance biodiversity (strategic objective 10). The creation of a business park to provide jobs, The Guardian Newspaper 13th December 2017 "The jobless rate remained at 4.3%, its lowest since 1975." which gives me great concern as this is one of LLAL's main reasons for building the business park "New Century Park is the latest exciting development in the continuing delivery of the Luton Investment Framework which is attracting much-needed new jobs" quote from Councillor Andy Malcolm, chair of LLAL, it would seem at this time a business development to create jobs would be misguided. Air Quality, the reduction of trees and grass and the increase of traffic and aircraft, which this development would, cause all go against the health and welfare of the local population. Parking, residents near the airport were recently asked to complete a survey on parking. The impact on the area with the current airport site and lack of parking near Wigmore Place have been high profile, in recent months Luton made the national news due to angry residents not being able to park in their street, because of the number of parked cars associated with the airport. Users of Wigmore Park had to fight for access to the facility due to staff from Wigmore Place taking all of the spaces. Wigmore Place has nowhere near the capacity of parking needed for staff and they have had to lease land on two sites in the park and one at Parkway station to meet the need. The Century Park development details in its plans the number of jobs provided and the number of parking spaces to be created, the two don't match, unless people's habits change then we will see more parking on the surrounding residential streets. This will again cause friction and ill feeling with local residents and the employers and could cause safety issues in the area. This proposal will have a huge impact on environment and the health and wellbeing of local residents, something which was recognised in the early 1980's but may now have been forgotten. There are so many strong examples given by residents and experts that show this land should remain untouched for the people of Luton to benefit from for future generations.
123.	Yes 17.2.18	REPEAT OF REF 108
124.	Yes 18.2.18	REPEAT OF REP 58 (AND REP 11)

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125.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11) As a result, I feel that it is clear that the immediate and longer-term dangers of development on this site are acute. Development here will run roughshod over the health and well-being of local residents, wildlife and ecosystems, and frankly contravenes the Council's role as a representative body entrusted with protecting local residents, those who vote to determine its makeup and who pay council tax to provide for its funding. The other fundamental danger of development here is in relation to the proposed new access road. Clearly, in beginning to make changes to local roads, this development is undeniably linked holistically to proposed developments on land to the east of Luton. If airport development here is linked with the proposed Century Park development, then the required road network would facilitate the construction of a new housing development on the lands of Wigmore and Cockernhoe. Whilst a separate application, the issues of such development are blindingly clear: further destruction of local wildlife, their habitats and ecosystems, further increased traffic on the already choking roads of this area, increased strain on Luton's failing social service provisions, and the permission of an unacceptable sprawl of Luton beyond its borders into Green Belt land, precisely the land designed to prevent such sprawl. As a result, it is clear that on many levels this proposed development of Wigmore Park is unacceptable. It poses immediate environmental and health dangers, but also would provide a fatal precedent for the further development and destruction of the land to the east of Luton and around Luton Airport.
126.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11) The park is beautiful and so diverse, please accept this email as my objection of the proposed development to Wigmore Valley Park.
127.	Yes 19.2.18	The proposed buildings will cause a loss of public space, wildlife and natural light. Instead, this green space will be replaced with noise and disturbance to the local community, which already suffers due to the noise and pollution created by London Luton airport.
128.	Yes 19.2.18	The proposed buildings will cause a loss of public space,wildlife and natural light. Instead, this green space will be replaced with noise and disturbance to the local community, which already suffers due to the noise and pollution created by London luton airport. I strongly object to this development application on many grounds. I agree with the arguments put forward in more detail within ANONYMOUS REPRESENTATION 3. 1-THE ADOPTED LUTON LOCAL PLAN EXPRESSIVELY FORBIDS THE ACCESS TO NEW CENTURY PARK FROM EATON GREEN ROAD IN

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		POLICY D1. Luton adopted their Local Plan 2011-2031 on 4 Nov 2017. On p.32 section d.1 it says no access road from Eaton Green Rd very clearly: "such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport" 2- THE COUNCIL IS LOANING 300 MILLION POUNDS TO THE COMPANY FOR THIS PROJECT - WHEN THERE IS ZERO GUARANTEE IT WILL EVER BE REPAID AND THE COMPANY ALREADY OWES MORE THAN IT'S SHAREHOLDING VALUE. 3- PRESENCE OF DANGEROUS, HAZARDOUS AND EXPLOSIVE MATERIALS THE EXECUTIVES AT THE COUNCIL ARE WELL AWARE THERE IS LIKELIHOOD OF UNEXPLODED ORDNANCE BENEATH THEIR UNTESTED LANDFILL, AND INSTEAD OF TESTING THIS AS THEY WERE ADVICED TO DO, THEY ARE IGNORING IT HOPING NOTHING WILL SLOW DOWN THEIR CONSTRUCTION, LEST THEY SHOULD LOOSE THEIR SEMLEP GRANT. THIS IS UNACCEPTABLE AND DANGEROUS. THEY HAVE ALREADY BEEN WARNED ABOUT THE POSSIBLITY OF SUBTERRANEAN FIRES BREAKING OUT. THE SITE ALREADY LEAKS METHANES AND IT'S GATES RUN UNDER HOUSES! OBVIOUSLY ALONG WITH LARGE AMOUNTS OF METHANE, AND SITTING DIRECTLY NEXT TO AN AIRPORT. THEY HAVE BEEN ADVISED NOT TO DIG THIS UP WITHOUT PROPER SPECIALIST INVESTIGATIONS OR THERE COULD BE SERIOUS CONSEQUENCES SUCH AS EXPLOSIONS, AND FIRES THAT RUN UNDERGROUND AND ARE IMPOSSIBLE TO PUT OUT. ALSO IT COULD RESULT IN DEATHS. THERE ARE ALSO DANGERS OF AQUIFER CONTAMINATION, SINCE THIS LANDFILL HAS ALREADY CONTAMINATED A NORTH HERTS BOREHOLE WHICH IS NOW UNUSUABLE! 4- DANGEROUS AIR POLLUTION HAS NOT BEEN MONITORED AT ALL IN EAST OF LUTON RESIDENTIAL AREAS, INCLUDING STOPSLEY, WIGMORE, CRAWLEY AND ROUND GREEN. 5-TRANSPORT STUDIES ARE INADEQUATE AND MADE FICTITIOUS MODELS ASSUMING ROADS THAT DO NOT CURRENTLY EXIST.

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		5-LONDON LUTON AIPORT FREEHOLD LIMITED PARK FIRST SCHEME IS INVOLVED. Last June 2017, a petition for the closure of Toby Whittaker's company Store First Limited, a nationwide firm was presented to the High Court by The Secretary of State for Business, Energy and Industrial Strategy. Although a spokesman for the Serious Fraud Office said the winding up petition was not connected with a separate investigation into pension schemes which had invested in pods from Store First. However as this petition, that was presented for the closure of Toby Whittaker's company back in June 2017, why would London Luton Airport Ltd suddenly have agreed to a new business arrangement and association with their precious brand only several months later in the form of London Luton Airport Freedhold Limited and a Park First investment scheme? 6-THE WIGMORE VALLEY PARK LAND HAS NOT BEEN DISPOSED OF LAWFULLY. 7-THE LOCAL PLAN SPECIFIES THAT THIS PARK IS AN AREA OF GREAT COMMUNITY VALUE. IT IS ALSO A PLAYING FIELD. 8-THE SITE IS A WILDLIFE CONSERVATION ZONE 9-THE ROAD NETWORK IS ALREADY CONGESTED AND CAN NOT COPE WITH 14,000 EXTRA VEHICLE MOVEMENTS DAILY.
129.	Yes 19.2.18	REPEAT OF REP 58 In summary I wish to log my objections to the planning application because I the impact this will have on the environment and the local area.
130.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11)
131.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11)
132.	Yes 19.2.18	Keep it green!!
133.	Yes 19.2.18	I object to the New Century Park, because the loss of green space, it's a beautiful park to walk around, so many people dog walk, and we do not want to lose this to large concrete buildings, too much traffic all around Wigmore and the Airport, which is already nearly at grid lock at peak times, the supermarket and surrounding shops will not cope with all the extra cars and staff. Parking is

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		already causing major problems around the Park using roads in housing estates. If the New homes get planning at Cockernhoe, it will be even worse for Stopsley and Wigmore to cope with.
134.	Yes 19.2.18	There is enough pollution in the wigmore area by the airport without the added pollution more industry and less green land will make
135.	Yes 19.2.18	EXTRACTS FROM REP 48 AND 58 Do not proceed with this development.
136.	Yes 19.2.18	REPEAT OF REP 135
137.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11)
138.	Yes 19.2.18	Wigmore Valley Park is enjoyed by all who use it and should be left in tact for future generations. I joined a large gathering of mixed ages for a 'Picnic in Wigmore Valley Park' in August 2017. The park is accessible for residents of local houses and within walking distance. Also visited by nearby residents of North Herts. The Picnic was televised on the local news and all agreed it was a special place that must be kept as it is for families now and future generations. Local Plan map LLP14 shows no development on Wigmore Valley Park. The park helps act as a barrier to protect the local residents from the Airport traffic noise and pollution. Pollution shortens lives. Hundreds of established trees in Wigmore Valley Park act as green lungs. As well as providing space for children to play, elderly residents to walk around it, the park also provides important wildlife habitat- note local plan LLP6E also it is a County Wildlife Site - the quality of open space and landscaping to be maintained. Luton Council has a responsibility for the health and welfare of people in such an overdeveloped town, more importantly this park acts as a barrier to pollution and noise. Richard Attenborough and many Scientists have proved that aviation is the fastest growing cause of climate change, Luton Airport is the fastest growing UK source - How can you justify the proposed plan? Is there a conflict of interest with Luton Airport and Luton Council? Luton Airport appears greedy. Please think again - you have the capability to improve air quality in Luton.

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		LLAL Vision 2020-2050: "Although climate change is beyond our direct control, we recognize that Luton Airport has a significant influence over factors that contribute to it, such as: emissions from aircraft; vehicle trips; and the activities of other companies operating at the airport. Ahead of any future expansion work, we will develop a comprehensive strategy to reduce where possible carbon emissions." It is the policy in the 20 year plan that Eaton Road access should not be allowed. It would bring more traffic, noise and danger from new rat runs on Wigmore Lane, Eaton Green Road. Disturbing and building on a landfill site anyway would be high risk with much testing still to do, not confident that development is safe anyway. Please think carefully - life is precious.
139.	Yes 19.2.18	I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 – London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency. REPEAT OF REP 11 RE LINK ROAD Also we need to keep the green spaces in Wigmore for the trees and wildlife. I'm a dog walker and frequently use the park and the bridle path. It seems like the area will be turned into a concrete jungle with the business park and thousands of new houses. Please listen to the opinion of local residents.

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140.	Yes 19.2.18	Mainly worried that the proposed development will put even more pressure on the already dire traffic situation in and around the wigmore area and the airport. Also, considering the land has been tested for such a long time now, I don't think that they found anything positive, so god knows what they will dig up if the development goes ahead. Why would they need to keep coming back, time and time and again? Surely this has to be a worry... Maybe better to leave it untouched, and keep the green space.
141.	Yes 19.2.18	I object to this application on the grounds that it is contrary to Section 10 of the 1906 Open Spaces Act, where the common land is held on trust for the use and enjoyment of all local inhabitants as an open space and no other purpose.
142.	Yes 20.2.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads. Large ground level car parks should not be built on a County Wildlife Site and Area of Local Landscape Value. The CWS has become a diverse habitat with 5 species of orchid and over 60 bird species. The offices, road and roundabout would all have unacceptable, adverse impacts on this landscape. Car parks can go anywhere and should be multi-storey due to lack of space. The 'replacement park' is much further away on agricultural fields and in no way equates to what we have now. It would be further from homes, less convenient, has no trees to absorb pollution, and would mean a net loss of green space. Described as "intensively farmed arable fields with little habitat value and relatively low ecological importance", it would take many years to become as good a site for wildlife, which is in sharp decline and needs help now. REPEAT OF REP 11 Luton is encroaching ever faster onto the green land that surrounds it. The quality of life for residents in these areas bordering countryside needs to be preserved
143.	Yes 20.2.18	X (Note the electronic submission indicated that the objection was made on the grounds of ‘Design’, ‘noise and disturbance’, ‘parking’ and ‘visual intrusion’
144.	Yes	REPEAT OF REP 58 (AND REP 11)

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
	20.2.18	
145.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11)
146.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11)
147.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11) I grew up in the Wigmore area and have used the park since it opened and even though I'm no longer local I still enjoy spending time there on a regular basis and would be extremely upset to see Luton lose one of its best parks.
148.	Yes 20.2.18	Loss of community green space and destruction of wildlife habitats.
149.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11)
150.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11)
151.	Yes 20.2.18	I am concerned about the effect on Wigmore Valley Park. I am concerned about the loss of recreational area and green space and the effect on wildlife in the park. I also object to the access road to Eaton Green Road as traffic would be using local roads to access Century Park making Wigmore area more congested with traffic. This also causes more noise and disturbance due to traffic flow.
152.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11) In summary I wish to log my objections to the planning application because of the impact this will have on the environment and the local area.
153.	Yes	REPEAT OF REP 58 (AND REP 11)

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
	20.2.18	
154.	Yes 20.2.18	Green space and parkland is very important to me and my family. We have 2 children who enjoy their days and walks in Wigmore Park. It is the only open space near where we live. We strongly object to this proposal.
155.	Yes 20.2.18	REPEAT OF REP 167
156.	Yes 20.2.18	REPEAT OF REP 167
157.	Yes 20.2.18	Please keep our green space its so vital for flora and fauna and a wonderful place to walk. There will be nothing of luton left soon just a concrete jungle. It is a proven fact that mental health is improved by open spaces surely to god thats more important .
158.	Yes 20.2.18	REPEAT OF REP 167
159.	Yes 20.2.18	This is a beautiful area used by many residents locally to walk dogs play with their children and enjoy the wonderful nature in the area. This would result in already saturated roads becoming increasingly busy and the nearby villages would foot a lot of this traffic causing damage to road surfaces and increased danger to children walking to schools.
160.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11) Luton is encroaching ever faster onto the green land that surrounds it. The quality of life for residents in these areas bordering countryside needs to be preserved.
161.	Yes 20.2.18	I have been using Wigmore Park to walk our dogs for years. It is a place of natural beauty and great for spotting wildlife. I understand the need for expansion but wildlife habitats, green space for dogs to play and explore & people's wellbeing outweighs that for me. I am totally against ploughing up more beautiful green areas & destroying natural wildlife homes.
162.	Yes 20.2.18	Loss of a green space and wildlife
163.	Yes	REPEAT OF REP 58 (AND REP 11)

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
	20.2.18	
164.	Yes 20.2.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads. The proposed development would encourage and lead to further congestion on already congested roads. At peak times the roads around Wigmore struggle to deal with the amount of traffic in the area and the proposed development would draw more traffic from the airport into the residential areas surrounding it. Along with the increased traffic also comes the very real increase in pollution that will impact local residents and the many schools in the area. The proposal also doesn't give proper consideration to other road users. I further object to this development as it is my understanding that Wigmore Valley Park is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement. I understand no formal consultation has taken place with residents of Luton regarding the transfer of this community asset to LLAL. Wigmore is becoming increasingly hemmed in with planned housing just outside the Luton border, coupled with the trend in Luton for high rise residential developments, the need for open, useable green space is becoming a premium and it is deeply concerning that consideration is being given to development that would remove such a space. Wigmore Valley Park is also an established wildlife area and would be severely impacted should this proposal go ahead. The alternate location proposed in the planning application for the new Wigmore Park is a ploughed farmer' s field that is devoid of any wildlife value and is located too far from the homes of the majority of park users. I also wish to object to the disturbance caused by the development of the former council tip. There is a real threat that disturbance of this former tip would have a very real impact on the local environment and waterways.
165.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11)
166.	Yes	I wish to object to this planning application for redesign the Wigmore park area to accommodate Century park. As has been

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Ref.	Objection	Comments
	21.2.18	stated the park was a gift to the community and as such should not be time limited. The disturbance of the old landfill site is a concern as there was little environmental control on the substances that were deposited over the years and their release could cause great harm to the environment which will be additionally polluted further by airport expansion. Although progress is inevitable I cannot understand why the original placement of Century Park, which I think was in the field where Wigmore park is now proposed to be moved, cannot be kept as it was therefore leaving Wigmore park undisturbed. The proposed entrance to the site from Eaton Green Road is also a concern with a substantial roundabout and large access road leading from an already very congested area. The original plan suggests that traffic from Hitchin would access the site from Vauxhall Way, therefore freeing traffic from the Wigmore area, however this entrance surely means traffic would use the inadequate Wigmore lane. To my mind this entrance suggests that an access route would be made along Eaton Green Road towards Tea Green to accommodate the proposed North Herts. Development which is a concern. Luton has substantial housing shortage at the moment, hence the other proposals for creating homes in the area, so the creating of 4000 jobs suggests that the majority of new employees will have to come from outside Luton. This will increase traffic congestion even more than the gridlock we have at peak times now. If the plan goes ahead then there must be provision for parking provided for these employees as surrounding roads are already littered with parked cars during the day creating a major hazard to safety especially for children crossing, restricted use of pavements and also access for emergency services in some roads.
167.	Yes 21.2.18	There should be no development on Wigmore Park. It was provided for the people of Wigmore close to homes because it was needed, and thoughtfully landscaped with hundreds of trees planted. It is a vital Community Asset, highly valued and crucial to our well being. It has been enjoyed by parents, families and visitors to the town since the 1980s and must be left for future generations to enjoy. Local Plan map LLP14 shows no development on the park – only a possible road to Century Park fields Luton is extremely overdeveloped and we have already lost too much green space for the town's needs. Wigmore residents have suffered disproportionately. It is not reasonable to expect residents and those who enjoy the park to tolerate a greater loss, when health and exercise are more important than ever

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Ref.	Objection	Comments
		Over two hectares of trees would be lost in this scheme, part of those planted for us in the 1980s. The trees in Wigmore Valley Park provide an important wildlife habitat for many species and also act as a barrier to air and noise pollution. This pollution barrier and biodiversity cannot be lost. This would be against the LLAL Vision 2020-2050 which states: *"As part of any expansion proposals, we will develop landscape and ecology strategies which seek to conserve, and where possible, enhance the landscape and biodiversity within Luton Airport and on nearby sites."* *We don't want development in this area, but if any were to be allowed it should be on Century Park Fields which have had planning permission for 20 years. The fields could be reached via a road which also stays within the airport boundary to join the point where the tunnel was planned. No development should take place on a public park which would ruin a well loved, peaceful green area and subject people to danger, noise and air pollution.* *The new 20-year Luton Local Plan is clear that there should be no access road to Wigmore Park from Eaton Green Road. A new access road by the Tidy Tip, one of two proposed roads on to the park from Eaton Green Road should not be allowed. It would generate more traffic, increase noise and create dangerous new rat runs on Wigmore Lane, Eaton Green Road and already congested surrounding roads. Frank Lester Way should not be closed to cars.* *My other concern is the rapid airport expansion which has made Luton the 5th most congested UK town, with huge traffic problems. No significant mitigation has been proposed, but expansion continues. A dual carriageway would make it worse and bring traffic gridlock . This cannot be permitted.* *The rapid increase in flights brings millions more vehicles and more pollution, which at several places in the airport is at illegal levels. A major road will make this worse. Rising levels of toxins will have a significant negative impact on health. Pollution from diesels and planes kills 40,000 people every year. It stunts children's lung growth, causes asthma, strokes and heart attacks, and shortens lives. A housing development was recently refused because no mitigation for pollution was provided. There is no mitigation here.* *Large ground level car parks should not be built on a County Wildlife Site and Area of Local Landscape Value. The CWS has become a diverse habitat with 5 species of orchid and over 60 bird species. The offices, road and roundabout would all have unacceptable, adverse impacts on this landscape. Car parks can go anywhere and should be multi-storey due to lack of space.* *The 'replacement park' is much further away on agricultural fields and in no way equates to what we have now. It would be*

Ref.	Objection	Comments
		further from homes, less convenient, has no trees to absorb pollution, and would mean a net loss of green space. Described as "intensively farmed arable fields with little habitat value and relatively low ecological importance", it would take many years to become as good a site for wildlife, which is in sharp decline and needs help now. *Local Plan policy LLP6E on Wigmore Park says "the quality of open space and landscaping will be maintained". LLP29: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas." The secret selling off of this public park is immoral and shows a cynical intention to disregard and spoil the landscape, and NOT to maintain the quality of open space and landscaping for the community of Wigmore. The offices, road and roundabout would have unacceptable impact on this ALLV landscape.* *I are extremely concerned about the possible irreversible contamination of groundwater and the drinking supply, and dangerous gases from disturbing and building on a landfill site where hazardous waste was dumped. With much testing still to do, until it can be said with confidence that development is safe, outline permission should not be granted.* *Building offices and roads on a landfill site which is unstable below ground is high risk, and can lead to costly subsidence, where buildings and roads can crack and sink. This happened to B & Q at Dallow Road, which had to be closed for a year and rebuilt. Also sulphates and acids in the landfill may attack the concrete in the pilings.* *The proposed dual carriageway through the airport, taking traffic into a public park, seems far bigger than is needed for the offices proposed. This appears to be for a bigger development, yet we are only asked to comment on what is shown. The reason for this road should be fully explained and justified in the application. If not, permission should not be granted.* *This major road would have been very close to the children's playground until many people objected. The road corridor remains. Because this is an outline application, a threat would be hanging over us that the big road could be brought back at any time.* *Aviation is the fastest growing source of climate change and Luton is the fastest growing UK airport. Therefore, Luton is the fastest growing source of climate change in the UK. The rapid fuelling of climate change will be disastrous for humanity's future, as we are often reminded by Attenborough and many scientists. The LLAL Vision 2020-2050 states "Although climate change is beyond our direct control, we recognise that Luton Airport has a significant influence over factors that contribute to it, such as: emissions from aircraft; vehicle trips; and the activities of other companies operating at the airport. Ahead of any future expansion work, we will develop a comprehensive strategy to reduce where possible carbon emissions."*

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Ref.	Objection	Comments
		The Wigmore application is for airport-related development, moving car parks on to a public park to make room for aprons and terminals, displacing businesses to build a major road to carry far more traffic. There is no strategy whatever to reduce climate change, contrary to the 2012 National Planning Policy Framework Section 10 (Meeting the Challenge of Climate Change) so this development should not be permitted. *I ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a Community Asset which does not comply with key relevant Local Plan policies.*
168.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11)
169.	Yes 21.2.18	Do not build on the public park. Too much traffic in an already congested part of town
170.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11) I'm strongly object to any part of the park & landfill being compromised for the reasons stated above & the potential dangers associated with it. I look forward to your acknowledgement upon receiving my objection.
171.	Yes 21.2.18	I object to the outline planning application for New Century business park and full planning. The loss of a highly valued open space environment, established trees and wildlife. The open space in Wigmore Calley Park has taken 35 years to mature. This area was given to the people of the East of Luton as part of the planning application for the development of further housing in Wigmore in the 1980's. The Wigmore Planning Brief December 1982 states "Provision of public open space in the Wigmore Area is close to the minimum necessary. The development of the Wigmore area will generate a need for an additional provision of public open space and allotments". It goes on to say "The former Airport Refuse Tip at Wigmore Hall Farm might also be used to accommodate some of the open space required by the Wigmore area, so releasing more land for housing". If anything this area has seen even more

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		development and reduction of open space since 1982. For example the 70 properties at Someries Hill on the former allotments adjoining Crawley Green Park, which took a well-used area of space away from the community. Accessibility The development would reduce the accessibility to open space for people, the proposed new area is not as accessible for those with walking difficulties as the gradient of the land proposed for the new park is much steeper than the current park area (from map contours shown on the planning maps) the park would be more remote, people would need to travel further to access the open area of parkland. The playing fields of which Luton already has less than required should not be built on as there have been no proposed alternatives, a requirement of Sport England. A Local park Wigmore Valley Park is a local park. The development and proposed relocation of recreational areas and open space would negate this thus creating an inconvenient and inaccessible space to those with difficulties who wish to access local open space. My Local park Wigmore Valley Park is my local park, easily accessible from where I live, one of the reasons I chose to live in this part of Luton and where I walk my dogs. The proposed new park would be further away and less accessible for me. County Wildlife Site (CWS) The Wigmore Valley Park area contains a valued County Wildlife Site (CWS) with many species of birds and five different species of wild orchid (numbering in their hundreds). The proposed development would reduce and diminish this CWS habitat which goes against the local plans aims to improve and enhance biodiversity (strategic objective 10). Air Quality The reduction of trees and grass and the increase of traffic and aircraft, which this development would cause all go against the

Ref.	Objection	Comments
		health and welfare of the local population. Quoted from Luton Borough Councils 2016 Air Quality Annual Status Report "The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion". "Luton is currently seeing an increased number of planning applications, including a number of substantial developments which have potential to impact upon air quality". Reference URL: [https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Environmental%20and%20Consumer%20Services/Pollution/2016%20Air%20Quality%20Annual%20Status%20Report%20(ASR).pdf] The Landfill The proposed development would take place on the currently capped landfill site, which was used to take much of Luton's waste from 1937 until its closure in 1978. According to the Environment Agency's listing for the tip on their website it contains industrial waste from factory or industrial processes, commercial waste and liquids/sludge which include chemicals, industrial wastewater, sewage sludge and chemical wastes mixed with municipal solid waste Reference URL: [http://maps.environment-agency.gov.uk/wiyby/queryController?topic=waste&ep=2ndtierquery'=_e&layerGroups=2&x=512492.833&y=221758.7525&extraClause=HLD_REFERENCE~%27EAHLD00782%27&textonly=off'stValue='stField] The tip would have been used to take waste from the airport, Vauxhall plant and from places such as LaPorte Chemicals. This unlined site (at the base) sits above the chalk aquifer, which provides drinking water for the local area. Any drilling or pilling and building (compressing) on this landfill layer could cause dangerous liquids to permeate into the vital source of drinking water below. One of the landfill soil sample reports in the planning application stated that the sampling borehole LF-BHG was stopped at 2.8m due to a high UXO reading. Luton was involved in manufacturing of munitions and tanks during WW2 and the airport was

Ref.	Objection	Comments
		targeted at the time. There are reports that hundreds of WW2 ordinance were dropped on Luton during air raids and many of these devices can lay dormant until disturbed by building works. The Traffic Increase Traffic in the East of Luton is already over capacity in some locations and will be greatly increased if this proposed development on Wigmore Park and the proposed development on the Luton/ Hertfordshire border were to go ahead. The Transport Assessment Part 4 (pg. 29) in the planning application for New Century Park shows that in 2016 (the base year) three of the assessed junctions were already over capacity and three were close to capacity. The assessment shows that over the period of time from the business park opening to design year this will increase to a total of six junctions being over capacity and a five more being close to capacity. The assessment states that it does not factor in the proposed housing development on the Luton/Hertfordshire border in part 2 pg. 47 table 5-7, but Hertfordshire's development report on traffic from the new site shows it would also cause an even greater increase in traffic. In addition, recent bus stop installations which cause traffic obstructions, potholes, inferior surfacing, poor markings and lack of cycleways are examples, individual and combined, that contribute to traffic delays in addition to sudden volume increases from incidents on the M1 motorway, delays on the Stockingstone Road / Old Bedford Road intersection A6 trunk route, A505 trunk route or adverse weather conditions which cause major delays to the entire area. Highway Infrastructure I'm concerned that the development of New Century Park has not properly acknowledged the wider infrastructure issues that commuters face in the East of Luton now and in the future and that the general state of highways will worsen given the capacity increases from the proposed New Century Park and housing developments on the Luton/Hertfordshire border, which have also not been considered. The proposed closure of Frank Lester Way The proposed closure of Frank Lester Way to vehicles will have a huge impact on traffic in the local area causing disruption further into residential areas. It will not reduce traffic as indicated in modelling, it will cause many other issues in the local area around major trunk routes to the M1 and LLA served by the A6 and A505 and will only worsen as volume increases. Frank Lester

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		Way (itself once the only entry point for LLA) provides traffic relief to and from Vauxhall Way for vehicles travelling to Capability Green and the M1 motorway using Percival Way and is an important route for traffic in the local area. Frank Lester Way also serves a multitude of existing business with large numbers of employees with personal vehicles (who may also not know about the proposal) in and around LLA, President Way units, airport car hire companies and the LLA car parks. Secondly, I object on principle to the proposed closure of a road named after Frank Stanley Lester OBE, a man who served as Mayor of Luton four times, with forty years of public service to Luton as well as the history and contribution to the town and airport. The contravening proposed link road The proposed road from Eaton Green Road cannot be created as it contravenes LLP6 in the Luton Local Plan 2011 -20314Di page 32 which states "such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport". This local plan was agreed through consultation between the council and local people and has only recently been published, November 2017. The contravening of the local plan to build on an Area of Local Land Value As well as being a well-used park for people, Wigmore Valley Park has also gone from being the local dump, to being an Area of Local Land Value (ALLV) as detailed in the Luton Local Plan 2011 – 2031 proposal map. The New Century Park planning application goes against the 2011- 2031 local plan (November 2017) which states on page 78 "Strategic Objective 10: Improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity". This proposed development would do the opposite, it would not protect and enhance biodiversity it will reduce the size and quality of this much-needed ALLV site. The creation of a business park to provide jobs The Guardian Newspaper 13th December 2017 "The jobless rate remained at 4.3%, its lowest since 1975." Which gives me great concern as this is one of LLAL's main reasons for building the business park "New Century Park is the latest exciting development in the continuing delivery of the Luton Investment Framework which is attracting much-needed new jobs" quote from Councillor

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Ref.	Objection	Comments
		Andy Malcolm, chair of LLAL, it would seem at this time a business development to create jobs would be surplus to requirements. There is no evidence to support that the proposed jobs will be for local people and there is no evidence to say which businesses will take residency in New Century Park. It is likely that much of the workforce will commute into Luton therefore the notion that this will benefit Luton by providing jobs for the town is unsubstantial. The creation of a business park in a residential area next to an International Airport The proposed development would increase capacity on the local highways and rail of non-London Luton Airport (LLA) passengers especially at peak times. With its passenger numbers increasing by the month and with future plans for growth and development, LLA operations will undoubtedly be affected by the proposal. The effect is twofold, one being operationally for LLA and secondly the LLA customer experience, where passengers could be unnecessarily affected, an affect not only on LLA but potentially airline operators themselves. The continued success of LLA is vital to the town. Parking Residents near the airport were recently asked to complete a survey on parking. The impact on the area with the current airport site and lack of parking near Wigmore Place have been high profile, in recent months Luton made the national news due to angry residents not being able to park in their street because of the number of parked cars associated with the airport. Recently users of Wigmore Park had to fight for access to the facility due to staff from Wigmore Place taking all the spaces. Wigmore Place has nowhere near the suitable capacity of parking needed for staff and they have had to lease land on two sites in the park and one at Parkway station to meet the need. The Century Park development details in its plans the number of jobs provided and the number of parking spaces to be created, the two don't match, unless people's habits change (based on an assumption of taking public transport over private vehicles) then we will see more parking in and around the surrounding residential streets. This will again cause further friction and ill feeling with local residents and could cause safety issues in the area. Summary This proposal will have a huge impact on the environment and the health and wellbeing of local residents, something which was recognised in the early 1980's but may now have been forgotten. There are so many strong examples given by residents and

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Ref.	Objection	Comments
		experts that show this land should remain untouched for the people of Luton to benefit from for future generations.
172.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11)
173.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11) I strongly object to any part of the park and landfill being compromised for the reasons stated above and the potential dangers associated with it
174.	Yes 21.2.18	I object to planning application 17/02300/EIA for the following reasons: I feel especially strongly about the: 1. development would obliterate an important area for recreation and for wildlife, and the proposed "replacement area" would be almost useless. It would be much further from people's homes, and its wildlife value would be negligible for many years, whereas the current park includes a County Wildlife Site and an Area of Local Landscape Value. 2. The proposed road access to Eaton Green Road would add seriously to an already congested area and hence to the air pollution suffered by everyone living in or passing through it. In more detail: REPEAT OF REP 167
175.	Yes 22.2.28	REPEAT OF REP 58 (AND REP 11) As a resident of Luton I would like my town to remain safe and uncontaminated. I would like my children to grow up seeing and appreciating nature on their door stop. Destroying natural habitats is a disgrace and will affect generations to come. Luton is fast becoming over populated I myself would like it to remain the way is it with its huge sense of community and high values. We do not need this development.
176.	Yes	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
	22.2.18	
177.	Yes 22.2.18	Loss of light aka loss of the light of children playing…
178.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11)
179.	Yes 22.2.18	Please leave the park alone
180.	Yes 22.2.18	REPEAT OF REP 167
181.	Yes 22.2.18	I strongly object to the above planning application for the following reasons: REPEAT OF EXTRACTS FROM REP 168
182.		
183.	Yes 22.2.18	Although I do not live that close to Wigmore Park, as a Lutonian and athlete for Luton AC I have ran many times there in Chiltern League and National Events, this is a wonderful public space and a tragedy to lose it. REPEAT OF REP 58 (AND REP 11)
184.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11) I strongly object to any part of the park and landfill being compromised for the reasons stated above and the potential dangers associated with it.
185.	Yes 22.2.18	I am writing to object against the plans to build on wigmore Park. I have used this park all my life, to take the dogs for a walk and meet up with friends after school and during half terms. The park has encouraged children to become individuals and to learn so much about nature and the environment in their local surroundings and for everyone to meet new people.

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Ref.	Objection	Comments
		You will be taking away everyone's freedom to escape to the park after a day of work, school and nursery. You will be taking away the people of Wigmore's, Park and greenery. This is a selfish act that Luton borough council have decided and once it's gone – it's gone. Maybe think about what your plans are doing and going to do to the people who live nearby and have lived there their whole lives, instead of just money making for yourselves.
186.	Yes 22.2.18	I object to the above planning application for the following reasons: There should be no development on Wigmore Valley Park. It was provided for people in Wigmore close to homes because it was needed, landscaped and planted with hundreds of trees. It has been enjoyed by parents, families and visitors since the 1980s, so is highly valued and crucial to our wellbeing. It must be left for future generations to enjoy. Luton is overdeveloped and green space is well below the town's needs, so people come from other parts of the town to walk here and see wildlife. This park should not be taken away. With more people sitting down all day, health and exercise are more important than ever. …. REPEAT OF REP 167
187.	Yes 22.2.18	REPEAT OF REP 167
188.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11)
189.	Yes 22.2.18	REPEAT OF REP 167
190.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11)
191.	Yes	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
	22.2.18	
192.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11) I also don't feel that Luton needs any more of this kind of development, the one at Butterfield was only half built and still has empty premises.
193.	Yes 22.2.18	REPEAT OF REP 167
194.	Yes 22.2.18	REPEAT OF REP 167
195.	Yes 22.2.18	REPEAT OF REP 58 (NOT REP 19)
196.	23.2.18	REPEAT OF REP 167
197.	Yes 23.2.18	REPEAT OF REP 167
198.	Yes 23.2.18	I VERY STRONGLY object to the above planning application on the following grounds: … REPEAT OF REP 11. … I strongly object to the above planning application on the following grounds:- Local, strategic, regional and national planning policies:- This application is in breach of the Luton Local Plan (published in November 2017.) The local plan is a major document that dictates future policy for 20 years and it is being broken by using Eaton Green Road as an access point.

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		Previous planning decisions (including appeal decisions):- The original permission for Century Park banned access from Eaton Green Road. Nature conservation:- Wigmore park is an area of natural beauty & offsets the airport pollution. Adequacy of parking:- The TUI car park will be much further away tempting more employees to park in the streets. This is already a major problem. Traffic generation Noise and disturbance resulting from use Hazardous materials in that the site is a recognised unregulated toxic tip so should be left alone with its clay cap. Smells through disturbance. Loss of trees Road Safety – The development may lead to a significant impact upon road safety due to more cars and lorries using local roads for access.
199.	Yes 23.2.18	REPEAT OF REP 167
200.	Yes 23.2.18	REPEAT OF REP 58 (AND REP 11) There is so much wildlife that will suffer, we regularly have deer visit this area, along with all the beautiful rare flowers, its just awful to think this lovely peaceful park area will be destroyed.
201.	Yes 23.2.18	REPEAT OF REP 58 (AND REP 11) ALSO EXTRACTS FROM REP 45 Nature makes us healthier and happier people and a growing number of studies show evidence that a connection with nature

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		can have sustained increases in health and happiness. One study in particular – 30 Days Wild, which was conducted by Dr Miles Richardson, head of psychology at the University of Derby showed that those who took part improved their general health by 30%.
202.		
203.		
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210.	Yes 23.2.18	I am writing to strongly object to planning application 17/02300/EIA, which is in breach of the local plan policy LLP6, as an access route has been provided from Easton green Road to the proposed business park. I feel that in building this road it will cause more traffic and pollution to the area, causing problems for local people. This will have a major effect on local people travelling to and from work and also create a massive parking issue in the area. The fumes from sitting traffic may also have an effect on local people's health. I also wish to object to any disturbance of the former council tip . I refer to the planning application statement in document 17_02300_EIA DAS_Part2-686521 page36 or page 16/24 of the PDF. As you are aware that as waste decomposes, gasses such as methane can build up to explosive levels. If you are to start

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		disrupting this land you will be responsible for releasing these gasses into the area and therefore putting peoples health and safety at risk. I cannot understand how you thought by trying to disguise the small print and ultimately lying to local people and telling them this area is safe to build on, would be a good idea . Do you really understand the damage to health disrupting this former tip could cause ? I can only imagine the health risks you would be creating and also the millions of pounds the you (the council) will end up paying out in compensation . I object to any development on Wigmore valley park, as this is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's .Speaking as a person with 4 children born and bred in Luton we wish this park to remain untouched with the wildlife living there happily as they have for many years .
211.	Yes 23.2.18	Comments against proposals for development of New Century Park and its impact on the surrounding area Firstly I am surprised that the long held official view that New Century Industrial Park would be accessed by a tunnel under the Luton Airport to alleviate any traffic impact on the roads in surrounding area has now been abandoned with it seems no mitigating explanation. I recall some years ago there was a traffic study on the impact in roads such as Eaton Green Road Crawley, Green Road, Wigmore Lane and so on, which came out against any further mayor traffic increase using the roads without causing serious traffic congestion. The very reason why the tunnel option was the most viable. The development of the established Wigmore Park itself is surely equally controversial. Already some land from the Wigmore Park was taken some years ago to accommodate parking requirements for a local company with the proviso that this was not going to set a precedent. Well time has shown how hollow that promise was. In the new plan, the relocated Wigmore Park is reported to have some upgrade. However the new proposed site is further away from access, causing increased distance for car travel but more worringly is the loss of playing field area is retained in any new proposal. These new plans while yes giving new job opportunities, in their present form do not give Luton inhabitants a better quality of life either because of increased 73ondon73 pollution and road congestion and at least the same area of land for leisure and sporting recreation.

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Ref.	Objection	Comments
212.	Yes 23.2.18	REPEAT OF REP 167
213.	Yes 23.2.18	REPEAT OF REP 167
214.		
215.	Yes 24.2.18	REPEAT OF REP 58 (AND REP 11)
216.	Yes 24.2.18	Stop destroying our parkland
217.	Yes 24.2.18	REPEAT OF REP 167
218.	Yes 24.2.18	REPEAT OF REP 128
219.	Yes 24.2.18	REPEAT OF REP 167
220.	Yes 24.2.18	REPEAT OF REP 167
221.	Yes 24.2.18	REPEAT OF REP 167

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Ref.	Objection	Comments
222.	Yes 24.2.18	REPEAT OF REP 167
223.	Yes 24.2.18	REPEAT OF ANONYMOUS REP 3 (SERIES OF 7 EMAILS)
224.	Yes (undated)	Quotes the documents put forward in REP 220, namely: 1. unlawful disposal of public land (quoting Muir v Wandsworth BC 2017 2. bias as Luton Borough Council as local planning authority will be determining a planning application being submitted by a private company wholly within the ownership of the Council (LLAL) 3. no air quality monitoring is being carried out in the Wigmore area 4. likelihood of unexploded ordnance beneath the landfill site and concerns about contamination and hazard REPEAT OF REP 128
225.	Yes 24.2.18	REPEAT OF REP 167 (AND 59)
226.	Yes 24.2.18	REPEAT OF REP 167 (AND 59)
227.	Yes 24.2.18	Due to the new documents which have been added to the planning application, it is necessary for me to lodge another objection. Page 884 of document GCC3 states that location LF-BH10G produced high readings in relation to Unexploded Ordnance. Given the explosive gases which will be released from the old landfill site, the risk posed to life by disturbing unexploded ordnance is clearly enormous. It is clear that no further exploration should be done on this site, and that no building of any sort should ever be considered within the boundaries of the park, due to the risk of loss of life and the risk of damage to surrounding buildings from an explosion.

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228.	Yes 24.2.18	REPEAT OF REP 167 24.01.2018 Added: I wish to add to my objection that after reading a late report submitted into the planning application. A report called "GCC3 Ground Investigation Landfill" states on page 289 that: Borehole abandoned due to UXO at 2.80m depth on client's instruction. Borehole abandoned at 2.80m in concrete with a high UXO reading. Only a very few bore holes were dug on a relatively large site yet unexploded ordnance was found that hasn't been removed. This is clearly a safety concern, as the site is a former landfill site opened during the war that was located next to a Second World War airfield. The fact that a high reading was found in concrete suggests that this was a bomb dump that was capped in concrete. No one knows the complete picture of what was placed in this tip as it was unregulated. For that very reason this planning application should be refused on the grounds of safety.
229.	Yes 25.2.18	And I oppose the proposal to build on the new century park due to the hazardous materials in the site which is a recognised unregulated toxic tip which fills me with worry if it is disturbed. I disagree with the principle of this proposal. I feel it inappropriate and that the use of this land should not change.
230.	Yes 25.2.18	REPEAT OF REP 58 (AND REP 11)
231.	Yes 25.2.18	REPEAT OF REP 11 AND REP 236 10 The slaughter of 1000s of indigenous species of flora and fauna. 11 Increase in health issues due to extra pollution and loss of oxygen producing trees. The loss of another green space in East Luton will increase physical and mental health issues to people living under the stress of

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		such an ill thought out plan, even the childen's play area promotes pollution and nothing to do with anything natural or eco-friendly to compensiate for the decimation of Wigmore Park. Digging up a former landfill site will only bring disaster and most likely huge compensation claims if touched, as in previous attempts to build on contaminated land such as this. Please think of this in your assessment.
232.	Yes 25.2.18	REPEAT OF REP 58 (AND REP 11)
233.	Yes 25.2.18	Wigmore park belongs to the people of luton, once you have destroyed it there is nothing left for us !!! All we are going to gain from this is more traffic more noise ……. Stop ruining luton with the constant building everywhere !!!
234.	Yes 25.2.18	I strongly object to the planning application for the following reasons: There should be no development on Wigmore Park. It is a vital Community asset, well used, highly valued and crucial to our well being. We have walked our dogs at this park for over fifteen years and are horrified at the thought of it being destroyed to make way for an industrial park. The trees in Wigmore Valley Park provide an important wildlife habitat for many species and also act as a barrier to air and noise pollution. This pollution barrier and biodiversity canot be lost. The proposed new access road by the Tidy Tip should not be allowed, It would generate more traffic, increase noise and create dangerous new rat runs on Wigmore Lane, Eaton Green Road and already congested surrounding roads. Frank Lester Way should not be closed to cars. The 'replacement park' is much further away on agricultural fields and in no way equates to what we have now. It would be further from homes, less convenient, has no trees to absorb pollution, and would mean a net loss of green space. It will take many years to become as good a site for wildlife, whish is in sharp decline and needs help now. The proposed dual carriageway through the airport, taking traffic into a public park, seems far bigger than is needed for the offices proposed. This also runs within a couple of hundred metres of my house and I am extremely concerned about how much extra noise and pollution it is going to create near my home.

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		I ask that for all the reasons above the application be refused as the proposal is an inappropriate development on a community asset.
235.	Yes 25.2.18	Wigmore Park is of great community value for family and sports activities. It is an established wildlife and conservation site. Moving it to the new site proposed would wipe out those assets. Access from Eaton Green Road contradicts the established Luton Local Plan. Damage and contamination to aquifers serving Herts would be inevitable. The proposed road and expected 24hour access needed to the site would impose an unacceptable traffic burden on surrounding roads and lanes, many in Hertfordshire.
236.	Yes 25.2.18	Wigmore is already a VERY VERY busy area I work in St.Albans and most days leaving my house it will take 15-25 minutes to get from Wigmore to the lower Luton Road at 7:00am because of all the airport traffic adding more cars and lorries is just plan stupid. REPEAT OF REP 128 (with amplification) Luton adopted their Local Plan 2011-2031 on 4 Nov 2017. On p.32 section d.1 it says no access road from Eaton Green Rd very clearly: (addition to [1]) Repeatedly residents have been assured that these developments will not have a significant negative impact on their quality of life, and these reassurances (such as separate road access) continue to be rescinded in later stages. The council also seem to neglect the fact that current traffic levels between the motorway and the airport are awful, and that the additional traffic generated from further developments in this area, and the area near Luton Airport Parkway Station are going to bring traffic to a complete standstill. (addition after [10]) The Council's current strategy of pursuing relentless development in every area of the town seems to neglect the town's limitations. We all accept that growth is good, but there is a saturation point which should be paid regard to. Luton is now at that point, and we should value and embrace what we are, rather than trying to be something else.

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		And I strongly object to this development application on many grounds. I agree with the arguments put forward in more detail within ANONYMOUS REPRESENTATION 3.
237.	Yes 25.2.18	REPEAT OF REP 128
238.	Yes 25.2.18	REPEAT OF ANONYMOUS REP 3(EXTRACT FROM SERIES OF 7 EMAILS BUT ONLY IN RELATION TO RSS AND LAW)
239.	Yes 25.2.18	REPEAT OF REP 128
240.	Yes 25.2.18	I disagree with the principles of this proposal. I feel it is inappropriate and that the use of this land should not change
241.	Yes 25.2.18	I disagree with the principles of this proposal. I feel it is inappropriate and that the use of this land should not change
242.	Yes 25.2.18	I disagree with the principles of this proposal. I feel it is inappropriate and that the use of this land should not change
243.	Yes 25.2.18	I disagree with the principles of this proposal. I feel it is inappropriate and that the use of this land should not change
244.	Yes 25.2.18	REPEAT OF REP 128
245.	Yes 25.2.18	[1] Outdated BREEAM Standard: The Capita BREEAM Design Strategy & Pre-assessment report Nov 2017 ref CS/089916-06 Rev1 is highly suspect by achieving only 56.4% rating which is just 1.4% above the target level. A normal margin of error would suggest the BREEAM report does not meet the project target. In addition, the Capita report is using the BREEEAM methodology which is now out-of-date with the introduction of BREEAM New Construction 2018 [see https://www.breeam.com/engage/research-and-

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		development/consultation-engagement/80ondo-uk-new-construction-2018-consultation] so the report should now be re-worked using the 2018 BREEAM standard as the project planning application cannot be evaluated using out-of-date principles. [2] Significant Traffic Growth: According to Capita at the consultation meeting 31Jan2018 Raynham Way Community Centre, the New Century Development will generate c3,000 new jobs which equates to 2,000+ additional vehicles, excluding additional road traffic & aircraft movements generated by the New Century Park businesses, all of which further pollutes the local environment. This will cause greater congestion in Luton & the surrounding area which is already the Uks 5th most congested town [see Inrix report]. The Inrix report highlighted "motorists in Luton spent approximately 29 hours in gridlock last year, costing each of them £1,143. They also wasted 11% of their total drive time stuck in congestion". In the Luton Airport area the congestion is worse with significant traffic queues during morning & evening periods despite the road developments as Luton Airport growth has already outstripped the new infrastructure capacity. The forecast for increased congestion from the development must be professionally identified using the Inrix report as the foundation to understand the additional costs to motorists & similarly affected local residents which we believe will be unacceptable to the community. [3] Premature Luton Deaths From Pollution: According to the Luton Borough Council [LBC] website report on Air Quality "A recent report by Public Health England estimated that in Luton, 86 deaths were 80ondon80ructu to particulate air pollution per annum with 1,004 associated life – years lost. Luton has a higher percentage of adult deaths (5.8%) related to long term exposure to air pollution than England (5.1%). The main source of air pollution in Luton is from road traffic particularly the M1 motorway and congested town centre streets". The LBC Air Quality Report stated "Ensure all major developments, and any significant developments in areas of elevated air pollution, are required to produce an air quality assessment". An Air Quality Assessment report in conjunction with this development application must be made available to the public based upon the inevitable increase in Luton area road vehicle & airtraffic pollution, which we believe will show the local community an unacceptable level of risk. [4] Environmental Impact Upon Luton Children & Elderly: The Luton residential area surrounding the development has a high demographic for children & the elderly & the development project includes a "childrens play area". However the LBC Air Quality Report states "Children are particularly susceptible to the effects of pollution, as their lungs are not yet fully developed, and pollution may have an effect on lung growth and lung function. Older people are also more vulnerable to the detrimental health effects of pollution, and those with pre-existing health conditions and diseases are also more at risk". It seems absolutely clear the development will risk worsening the impact upon vulnerable Luton residential groups including children & the elderly, adding further stress to the local Luton NHS costs & resources which is a further reason to reject the application. We believe these points totally justify rejection of the planning application.

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246.	Yes 25.2.18	REPEAT OF REP 128
247.	Yes 25.2.18	REPEAT OF REP 128
248.	Yes 25.2.18	REPEAT OF REP 128
249.	Yes 26.1.18	I am writing to object to the above planning application. I am opposing the plans due to the loss of the natural wildlife and the impact that the plans on the habitat to this area. In addition, I am opposing the application because it is in breach of the local plan that was published in November 2017, as the local plan states that there should be no access except for buses and taxis from Eaton Green Road to the business park. Finally, I am against the application due to the noise level, increased pollution and traffic because of the plans.
250.	Yes 26.1.18	PART 1 OBJECTION TO APPLICATION ON PLANNING GROUNDS Why two parts to our objection? Our concerns relate not only to the impact on local people and wildlife from the possible loss of most of Wigmore Valley Park, but it was quickly obvious that this development is part of a much bigger picture, and could be the start of a chain of events that could have a major impact on people across Luton in Herts, and across the UK. We attach our response to the consultations from 10 May last year, which forms part of our response now. A few features were changed by the applicant in late 2017, such as the road across the north of the park, buildings being removed from Century Park fields, the number of buildings halved, and an access point proposed at Eaton Green Road, but most of our concerns still apply. We attach also some photos to indicate the importance of the park. Members of Friends of the Earth have been deeply concerned about the proposal to build on Wigmore Park since the two stakeholder workshops in February 2017. Following the 3 consultations in Mar 2017, we were proactive in discussing the issue with local residents and helped to set up Friends of Wigmore Park, who we have supported continually since, including help with organising the Big Picnic in the Park in August 2017 which attracted nearly 200 people, and joining the FoWP committee at a Town Hall meeting with LLAL and LBC. Although we have not posted on it, we are delighted that the FoWP facebook site now has nearly 1400 members.

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		Wigmore residents have lost their library, seen increased airport parking in residential roads, great inconvenience from traffic congestion, and health problems from pollution. But they have seen no benefits from airport expansion, and now the proposal is for them to lose most of a vital park. 1 WIGMORE VALLEY PARK KNOWN TO BE ESSENTIAL IN 1980S "The 'urban-fringe', the areas of the borough at which there is a link between the countryside and the urban area, is of particular importance." – Borough of Luton Planning Handbook, 1989. From Environmental Statement for Century Park 2009: Importance of Wigmore Park: New Local Plan policies included nothing about development on Wigmore Park – the proposals map has an arrow indicating only a possible road across the park. Council documents show that a road to the Century Park development proposed for 20 years on the fields beyond need not touch the park (see 15). Wigmore Valley Park should not be developed. It was planned and provided for the people of Wigmore when the estate was built, to be as close to homes as psossible, based on recognised recreation need per 1000 population, by responsible council officers. They thoughtfully landscaped the park, with banks, ridges, and planted hundreds of trees. It is a vital Community Asset, highly valued and crucial to well being. It has been enjoyed by parents, children, dog walkers and visitors to the town since the 1980s and must be left for future generations to enjoy . 2 LUTON IS OVERDEVELOPED Luton is one of the most overdeveloped towns in the UK, and green space provision is well below people's needs, so many people come from other parts of the town to walk here and see wildlife, as it is the nearest area of semi-wilderness they can encounter. Some visit from outside Luton, and a great many who have left the town return to enjoy the park when visiting friends and relatives. With more people sitting down all day, health and exercise are more important than ever, and there is a need for health sector and parks to work more closely together to encourage this, so the park should not be taken away. 3 WHAT THE PARK PROVIDES: OPEN SPACE AND LANDSCAPE Local Plan policy LLP6E on Wigmore Park says "the quality of open space and landscaping will be maintained". LLP29: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas." The secret sell-off of this public park shows a cynical intention to disregard and spoil the landscape, and NOT to maintain quality of open space and landscaping for the community. Offices, road and roundabout would totally change the area, and have unacceptable impact on the ALLV landscape. 4 WHAT THE PARK PROVIDES: DESIGNATED WILDLIFE & LANDSCAPE FEATURES The whole of the southern area of Wigmore Valley Park, stretching diagonally to the north-west, is a County Wildlife Site, which links with an ancient woodland corridor to the east. The CWS has developed into an important mosaic of habitat, with a surprising variety of wildflowers. This is exceptionally rich in orchids (photos), of which there are,

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		unusually, 5 species. These flourish amongst an impressive diversity of other species, to a large extent due to the local conditions. This is likely to be because the clay layer over the landfill, which allows the ground to become waterlogged over winter months (see photo of the seasonal pond) is overlaid with chalky soil. Trying to reproduce such conditions elsewhere would be risky and unlikely to succeed. Wigmore Valley Park is also an Area of Local Landscape Value (see Local Plan policies map). Strategic Objective 10: the Local Plan aims to "improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity". LLP29 A: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas." This includes ALLVs. This planning application does not meet either of the above objectives. The large office buildings proposed would take away most of Wigmore Park, and ruin views currently enjoyed. It would not create a relaxing environment for park users. It would not protect, enhance or conserve the character of the area. It would change the area completely and would take away the ALLV. This cannot be permitted. A board at the Raynham Way exhibition stated: "The development has been designed to reduce potential ecological impacts and minimise loss of habitat." By building ground-level car parks (which LLAOL oppose) over a County Wildlife Site? The proposal is simply appalling, and unnecessary. The offices are speculative, shown by being reduced from 20 to 10 in late 2017. We view it as criminal not only to build on a park, but also to waste land with huge and pointless car parks, roads and roundabouts. Given the shortage of both green and commercial space in Luton, developments like this should go on brownfield sites, where car parks can be multi-storey. It appears to us that there is still plenty of space on the airport complex itself, and for offices, the Monarch, Halycon and many other buildings are vacant. 5 WHAT THE PARK PROVIDES: ESSENTIAL FUNCTION OF TREES Over two hectares of trees would be lost in this scheme, part of those planted for us in the 1980s. The trees and CWS in the park provide an important wildlife habitat for many species and also act as a barrier to air and noise pollution which must not be lost. This would be against the LLAL Vision 2020-2050 which states: "As part of any expansion proposals, we will develop landscape and ecology strategies which seek to conserve, and where possible, enhance the landscape and biodiversity within Luton Airport and on nearby sites." The loss of mature trees would take place around the park where commercial development is planned, which is unnecessary as offices and roads could be sited to avoid this. It seems that most would be destroyed to create access for construction of a major new access road from Eaton Green Road. This is against the new Local Plan (see 8 below). The trees here are on a bank, forming an attractive sloping access point to the park which partially masks the road to the Tidy Tip. The loss of these trees would create a

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		stark open area focused upon the new road, which would rapidly become congested as it would meet a big roundabout within the park, joining the proposed new major road through the airport. This would ruin the feeling of well-being as one enters the park which encourages people to go there, and is totally unacceptable. There appears to be little addition of semi-mature trees to compensate for the loss planned. Parks Dept say: "The loss of areas of County Wildlife Site is of concern and as the mosaic of habitats is unlikely to be replicated in the short term on the replacement area of open space proposed in the agricultural area – it would seem reasonable that some form of mitigation should be sought for loss of habitat." FoE applauds this request for funding for tree planting elsewhere in the borough, which should not have been withdrawn. The i-Tree survey in Wardown, which may be replicated elsewhere in the town, showed that apart from all the well-known benefits of trees which bring wellbeing, trees have financial value in terms of absorbing pollutants and carbon, reducing climate impacts. With increasing traffic due largely to the airport, we should be planting a great many more trees across Luton, including street trees, and creating pocket parks whenever the opportunity arises. But the mosaic of habitats at Wigmore Park should not be lost. The CWS and other areas of the park include thousands of trees planted for the community and for wildlife by previous council officers. These trees provide the vital function of absorbing noise and pollution from planes. It is suggested by Parks Dept that because of the risk of bird strike, substitute planting should take place at other sites. The Blake Morgan document for LLAOL states: "35 species of birds would suffer adverse effect due to removal of vegetation". So don't remove it. The CWS provides a diverse habitat for our beleaguered wildlife, with continued loss of habitat and crashing populations, and is important not only for birds. Removing trees is flawed thinking, as modern methods have much reduced the risk of bird strike. Mitigation measures suggested to compensate for removing trees include creating open grassland – this could attract geese. Bird strikes http://www.telegraph.co.uk/travel/travel-truths/how-dangerous-is-a-bird-strike/ "Aircraft are designed and built to withstand bird strikes and pilots undergo rigorous training to enable them to deal with such eventualities," said BALPA flight safety specialist, Stephen Landells (5 Sep 2017) Very few bird strikes cause damage to planes. Despite massive increase in flights, no accidents were reported at Luton in the last 5 years due to bird strikes. There is no open water at Wigmore Park or near the airport. Canada geese need suitable grassland, and do not roost in trees are not present at Wigmore. Very few seagulls visit, and starlings are rarely seen there. Crows and pigeons would do no damage to a plane on takeoff or landing. Heathrow monitors bird activity and keeps records. Scaring measures, such as playing distress calls, firing flares, and even controlled use of birds of prey have been successfully employed at various airports, says BALPA. Vehicles used by Heathrow are fitted with an electronic system called Digiscare. Two external loud speakers are fitted. It is pre-programmed with the distress

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		calls for a variety of birds based on knowledge of how different species will react in different ways. At Luton, two vehicle mounted bio-acoustic Scarecrow B.I.R.D. Tabs? Are used daily as part of LTN's persistent wildlife management system to disperse birds from the airfield and surrounding areas. Described as 'faultless' by the bird controllers. Since using this system the airport has seen an 80% reduction in airfield bird sightings in the last year which has minimised the risk of bird strike. https://www.scarecrow.eu/luton-airport/ Given that the landscaping and planting was provided for the benefit of nearby residents and other users of Wigmore Valley Park this planning application is totally contrary to past agreements reached between Luton Council and local housing developers. The park's trees, planted by council officers for residents 30 or more years ago, form an important noise and pollution barrier, also absorbing carbon and reducing climate emissions, the park's trees must not be lost. 6 'REPLACEMENT PARK' While Wigmore Valley Park is the nearest park for most people in the large Wigmore estate, and much-used, many already live further away than the national recommended standards. The 'replacement park' on agricultural fields would be still further away from their homes, and would in no way equate to what they have now. People have ever less free time to visit parks, and need them more than ever for fresh air, tranquillity, recreation and connection with nature. These fields would be less convenient, have no trees to absorb pollution, and there is a question mark over whether new trees would be planted because of worries about bird strike. Offices, roads and a hotel on Wigmore Park would mean a net loss of green space within reach of people's homes, and their view of and from the park would be spoilt. There is no disguising the stark 4 or 5 storey blocks seen in brochures. The new far-away park would be less used because of the time factor and limited interest there. Described as "intensively farmed arable fields with little habitat value and relatively low ecological importance", it would take many years to become as good a site for wildlife, which is in sharp decline and needs help now. 7 NO EATON GREEN ROAD ACCESS The new 20-year Luton Local Plan is clear that there should be no access road to Wigmore Park from Eaton Green Road. LLP6 p38 London Luton Airport Strategic Allocation inc Century Park: "Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percival Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency." This policy was created for very good reasons. With rapid airport expansion, roads in east Luton and across the town have become far more congested, already causing greater inconvenience. A new access road from Eaton Green Road by the Tidy Tip, one of two proposed roads on to the park, should not be allowed. It would generate more traffic, increase noise and create danger. This access would mean vehicles would pour into Wigmore, seriously affecting already congested Eaton Green Road, Wigmore

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		Lane, Ashcroft Road, Lalleford Road, and surrounding roads, creating new rat runs. Three nearby schools would see more danger and pollution on school routes. The Raynham Way exhibition boards said that junctions on Eaton Green Road and Vauxhall Way are already over-capacity; and that it would not be appropriate to encourage significant levels of traffic on to the new dual carriageway via Eaton Green Rd/Wigmore Lane/Lalleford Rd, as it would be contrary to the Local Plan and LTP3 policies. That is exactly what the new access point and large roundabout would achieve! The Blake Morgan document shows LLAOL are clearly concerned about people getting to their planes on time. It has the useful statement that "after the development, many of the junctions will be operating over their capacity? The proposal will lead to increased journey time and increased traffic flow." It is also concerned about closing Percival Way as a through route, which will "cause major operational disruption." And the lack of evidence that Dart would reduce traffic. It concludes: "The proposal will have a serious impact on the surrounding infrastructure." We agree with LLAOL that Frank Lester Way should not be closed to cars: LLAOL says it would cause major disruption to the airport. LLAOL also says that moving the staff car park and part of the long-stay car park into Wigmore Park would cause major problems for the airport and staff; that splitting the car hire centre into 3 areas including Wigmore Park is ill-conceived; that the road modelling for access to the business park was useless; and there is no evidence that Dart would make a significant difference to car numbers. Travel plans have been mentioned in the last 3 Local Plans but have achieved very little. In this case their aims is to reduce the car journeys to and from Wigmore Park. It would be best to ensure there are no journeys at all. 8 CONGESTION OUT OF CONTROL – URGENT ACTION NEEDED Rapid airport expansion has made Luton the 5th most congested UK town, with huge traffic problems. No significant mitigation has been proposed, but expansion continues. One report lists all the junctions where congestion is already bad, and proposes much costly remedial work. A dual carriageway would make it worse and bring traffic gridlock . This cannot be permitted. 9 AIR POLLUTION – URGENT ACTION NEEDED Air pollution is a serious and much neglected problem. It costs lives and billions of pounds, and like the government, Luton Council is seriously failing in its duties to act to reduce it, and this development would make the impacts worse. People are encouraged to spend time in parks as part of a healthy lifestyle. However, due to a major road through the airport, vehicles going to new offices on the park, and increased flights, the proposed reshaped park, and the Eaton Green Road area, would receive higher levels of noise and air pollution. People in East Luton, including Eaton Green Road and parts of Wigmore Lane, already suffer fairly high pollution levels, and extra traffic would be likely to bring these near illegal levels. It is not all right to be just below legal levels – that is far too high. The government has lost in the High Court for a third time on its lack of action on air pollution. With a plan for continued airport

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		expansion, it is vital that the whole area around the airport, including access roads, be made an Air Quality Management Area, wqith a range of strategies to reduce pollution. The rapid increase in flights at Luton has brought 5 million more vehicles in 4 years, and greater pollution, which at several places in the airport is at illegal levels. A major road would bring far more traffic, increase toxins in the air, and have a significant negative impact on health. Pollution from diesels and planes kills 40,000 people every year – more than obesity and alcohol – shortening lives and causing misery. Vehicles contribute about 80% of NO2 pollution at the roadside (pushchair level). Diesel fumes are Grade 1 Carcinogens. They are the biggest killer: the tiny particles they emit are the most dangerous. They stunt children's lung growth, fuel asthma, lung cancer, strokes, dementia and heart attacks, and shorten lives. This is reflected in the terrible statistics for Luton, shown in the Joint Strategic Needs Assessment. Pollution puts an extra burden on stretched health services and businesses. The cost of illness and working days lost is estimated at £20bn a year. Children in polluted areas are 4 times as likely to have stunted lung growth. The UK has the highest asthma levels in the world: 1.1m children have asthma. Dramatic effects are seen in children who live or go to schools near busy roads. Particulates are a key reason for the decline of insects & mammals such as hedgehogs – numbers have crashed in proportion to the increase in diesel cars since the 1990s. Luton has a special problem to deal with Luton sits in a valley, and on windless days, pollution is especially bad for its citizens' health. The airport has not only increased pollution from plane exhausts, but the increase in flights from 9 to 15.7m passengers in less than 5 years has increased the number of cars on Luton's roads by 5 million in the same period. Luton has far above average car use. People needed a sub-regional east-west rail service but they got a local busway, which did nothing to help half the people in Luton who leave the town to work, or half Luton's employees who come to Luton to work. A housing development in Kent was refused in Nov because no mitigation for air pollution was provided. There is no mitigation here. NO2 is a lung irritant, and a key symptom of other air pollution. LBC/LLAL is behaving dishonestly and irresponsibly in averaging NO2 levels measured across all monitoring points around the airport, when the 6 busiest points there, where most people pass through, are constantly at illegal levels. This poses special dangers for people who work at the airport. No2 levels are not far from reaching illegal levels on Eaton Green Road, which with rapid airport expansion has become far more congested. If a new access point to Wigmore Park, to join the dual carriageway through the airport, was created near the Tidy Tip, Eaton Green Road would soon reach illegal levels too. It is good news that in February 2018 Client Earth has beaten the government in court for the third time, and there will have to be far more Air Quality Management Areas. These require serious preventative measures to cut pollution. One is certainly needed around Luton Airport and its approaches, as with such rapid expansion we've become 5th most congested town! Ten Luton GPs in 2014 signed a petition to stop Luton Airport expansion, concerned about the health of their patients. Continued expansion to 18m passengers should now be seriously and transparently reviewed in the light of failure to provide legal air

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		quality. Plans to cut Pollution at the airport and across Luton - Phase out diesels, with scrappage schemes - Catalytic converters & clean diesel filters must be the only replacement for a car's first exhaust - Higher charges for diesels to park - When buying a vehicle, people should look for the highest (80+MPG), hybrid or electric - Borough-wide measures to reduce traffic use, including car pool and car sharing schemes - Public education programme, including the dangers of sitting in a vehicle with its engine idling - Training on how to drive better, such as accelerating slowly, not leaping away at traffic lights - Teach people that their health is more at risk in their car than on the pavement or a bike - Assess Luton schools for pollution risks – at least 3 have found poor air quality. Action on this should be a priority, such as cutting car journeys to school, and walking bus schemes - All mature trees in Luton should be protected: they have great value in absorbing pollution, fixing climate gases, providing shade and reducing the 'heat island' effect of a densely populated town. Many more trees should be planted, mainly native species - Frequent flying should be discouraged, like the higher charge for using more gas or electricity - Council to stop promoting unsustainable development using the excuse of 'more jobs' when it means more income for the council The benefits of cleaner air would be shared by all – reduced congestion, more liveable towns, better health 10 GROUND LEVEL CAR PARKS SHOULD BE ELSEWHERE & MULTI-STOREY Large ground level car parks should not be built on a County Wildlife Site and Area of Local Landscape Value. The CWS has become a diverse habitat with 5 species of orchid and over 60 bird species. The offices, road and roundabout would all have unacceptable, adverse impacts on this landscape. Car parks can go anywhere and should be multi-storey due to lack of space in Luton. Document GCC5 – PRA Landfill states (at the time the landfill was closed in Jan 1978): "There will have to be a move towards provision of multi-storey airport parking." 11 DANGERS OF LANDFILL We are extremely concerned about : - possible irreversible contamination of groundwater, river quality and drinking supply over a wide catchment - inflammable, explosive methane and threats from a combination of other gases from disturbing and building on a landfill site containing hazardous waste. With much testing still to do, it cannot be said with certainty that proposals are safe, so outline

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		permission should not be granted. Building offices and roads on a landfill site which is unstable below ground is more complex, costly, and a high risk strategy. It can lead to subsidence, where buildings and roads can crack and sink. This happened to B & Q at Dallow Road, which had to be closed for a year and rebuilt. Also sulphates and acids in the landfill may attack the concrete in the pilings. The large amount of surface water is a concern – the whole site is soggy in winter. With heavy rain, pilings would open pathways for toxic contaminants in landfill to seep down to groundwater, leading to the pure River Mimram, where watercress has been grown for 200 years at Whitwell. Arup's Contamination Preliminary Risk Assessment gives a long list of likely dangerous contaminants from landfill – and many of these were found when testing. The risk assessment states: Migration of ground gases from former landfill eg methane into future buildings and build-up of gases – Risk very high Waste in former landfill – risk to users of future development / public / workers – Risk high Driving of contaminants downward to the prinicipal chalk aquifer – Risk high Leachate in former landfill – downward migration to the prinicipal chalk aquifer – Risk high Driving of contaminants downward during piling to the prinicipal chalk aquifer – Risk high Inhalation of airborne contaminants and microorganisms by adjacent site users (eg residents and other buildings on the airport) – Risk high Inhalation of vapours from contaminants in capping material by users of future development / public / workers – Risk high Yet the plan shows 4-5 storey office blocks and a hotel on the high ridge – the most polluted, dangerous part of the site – near borehole LF-BH07, where methane readings are in 6 figures, and high across this area – see interactive gas map Fig 14 (doc GCC6). Engineers who drilled at the former landfill site below Wigmore Valley Park have told us: "You would have to be mad to try to build there." Methane gas escaping from landfill is highly likely to make people ill (Radio 4, June 21 2017). A 2006 study showed that groundwater in the bedrock was already being contaminated by the landfill. The combination of these risks in our view makes the proposed development too dangerous, and the proposal to build offices, a hotel and roads on Wigmore Park should be withdrawn. 12 CLIMATE CHANGE – URGENT ACTION NEEDED Aviation is the fastest growing source of climate change and Luton is the fastest growing UK airport. Therefore, Luton is the fastest growing source of climate change in the UK. The rapid fuelling of climate change will be disastrous for humanity's future, as we are often reminded by Attenborough and many scientists. The airport is a huge energy consumer and major polluter, unfairly affecting people's future when compared with other towns. The LLAL Vision 2020-2050 states "Although climate change

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		is beyond our direct control, we recognise that Luton Airport has a significant influence over factors that contribute to it, such as: emissions from aircraft; vehicle trips; and the activities of other companies operating at the airport. Ahead of any future expansion work, we will develop a comprehensive strategy to reduce where possible carbon emissions." The Wigmore application is for airport-related development, moving car parks on to a public park to make room for aprons and terminals, displacing businesses to build a major road to carry far more traffic. As planes and traffic are such a big source of climate emissions, the council should also have a robust policy to keep this to an absolute minimum. But there is no strategy to reduce climate change, contrary to the 2012 National Planning Policy Framework Section 10 (Meeting the Challenge of Climate Change) so this development should not be permitted. 13 THE MAJOR ROAD (See Part 2) The proposed dual carriageway through the airport, taking traffic into a public park, seems far bigger than is needed for the offices proposed. This appears to be for a bigger development, yet we are only asked to comment on what is shown. The reason for this road should be fully explained and justified in the application. If not, permission should not be granted. This major road would have been close to the children's playground in Wigmore Park until many people objected. The road corridor remains. Because this is an outline application, a threat would be hanging over us that the big road could be brought back at any time. 14 NEW CAFÉ, TOILETS, PLAYGROUND & SKATEPARK WELCOME Residents would be pleased to receive long-needed toilets, and the other facilities would attract more people to the park. We also welcome the ongoing funding commitment for maintenance of the whole park. However, we believe the council should make this commitment anyway, using funds from the airport whose activities have caused so much inconvenience for residents who live in the same ward. 15 NO DEVELOPMENT VERY STRONGLY PREFERRED- LAST RESORT CENTURY PARK People don't want development in this area, but if any were to be allowed it should be on Century Park Fields which have had planning permission for 20 years. It would be partly screened from Wigmore Valley Park by the strip of ancient woodland and trees along the eastern avenue. The fields could be reached via a road which also stays within the airport boundary across existing car parks to join the point where the tunnel was planned. A public transport route was planned along this corridor in 2008 to serve proposed development on Century Park fields. This would be easier and cheaper to build. It would be safer for the public and occupants of new buildings than a high-risk complex, costly attempt to build a business park on a landfill site, subject to dangers of methane escape, subsidence and irreversible contamination of groundwater below the landfill which via surface water and heavy rain could affect a wide catchment area (see 12). Ultimately the public might have to pay for problems caused out of airport money that could be more

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		beneficially used elsewhere. No development should take place on a public park which would ruin a well loved, peaceful green area and subject people to danger, noise and air pollution. 16 SUMMARY We ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a valuable Community Asset which does not comply with key relevant Local Plan policies. We reserve the right to speak at any committee assigned to determine this application. Yours sincerely David Oakley-Hill and Julie Furnivall Luton Friends of the Earth PART 2 OBJECTION TO APPLICATION ON OTHER GROUNDS This Part will follow when we have received a reply to our Freedom of Information request. REASONS FOR THE ROAD AND SECRET INTENTIONS Ever since the stakeholder workshops, secrecy has been employed by Luton Council / LLAL, and the presentation of what is intended has been highly selective. This is not how a council should behave – it should perform the role of a caring public servant, and be open and transparent. Instead this project has been presented in a way you might expect from the worst, greedy corporate, out for itself. Why Wigmore Valley Park? Local Plan map LLP14 shows no development on the park – only a possible road to Century Park fields. Nowhere in the application is the reason stated why Century Park Fields, with planning permission and a 20-year aspiration for building on, was dropped in 2014 (Arup aerial photo) or earlier in preference for Wigmore Valley Park. Yet a road could easily follow the proposed public transport route of 2008 north-south within the airport boundary to reach the point near the emergency training area where the previous tunnel under the airport would have emerged, to reach Century Park fields only a short distance away, obviating the need for costly remediation work to build on an ex-landfill, and the destruction of a public park and County Wildlife Site. Further, the reason is not stated why a dual carriageway should be built through the airport at great expense to reach a few offices which were proved speculative when their number was halved from 20 to 10 post-consultation with Friends of Wigmore Park. The large road across the north of the site was removed at the same time. But as it is an outline application, there is a fear that the road could be brought back at any time. It is obvious that it points in the direction of new housing across the Herts border. Luton Council's aspiration for an east and north circular 'M25' is longstanding. Yet the public was told to treat this application as 'standalone', and that it was not related to proposed airport expansion. This does not instil trust in our council,

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		which is supposed to act as a public servant, not a land-grabbing corporate intent on getting as much income as possible from the airport and housebuilding, however unsustainable, and whatever loss of countryside or adverse health and environmental impacts this might cause. 'New Century Park' 10 May 2017 Luton Friends of the Earth response to stakeholder workshop and exhibition about plans to build offices on Wigmore Valley Park, also commercial development on Century Park fields. Copy to national committee following up Parliamentary Inquiry on Deficit in Parks & Green Spaces We object in the strongest possible terms to any development on Wigmore Valley Park. We are also unhappy about development on Century Park fields. Members of Luton Friends of the Earth attended the stakeholder workshops, and all three exhibitions. We have visited Wigmore Park several times this year, spoken with park users and attended two meetings organised by residents, so we are well aware of public opinion on this proposal. People who use the park are the key people who matter, as many have been visiting and enjoying the park for years – some all their lives – because it is a park with its own character and much variety. Some who only use the park occasionally, who live not only in Wigmore but elsewhere, nevertheless value it greatly, and are universally outraged by the threat of its loss. Most people say that Luton is over-developed, and there are not enough parks and green spaces. Their view is that this is a public park which they own, and the council are their public servants, who are supposed to manage it for them. Nobody who uses and enjoys it wants to see any development at all on Wigmore Valley Park. Consultation literature states that Wigmore Valley Park is a well-used amenity. A Friends of Wigmore Park group has been formed. One resident has produced a slideshow of wildlife and other scenes in the park that has already attracted 900 views. REASONS FOR OBJECTION 19) A public park belongs to the public Wigmore Valley park is a large, diverse public park with interesting areas of wilderness, which many users have been visiting for a great part of their lives, and it means a lot to them. Many come to it from across Luton and from further afield. The park was given to residents of Luton as compensation for loss of open space when building the large Wigmore estate and Finefare (now Asda) on fields. 2) Wigmore Park was designed by council officers When the landfill was closed in the 1970s, the council chose the best possible option for its future, and spent time and public money on the project. A team of council officers thoughtfully designed the area as a public park to make it interesting for people to use, with banks, ditches, and paths. They planted a great many trees of widely varying species, planning the landscape to

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		attract and support increasing amounts of wildlife as the site matured, with the advantage that it was alongside an existing valley with a substantial strip of ancient woodland, a wildlife corridor providing diverse habitat that would spread on to the site. Parkland is widely thought to be the best, and safest, use of an ex-landfill site: there are numerous examples of this good practice around the UK. This was an extremely successful project, and it must not be undone. 3) An important wildlife site The successful layout of the park by officers led to its designation as a County Wildlife Site, which is particularly diverse and important. It has the advantage of size, lies at the edge of countryside, and has considerably more value being adjacent to a footpath and bridleway through a strip of ancient woodland and hedgerows with bluebells, providing a corridor for wildlife into Hertfordshire. It has a mosaic of habitat including grasslands, many trees, self-seeded shrubs and wildflowers, a seasonal pond, marshy areas, and wilderness areas not found in most of the town. The park has the advantage for wildlife of providing plenty of dense, undisturbed habitat, and supports a rich variety of plant species including 4 orchids; 60 or more bird species; many mammals including stoats; slow worms, lizards and newts; and a great variety of pollinators and other invertebrates that cannot survive in more urban parks. Luton is overdeveloped and there is too much pressure on most of its parks for leisure activities to provide this kind of habitat. The CWS is recognised as important in the Local Plan, and requires Biodiversity Action Plans for conservation which public authorities must carry out. Benefits of development proposals must clearly outweigh the intrinsic nature conservation interest, which cannot be the case with this development, which is speculative and not needed. The habitats at Wigmore Park have taken several decades to develop, and it would not be feasible to move or 'replace' them. There is always something new and different in this park to discover through the seasons. It is a special place to escape the dense urban housing and enjoy nature, trees, birdsong, areas of wilderness and, except for the planes, peace and quiet. For their council to plan to lease it to the airport to build offices is totally unacceptable. Development would wipe out species and degrade its value as a habitat of wild places that are increasingly under threat and cannot be found within the town. All wildlife areas in Wigmore Valley Park must remain. Along the west side of the park is a natural area with many trees along the boundary, a pond and marshy areas. To even suggest building a long-stay car park here, covering over a large area of wildlife habitat in tarmac, shows crass insensitivity to the value of the park. The wildlife here has been enjoyed for years by many visitors, and should be enjoyed by future generations. Everyone acknowledges that Luton has too few parks and green spaces, and hardly any with wildlife areas. We cannot lose this park. 4) Century Park fields is not a replacement! There is not much in these agricultural fields for people to enjoy. There is no wildlife, bushes or trees which take years to mature. It is too far for many people to walk. The attractive landscape would be ruined anyway by offices and sheds. If residents' wishes

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		are ignored, and anything at all is to be built on Wigmore Valley Park, then people should be offered part of the fields, but this is the poorest possible substitute for the removal of most of a large, popular park with an unusual degree of wildlife enjoyed at the edge of an urban area. 5) Brownfield first This is a fundamental development principle. Century Park Fields is a very large area – 94ondon94 40 hectares, that was given outline planning permission for commercial development in 1996. We and others strongly objected to this, as the whole site is an attractive landscape of rolling green fields, where crops are grown. Before any fields are considered for development, planning guidance states that brownfield sites should be prioritised (on existing airport land or elsewhere in Luton). Wigmore Valley Park, adjacent to Century Park fields, is not part of those fields, does not have planning permission and should in no circumstances attract development. There is no need for offices – this is speculative development. There is still empty space at Butterfield Green, opened 20 years ago, was to be a 'science park'. Huge development areas are still to be built on at Kimpton Road and Power Court. Although users of Wigmore Park don't want to see the scenic green rolling Century Park Fields covered in offices or sheds, as a last resort, if the airport has now bought the land, they say build there, not on our park. A footpath and separate cycle track could be provided around the perimeter of Century Park fields, to encourage more people to this area and provide healthy exercise. 6) Landfill dangers Luton Airport Landfill Site, the largest landfill site within Luton's boundaries, was operated by Luton Council between 1937 and 1978. All types of waste were dumped here, including liquids, sludge and other organic matter. The landfill is bigger than Wigmore Valley Park, and almost entirely encloses it. Potential development on a landfill site is an important public issue and there should be no secrecy about it, so as contractors have been regularly testing on the site, we would expect to see results in a clear and understandable form, and to know if the proposed buildings and roads on the landfill meets the National Quality Mark Scheme for Land Contamination Management (NQMS) launched in January. In winter, and after heavy rain, a huge amount of water collects in the park, leaving the site soaked with puddles and small lakes. This only dried up in April, so building would be difficult and costly. Office car parks in open areas under buildings would flood, and on this exposed hill, biting winter winds would howl through them. If water were pumped away, where would it go, and what would be the implications of this, and of disturbing the site for building, for contamination of groundwater, streams and rivers such as the Lea (already contaminated at Luton Hoo) and nearby Mimram, one of the cleanest rivers in the area? Would pumping have to continue regularly? Would this amount of water cause problems for creating stable foundations for offices and roads?

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		Regarding building on landfill, we would mainly be concerned about 3 issues: contamination of groundwater flowing beneath the chalk under the landfill – and this could not be avoided should the normal pilings for construction be driven through the clay landfill cap; the dangers of methane, which as wellas being a potent greenhouse gas, has when buildings have been constructed on landfill sites elsewhere caused leaks into buildings, fires, explosions and adverse health effects; the extra cost and likely problems with building on landfill – 4-storey buildings are planned! Deep pilings would puncture the clay cap and lead to contamination of groundwater. It is extremely likely that things could go wrong, including subsidence, and this could lead to ongoing and long-term remediation at the site, or even fines, with potentially huge costs. These would fall not only on the airport, but to its major shareholder the council, who owns the land, and hence the taxpayer, who did not want the development in the first place. The Environment Agency "encourages sustainable practices that prevent harm or pollution. We can set and enforce conditions requiring this". Given that none of the 4 conditions below appear to apply to this site, do you consider that building offices and roads on the landfill is feasible and justifiable, and would the EA be likely to object to planning permission to build offices and roads across Wigmore Valley Park? Emberton and Parker (1987) proposed the following set of criteria that should be met before considering a landfill site for redevelopment purposes: o the waste should be shallow with a depth of less than 10 m; o the site should have a stable low water table; o the landfill should not contain toxic or hazardous materials, particularly liquid wastes; o the development should be appropriate for the site conditions. We have spoken to several engineers. All of them told us that building on here could be dangerous, costly and expose people working on construction and in the buildings to unacceptable risk. One used the term 'reckless'. We can envisage that if an attempt was made to support buildings on concrete rafts on this unstable footing, sudden ground subsidence could throw construction workers to the ground, or people in the buildings later could experience a damaging 'earthquake'. When this landfill was in operation, there were no separate sites to take hazardous waste. Large amounts of toxic liquid sludge were dumped here. One engineer we spoke to had drilled on this site in 2016, and explained that there are big pockets (hot spots) of highly toxic material and methane, particularly under the ridge between the airport fence and children's playground. Below, the site is highly unstable, and "you would be mad to try and build on this site." Underground there are slurry pools of toxic water. Water flows under the chalk beneath the landfill and this would become contaminated if buildings were erected on the site. The Environment Agency has strict rules about contamination of water, and in its response to the shoddy Environmental Scoping Request (which did not refer to the County Wildlife Site), the EA appeared in

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		diplomatic language to express scepticism about the wisdom of building here. We have put in a Freedom of information request to the Environment Agency to obtain a better picture of the site's history and condition. We advise in the strongest terms NOT to attempt building offices or roads here. The best way to reach Century Park fields would be to take a road along the inside of the airport perimeter to the point where the tunnel was shown in the previous Local Plan, near the aircraft fuselage used for fire drill . It should not encroach on to Wigmore Valley Park. It would need a bridge over the public footpath / bridleway. This would mean moving the Recycling Centre, but it is a safer choice. Building a road or roads across the park would not only be high-risk and costly, but would sever connections for walkers and prevent access to the wilderness areas across the south of the site. The large B&Q store at Dallow Road, Luton, was unwisely built on the old Laporte site, where toxic heavy metals such as mercury, lead, arsenic and cadmium had been dumped early last century, before any controls. The site was technically referred to as a 'lagoon', which still contained liquid sludge. The building split in two, and had to be closed for a year to be detoxified and rebuilt, with a mass of new material below to stabilise it. At Nottingham Sixfields, where a road was built across an ex-landfill site, this quickly became uneven and 'lumpy' and has required frequent repair to make it usable. 7) Air pollution, health, noise, congestion Councils have a remit to provide open areas for healthy leisure activities. Green areas are deeply important for clean air, exercise and well being. This enriches lives. The Plans are contrary to planning guidance and enlightened modern practice. LLAL's Corporate Social Responsibility Statement says "We improve the health and wellbeing of children and young people". Everyone, particularly children, needs to connect with nature and spend time in wild spaces. Wigmore Valley Park is a healthy place to be. The statement also says "The quality of Luton's built and natural environment is an important benefit to local residents, community groups and businesses. The environment theme has a broad agenda to protect and enhance Luton's environment including parks and open spaces." You don't do this by building over them. Air pollution ruins lives. The council/airport shouldn't pay public money to developers and consultants to build on parks and shorten people's lives with pollution, putting a huge strain on the NHS. They should demand more cash from the airport they own to be spent on public services like health. The airport has grown from 9m to 14m passengers in 5 years, bringing 5 million more polluting vehicles to jam our roads, affecting our health. Residents complain of soot on their washing and in their houses, and wonder what this is doing to their health. Luton is UK's 7th most congested town, yet passenger numbers will grow to 18m. It must STOP. People are often late for work, affecting the local economy. The increase is self-defeating: people are frequently missing flights,

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		having their holidays ruined. There has been a relentless build-up of local parking problems, blocking roads to regular traffic and bus services. Pollution from UK traffic & planes kills 50,000 people each year. Children and older people are most vulnerable – many children already use inhalers. This affects the whole town: most of Luton sits in a valley where pollution collects on windless days. Luton's health figures are very poor. The Health Authority must work harder on prevention to reduce the problem. The Airport and council must reduce pollution. This park should remain good for health. The airport must work harder to cut pollution from planes. We must prevent tiny particles entering our lungs, so the airport should rapidly phase out diesel vehicles that visit the polluted airport, to protect vulnerable employees, and people in nearby areas, who breathe the fumes. A main focus should be to switch to electric / hybridvehicles. As in London, they should charge more for passengers or drop-offs who bring diesel vehicles to the airport. The council should do the same across the town. More reward for residents via Luton Council. The council is allowing unsustainable development of the airport, increasing pollution, congestion and reducing public green space. It can't keep growing. Every flight fuels climate change. For every extra million passengers, the airport should provide at least 2 million pounds to the council. £2 for each passenger is a tiny amount. A big proportion of this should be used to reduce climate gases and pollution, and support better health. 8) Security The southern part of Century Park fields is very close to the runway. This is bad not only for health, but also for SECURITY. Irresponsible people with drones and lasers and worse could be a threat to pilots. 9) Exhibition and consultation inadequate, flawed and 'controlled' This is a major development which should have been put before the whole town, but was grossly and deliberately under-publicised. It is claimed that invitations to the exhibition were delivered to 14,000 homes. Luton's population is 220,000. The tent at St George's Square didn't even have a nameboard to draw people in. Many people using the park, some of whom visit from other parts of the town, are still unaware of the proposals. The many who didn't hear about the exhibition, particularly users of the park, are angry that they weren't consulted. Stakeholder workshops – an intimidating and closely controlled experience The name 'New Century Park' is, unbelievably, being used to include not only this large area of fields, but also a large public park, Wigmore Valley Park, which does NOT have planning permission for any development, and is an important County Wildlife Site. This was not stated in the invitation to the stakeholder workshops in February. It was known that a tunnel beneath the airport was unaffordable. The invitation letter suggested a road across Wigmore Park to a new development at Century Park fields, which we were told at the workshops had recently been bought by the airport. Some attendees were left shocked and came away very angry at the scale, the manner of presentation, effrontery and injustice of the development proposal, which was presented as a fait accompli that had been agreed by 'those in power', and almost impossible to object to. Luton Council, the architect of this plan, had removed itself to a place where its officers and councillors have the

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		nom-de-plume of London Luton Airport Limited. At the exhibitions, both council officers and their consultants acted like bouncers or minders providing enough 'experts' to effectively dissuade public visitors from getting together and discussing the plans amongst themselves. FoE members were the soul of discretion, approaching visitors to hear their views, but attempts were made to discourage this by council officers and consultants – hardly democratic, open behaviour. An open council with open plans, acting as it should on behalf of residents, should have nothing to hide. Throughout the exhibitions it was obvious that the council did have something to hide, and wanted the emphasis presented by officials and by the exhibition boards to prevail. 10) The need for trees Luton is already one of the most densely populated urban environments in England, and is the 7th most congested. It needs all the mature trees and green spaces it can get, yet has destroyed many thousands in recent years, and any further loss must not be allowed to take place. Luton Council carried out an i-Tree survey in Wardown Park, which gave financial value to its trees, for their ability to absorb air pollution and capture carbon emissions. Because of its airport and extremely high volumes of traffic, causing peak-hour gridlock, Luton needs more trees than most towns, but has fewer. Yet the council has had the lack of foresight to remove completely the budget for tree-planting. This is a recipe for poorer health, putting greater strain on our health service, which is struggling to cope. And it is abjugating its responsibility for countering its extremely high greenhouse gas emissions. 11) Conflict of interests The vital role of the Director of Public Health appears to have been overruled by 'the development wing' of the council, which clearly has been given (or taken) far too much power, and overridden the role of council as public servant, now acting instead like a private corporation given to hiding facts from the public and using consultants to cover its intentions.
251.	Yes 26.2.18	I object to the above application on the grounds as follows: 1. The Luton Local Plan, adopted by LBC on 04/11/17, page 32 sect, d1, Access shall be designed to ensure that no use is made of Eaton Green Road to provide access to Century Park or Luton Airport. You can not vote to accept a Local Plan and then ignore any part you do not like. 2. Luton Borough Council own 99.99% of the shares of London Luton Airport. This application was proposed by LLA (owned by LBC), it is being presented to LBC (the owner of LLA) as the planning authority and will be judged by LBC (owner of the applicant). Do Luton BC think they will be judged as impartial in this matter. 3. Luton BC is loaning London Luton Airport (who they own) £300M. LLA already owe LBC more than their shares are worth. Have they even paid Luton BC the interest on any of the previous loans. This money is Luton ratepayers money, the council is

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		treating our money as Monopoly money, and treating the ratepayers with contempt. They should not forget it is us ratepayers who employ them, and they are not giving value for money. 4. Digging up parts of the old Eaton Green Road rubbish tip to site this development is a bad idea, it contains explosive materials from WW2, from all the various manufacturers in this area, who were involved in armaments, as well as unknown pollutants that were deposited there over the years, some of which are carcinagenants [sic], A company drilling test bore holes stopped working because of the dangers they found and advised Luton BC not to allow work on this site until full site testing has been undertaken. Luton BC has ignored this advice. 5. Air pollution in this area is already well known, you only need walk in the area and jet propellant fumes envelop you, drifting over from the airport. Century Park would only increase air pollution and with NHDC proposed housing development sites to the East of Luton, the pollutants from vehicles would increase air pollution. Neither LBC, London Luton Airport or NHDC are running monitoring of pollutants in the area. There is especially no monitoring of Lead, Benzene, Carbon Monoxide, Non-Methane Volatile Organic Compounds (NMVOC), Ammonia, Methane, Sulphur Dioxide and Nitrogen Dioxides, this is from the Councils own annual air status reports. I strongly believe if this development had been proposed to be sited further over to the East on the fields near the runway end, where there would be no need to disturb the tip, and the flora and fauna on this site would not be affected, they would have less arguments against the development. As it stands I am strongly opposed to the development and because of the above reasons believe this Council to be guilty of maladministration. I will be sending a copy of this email to the relevant Secretaries of State, for further investigation.
252.	Neutral 26.2.18	On behalf of TUI Group, please find representations attached in relation to recent applications made for the New Century Business Park (NCBP) and New Century Park Access Road (CPAR) located to the east of Luton Airport.
253.	Yes 26.2.18	REPEAT OF REP 167
254.	Yes	REPEAT OF ANONYMOUS REP 3 (SERIES OF 7 EMAILS, BUT ONLY SECTIONS ON AQ AND LAW)

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	26.2.18	
255.	YES 26.2.18	REPEAT OF REP 167
256.	Yes 26.2.18	Having attended exhibitions on this subject, and read as much as I can about it I would make you aware of some objections I have to this scheme. 1. Having made it clear in the Luton Local Plan last year that no access would be permitted for Century Park onto Wigmore Lane or Eaton Green Road I see that the junction area of these two roads has become a focus for access into the site. This surely cannot be possible as you have an adopted Local Plan. Also the junction now proposed is extremely busy with traffic by-passing the town and accessing Asda and the local shopping hub nearby. Especially at times before and after school the next mini-roundabout on Wigmore Lane beyond Asdas, (that with Twyford Drive), becomes clogged with vehicles, sometimes as far back as Someries Primary School. To add to this present congestion all the proposed extra traffic accessing the 7,000 or so workplaces on Century Park and also the proposed extra traffic from the new housing development to the east of Luton on North Herts land agreed to by your Council, will put a considerable extra burden on the area, and attract people to seek new rat runs towards the airport, Century Park and ultimately the M.1.. The extra pollution added by queuing traffic added to the extra flights already proposed for the airport will add to journey times for all and to the health and safety dangers of local residents. 2. The development of Century Park removes the present play facilities for young people in Wigmore Park and relocates them further from the houses from which the youngsters come, perhaps for some beyond reasonable walking distances and puts the Business Park between Wigmore and the play area. There is no suggestion that there will be toilet facilities accessible at all times for families visiting the park, as presumably as with all pavilions this will be securely locked when organised sport is not being played, if this facility is restored after the redevelopment. The disturbing of the remnants of the old town tip and ordnance dump may well have further health concerns for which I see no risk analysis or assessment. How are the potential problems from the methane produced by rotting going to be dealt with with housing and businesses and sporting activities all in the nearby area. Is this not endangering peoples health or even lives? How might this disturbance affect the seepage of chemicals into the local aquifers? 3. I am not clear on whether the Council and Airport Management have full powers to change the Local Plan without a full public review procedure, to redistribute land use, commit large amounts of Public money before schemes have been agreed, to make

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		loans and agreements with organisations where serious fraud investigations are already under way, and to possibly pay off Sport England in order to remove the need to provide sporting facilities in this area. This all seems to be against what members of the public would be expected to do in their own lives and financial dealings.
257.	Yes 26.2.18	I would like to draw your attention to the case of Muir v Wandsworth Borough Council [2017] EWHC 1947 (Admin) (28 July 2017) – which provided guidance to local authorities on the scope of the restrictions that apply to disposals of open spaces. The ruling has implications for local authorities considering the disposal of land owned by them in order to generate income. They need to ensure that their actions are compliant with legislation that seeks to ensure that open spaces are kept available for public use and local authorities should be aware that disposals of such land may be held unlawful if the effect is to exclude the public from those areas. In January 2015, the Wandsworth Borough Council ("the Council") decided to invite expressions of interest for a lease of 10 or 15 years in respect of premises situated on Wandsworth Common. This could equally be changed to "In January 2018, the Luton Borough Council decided to grant a lease to London Luton Airport Limited in respect of premises situated on Wigmore Valley Park, which was an area of common land given to the public 40 years ago." Three pieces of legislation were relevant to the Wandsworth Council's decision: 1. Section 10 of the Open Spaces Act 1906 (the 1906 Act) – this provides that a local authority that has acquired control over any open space to which the 1906 Act applies shall, subject to certain conditions, hold and administer the open space in trust to allow the enjoyment of it by the public as an open space and for no other purpose. 2. Section 123 of the Local Government Act 1972 (the 1972 Act) – this provides that a council may dispose of land held by it in any manner it wishes subject to certain conditions including that it should not be disposed of for less than the best price that can reasonably be obtained in the market and that the council must advertise its intention in a local newspaper. 3. The Greater London Parks and Open Spaces Order 1967 (the 1967 Order) – Article 7 empowers local authorities to provide facilities for public recreation in any open space in greater London. Article 11 sets out provisions in relation to the exercise of those powers, including that the powers cannot be exercised in such a way that members of the public are by reason only of the

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		exercise of those powers, unable to obtain access without charge to some part of the open space. Wandsworth Council was aware that the grant of a lease in these circumstances would amount to a disposal of open space and so complied with the requirement to advertise under section 123 of the 1972 Act. The Council received various expressions of interest, one of which was from the claimant, who proposed an educational and recreational facility for use by local maintained schools. The claimant's application was rejected on the grounds that it did not provide sufficiently detailed information. The Council's principal valuer recommended that the lease be granted to a limited company (the Company), who intended to operate a private nursery at the premises for up to 62 school children aged two to five years. The claimant applied for judicial review against the Council's decision, on the grounds that the Council did not have the power to grant the lease to the Company for the provision of childcare at a nursery which had exclusive use of the premises and could therefore restrict entry to members of the public (Ground 1) and that the Council's principal valuer had acted unlawfully in deciding to grant the lease to the Company because he did not have authority to do so under the Council's constitution (Ground 2). Likewise, the argument would apply equally that Luton Council do not have the power to grant the lease to London Luton Airport Limited for the provision of industrial units within an industrial enterprise zone which will have exclusive use of the premises which would restrict entry to members of the public (Ground1) and that the Council's principal valuer has acted unlawfully in deciding to grant the lease to the Company because he does not have authority to do so under the Council's constitution (Ground2). The Descision for the Wandsworth Case: The Court rejected Ground 2 but upheld Ground 1, holding that the disposal was contrary to the statutory trust arising under section 10 of the 1906 Act pursuant to which the common is held on trust for the use and enjoyment of all local inhabitants and it was not a lawful exercise of the council's power under the 1967 Order. It was held that the obligation under section 10 of the 1906 Act applies equally to buildings in the open space. Local authorities will therefore need to ensure that care is taken not to prevent public use of such buildings for a significant period of time. The decision to let the premises to a private company to operate a fee paying nursery would deny members of the public a right

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		of access to the premises and would not provide them with any facilities. Facilities would only be provided for the cohort of children enrolled in the nursery and not for children generally. If local authorities are considering letting any such premises to private companies, then they will need to consider whether the services provided by any such company can be said to be for the benefit of the public as a whole, rather than just a specific group of people. This decision does not prevent local authorities from allowing private companies to step into its shoes and provide facilities for the use of clubs, services or organisations and make a charge for those services. However, this must be distinguished from the circumstances of the present case in which the Council was allowing the Company to make an entirely different use of the premises and create a new charge for its use. Grounds for Objection to the Plans for New Century Park and development of new roads upon Wigmore Valley Public Park are supported by the ruling of this case. I therefore object to this application on the grounds that the local authority, Luton in this case, is considering disposing of open space land and that the disposal is contrary to the statutory trust arising under section 10 of the 1906 Act pursuant to which the common is held on trust for the use and enjoyment of all local inhabitants and it was not a lawful exercise of the council's power under the 1967 Order – since the name of the Airport is LONDON Luton Airport. Also Section 10 of the Open Spaces Act 1906 (the 1906 Act) – provides that a local authority that has acquired control over any open space to which the 1906 Act applies shall, subject to certain conditions, hold and administer the open space in trust to allow the enjoyment of it by the public as an open space and for no other purpose. Section 123 of the Local Government Act 1972 (the 1972 Act) – this provides that a council may dispose of land held by it in any manner it wishes subject to certain conditions including that it should not be disposed of for less than the best price that can reasonably be obtained in the market and that the council must advertise its intention in a local newspaper. Wigmore Valley Park land has not been disposed of and it is only being leased to the London Luton Airport Company Limited. Under Case Law as upheld, the obligation under section 10 of the 1906 Act applies equally to buildings in this open space. The local authority will therefore need to ensure that care is taken not to prevent public use of such buildings for a significant period of time, however since this is not possible for an Airport Enterprise Zone and Private Industrial Units for rent, we believe this

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		disposal to be unlawful. https://www.hughjames.com/news/comment/2017/09/councils-decision-lease-open-space-land-limited-company-private-use-held-unlawful/#.Wn8jI3ynzIU Council's decision to lease open space land to a limited company for private use was held to be unlawful 5 Sep 2017 | Comment In times of increasing cuts to public funding, alternative methods of raising funds to provide services to local inhabitants are being considered by local authorities. Some local authorities may be considering disposing of land or premises owned by them in order to generate income. However, local authorities considering taking such steps need to ensure that their actions are compliant with legislation that seeks to ensure that open spaces are kept available for public use and local authorities should be aware that disposals of such land may be held unlawful if the effect is to exclude the public from those areas. The case of Muir v Wandsworth Borough Council [2017] EWHC 1947 (Admin) (28 July 2017) provided guidance to local authorities on the scope of the restrictions that apply to disposals of open spaces. The background In January 2015, the Wandsworth Borough Council ("the Council") decided to invite expressions of interest for a lease of 10 or 15 years in respect of premises situated on Wandsworth Common. Three pieces of legislation were relevant to the Council's decision: 1. Section 10 of the Open Spaces Act 1906 (the 1906 Act) – this provides that a local authority that has acquired control over any open space to which the 1906 Act applies shall, subject to certain conditions, hold and administer the open space in trust to allow the enjoyment of it by the public as an open space and for no other purpose. 2. Section 123 of the Local Government Act 1972 (the 1972 Act) – this provides that a council may dispose of land held by it in any manner it wishes subject to certain conditions including that it should not be disposed of for less than the best price that can reasonably be obtained in the market and that the council must advertise its intention in a local newspaper.

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		3. The Greater London Parks and Open Spaces Order 1967 (the 1967 Order) – Article 7 empowers local authorities to provide facilities for public recreation in any open space in greater London. Article 11 sets out provisions in relation to the exercise of those powers, including that the powers cannot be exercised in such a way that members of the public are by reason only of the exercise of those powers, unable to obtain access without charge to some part of the open space. The Council was aware that the grant of a lease in these circumstances would amount to a disposal of open space and so complied with the requirement to advertise under section 123 of the 1972 Act. The Council received various expressions of interest, one of which was from the claimant, who proposed an educational and recreational facility for use by local maintained schools. The claimant's application was rejected on the grounds that it did not provide sufficiently detailed information. The Council's principal valuer recommended that the lease be granted to a limited company (the Company), who intended to operate a private nursery at the premises for up to 62 school children aged two to five years. The claimant applied for judicial review against the Council's decision, on the grounds that the Council did not have the power to grant the lease to the Company for the provision of childcare at a nursery which had exclusive use of the premises and could therefore restrict entry to members of the public (Ground 1) and that the Council's principal valuer had acted unlawfully in deciding to grant the lease to the Company because he did not have authority to do so under the Council's constitution (Ground 2). The decision The Court rejected Ground 2 but upheld Ground 1, holding that the disposal was contrary to the statutory trust arising under section 10 of the 1906 Act pursuant to which the common is held on trust for the use and enjoyment of all local inhabitants and it was not a lawful exercise of the council's power under the 1967 Order. It was held that the obligation under section 10 of the 1906 Act applies equally to buildings in the open space. Local authorities will therefore need to ensure that care is taken not to prevent public use of such buildings for a significant period of time. The decision to let the premises to a private company to operate a fee paying nursery would deny members of the public a right of access to the premises and would not provide them with any facilities. Facilities would only be provided for the cohort of children enrolled in the nursery and not for children generally. If local authorities are considering letting any such premises to private companies, then they will need to consider whether the services provided by any such company can be said to be for the

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		benefit of the public as a whole, rather than just a specific group of people. This decision does not prevent local authorities from allowing private companies to step into its shoes and provide facilities for the use of clubs, services or organisations and make a charge for those services. However, this must be distinguished from the circumstances of the present case in which the Council was allowing the Company to make an entirely different use of the premises and create a new charge for its use. Local authorities who are considering disposing of open space land may wish to seek advice on the impact of this decision on their proposed plans. If you would like to discuss this, please contact a member of the Property Dispute Resolution team who will be happy to give you advice on your specific circumstances.
258.	Yes 26.2.18	REPEAT OF REP 128 … 11-There is also the archaeological aspect regarding the Roman settlement site, Second World War commandment post and Someries Castle which this development would have a great impact on.
259.	Yes 26.2.18	I totally disagree with the plans for development on Wigmore Valley Park!... 1: Building on county wildlife area 2: Closure of Frank Leicester Way 3: Shortage of green space in Luton 4: Possible contamination of ground water from landfill site 5: Increase in pollution 6: New park area too far away for many people to walk 7: Look horrendous!
260.	Yes 26.2.18	REPEAT OF ANONYMOUS REP 3(SERIES OF 7 EMAILS, BUT ONLY AQ)
261.	Yes 26.2.18	REPEAT OF ANONYMOUS REP 3(SERIES OF 7 EMAILS, BUT ONLY AQ)
262.	Yes 26.2.18	REPEAT OF ANONYMOUS REP 3(SERIES OF 7 EMAILS)

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263.	Yes 26.2.18	REPEAT OF REP 128 … 9-DRAINAGE IN THE WHOLE OF THE STOPSLEY/WIGMORE AREA IS POOR, THE SEWERS CANNOT COPE WITH HIGH LOAD PERIODS AS IT IS, THEY WILL NOT COPE WITH ANY EXTRA LOAD AND THERE WILL BE MORE FREQUENT OCCURENCES OF FLASH FLOODING.
264.	Yes 26.2.18	We object to the application as the roads cant handle the extra traffic the development will create the air pollution in the wigmore area is bad now with out adding to it you often smell 107ondon107r fule in the air the park will be a big loss to the community no more pollution please
265.	Yes 26.2.18	There are limited amounts of open space and parks already in the area. Children need this park and outdoor space! Traffic around the area is already very congested. The airport already cannot cope with the traffic and current 107ondon107ructure. A business park will only add to this pressure.
266.	Yes 26.2.18	After careful consideration and speaking with representatives at the public exhibition evening 31st January 2018. I wish to strongly object to planning application 17/02300/EIA, REPEAT OF REP 58 (AND REP 11)
267.	Yes 26.2.18	I would like to object to the above plans for development.
268.	Yes 26.2.18	REPEAT OF REP 167
269.	Yes 26.2.18	REPEAT OF REP 167
270.	Yes 26.2.18	REPEAT OF REP 167
271.	Yes 26.2.18	REPEAT OF REP 167

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272.	Yes 26.2.18	REPEAT OF REP 167
273.	Yes 26.2.18	The Wigmore Valley park was provided to the people for recreational values and it has flourished and developed into a beautiful and valued landscaped area providing much space needed for the local people and visitors to enjoy since the 1980's, it will only be replaced with an access area to Century Park Fields, so why cant it be left so families and visitors can come and enjoy the wildlife and maybe use the area to exercise and bring mental balance to some. The trees provide much needed barrier to noise pollution and provide better air quality, which will only be lost if you remove the trees. Bringing in more roads to the area, will only provide more gridlock and the expansion of the airport will expand on the gridlock effects brought around the Luton area with more buildings and developments expanding all the time it will increase noise and pollution and cause the surrounding roads to be rat runs away from the traffic congestion. I believe a housing development was refused planning permission as it didn't have mitigation for pollution, well taking away WVP (Wigmore Valley Park) will only add to the pollution in the area. The area that has been ear marked to replace WVP will not be as convenient to use as it's further away and taking agricultural land away to provide the new park will be a net loss of green space, and the said land is of over worked quality and to bring it up to a quality of what we have now might take years and we will loose the wildlife and even the wildlife is in decline, so shouldn't we be trying to improve the quality and try improve the wildlife habitat to increase wildlife in the area. I am seriously concerned about the irreversible contamination of the groundwater and drinking supply because of the disturbance of the landfill site, explosive gases could be released and the hazardous waste that has been dumped there could also has a serious effect on the area. Have all the tests performed on the previous landfill site come back to a satisfactory level of safety? Is that something the Government is willing to admit without any uncertainty that is safe? Will building on landfill sites cause subsidence where buildings and roads can crack and sink & require even more government funds to fix them at a later date? I would like you to consider my points and refuse the future planning and development of the Wigmore Valley Park area
274.	Yes	I emailed some time ago to put my objections in regrading Wigmore Park's development into Century Park. You emailed back to say you would not accept the objections without an address so I am emailing them again.

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	26.2.18	I am extremely concerned about the fact that you will be building on an old landfill. When I rose this objection at the open event you held I felt the answer was very lame. This land fill site had very little toxic waste in it. I do not believe this to be so as everything and anything was thrown into old landfill sites. As a resident I am very worried about what toxins will be released into the environment. Also as a resident I am concerned about the traffic this development will generate. Some mornings the traffic is backed up to the roundabout at Wigmore Lane where the TUI building is. More traffic will make the journey down Eaton Green Road even worse than it is now. I do not see how the new access road will make much difference as the traffic will still have to enter Eaton Green Road at some point.
275.	Yes 26.2.18	REPEAT OF REP 128 Note corruption elements left out and the additional drainage issue re Stopsley/Wigmore raised as per OBJ 217
276.	Yes 26.2.18	We write to strongly oppose the above planning application for the following reasons. Wigmore Valley Park We opposed to any development on the park. Morally it belongs to the public and is an essential Community Asset enjoyed equally by local residents and visitors to the area. It is a public open space and should remain so. The Consultation Statement Part 1 para 2-8 – 2.10 refers to the pre-application announcement to media and interested parties in early 2017 and that the applicant acquired the site in 2015 (para 1.10). It leads us to conclude that Luton Borough Council (LBC) being the major stakeholder and owning 100% of LLAL had full knowledge of the intention to develop on the park and would knowingly breach it's own Luton Local Plan making a mockery of local democracy. The Transport Assessment Part 1 prepared for LBC illustrates the location and scale of the New Century Park site. The figures 1.1, 3.1 & 3.2 show what little regard LBC give to Wigmore Valley Park. It appears that the whole area including the old and proposed new park is incorporated into Century Park. We have no confidence that this application will be dealt with objectively and seek assurances that any replacement green areas and park do not form part of ~~P~~Phase 4 or beyond this proposed

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		development. The LLAL Vision for Sustainable Growth 2020-2050 states that We will work tirelessly to keep you informed. We will share proposals as they develop, and will make sure everyone has an opportunity to feed into the process. We believe that the community has not been treated as equally or fairly and that the opportunity to identify Wigmore Valley Park as an area of great importance and afford it some protection has been purposely denied to us. At the very least It should have been a matter for public debate prior to any plans to build on it. Wigmore Valley Park provides an important wildlife habitat for a variety of species and is rightly recognised as a Country Wildlife Site (CWS). The park in its entirety caters for the leisure and educational interests of both children and adults both residents and visitors. It was sympathetically planned and reflective of the communities needs both then and now. It serves as a barrier area to help reduce air and noise pollution from the Airport, helps to improve air quality as well as a good example of what can be achieved with former landfill sites. The proposal is too close to the CWS and this development will result in the loss of wildlife, wildlife corridors and important biodiversity. There will be a substantial loss of mature trees which cannot be replaced because of the siting of the new park in such close proximity to the runway and the danger of bird strike as mentioned in several consultation documents. Wigmore Valley Park is a much valued landscape and has great amenity value. The development does not conserve, protect or enhance the natural and local environment nor does it minimise pollution and other adverse effects in accordance with the National Planning Policy Framework 2012 (NPPF) Chapter 11. Building on the park will also increase the noise levels and pollutants locally and this important buffer zone to the airports negative aspects will be lost and given the determination to increase airport numbers in addition to this development the park is crucial to our health and well being and should remain untouched. The proposed development is entirely contrary to the recently adopted Luton Local Plan 2011 – 2031 November 2017 (LLP) and the local plan policies map which clearly shows no development on the park. Replacement Park The National Planning Policy Framework (NPPF) 2012 Section 8 para 73-77 emphasizes the importance of high quality open

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		spaces for the health and well being of communities and that assessments should identify specific needs for the local area and that any resulting loss will be the equivalent or better in terms of quantity and quality in a suitable location. The suggested siting of the park is to close to the runway increasing the serious health risks associated with noise and air pollution. It will not be a nice or pleasant place to visit and experience. The proposed replacement New Country Park (17/00405/EIASCP Scoping Letter 19.4.17) is vastly inferior and doesn't meet the essential criteria listed by Natural England for a Country Park. It does not make provision for all members of the community, it is situated to far away from residents, is not central to the community and it will be inaccessible to some members of society who will not reasonably be able to access it on foot. The likelihood is that it will encourage people to use cars to reach the area or to not to use it at all and contrary to LLP31 part B (Sustainable Travel). There is no provision of a sporting nature for instance and there would have been an opportunity for reconciliation of the football pitches but instead the area will be lost. We can only presume that this is due to the size of the new proposed park and that the green space is therefore smaller than the existing park. The replacement new park will be devoid of wildlife and the biodiversity that currently exists will be lost. Treated farmland will not support similar biodiversity and an old field of little wildlife value and devoid of interest is not a substitution and most definitely not an improvement on vibrant fully fledged parkland. It will effectively leave large parts of the community with little or no interest in the area. It will be subject to pesticides being used on neighbouring agricultural land, will be unappealing visually and will take another forty years to reach maturity. The needs of the community have not been assessed accurately nor the specific needs identified. The proposed new park does not comply with the open space policy LLP27 B (I). Eaton Green Road and Traffic We note that the plan includes access to the proposed development via Eaton Green Road which is contrary to the LLP4 Section D (ii) (Spacial Strategy) which quite clearly states that no use of Eaton Green Road is to be made of with the exception of public transport, cyclists, pedestrians and emergency services. We do not consider the massive generation of construction traffic including huge articulated vehicles to fit this criteria. To propose access here is extremely ill conceived. It will place an overwhelming strain on an already congested area and will create dangerous new rat runs as local traffic tries to avoid a grid locked area. It is already a busy civic centre and employment area and this scheme will also draw traffic towards residential areas creating a substantial danger to health and safety increasing toxic pollutants, noise levels and causing significant adverse impacts on the quality of life. We are very concerned that the

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		proposed route through to the development will effectively make the whole area unsafe and unusable for pedestrians and will result in the community being unable to reach essential amenities. To propose closure of Percival Way to through traffic and Frank Lester Way is, in addition also ill conceived and will further compound the problem. The Traffic Assessment is inadequate and does not give enough weight to the cumulative negative effects of other major developments in the area on a similar timescale nor that of the substantial growth in passenger numbers at the airport. Development Why does the application require a dual carriageway for simply access to offices as this is most certainly over development and we believe that the truthful reason for a major road of this size should be properly revealed before giving any outline planning consent. It is also our concern that the road originally sited to close to a children's playground will also resurface were consent to be given. The Consultation Statement states that it will deliver 7,200 jobs to the enterprise zone with over 4,000 jobs for local people this is in addition to the increase in passenger numbers. Where will all these people live and where will they all park their cars? There is woefully insufficient parking allocated within the application. There should be provision for a multi-storey car park sited away from the CWS not one level areas eating up valuable green space. The Landfill Tip We are extremely worried about the dangers of disturbing and building on top of the landfill site for both the risk of contaminating the groundwater and leaching chemicals into the local drinking supply and releasing dangerous ground gases. There does not seem to be any accurate records existing that show precisely what materials and hazardous waste was dumped on this site. The Contamination Quantitative Risk Assessment para 7.2 acknowledges that data for the landfill is currently limited and does not meet the requirements of guidance. And para 7.4.1 (Ground Gas Risk Assessment Methodology) The current monitoring does not meet the requirements within CIRIA C665 so is not sufficient to inform the design of the ground gas protection measures. Further long term monitoring is proposed at the site which will provide the required detailed gas data.

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		The assessment has identified that the tip contains a significant component of industrial waste, a number of alarming potential leakages and the possibility to inhale dangerous vapours causing both the residents and anyone working on the development to be exposed to airborne chemicals. This is an unacceptable risk in a residential area and to anyone working on site. The entire content of the landfill should be identified before any excavation, movement or disturbance takes place. The dangers and hazardous materials have not been accurately measured and established and the potential harm cannot therefore be predicted. The application cannot comply with the NPPF para 109. Climate and Pollution LLAL is major contributor to climate change and pollution and it has a responsibility to mitigate these effects both to it's neighbours and the wider population. The local community suffers on a daily basis with the negative health effects of both traffic and airport pollution. The airport is ahead of schedule in increasing airport capacity and drawing yet more traffic, building lorry parks and encouraging more HGV's to travel to the area at all times of the day and night will further pollute the environment and contrary to LLP33 (Freight). This proposal is wholly airport related and does not include a strategy to reduce these adverse effects and is contrary to NPPF Chapter 10 (Meeting the Challenge of Climate Change). The LLAL Vision for Sustainable Growth 2020-2050 states: Ahead of any future expansion work, we will develop a comprehensive strategy to reduce where possible carbon emissions associated with additional construction and operation of LTN. Demolishing existing buildings and building an unwarranted dual carriageway through a park is not meeting this challenge and the application shows no attempt to mitigate any of the negative impacts on heath. Perversely it is actively contributing. Conclusion This application is an inappropriate development in an inappropriate place on an area identified as a County Wildlife Site and Area of Local Landscape Value. Wigmore Valley Park is a Community and Visual Asset that should remain so. The proposal is

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Ref.	Objection	Comments
		contrary to LLP29 and LLP6 part E and does not protect, conserve or enhance the character, setting and natural beauty of a local landscape nor maintain the quality of open space and landscape and so this development should not be supported. The NPPF Chapter 1 para 22 states that Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. To retain a site for over twenty years with no prospect of the development being realised unless you turn a residential area upside down is not inline with this policy. We do not believe that there is a need for further development of this nature with both office and commercial space still available elsewhere in the town and that brownfield sites should be more frequently utilised. The surrounding infrastructure will not be adequate to support the proposal and it is therefore not sustainable. We therefore respectfully request the application be refused.
277.	Yes 27.2.18	REPEAT OF REP 128
278.	Yes 27.2.18	27 page objection. These can be summarised as follows: 1. Raises issue of link with LLAFreehold Ltd Park First and disqualified director 2. Involvement of Capita, then equating it with another separate company. 3. Issue on Local Plan compliance (LLP6) and the RSS. 4. Issue on LBC lending £300M to LLAL with no guarantee of return. 5. Issues of UXOs and the unknown contents of the tip 6. Lack of monitoring of AQ and issues of pollutants 7. Rigged and biased planning application due to ownership of LLAOL (judge and jury) 8. Issue of sale of public land
279.	Yes 27.2.18	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
280.	Yes 27.2.18	I wish to object to planning 17/02300/EIA. We need our park as a protection from all the air pollution that is caused by the aircraft , our air quality is bad and the removing of any green space trees will have a very bad effect on us who live very near the airport , Also the traffic around our roads is at a standstill at rush hour and at the weekends going into Asda the traffic is queing . We cannot tolerate any additional traffic on these roads
281.	Yes 27.2.18	REPEAT OF REP 167
282.	Yes 27.2.18	REPEAT OF REP 128
283.	Yes 27.2.18	I wish to place my strong objections to the proposed development of Wigmore Valley Park. Although, not a Luton resident, having moved for work purposes, I spent much time there with my family visiting the park and I see the great benefits for families, children and single people. I wish to object for the following reasons:- 1. This excellent green space was provided for the large area of housing nearby and its use is of essential benefit to the physical and mental health of those living in the great number of closely-developed houses nearby and it is in walking distance for a great number of people. 2. Luton is very heavily developed with closely packed buildings and certainly lacks the green spaces which provide for the government's much- promoted need for healthy exercising for all ages as well as Wigmore Valley Park providing a much-needed environment for the development of children's awareness of nature. As a teacher, I have seen how the use of such an environment affects the children's understanding of issues of climate change. Its loss will affect future generations and the attitude which they have to caring for the earth. 3. The park is in an area of much pollution, being near the airport and the replacement of the bushes and trees by concreting over this most valuable of ecological areas would be a total scandal in the light of the effect on people's health, well-being and the important variety/benefits of the wild life of the area. It is also against the LLAL vision 2020-2050 mandate of "developing the landscape and ecology strategies which seek to conserve?.enhance the landscape and biodiversity within Luton Airport and on nearby sites" The LLAL Vision 2020-50 acknowledges that .." we recognise that Luton Airport has a significant influence over factors that contribute to it" (climate change) so such a massive reduction of pollution- absorbents in the immediate area would

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Ref.	Objection	Comments
		be totally again the LLAL vision which would become merely words on a page with no impact. 4. By the nature of its position, the area near the airport is already subjected to the heaviest of traffic and every effort should be made to maintain any existing environment which helps to absorb the pollution and to minimize the use of cars in the area. 5. The main attraction of Wigmore is that it is in walking distance of a densely populated area and the suggested replacement park would be at a greater distance, likely adding to increased use of cars and consequent pollution. As it would take extensive time to develop into biodiverse area of Wigmore Valley Park, there would be a great gap with no protection from the pollution of noise and air with the consequence that local inhabitants and those working in the area would be deprived of the advantages of this most valuable site. 6. The history of the site is one of landfill with its concomitant problems of likely contamination once the ground is disturbed by the mechanics of development. Any contamination would have a devastating effect on residents over a great distance. 7. Because this is an outline planning application, there is always the possibility of extended development and further destruction of the environment in future. For the reasons cited above, I feel that under no circumstances should this most valuable of ecological and leisure sites be destroyed and urge that this is preserved for present and future generations; thus planning application be refused.
284.	Yes 27.2.18	REPEAT OF ANONYMOUS REP 3(EXTRACT FROM SERIES OF 7 EMAILS BUT ONLY IN RELATION TO RSS AND LAW [LLP6 EATON GREEN ROAD])
285.	Yes 27.2.18	REPEAT OF REP 58 (AND REP 11)
286.	Yes 27.2.18	REPEAT OF REP 58
287.	Yes 27.2.18	REPEAT OF REP 167

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Ref.	Objection	Comments
288.	Yes 27.2.18	REPEAT OF REP 167
289.	Yes 27.2.18	REPEAT OF REP 167
290.	Yes 27.2.18	It is with great regret that I have write to you as Councillor for the Wigmore Ward regarding the proposed new access road to Century Park opposite Keeble Close. This will mean that there will be 2 junctions very close to each other causing an already very busy road to have even more traffic jams. Thus, making the journey from the A505 and surrounding areas a good 30 minutes to the M1 and that is on a good day. Any incidents on the M! doesn't bear thinking about. Residents and Councillors alike are already very concerned about the traffic having to be endured along Wigmore Lane, Eaton Green Road and Crawley Green Road. We have 5 Schools in close proximity to these roads which are already creating traffic jams, pollution and concerns for children and adults with heart and lung conditions are being raised constantly. With the Airports massive expansion, I feel that Wigmore residents are getting a very rough deal, that also includes massive parking issues caused by inconsiderate development and lack of parking spaces, on the Expansion Plans, for employees of Century Park as with other businesses in the immediate area.
291.	Yes 27.2.18	REPEAT OF ANONYMOUS REP 3 (SERIES OF 7 EMAILS)
292.	Yes 27.2.18	I object to the above planning application for the following reasons: No considered consultation with residents has been made. No explanation as t why we have no choice in the decision has been given. No explanation as to how we can possibly travel anywhere including how we get to work whilst this extensive work continues. How we are supposed to cope with the vastly increased noise, pollution and traffic. Where we are all supposed to walk our dogs now, the proposal offers a totally inadequate and insensitive solution. No consideration has been given to the loss in equity for hardworking homeowners who will not now be able to sell their homes at market rates.

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Ref.	Objection	Comments
		REPEAT OF REP 167 I ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a valuable Community Asset which does not comply with key relevant Local Plan policies. I am utterly devastated at the council's lack of communication and consideration for this community and the severe stress this will cause for residents.
293.	Yes 27.2.18	I object to Wigmore park being built on, the area as it is provides a balance between adjoining industrial areas and open spaces, any less than there is is now will ruin the area in so many ways! The park serves a huge area of homes where people can walk their dogs and let their children enjoy the open space. If anything I think the park needs more social areas ie basketball courts and such things that will encourage social interaction between people who would otherwise never interact. The wildlife that has established in the park is amazing and should be preserved not destroyed. The park serves as an excellent defence against the pollution of the airport and landfill, building will only bring the pollution closer to people's homes. I am very concerned about the old landfill site near the tidy tip being disturbed and what poison might be released when this happens. The roads around the park cannot cope with any more traffic than it does now, building will mean more traffic on the surrounding roads.
294.	Yes 27.2.18	I am objecting because of my concerns about the loss of a valuable green space and wildlife habitat, and about the wider environmental impacts of the proposed development, which are set out in detail in many of the comments submitted by local people. In particular, the climate change impacts of the development have not been properly considered.
295.	Yes 27.2.18	REPEAT OF REP 167
296.	Yes	I have moved back into this area after being in Ireland for 15years, I love Luton and consider us all as being lucky to have such beautiful areas to walk, with friends family and /or our dogs. As most of us lead high stressful jobs or live with difficult personal

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	27.2.18	issues or challenged health matters it is essential we have the local countryside areas to walk. As a regular walker I. The Wigmore Park area, I have great pride in the place as a local resident. I see regular people walking in the park whom I have exchanged conversations with, I am moved by the amount of people who rely on their walks for many reasons, coping with illness/disability, emotional strains and recovery of various types or just distressing!, please can we consider and keep this area as the precious place it is and an essential area for so many people in so many ways.
297.	Yes 27.2.18	REPEAT OF REP 58 (AND REP 11)
298.	Yes 27.2.18	REPEAT OF REP 167
299.	Yes 27.2.18	REPEAT OF REP 167
300.	Yes 27.2.18	REPEAT OF REP 167
301.	Yes 27.2.18	REPEAT OF REP 167
302.	Yes 27.2.18	REPEAT OF REP 167
303.	Yes 27.2.18	I strongly object to this development application on many grounds. I fully agree with the arguments put forward in more detail within ANONYMOUS REPRESENTATION 3. In addition even this far away from the Airport, we often have the strong smell of Kerosene, as if we were on the tarmac with the planes. As well as the exhaust dirt on our window ledges and fruit growing in the garden. Downwind pollution measurements should be carried out before any further expansion, Then add to this the opening up of an old rubbish tip, with the release of chemicals into the air, blowing from the south west across the Wigmore housing estate, you have a recipe not only for lung disease but also other linked health ailments for the existing local population, Could prove expensive if not handled responsibly,

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Ref.	Objection	Comments
		and the appropriate Health and Safety risk assessments are not evidenced. Total disregard for the local voting constituents, whom you should be representing. REPEAT OF REP 128
304.	Yes 27.2.18	I would like to oppose the development of Wigmore Park. I feel that more buildings will cause more traffic and more people illegally parking on residential areas. The environment will be at risk to more pollution which is not good for us. Wildlife will be scares. Lighting from roads and buildings will effect our sleep, The development of the site is potentially hazardous to local residents with building on ex landfill sites and releasing of hazardous gases could cause discomfort to some of us and unexploded WW2 bombs potentially exploding. The park at the moment is a welcome sight to our bleary eyes from al the airport buildings and lighting. This would get much worse if you go ahead with development plans. I wholeheartedly oppose this development due to damage to the environment and pollution risks.
305.	Yes 27.2.18	REPEAT OF REP 167
306.	Yes 28.2.18	REPEAT OF REP 167 (bullet points reorganised)
307.	Yes 28.2.18	REPEAT OF REP 58 (AND REP 11) I'm strongly object to any part of the park & landfill being compromised for the reasons stated above & the potential dangers associated with it. I look forward to your acknowledgement upon receiving my objection.
308.	Yes 28.2.18	REPEAT OF REP 167

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Ref.	Objection	Comments
309.	Yes 28.2.18	REPEAT OF REP 167
310.	Yes 28.2.18	REPEAT OF REP 167
311.	Yes 28.2.18	REPEAT OF REP 167
312.	Yes 28.2.18	REPEAT OF REP 167
313.	Yes 28.2.18	REPEAT OF REP 167
314.	Yes 28.2.18	1. The application should be refused since it does not accord with Local Plan policy LLP6E on Wigmore Park which states "the quality of open space and landscaping will be maintained". LLP29: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas." Transfer to a private company without strict planning restrictions which prohibit development of the kind proposed is not in accordance with policy and therefore should not be granted. Offices, road and roundabout development is not going to conserve or enhance the character and landscape and therefore should be refused. 2. Wigmore Valley Park clearly has a valuable role to play for the local community, and was provided for the local residents as part of residential amenity. Providing and maintaining green space adjacent to urban areas is a key resource in the balance of local planning decisions, as well as promoting health and wellbeing as people walk and take exercise. Removing such an amenity is likely to have a negative impact on health and produce more burden on already overstretched health care provision. Its trees help to offset local pollution caused by surface traffic and aircraft, and it forms part of the natural heritage of the local area and should be undeveloped in accordance with the Local Plan. As a green area planted with trees it is an important wildlife habitat, and a buffer against pollution as well as being an important part of the landscape. The planning application is therefore contrary to LLP29 and should be refused. 3. Nearby Century Park Fields has had planning permission for 20 years and could be reached via a road within the airport boundary to join the point where the tunnel was planned. This would be a more sensible planning approach and avoid

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Ref.	Objection	Comments
		destruction of a green space valued by local people and visitors alike. This application should be refused since it is not in accordance with the new 20-year Luton Local Plan that there should be no access road to Wigmore Park from Eaton Green Road, so. There is a danger of creating new rat-runs with associated traffic, noise and nuisance in already congested roads. 4. A new dual carriageway could make traffic congestion in the entire south Luton area much worse, and so should be refused on transport planning grounds. 5. It is not clear why such a significant road would be required in any case and planning should not be granted in the face of a clearly part-complete picture. It is entirely possible, for example that this application is related to proposals for future airport-related development, and may involve swapping a park for car parks to make additional room on the airport site for aprons and terminals. This is not in accordance with the 2012 National Planning Policy Framework Section 10 (Meeting the Challenge of Climate Change) so this development should not be permitted. 6. The site has become a County Wildlife Site and Area of Local Landscape Value, with new diversity in plants and birds and hence is unsuitable as a location for large ground level car parks, offices, roads and roundabouts and so the application should be refused. 7. Mitigation by way of a replacement park further away from the communities which need and use Wigmore Park is unacceptable and inadequate, and would not provide equivalent amenity since it is currently simply fields. 8. Building on a landfill site could well result in pollution to the local water supplies and is not in any case appropriate where hazardous substances or unstable ground conditions may exist, therefore outline planning permission should not be granted. For all the reasons above, the application should be refused in order to safeguard a valuable community asset.
315.	Yes 28.2.18	In my opinion there is not enough open space in Luton, and especially not enough that is 'wild'. So there should be no development on Wigmore Valley Park. From the Local Plan map I got the impression that there would be no development of the park. Surely the four lane road could go round the perimeter of the park instead of straight across it. My mother, her dog, and I have visited the park hundreds of times. Please do not destroy it.
316.	Yes 28.2.18	The affects of such a new business park will be hugely detrimental to the well being of local residents and nature – not worth the money the companies overseeing this will make given what you would destroy. The council should be looking after its people and their needs. When the council should be making every effort to make Luton a better place to live, such a construction here will only add to the depressing state of the town. It is completely unnecessary and irresponsible to take this valuable green land. Use existing concreted / office areas – Luton has plenty empty of this but not enough of the green.

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Ref.	Objection	Comments
		Please leave this beautiful and special green space alone.
317.	Yes 28.2.18	REPEAT OF REP 167
318.		
319.	Yes 7.3.18	REPEAT OF REP 167
320.	Yes 7.3.18	1 The land was granted for the pleasure and benefit of the people not to facilitate a commercial enterprise 2 The blight inflicted on the area by excessive airport growths in this way is unacceptable 3 The lost green lung amenity is an environmental outrage
321.	Yes 7.3.18	I object to the development for the following reasons: 1. The Luton Playing field strategy 2014-2021 identifies deficiencies in every outdoor sport including 11 cricket pitches. At one time there was at least 6 pitches on the park. They have existed for at least 25 years and some did have drainage problems. The present one where the posts remain has no problem whatsoever. 2. The condition of the playing surfaces are irrelevant – it is the quality of the pitches which could be created on the new park which matters. 3. A discussion on this matter would have taken place at the consultation stage but a SERIOUS error. I attended the stakeholders meeting on the 21st February at Wigmore school. Maps of the new site were distributed. There were THREE FOOTBALL PITCHES CLEARLY SHOWN which later were designated as dog walking areas (I have copies) 4. The park was also a designated cross country site hosting National competitions. These cannot now take place because changing facilities will not exist. 5. The Local plan states that the new park should have facilities of at least equal quality. The loss of sports facilities suggest otherwise. While the Airport plans more major development in the future it is encumbent that Local residents who mainly suffer from the adverse effects should benefit most. This clearly is not happening. Upgrading existing facilities that were allowed to degenerate is a poor response. I have unsuccessfully championed the cause of replacing the Spectators building creating an Education and employment centre.

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Ref.	Objection	Comments
		All measures which would have benefitted all Lutonians.
322.	Yes 7.3.18	REPEAT OF REP 167
323.	Yes 7.3.18	REPEAT OF REP 167
324.	Yes 7.3.18	REPEAT OF REP 167
325.	Yes 7.3.18	There should be no development on Wigmore Valley Park. It was provided for people in Wigmore close to homes because it was needed, landscaped and planted with hundreds of trees. It has been enjoyed by parents, families and visitors since the 1980s, so is highly valued and crucial to our wellbeing. It must be left for future generations to enjoy. The area is a County Wildlife Site (CWS) and should be protected by your own planning policies. Luton is overdeveloped and green space is well below the town's needs, so people come from other parts of the town to walk here and see wildlife. This park should not be taken away. With more people sitting down all day, health and exercise are more important than ever Over two hectares of trees would be lost to roads and car parks. The trees and CWS in the park provide an important wildlife habitat, and act as a barrier to air and noise pollution. No development should take place on a public park which would ruin a well loved, peaceful green area and subject people to danger, noise and air pollution. The CWS has become a diverse habitat with 5 species of orchid and over 60 bird species. The offices, roads and roundabout would all have unacceptable, adverse impacts on the biodiversity and landscape. The 'replacement park' is much further away on agricultural fields and in no way equates to what we have now. It would be further from homes, less convenient, has no trees to absorb pollution, and would mean a net loss of green space. Described as "intensively farmed arable fields with little habitat value and relatively low ecological importance", it would take many years to become as good a site for wildlife, which is in sharp decline and needs help now. Local Plan policy LLP6E on Wigmore Park says "the quality of open space and landscaping will be maintained". LLP29: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas."

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Ref.	Objection	Comments
		I ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a valuable Community Asset which does not comply with key relevant Local Plan policies.
326.	Yes 7.3.18	Friends of Wigmore Park comments on application 17/02300EIA. We have a number of major concerns about the application that would have a significant impact on Wigmore Valley Park and the local area, if the development were to receive planning permission. Our concerns relate to the impact on local people and wildlife. 1. The loss of mature trees caused by the construction of a slip road from Eaton Green Road, but also around the park where commercial development is planned. There appears to be little addition of semi mature trees to compensate for the loss planned. Given that the landscaping was provided for the benefit of close residents and also users of Wigmore Valley Park it seems that this planning application is totally contrary to past agreements reached between your department and local housing developers, this important noise and pollution barrier that offers residents some protection from the airport should not be lost. 2. The southern area of Wigmore Park next to the runway is designated as a County Wildlife Site (CWS), this signifies that it is an area of local wildlife value. The CWS has grown and become established during the course of the last thirty years, it has five different species of wild orchid and sixty bird species. A portion of this CWS has been detailed on the plan as a long stay car park, the loss of this area and the creation of a car park and office development so close to the remaining land would have a negative impact on both the wildlife and the people who go to visit. This view and seasonal pond would disappear under a car park. 3. Wigmore Valley Park has been identified in the Luton Local Plan and on the policies map as an ALLV. Strategic Objective 10 of the Luton Local Plan states that the local plan aims to “improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity”. This planning application doesn’t meet strategic objective 10, it would take away most of Wigmore Park a designated ALLV. LLP29 A states that “development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas”, which includes ALLV’s. This proposal will not protect, enhance or conserve the character of this area. It will change the area completely and would take away the ALLV, displace the wildlife, set

Ref.	Objection	Comments
		plant growth back thirty years and take away many trees which would not be replaced. The current ALLV view, this view would be lost, it would have large industrial buildings on the right behind the swings, which would not create a relaxing environment for park users. The current ALLV view, which would be replaced with buildings, these trees would be hidden from view. 4. Luton Local Plan LLP29 B states "developments giving access for all users, where feasible, to the countryside and green space". This development would reduce access to green space for many local residents as the proposed new area of open space will be a greater distance from their homes. The new area of open space would not be as accessible for those with walking difficulties as the gradient of the land is much steeper than that of the current area of open space. Under the Equalities Act 2010 organisations have a duty to create accessible places, this proposed new area of open space would go against that. This planning proposal does not safeguard and enhance the district park, it encroaches onto most of the current area of parkland It forces local residents to go further to enjoy an area of open space and limits access for those who have difficulty walking on steep inclines. In a recently published report, highlighted by the BBC U.K residents were able to look up their town and see how much was built on, how much was farmland and how much was open space. Luton's stats were 70% built on, which is higher than some London boroughs and unfortunately Luton only has 20% open space, which would be reduced ever further by this proposal. The drawing, "Detailed Landscape Master Key Plan" in the planning application documents shows the contours of the land in the proposed new park area and the existing Wigmore Valley Park. The contours are much closer together in the new area, which means the gradient is much steeper than the current park making it less accessible. https://planning.luton.gov.uk/online-applications/files/A5596EE2A0A2D6AD36ECBADE2ED6B021/pdf/17_02300_EIA-CS083075-L-100B_Detailed_Landscape_Masterplan_Key_Plan-686508.pdf 5. The Playing Pitch Strategy (PPS 2014) sets out key aims and supporting objectives for sport provision in the Borough. "The PPS recognises Luton's constrained supply of land for facilities, growing demand in some sporting sectors as the population is set to grow with a consequent increasing pressure to develop sites for alternative uses. Essentially the key aims seek to protect and enhance levels of outdoor sports facilities and better manage the resources including maximising shared access (e.g. to educational sports facilities) and investment". This proposal will see the loss of playing pitches that have been used within the last five years and the loss of a vast area of open level ground used by families and friends for recreational activities. Mitigation by moving to other sites in the ward is highly unlikely and Luton already has a lack of high quality pitches and open space.

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		6. Development planning document KQ30131H168 shows a link with Eaton Green Road, this is a clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 – London Luton Airport Strategic Allocation, including Century Park where on page 38 the policy states the following regarding access: "Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency". 7. Document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF makes the following comments on two diagrams of the landfill. "During construction waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas. Waste may contain volatile contaminants which produce vapours. Potential risk to future users of the site. As waste decomposes gasses e.g. methane, which can build up to explosive levels in confined spaces. Piling through landfill can potentially cause downward migration of contaminants. In the 1970's dilute and disperse landfill was considered acceptable i.e no liner on bottom of landfill so contamination can seep out of the base of the landfill. Ground water in chalk is highly protected in the area as it is the main source of drinking water. Settlement waste is uncompacted and has a high potential for immediate and long term settlement. Settlement could impact upon the integrity and proper falls of drains and other services. Pilling over and against the landfill will cause it to settle. Stability of chalk- the top of the chalk may be weathered and weak. Therefor may not be suitable for founding in. Large obstacles in the landfill could prevent piling to full depth. Sulphates in the landfill may attack and degrade the concrete in the piles. Development of site could change gassing regime". As the planning application has stated there are considerable dangers in attempting to build on this landfill, including further subsidence, deadly inflammable gases and odours that could affect the health of residents, the irreversible contamination of groundwater the application should be turned down for all of the above reasons. 8. Pollution from noise and aviation fuel could potentially be at higher levels in the proposed new park area. The noise contours

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		map on the Luton Airport website clearly shows that the noise levels in the proposed park area would be higher than the current park https://www.london-luton.co.uk/corporate/community/noise/noise-monitoring. People are encouraged to visit parks as part of a healthy lifestyle, this would not be possible, as the proposed park area is closer to the runway and would potentially expose them to higher levels of noise and air pollution. 9. This area was given to the people of the East of Luton as part of the planning application for the development of further housing in Wigmore in the 1980's. The Borough of Luton Wigmore Area Planning Brief December 1982 states "Provision of public open space in the Wigmore Area is close to the minimum necessary. The development of the Wigmore area will generate a need for an additional provision of public open space and allotments". It goes on to say "The former Airport Refuse Tip at Wigmore Hall Farm might also be used to accommodate some of the open space required by the Wigmore area, so releasing more land for housing". This planning policy recognised the need to provide accessible open space and this need has grown with more housing infill across Luton. The people of Wigmore and the neighbouring boroughs have used this park to benefit their health and wellbeing over the last 30 years and should continue to do so. Conclusion Our committee group requests that the application be refused on the above points. If the application should go to development control committee we request that we should be given notice of the date and be given the opportunity to have a representative of our group speak against the planning application. Should the planning application proceed to the next stage, we ask to be consulted with at the appropriate time. However, please know that the loss of any part of the park will be greatly felt by local residents.
327.	Yes 7.3.18	There will be significant impact on the local area which will affect people who live and work in the local area. There will be a loss of numerous mature trees in the current Wigmore Park to build access roads and the Century Park itself. Luton has a reputation of being a concrete industrial town that no one wants to visit and the current trees help the environment and the beauty of the local area. They will also act as a noise barrier between the airport and its associated noise and the local housing estate having a detrimental impact to people living there. The current Wigmore Park (which is a proper park in the true sense rather than an office estate called Century Park incidentally) has a County Wildlife Site (CWS) which has established over the last 30 years with five different species of Orchids and sixty bird species. The creation of an office car park on this site and close to this site will have a negative effect on the wildlife here.

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		The infrastructure in terms of the roads will not be able to cope with the additional office buildings as there is significant traffic and congestion in this area currently and not enough sufficient parking for the existing office buildings at Wigmore Park which is having a detrimental impact on the local community and environment. At times there is already significant polluition in the local area from aviation fuel and this will increase. [redacted] will have worsening symptoms due to the impact on the air around this area. People are encouraged to go to parks for their health but how can I take my daughter there so close to the noise and air pollution as it's closer to the runway? Wigmore Park was given to the local residents of the Wigmore area by the council as part of the planning application for further development of housing in Wigmore in the 1980's. This was then taken back by the Council without communication and/or consultation. I also understand that before Wigmore Park it was a ground used for industrial waste and therefore I am concerned if this was disturbed to build Century Park that it will cause environmental damage to the local area and also cause potential health issues. Please can you confirm acceptance of this objection and ensure it is logged on the website?
328.	Yes 7.3.18	REPEAT OF ANONYMOUS REP 3(SERIES OF 7 EMAILS, BUT ONLY SECTION ON RIGGED AND BIASED PROCESS)
329.	Yes 7.3.18	I do not understand why the park needs to be moved as surely if more units are required for the airport then they could be built on the area nearest the runway which is currently being proposed for the re-instatement of the park area. This would surely be much more cost effective as the current park would remain. The existing park could then be re-vamped but there would be no need for all the moving of plants etc. The above would also ensure that the local people using this parkland would not be subjected to higher pollution levels from being nearer the runway. I understand that Century Park Fields were given planning permission some years ago for building on so why not do this? The new 20-year Luton Local Plan states there should be no access road to Wigmore Park from Eaton Green Road, so this application should be refused. A new road by the Tidy Tip, one of two proposed roads on to the park from Eaton Green Road would bring more traffic, increase noise and create dangerous new rat runs on Wigmore Lane, Eaton Green Road and already congested surrounding roads. Frank Lester Way should not be closed to cars. As for the proposed duel carridge way. This is not

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		necessary for the Century Park development and is obviously only there to serve the proposed housing development in North Herts. This has recently been admitted after months of denying it. So many lies and half truths that the local residents have now lost all trust in the local council. As if all this isn't enough what about the possible contamination of groundwater and drinking supply. There needs to be a lot more investigation into this before any decisions are made. For these reasons please do not pass the proposed plan. It is totally inadequate and does not make any sense when better, cheaper alternative plans could be used. The only reason for passing this application is that there are other (hidden) reasons for this plan which have not been bought to light in the consultation which would mean laws are being broken here. Please be honest and let people know what is really going on and then a proper plan can be put forward.
330.	Yes 7.3.18	REPEAT OF REP 326 (FoWP)
331.	Yes 7.3.18	There should be no developement on Wigmore Valley Park. It was provided for people in wigmore because it was needed and is probably needed more than ever for the wellbeing of the many people who use the park. The park has grown into a beautiful place and we really dont want to see more buildings which will inevitably bring more traffic and pollution. The replacement park is much further away with no green space and has no trees to absorb noise and pollution. I am extremely concerned about disturbing and building on a landfill site where hazardous waste was dumped. Wigmore Valley Park has been enjoyed by so many generations and is highly valued no development should take place on a public park which would ruin a well loved, peaceful area that acts as a buffer to the airport Luton is already overdeveloped and green space is well below the towns needs, people come from other parts of the town to walk and see wildlife and enjoy all this great park has to offer. I ask that, for all the reasons above,the application be refused as the proposal is an inappropriate development on a valuable community asset which does not comply with key relevant local plan policies.
332.	Yes 7.3.18	I am writing to object to the Airport expansion at Wigmore Valley Park. All the natural land that absorbs harmful chemicals/gases from the airport will be taken away, which will result in polluting local residence. There could be un-detonated WW Bombs within the land. That will be disturbed. Also, we do not have the infrastructure to cope with all the extra traffic.
333.	Yes	Loss of green space/environment: Wigmore Valley Park is a beautiful area well used by local residents (it's a park I enjoy running around). It is well established, thanks to the landscaping and tree planting of 30+ years ago and, therefore, is an important haven

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	7.3.18	for wildlife. The replacement part envisaged would destroy all this, and is also further away from the residents the current park serves. This area of Luton has precious little public green space and these plans would cut that even more. Traffic/infrastructure: Traffic in this area is already a huge issue, particular in the morning and evening rush hours. The new access road from Eaton Green Road as proposed, plus all the extra motorists who would be coming into the area to work in the new Century Park development would only further exacerbate this problem, leading to yet more gridlock. Safety: I understand that initial testing has flagged up possible dangers of building on a landfill site. Until these risks have been fully investigated and safety guaranteed, no development should be given permission to proceed.
334.	Yes 7.3.18	REPEAT OF REP 167
335.	Yes 7.3.18	REPEAT OF REP 167
336.	Yes 7.3.18	REPEAT OF REP 167
337.	Yes 7.3.18	REPEAT OF REP 167
338.	Yes 7.3.18	REPEAT OF REP 167
339.	Yes 7.3.18	REPEAT OF REP 167
340.	Yes 7.3.18	I object to the lack of community space and the destruction of an established parkland. The damage to the local wildlife and established woodland is unforgiveable. Luton already is lacking in green spaces and destroying a large established area is not good for local residents. The land was originally given to the residents as compensation for building the Wigmore Estate , and the proposed spaces to

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		replace the park is not a suitable substitute for the current park. The Local Plan does not show development of the Wigmore Park site. The site was a former landfill site, and has been used to dump all manner of waste over the years. It has been safely capped off and is currently contained; turning an ugly, disused landfill into a beautiful natural natural amenity. By disturbing this site, the environmental contamination risk is really high. There are several local ancient chalk aquifers which sustain an important local ecosystem, and the damage that could result from groundwater penetration is vast and far reaching. The increase in local traffic will be large. Not all the traffic to the proposed site will access from the M1. Any traffic coming from the A1 or elsewhere will be using local roads to cut through. Many of the local roads are barely more than single track lanes. Through the hamlet where we live, the road is very narrow, and is often congested at rush hour times, if lorries and van, or cars, are trying to get through the same time as the local public bus – a valuable link to Hitchin and Luton for the residents of the rural villages. On the above grounds I object to the development.
341.	Yes 7.3.18	REPEAT OF REP 128
342.	Yes 7.3.19	REPEAT OF REP 167
343.	Yes 7.3.18	REPEAT OF REP 167
344.	Yes 7.3.18	I strongly object to this development application on many grounds. I agree with the arguments put forward in more detail within ANONYMOUS REPRESENTATION 3. THE ADOPTED LUTON LOCAL PLAN EXPRESSIVELY FORBIDS THE ACCESS TO NEW CENTURY PARK FROM EATON GREEN ROAD IN POLICY D1. Luton adopted their Local Plan 2011-2031 on 4 Nov 2017. On p.32 section d.1 it says no access road from Eaton Green Rd very clearly: “such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the

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		Airport" THE COUNCIL IS LOANING 300 MILLION POUNDS TO THE COMPANY FOR THIS PROJECT – WHEN THERE IS ZERO GUARANTEE IT WILL EVER BE REPAID AND THE COMPANY ALREADY OWES MORE THAN IT'S SHAREHOLDING VALUE.
345.	Yes 7.3.18	REPEAT OF REP 58 (AND REP 11)
346.	Yes 7.3.18	REPEAT OF REP 167 … With Luton Council the majority shareholder in Luton Airport, I think it is a serious conflict of interest that Luton Planning Department is involved in deciding whether or not to grant this planning application. At the meeting, the New Century Park developers had a board posting the anticipated timescales for the project should permission be granted. According to that, after spending a year destroying our existing park and wildlife and causing major disruption for local residents whilst building the new access road via the tip access on Eaton Green Road, there is every chance the proposed new buildings will not be erected since their timeline states – and I quote – "Early 2020: Early start for commercial development (subject to market conditions)". So after ruining our park and creating chaos on our roads, they may not even go ahead with building the complex if they deem it non-viable financially! I ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a valuable Community Asset which does not comply with key relevant Local Plan policies.
347.	Yes 8.3.18	REPRESENTATIONS SUBMITTED ON BEHALF OF TUI GROUP IN RESPONSE TO THE PROPOSED NEW CENTURY PARK ACCESS ROAD (REF: 17/02300/EIA) We write on behalf of our client, TUI Group, to submit representations in relation to recent applications made for the New Century Business Park (NCBP) and New Century Park Access Road (CPAR) located to the east of Luton Airport. These representations primarily relate to the impact of the proposed CPAR on the various assets and operations of TUI Group. TUI Group is a multinational leisure, travel and tourism company and a principal airline operator at Luton Airport. The head office for TUI UK & Ireland is based at Wigmore House to the immediate north of the proposed new CPAR. TUI Group employs over 1,800 people at its head office and as part of its maintenance operations based at Luton airport which serve the UK fleet of 63 airliners and also part of the European fleet. As discussed in this letter, the primary concern regarding the CPAR proposals relates to the loss of significant areas of car parking which is essential for the continued operation of all TUI Group operations in the area. The proposed CPAR dissects a number of TUI Group buildings and car parks. Whilst the principle of the New Century Business Park proposals are supported by TUI Group, without proper and full consideration and mitigation, the proposed CPAR will

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		severely compromise TUI Group operations. We encourage London Luton Airport Limited (the Applicant) to engage further with TUI Group to ensure its New Century Business Park proposals do not compromise TUI Group assets and operations. We also ask that the Council carefully consider the proposals in terms of the impact on TUI Group's car parking. At present TUI Group does not consider that the mitigation measures contained within the proposals are adequate and that these fall short of what is required to prevent significant disruption to its operations. Background A Car Parking Strategy and associated plans has been submitted in support of the application (Ref: 17/02300/EIA) and has been reviewed by GVA on behalf of TUI Group. The following comments and references are made with regards to this Car Parking Strategy. Car Park CP4 is located between Prospect Way and Percival Way and currently comprises approximately 166 spaces used exclusively by TUI Group staff in relation to its flight training centre and aircraft maintenance facility. As a result of the alignment of the proposed CPAR, all 166 spaces are expected to be lost. The proposals include replacement car parking in Plots B (extension) and L, providing 54 and 75 spaces respectively. It isn't clear whether these spaces will be reserved for exclusive use by TUI Group to partly mitigate the loss of existing car parking spaces. As set out in the Representations section below, further explanation of the permanent replacement of TUI Group car parking is sought from the Applicant. Car Park CP9 is located to the south of Eaton Green Road and currently comprises approximately 492 spaces used exclusively by TUI Group staff in relation to its head office at Wigmore House. CP9 is also used as the fire assembly point in the event of the evacuations of staff of located at Wigmore House. As a result of the alignment of the proposed CPAR and the construction of a replacement of Building B16 in the southern area of the existing car park, approximately 377 spaces will be lost. Approximately 115 spaces are expected to be retained in the northern part of the car park (Plot F). To help mitigate the loss of car parking spaces during construction, a temporary car park at the southern end of the long stay car park is proposed to be provided, comprising approximately 300 spaces (Plot P). Building B16 is expected to provide 51 car parking spaces when complete but it understood that these spaces will serve the B16 building and not be made available to staff of TUI Group. Car Park CP10 is also located to the south of Eaton Green Road and currently comprises approximately 315 spaces, of which 194 spaces are used exclusively by TUI Group staff in relation to its head office at Wigmore House. As a result of the alignment of the proposed CPAR and major reconfiguration of the plots, all 315 spaces are expected to be lost. It is expected that 145 car parking spaces will be provided on a temporary basis during construction in the remaining area of CP10 to help with the displaced car parking spaces. On the northern element of CP10, it is expected that 227 permanent spaces will be provided (Plot I). The Planning Statement submitted in support of the application acknowledges that the proposed route of the CPAR dissects the existing TUI staff car park. As a result, it is proposed that "the most appropriate long term solution for this area of the site is to redesign the existing TUI car parks and car hire centre in order to create one large TUI car park located as near to their existing

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		office development as possible". However, that this redesign to the north of the CPAR would require "the relocation of the existing car hire centre, with the most appropriate location being adjacent to the Central Terminal Area". As set out in the Representation section below, confirmation is sought from the Applicant of a contingency plan should the relocation of the existing car hire centre be delayed or not be forthcoming. Representations The following representations are made on behalf of TUI Group in response to the car parking strategy of the proposed CPAR: Temporary car parking to mitigate the loss of CP4 Car Park CP4 is currently used by TUI Group in relation to its aircraft maintenance operation in Hanger 61, which is located within close proximity to the car park. The proposed CPAR will result in the loss of all 166 spaces. Provisions must be made and secured to ensure suitable temporary car parking is provided to re-provide all 166 spaces in close proximity to Hanger 61 to ensure the continued operation of the TUI Group's UK aircraft maintenance operation. Without proper mitigation, the loss of this car park will result in significant and preventable disruption to TUI Group operations and could result in staff being required to park elsewhere within the vicinity, including in the Wigmore Valley Park car park and surrounding residential estates. A temporary car park for the exclusive use of TUI Group should be provided and provisions secured as part of a S106 Agreement to ensure this is complete and operational prior to any of the existing 166 parking spaces being lost. We ask that the Applicant engages further with TUI Group to ensure that adequate mitigation is considered and that the Council secure appropriate mitigation to ensure the application can be considered acceptable. Permanent car parking to mitigate the loss of CP4 It is not clear within the submitted Car Parking Strategy whether the existing car parking spaces in CP4 are proposed to be replaced permanently. Whilst the proposals show that 129 car parking spaces will be provided in new Plots B (extension) and L, it isn't clear whether these spaces will be reserved for exclusive use by TUI Group to mitigate the loss of existing car parking spaces. In any case, the permanent replacement of car parking spaces within the existing CP4 must be secured to ensure that existing TUI Group operations are not severely compromised and to avoid any harmful impact on local car parking. We ask that the Applicant engages further with TUI Group to ensure that all 166 car spaces are replaced in close proximity to Hanger 61. Temporary car parking to mitigate the loss of CP9 and CP10 Car Parks CP9 and CP10 comprise of 807 spaces, of which 686 spaces are currently used by TUI Group in relation to its head office at nearby Wigmore House. The proposed CPAR will result in the loss of a majority of spaces. To mitigate the loss, it is proposed to provide 300 temporary car parking spaces to the south of the existing long stay car park. The car parking within CP9 and CP10 is used predominantly for staff of the head office at Wigmore House (located to the north of Eaton Green Road). The proposed temporary spaces to the south of the existing long stay car park are a significant distance from Wigmore House and are not within reasonable and practical walking distance. CP9 is also used as the fire assembly point in the event of the evacuations of

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		staff of located at Wigmore House and the temporary car park proposed some distance from Wigmore House and an alternative fire emergency strategy would therefore need to be accommodated. Therefore, we consider that the temporary car parking spaces would not effectively mitigate the loss of car parking in CP9 and CP10 during construction works. This proposed arrangement will likely further exacerbate the existing issue of parking within the Wigmore Valley Park car park and surrounding residential estates. We ask that the Applicant engages further with TUI Group to ensure that a solution can be identified that is acceptable to TUI Group and that the Council secure appropriate mitigation to ensure the application can be considered acceptable. Permanent car parking to mitigate the loss of CP9 and CP10 Approximately 115 spaces are expected to be retained in the northern part of CP9 (Plot F) and 277 spaces retained in the northern part of CP10 (Plot I). The proposed arrangement will result in the loss of 415 car parking spaces in CP9 and CP10 and without suitable agreements in place, a significant number of TUI Group car parking spaces will be lost. Whilst not confirmed specifically within the Car Parking Plan, the Planning Statement confirms that the existing TUI car parks and hire centre will be redesigned to "create one large TUI car park" located as near to the TUI Group head office building as possible. Referring to Plots G, F and I on the Car Parking Strategy 'Potential Areas for Reprovision' plans, 1,015 permanent car parking spaces will be delivered in these areas. Whilst the overall quantum of car parking spaces is welcomed, allocation of spaces for the exclusive use of the TUI Group will be necessary to ensure the loss of existing car parking spaces is properly mitigated. We ask that the ApplicanSummary TUI Group is supportive of the principle of the proposed New Century Park and the New Century Park Access Road. However, as set out in this letter, adequate provisions should be made to ensure there is no net loss of car parking spaces used by TUI Group at any stage during construction and at the time of completion of the proposed development. We look forward to further engagement with the Applicant to ensure that: A minimum of 166 permanent car parking spaces be reprovided for the exclusive use of TUI Group in relation to the loss of CP4, where reprovided spaces are located within walking distance of Hanger 61. Assurances must also be made that adequate temporary car parking spaces are provided whilst the CPAR is being constructed and the existing car park is not operational. A minimum of 686 permanent parking car parking spaces to be reprovided for the exclusive use of TUI Group in relation to the loss of CP9 and CP10, where the reprovided spaces are located within the proposed car park in Plots F, G and I (within walking distance of TUI Group head office). Whilst the provision of temporary car parking spaces is welcomed to mitigate the loss of the existing car parking spaces in CP9 during the construction of the new B16 building, considering that these space will be used by TUI Group staff located in the head office at Wigmore House, a more appropriate temporary location needs to be explored to ensure this proposed mitigation is effective. We look forward to further discussions to agree an appropriate location.

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		The provision of replacement parking in Plots F, G and I rely on the relocation of the existing car hire facility. It should be ensured that no relevant works should commence until the relocation of the car hire facility has been secured to ensure that there is at no time, any loss of car parking used by TUI Group. We look forward to receiving confirmation that these representations have been received and will be considered in the Council's determination of the planning application. We also look forward to further engagement with the Applicant to agree provisions and mitigation related to the temporary and permanent loss of TUI Group car parking.
348.	Yes 8.6.18	The planning application for a business park and associated roads should be refused on the following grounds: *Wigmore Valley Park is a much loved community asset containing playing fields and a County Wildlife Site. The planning application fails to take this into consideration nor does it intend to replicate these existing features at its proposed new location for the new Wigmore Park. It should be noted that the applicant has already identified the location of the New Wigmore Park as a site for a long term car park in its consultation for airport expansion so there has to be doubt if the park will actually open and if it does for how long.* *The proposed business park already has outline planning permission on land that has a boundary with Luton Airport. A physical connection to the airport was given as a reason for using Wigmore Valley Park. A tunnel could be avoided if the new dual carriageway were to be diverted around the outside of Wigmore Park.* *The applicant has submitted plans for a business park yet it is committed to using Wigmore Park for a primary role in its aims to expand the airport from 18 million passengers to 38 million passengers per year. The planning application fails to mention this at all.* *The planning application seeks full planning permission only for a dual carriageway, a link road from Eaton Green Road and the construction of airport related parking. The sole purpose of this application is to build infrastructure to support a later planning application for the expansion of Luton Airport and has little to do with the construction of a business park; thus the application is misleading.* *One of the justifications for the planning application is that a new Wigmore Park will be created. The application goes into great detail about a park that will be created next to the existing Wigmore Park in a featureless farmer's field, yet the applicant has made it clear in a consultation document for the expansion of the airport that they want to use this land for a car park and not a replacement park.* *The link road from Eaton Green Road is contrary to policy LLP6 which was only adopted late in 2017 and remains in the latest amended applications.* *Further, the application should be refused on the grounds that a link road from Eaton Green Road would congest local roads and would send airport and business park related traffic directly past three schools on roads that were designed for local traffic conditions only.*

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		Ashcroft Road, Wigmore Lane and Eaton Green Road would act as feeder routes for traffic from the A505 and A1 for not only a business park, but also for a terminal 2 and even the existing terminal. Even if the routes were not signposted Sat Navs would direct traffic to use local roads. This is a clear intention as without it traffic would have to use Vauxhall Way and Airport Way to the Ibis Hotel roundabout and then traffic would have to head down New Airport Way, as though it was heading for the M1. Cars and lorries would then use a right turn onto the new dual carriageway causing a tailback to the Ibis Hotel roundabout. *Road junctions associated with access via Eaton Green Road will be over capacity and that doesn't take into account the applicant's plans to put a terminal for up to 22 million passengers opposite this entrance. Once this link road was built it would be too late to do anything about it, if and when Terminal 2 was built.* *The construction of the dual carriageway will result in the loss of many company car park spaces that will be replaced by car parks on Wigmore Park and is contrary to policy LLP6.* *The revised planning application still involves the loss of most of the County Wildlife Site and the admittance that it cannot be replicated at a new site. The application also admits there will be no replacement grass wetlands to discourage birds. Nothing in the revised application satisfies policy LLP29.* *The replacement trees are shown in locations that the applicant wishes to expand the airport and its associated infrastructure into, so if they were planted they would be removed if LLAL were successful in their desire to expand the airport using its preferred options.* *The application still supports the loss of playing fields with no alternative proposed. The replacement Wigmore Park has no provision for playing fields, as the land is not flat. Again the replacement Wigmore Park was part of a consultation to build a car park at its proposed location so the applicant has no desire to follow its own planning application if approved. This could mean the plan for a replacement park could be dropped if this application were to be granted approval.* *The application still does not address policies LLP6(D) and LLP27 for the provision of open space and sports pitches and that the influx of new workers would not have any sports facilities that they could use.* *The application is harmful to local residents on the following grounds that haven't been addressed in the revised application:* *A link road from Eaton Green Road.* *Loss of trees and hedgerows.* *Loss of a valued park.* *Loss of sports pitches.* *Potential contamination impacts.* *Loss of ecological areas (CWS and District Wildlife Site [DWS])* *Impact on the openness of the surrounding area.*

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		There is no safeguarding of the nature conservation of the area or the County Wildlife Site. The statement that "the largest and most significant part of this site will be kept and incorporated in the proposed scheme" is false, as the majority of the CWS will become a car park. This is despite the applicant reducing the number of parking spaces. All of the CWS will in fact disappear, as the applicant has published consultation documents that show a terminal 2 located on the remainder of the CWS. The fact that this hasn't been mentioned in this planning application should not be dismissed as there is a clear intention in their preferred option for airport expansion to build on the remainder of the CWS. *During construction of hangars on the edge of the existing council tip around the year 2000 large amounts of unregulated waste were exposed. There are no guarantees this would not happen again which could put the public in danger; and there are no guarantees that additional contamination would not occur. It was noted by a member of the public who published photographs that during the bore hole and test pit dig samples of waste were discovered outside the cordoned off areas.* *The planning application update still shows vast areas of car parks that will destroy large areas of landscape-value park and the CWS.* *The application has not dealt with the fact that the existing park sits higher than many residential roads that front the existing park so any new buildings will dominate the landscape. This will be in part due the removal of a wood of mature trees bordering Eaton Green Road that would be cut down to facilitate the construction of the Eaton Green Link Road.* *The Transport Assessment makes no mention of a second terminal or the plan to add up to 22 million passengers to that second terminal. This is despite the applicant promoting a second terminal in their own consultation for airport expansion. Also it does not take into account additional traffic generated by the airport or from the Bloor Homes and Crown Estates developments making the application untenable.* *Traffic modelling has ignored existing traffic congestion or the impact from a second terminal. This should be included as the applicant is also the sponsor for airport expansion and has made reference to the new road as a gateway to terminal 2. It should be noted that the proposed dual carriageway/Eaton Green Link Road is already one of the reasons LLAL is justifying a terminal on Wigmore Park. LLAL cannot promote a route in a consultation while at the same time ignoring its own consultation when it seeks planning permission. This is just another example of the applicant withholding key information that will give false traffic forecasts if it is not included.*

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		The application makes reference to the DART rail link but has not laid out how it will be seamless using a single ticket solution. At the moment travel times can be extended by the need to queue and buy a second ticket for travel to the terminal. LLAL was looking to the new franchise rail agreement for East Midland trains to run a nonstop train every 15 minutes. The actual franchise agreement announced an ending of nonstop trains that call at Luton Airport Parkway at peak periods and still only 1 nonstop train an hour off peak thus reducing demand for the DART. *The revised application is still in breach of the local plan, as it still contains a link road from Eaton Green Road, which is in breach of policy LLP6D(i)* *Highways England have not been approached for comment about the new dual carriageway potentially serving terminal 2, which is the clear intention of the applicant.* *There will be major disruption to the airport operator, local businesses and residents during the dual carriageways construction phase.* *One of the justifications for the business park is to create jobs yet much of the existing land LLAL owns behind Percival Way has been derelict for years with no attempt made to create jobs within it. The dual carriageway will cut through much of this derelict land that could have been redeveloped.* *The application does not benefit local residents, whose views have been ignored; residents are strongly opposed to the loss of their park, traffic congestion and pollution. Friends of Wigmore Park, whose mandate is to save the park, has in excess of 2000 members. The planning application makes limited reference to the concerns or opposition of residents.* *The transport assessment also claims that the development contributes to health and wellbeing and protects and enhances biodiversity. This is a total fantasy when the park is under threat. In fact the House of Commons Communities and Local Government Committee published a paper on the value and threats to local parks. It included the following statement.* *"Parks and green spaces are treasured assets and are often central to the lives of their communities. They provide opportunities for leisure, relaxation and exercise, but are also fundamental to community cohesion, physical and mental health and wellbeing, biodiversity, climate change mitigation, and local economic growth"* *"Parks and green spaces matter. They make a vital contribution to many of our most important strategic objectives, such as climate change mitigation, public health and community integration. However parks are at a tipping point, and failure to match*

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		their value and the contribution they make with the resources they need to be sustained could have severe consequences. We believe that our recommendations will help to ensure that parks receive the priority they deserve, and to prevent a period of decline" *The above statement in its own right should be considered as justification for refusing planning permission as no viable alternate has been offered that is comparable with what local residents already have.* Jeff Morgan Comment submitted date: Tue 23 Jan 2018 Dated 23.01.18 I wish to lodge an objection to the following points. 1/ The planning application is in breach of the newly adopted local plan, as the local plan states in policy LLP6 that there should be no vehicle access from Eaton Green Road to Century Park except for buses and taxis. The planning application has a new link road from Eaton Green Road by Kimble Close to Century Park and the airport so breaches this policy. 2/ Document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF makes the following comments on two diagrams of the landfill. During construction waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas. Waste may contain volatile contaminants which produce vapours. Potential risk to future users of the site. As waste decomposes gasses e.g. methane, which can build up to explosive levels in confined spaces. Piling through landfill can potentially cause downward migration of contaminants.

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		In the 1970's dilute and disperse landfill was considered acceptable i.e no liner on bottom of landfill so contamination can seep out of the base of the landfill. Ground water in chalk is highly protected in the area as it is the main source of drinking water. Settlement waste is uncompacted and has a high potential for immediate and long term settlement. Settlement could impact upon the integrity and proper falls of drains and other services. Pilling over and against the landfill will cause it to settle. Stability of chalk- the top of the chalk may be weathered and weak. Therefor may not be suitable for founding in. Large obstacles in the landfill could prevent piling to full depth. Sulphates in the landfill may attack and degrade the concrete in the piles. Development of site could change gassing regime. As the planning application has stated the dangers of building on this landfill, including further subsidence, deadly gases and odours that could affect the health of residents the application should be turned down for all of the above reasons Jeff I wish to lodge an objection to planning application 17/02300/EIA on the ground that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 - London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and

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		shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency. Planning document KQ30131H168 shows a link with Eaton Green Road, which is also in breach of a planning condition when outline planning permission was granted to the original Century Park some 20 years ago. This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested. This will put considerable traffic on the local road network including Eaton Green Road, Wigmore Lane and Crawley Green Road that were only designed to handle local traffic. Also these three roads have three schools on them called Wigmore Infant and Primary School, Someries Infant and Junior School and Ashcroft Secondary School that will enhance the dangers of these roads to the general public including children. 24.01.2018 Added I wish to add to my objection that after reading a late report submitted into the planning application. A report called "GCC3 Ground Investigation Landfill" states on page 289 that: Borehole abandoned due to UXO at 2.80m depth on client's instruction. Borehole abandoned at 2.80m in concrete with a high UXO reading. Only a very few bore holes were dug on a relatively large site yet unexploded ordnance was found that hasn't been removed. This is clearly a safety concern, as the site is a former landfill site opened during the war that was located next to a Second World War airfield. The fact that a high reading was found in concrete suggests that this was a bomb dump that was capped in concrete. No one knows the complete picture of what was placed in this tip as it was unregulated. For that very reason this planning application should be refused on the grounds of safety.

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		Dated 04.10.18 Dear Mr Gurtler, I wish to further object to planning application 17_02300_EIA for a business park on Wigmore Park due to the answers provided in document 17_02300_EIA-Consultation_Statement_Addendum-769080 Eaton Green Road Access Paragraph 19 mentions estimated traffic conditions in 2031 when the business park would be fully operational but mentions nothing about the applicants own proposal to expand Luton Airport and the effects of a second terminal on traffic conditions in Eaton Green Road. Paragraph 22 "Despite a link road being a departure from Local Plan policy, the easing effect that it would have future traffic patterns is a justification for its inclusion within the application, and prevents severe impacts on the local traffic network". This statement is nonsense as it does not take into account new traffic that would use the link road from the A505 and A1 via Ashcroft Road and Wigmore Lane to access the business park and the existing and expanded airport. Car Parking 25. "The Century Park Access Road (CPAR) will provide easy access to the site from the A1081 and motorway" There is no mention about the more difficult access from the A505 and A1 using CPAR as this would involve joining the queue of traffic heading for the existing terminal along the original Airport Way, then taking the third exit at the Holiday Inn roundabout, which is the route to the M1 and then turning right across the dual carriageway. As this proposed new junction is very close to the existing roundabout traffic would back up and block this roundabout, which is no doubt one of the reasons why a new access point at Eaton Green Road is proposed. 26. "By adhering to the maximum standards set by the Council, this encourages a 'modal shift' across the business park, as visitors and staff members change the mode of transport for getting to and from the business park to a car alternative" This is Déjà vu, as the same logic and reasoning was applied to the TUI building at the junction of Eaton Green Road and Wigmore Lane when that was given planning permission. The result was a later planning application for an additional car park on Wigmore Park to serve this building, a further overflow car park on the top floor of the multistory car park at Luton Airport Parking and street parking around local roads. Loss of Parkland 33. "Policy LLP6E (i) states that "provision will be made to ensure that the scale and quality of open space and landscaping in the area is maintained, and if feasible, ensure that there is a net increase in open space provision". Whilst LLP6E (iii) requires that

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		"new open space to replace Wigmore Valley Park offers facilities of at least equal value". The Policy therefore recognises that land at Wigmore Valley Park will be lost in order to deliver employment within the Strategic Allocation which will contribute to the Strategic Objectives of the Local Plan" The old Centrury Park location already has outline planning permission. Using Wigmore Park will not create any more jobs than the original site would have. 35. "The total (existing) public open space allocation at Wigmore Valley Park measures 38.6ha, whilst the newly created open space, when added to the area of WVP which will be retained and enhanced, will measure 40.6ha. The proposed development will therefore create a net increase of 2 ha of public open space. This is illustrated in the 'Existing and Proposed Open Space' plan (Ref:)" LLAL have already announced their intension to build a car park on the new Wigmore Park as per their airport expansion consultation document making the above statement nonsense. Ecology and Trees 39. "The creation of New Century Park will result in the significant loss of ecologically valuable habitats within two non-statutory designated sites which will have a significant impact on protected species such as birds, great crested newts and invertebrates. Construction works will most likely temporarily disturb fauna due to light, noise and dust protected species. There may also be damage to habitats caused by accessing the site, the movement of movement of machinery and the creation of areas for temporary construction offices, machinery and storage" This statement alone is justification for refusing planning permission as Wigmore Park is a major established town park and County Wildlife Site. Opportunities for Enhancing Bridleways/Pavements 50. "A few comments queried if the proposal has fully taken advantage of the opportunities for new bridleways and pavements. The site is fully accessible to pedestrians, and wide pavements have been incorporated on all the roads within the Business Park. Furthermore, additional footpaths have been created to promote walking within the natural landscaping maintained within the Business Park but also linking up with the numerous footpaths created within the existing Wigmore Valley Park but also the extended replacement parkland, which will connect to the BW6 bridleway" The consultation documents, which supersede this planning application, show a business park on the fringes of an expanded

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		airport. Paths would lead only to airside boundary fences. 65. "A number of measures have been incorporated into the design in order to reduce impacts on views when the business park is constructed" LLAL are proposing a second terminal on Wigmore Park which would have a major impact on any business park that would be built around the edges. Disruption to Local Business 74. "For those buildings that are not proposed to be replaced, the jobs losses are minimal. This is on account of the buildings comprising of disused storage sheds which have been remained vacant for many years. The loss of 15 jobs is significantly offset by the creation of up to 3,724 Full Time Equivalent (FTE) jobs within the borough once fully operational" There is no guarantee that 3,724 jobs will be created or any more jobs that could have been created on the original Century Park site which the applicant has refused to build. Queries Regarding Prior Permission 75. "Queries have been raised as to why the Applicant is not implementing a previous consent on the site, which proposed a business park primarily storage and distribution units, accessed via a tunnel under the airport" 76. "The scheme proposed was in an isolated 'land locked' location which makes its viability fully reliant on a standalone transportation link like the highways tunnel link proposed. This link would start at the roundabout on Airport Way, take the form of a tunnel going under the Airport and resurface to the West of Century Park" 77. "Notwithstanding the complexity of implementing the tunnel, the proposed 'island' location of Century Park hugely limited its commercial viability and its detachment from the airport itself reduced the possibility of aviation linked businesses associated with the expanding airport taking residence there" LLAL proposal for the 2.1km dual carriageway actually made the tunnel solution redundant as the road crosses the airport. Instead of entering Wigmore Park the road could have followed the airport boundary to the old Century Park location. As the old Century Park location had a land border with the airport it would be no different than the new Century Park except it would not be suitable for a second terminal, which is really what this planning application is all about.
349.	Yes 9.8.18	Letter sent on behalf of our client London Luton Hotel BPRA Property Fund LLP, who are the owners of the Holiday Inn Hotel located on Airport Way, Luton.

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350.	Yes 9.8.18	SUBMITTED REP 2 IN PETITION SHEET
351.	Yes 23.9.18	I was disappointed that the revised plan for airport expansion has failed to take account of important elements pertinent to Wigmore residents. I have listed objections below: 19. Ecology: Luton Borough Council's own publications seek to promote parks. It has recently adopted the national 'parkscharter.org.uk' charter which states "embed effective protection from inappropriate development or use, or loss of any part of our parks." Translocation of wildlife habitats – whilst LBC claim to be able to undertake this, during the summer an attempt was made to translocate orchids in Wigmore Park but the "translocation of wildlife habitats guide for civil engineers" was not followed in that tubers were not placed end to end, were too small, and not watered in when we were in the midst of a heat wave. Personnel appeared unaware of up to date guidelines. I refer to the Luton Local Plan 2011-31 pages 76-88 whereby development ton open spaces should only be where it is surplus to requirements and only if equivalent type quality and quantity is given. You cannot build a car park on a country wildlife site and replace it with a former wheat field. The LLP also states that existing habitats and ecological networks are afforded protection from harm. The LLP recognises there is limited and deficient green space and yet state they need to promote biodiversity. They have a statutory duty to protect wildlife – see 40 Natural Environment and Rural Communities Act 2006 and Town and Country Planning Environmental Impact Assessment 1999. The replacement of open space mentioned in Antony Aldridge's letter, namely 'new public open space' is not by any means 'new'. This is an area I have walked with my family and my dogs for over 30 years – it has always been there. 19. Traffic: The newly created access from Eaton Green Road this is again contrary to the LLP. It is recognised by all who live in the Wigmore, Stopsley and outlying Beds and Herts villages that this will be a pull on traffic from the A505 Hitchin onto the surrounding residential roads which are already gridlocked at rush hour time. 19. Pollution: WVP has always been described as the bugger for pollution from Luton airport, however, as all local residents know you can often taste airport fuel in your mouth. Increase in traffic to access the Eaton Green Access would further add to the current ambient pollution that lingers in the air we are breathing.

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		Over the past few weeks there have been national reports regarding pollution links to diabetes and dementia, in addition to the well documents heart and lung conditions associated with poor air quality. 19. Need for business park: Since Monarch Airlines along with a number of other businesses have moved out of the airport land is there really a need to create a business park outside the current footprint? 5. Jobs: Top of Antony Aldridge's list for losing WVP was the creation of jobs, Luton is not a town without employment opportunities many vacancies have been unfilled for some time. Where will people come from, and where will they live, in a town that has under capacity for accommodation? 6. Sport England misrepresentation: The information regarding the loss of playing fields at WVP. Officially football has not been played for a number of years as Council didn't flatten out sunken areas of pitch but in reality informal cricket, rounders and multi-exercise and running groups are regulars. I understand the Council provided Sport England with a plan for mini football but that plan puts those pitches in the area for the business park. 7. Concurrent proposal for Termianl 2: I recognise that this isn't the remit but what is the purpose of spending huge sums of money with this plan when the ultimate plan is for a Terminal 2 to be built on the area. This is taxpayers money and I feel the Council are either hoping to confuse the local council taxpayers or have some devious planning strategy that requires outwitting the local community. I enclose for your information a booklet produced by our local orchid expert (the wild orchids of Wigmore Park).
ANONYMOUS RESPONSES		
1.	Yes 30.1.18	I have lived in the Wigmore area for ten years now , and have just found out about the possible development of Wigmore Park. I think we need to keep our park for the established trees and wildlife. I would like to register my vote against these proposed works .
2.	Yes 31.1.18	REPEAT OF REP 53

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3.	Yes 10.2.18	The email contained a series of lengthy objections (29 pages), which were then copied by others. These can be summarised as follows: 1. Alleges that London Luton Airport Freehold Limited was part of the application and LBC had allowed the Director of that company to use the name. 2. Quotes law in relation to the Regional Spatial Strategy, but also pointed out the development was in conflict with LLP6D. 3. Objects to the Council lending £300M to LLAL for the development. 4. Objects to the fact that no air quality monitoring is being carried out in the Wigmore area. 5. Objects to the application on the basis of the likelihood of unexploded ordnance beneath the landfill site and concerns about contamination and hazard. 6. Objects to the fact that Luton Borough Council as local planning authority will be determining a planning application being submitted by a private company wholly within the ownership of the Council (LLAL). 7. Objects to the unlawful disposal of public land (quoting Muir v Wandsworth BC 2017.
4.	Yes 10.2.18	I do not believe this New Century Park will bring any benefits to Luton due to the council's record on half baked schemes of the past. The ghost town of Butterfield Park stands testament to this and the once thriving community of one man/woman businesses in Power Court were compulsory purchased overnight and has been left as a decaying eyesore for 20 + years….I am not sure how much council tax money it cost to demolish the very prominent and dynamic looking 'Measurement Technology' building but this building was less than 30 years old.. Traffic too is a problem as those accessing a new park from the West will have to climb the clogged up Stockingstone Road., but more of a major concern is what is under the site, this was once the site of the original landfill tip as well as legend has it…secret experiments for the Blue Streak rocket of the 1950s.So heaven knows what is buried up there. There must a limit to what expansion can take place or is Luton and Hitchin going to be linked by concrete?
5.	Yes 12.2.18	REPEATS ANONYMOUS REP3 – unlawful disposal of public land
6.	Yes 12.2.18	REPEATS ANONYMOUS REP3 – unlawful disposal of public land
7.	Yes	REPEATS ANONYMOUS REP3 – unlawful disposal of public land

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	12.2.18	
8.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11)
9.	Yes 20.2.18	I would like to object to this development
10.	Yes 21.2.18	I am writing to strongly object to the planning application 17/02300/EIA for the following reasons: The building of new roads will, I feel, create more congestion and pollution in an already overdeveloped area of Luton. The piling and drilling of the old tidy tip and other areas has been identified as causing dangerous hazards to health for local residents. Development of the airport will increase air and noise pollution which is detrimental to residents health and wellbeing. Most important of all to myself as a parent is the development and destruction of Wigmore Valley Park which is a wonderful local green space for residents that was gifted to the people of Luton. It is an area of natural beauty and home to an abundant variety of wildlife. I have visited this park all my life and have many happy memories of time spent there. As a parent, I am concerned about my daughter growing up in an area where there is a paucity of open green park space for her to run around and play in. I do not believe that the alternative suggested by planners will be sufficient for the volume of residents in the local area. The next nearest wide open green space would necessitate travelling in a car or using public transport which is worse for the environment.
11.	Yes 22.2.18	I object to the planning application under this reference to significantly alter and increase the vehicle movements. To further aggravate the already heavy pollution that is being produced by Luton Airport activities and to assist enabling even further expansion of these activities. Commercial interests are again being put ahead of the quality of life for those living and working in and around the area. There appears to be little, if any, regard for the environment with Luton already heavily congested . The further expansion of the airport and surrounding area are simply not supportable when the basic site is entirely unsuitable for an airport as large as Luton has become.

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12.	Yes 22.2.18	Please note and acknowledge my objection to application 17/02300/EIA
13.	Yes 25.2.18	I disagree with the principle of this proposal. I feel it is inappropriate and that the use of this land should not change
14.	Yes 24.2.18	REPEAT OF REP 168
15.	Yes 27.2.18	I hereby object to the proposed development of Wigmore Valley Park into Century Park My reasons being: Loss of green recreational space for locals of all ages. Remove this and what is left? Hardly anything. Loss of habitat for bird life. Once destroyed the birds will have no nesting sites and will be lost for ever. Loss of habitat for mammals- from small to large including badgers and foxes. Loss of trees that clean up the environment so close to the airport where pollution is high. Loss of habitats for butterflies that come for the diverse flora. Congestion on already busy roads which combined with the proposed new houses will be gridlock. You may not be bothered about a few trees, birds, wildlife but they are our grandchildren's heritage and we are destroying it for people who will come from outside the area contribute nothing to our local economy but take our green space.
16.	Yes 18.3.18	I formally wish to reject the parking plans for Wigmore and I formally object to the access road for the new Industrial Estate leading onto Eaton Green Road.
SECOND CONSULTATION FOLLOWING RECEIPT OF FURTHER INFORMATION		
1.	Yes 28.8.19	1) Traffic in Wigmore is bad enough as it is, especially in the commuting hours. A further expansion of the airport and/or business area on Wigmore valley park will further add to those problems. I understand a traffic survey was done but during the period of holidays and Asda being burnt down, so not a true reflection on the heavy traffic. 2) The destruction of park land, with well established wood land and wild life should not be done, full stop... I believe this area is listed in the wildlife conversation zones. 3) The concerns of toxic contamination due to any works being done on a land fill site.

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		4) The concern of methane being released from the landfill once work starts. 5) The concerns you will find unexploded WII bombs 6) Increased noise during the works, and indeed after completion 7) Increased pollution during the work and after completion. This is a great concern to the surrounding community and local schools with small children. 8) Concern of more people parking their vehicles in the surrounding housing estates for the LLA and/or business area.
2.	Yes 30.8.18	1. ACCESS ROADS. There is proposed access from Eaton Green Road. Access from this road is specifically prohibited in the Luton Local Plan, a plan which has only just been adopted. The access to the Century Park must be through a separate and adequate new road. 2. COMBINED EFFECT ON WIGMORE Century Park is also linked to proposals for a major expansion to the airport. North Herts is still considering a massive housing development on greenbelt land to the east of Luton. There are also proposals to build a giant incinerator on Lower Luton Road. The overall combination of these developments is simply too much pressure on traffic, environment and public services in Wigmore.
3.	Yes 13.9.18	As a group recognised in the planning application and formally consulted with on two occasions by LLAL and members of Luton Borough Council we wish to put in a consultation letter. Unfortunately we were not written to as part of the planning application consultation but we request that our letter be acknowledged as consultees for the planning process. We act as a representative committee for the Friends of Wigmore Park a group that has over 1300 members. REPEAT OF REP 326 (FoWP)
4.	Yes 13.9.18	I wish to lodge a serious rejection of all plans as described on the planning application web site 17/02300/EIA. I am attaching a press release describing the dire state of air pollution in Luton today. Luton needs more green spaces and mature trees to help clean the air that is being constantly polluted by aviation activities on the ground and in the air.

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		Century park is now an established green space with mature trees, grassland and habitat for wildlife, thus creating a mini lung for the immediate area. Trees take 25-30 years to mature enough to convert unclean air to clean air. Removing the present trees and dislodging the soil will release all the carbon they have been storing for our protecting, thereby increasing the already high CO2 levels produced by fossil fuels in Luton. Kerosene from planes now becoming the largest producer of CO2 which is warming the planet at an alarming rate. DO NOT REMOVE ANY TREES! The roads around Luton which already suffer a high density of traffic can not take any more. The local population do not want to, or should have to, live on rat runs. We have been living near Luton for 28 years, and over the last 5 years traffic and planes have increased beyond a reasonable amount, blighting our lives with noise and fumes. Luton is one of the most congested towns in the UK, more building is a very dangerous plan for the health of the local community and the planet at large. Economic growth is now not the priority, the health of our planet is, Future generations will not be able to exist in the SE of England because of severe over building creating flood risks, poisoned under ground water, over crowding, no green areas to enjoy and breath. I could go on, but I'd like you please to read the enclosed press releases instead. Thank you.
5.	Yes 4.10.18	I wish to further object to planning application 17_02300_EIA for a business park on Wigmore Park due to the answers provided in document 17_02300_EIA-Consultation_Statement_Addendum-769080 Paragraph 19 mentions estimated traffic conditions in 2031 when the business park would be fully operational but mentions nothing about the applicants own proposal to expand Luton Airport and the effects of a second terminal on traffic conditions in Eaton Green Road. Paragraph 22 "Despite a link road being a departure from Local Plan policy, the easing effect that it would have future traffic patterns is a justification for its inclusion within the application, and prevents severe impacts on the local traffic network". This statement is nonsense as it does not take into account new traffic that would use the link road from the A505 and A1 via Ashcroft Road and Wigmore Lane to access the business park and the existing and expanded airport. Car Parking

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		25. "The Century Park Access Road (CPAR) will provide easy access to the site from the A1081 and motorway" There is no mention about the more difficult access from the A505 and A1 using CPAR as this would involve joining the queue of traffic heading for the existing terminal along the original Airport Way, then taking the third exit at the Holiday Inn roundabout, which is the route to the M1 and then turning right across the dual carriageway. As this proposed new junction is very close to the existing roundabout traffic would back up and block this roundabout, which is no doubt one of the reasons why a new access point at Eaton Green Road is proposed. 26. "By adhering to the maximum standards set by the Council, this encourages a 'modal shift' across the business park, as visitors and staff members change the mode of transport for getting to and from the business park to a car alternative" This is Déjà vu, as the same logic and reasoning was applied to the TUI building at the junction of Eaton Green Road and Wigmore Lane when that was given planning permission. The result was a later planning application for an additional car park on Wigmore Park to serve this building, a further overflow car park on the top floor of the multistory car park at Luton Airport Parking and street parking around local roads. Loss of Parkland 33. "Policy LLP6E (i) states that "provision will be made to ensure that the scale and quality of open space and landscaping in the area is maintained, and if feasible, ensure that there is a net increase in open space provision". Whilst LLP6E (iii) requires that "new open space to replace Wigmore Valley Park offers facilities of at least equal value". The Policy therefore recognises that land at Wigmore Valley Park will be lost in order to deliver employment within the Strategic Allocation which will contribute to the Strategic Objectives of the Local Plan" The old Centrury Park location already has outline planning permission. Using Wigmore Park will not create any more jobs than the original site would have. 35. "The total (existing) public open space allocation at Wigmore Valley Park measures 38.6ha, whilst the newly created open space, when added to the area of WVP which will be retained and enhanced, will measure 40.6ha. The proposed development will therefore create a net increase of 2 ha of public open space. This is illustrated in the 'Existing and Proposed Open Space' plan (Ref:)" LLAL have already announced their intension to build a car park on the new Wigmore Park as per their airport expansion consultation document making the above statement nonsense. Ecology and Trees 39. "The creation of New Century Park will result in the significant loss of ecologically valuable habitats within two non-statutory

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		75. "Queries have been raised as to why the Applicant is not implementing a previous consent on the site, which proposed a business park primarily storage and distribution units, accessed via a tunnel under the airport" 76. "The scheme proposed was in an isolated 'land locked' location which makes its viability fully reliant on a standalone transportation link like the highways tunnel link proposed. This link would start at the roundabout on Airport Way, take the form of a tunnel going under the Airport and resurface to the West of Century Park" 77. "Notwithstanding the complexity of implementing the tunnel, the proposed 'island' location of Century Park hugely limited its commercial viability and its detachment from the airport itself reduced the possibility of aviation linked businesses associated with the expanding airport taking residence there" LLAL proposal for the 2.1km dual carriageway actually made the tunnel solution redundant as the road crosses the airport. Instead of entering Wigmore Park the road could have followed the airport boundary to the old Century Park location. As the old Century Park location had a land border with the airport it would be no different than the new Century Park except it would not be suitable for a second terminal, which is really what this planning application is all about.
6.	Yes 14.9.18	The excess vehicles on the road will further increase pollution around the area along with possible airport expansions and new homes therefore making heavy vehicles a regular occurrence and the noise created will be detrimental
7.	Yes 19.9.18	The building of the industrial park with the intended roadwork's goes against all the evidence that is now coming into the public domain. The evidence that pollution from vehicular traffic is causing unnecessary deaths from inhalation of nitrogen dioxide and sooty deposits from diesel vehicles would seem to be proven. New studies point to this pollution being the cause of 60,000 cases of dementia within the U.K. The very make-up of the proposed industrial park would point to the majority of the vehicular traffic being of the diesel type. This proposal with the intended building of some two thousand homes in the next county, which will inevitably use the easiest route to the M1, via the proposed new road, will mean a large increase in the pollution in the area. In addition it is the intention of the airport to double the throughput of passengers in the next few years. This means a vast increase in exhaust pollution from this source. When all over the country councils are seeking to mitigate pollution I cannot understand why this council seeks to introduce a new industrial park, increase throughput of the airport and apparently does not take into consideration other building that will add to the pollution problem. This does not even go into the fact that the land to be used for this project is one of the last pieces of wild land in the Luton area and is enjoyed by the local people. I believe that Luton has the least amount of green space in the whole country. To use this land for the proposed purpose is surely wrong. In five or ten years when people look back they will ask how this could even have been considered.
8.	Yes	1. The site description in application is incorrect. The site described is not Century Park, this is a small part of this current application, to East of Wigmore Valley Park.

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	1.10.18	All documentation for this application by Luton Borough Council, and London Luton Airport Ltd, gives name of site as New Century Park, encompassing Wigmore Valley Park, new site, and the actual Century Park site. As this is not specified in this application still using Century Park name, the application is incorrect in wording. 2. The listing of areas for development is incorrect, and does not specifically name areas shown for development. President Way will form the Eastern part of the Century Park Access Road. At no point in either description 1 or 2 of this application, is this road specifically mentioned for development. Application should be denied as it does not contain specific mentioned to developments of President Way. 3. The Century Park Access Road must be denied planning permission on environmental and health and well being grounds. The applicants own findings show that this road will not be fit for purpose before it is even built, as it will have congestion bottlenecks, and will produce pollution levels of the worst loadings. The applicants answer to this is to build an access point onto Eaton Green Road.This link has already been refused on original plans as against Luton Borough Councils Local Plan. This and other local roads are already subject to congestion and dangerously high pollution levels from airport related traffic congestion, and any new routes will obviously increase this to unacceptable levels. New Airport Way was built to take airport traffic out of neighbouring residential areas, these roads will bring that traffic back, so approval must be denied 4. This application should be refused as it involves the development of mature community green space, contrary to Luton Borough Councils Green Space Policy. They quote in numerous documents and surveys, that the town does not have enough community green space for it's population density, and that the retention of all green space is a priority, for the health of it's residents. On the grounds that this application consumes a huge area of such space, it must be denied in line with local government policies. 5. This application should be denied as it makes knowingly fraudulent claims on replacement green space provision. The detailed replacement green space, is already shown in London Luton Airport Ltd development consultation literature, to be consumed by future airport expansion. Any new grassland/woodland will be consumed long before it reaches the diversity and maturity of the current Wigmore Valley Park.

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		6. The application should be denied, as in light of the latest resident letter from Mr Aldridge on behalf of London Luton Airport Ltd re their application, the project has moved from local employment creation, to road and car park creation for current airport use and future expansion. The letter clearly states that the commercial development will only be commenced in 2020 "subject to market conditions". So the prime driver, employment for local residents, is now the last objective behind new road access to car parking for airport use. The application should therefore be denied under a change of use which is not specified in this application notice. 7. the application should be denied as it takes place on a site that the disturbance of, could be seriously damaging to local health. The site is on the old municipal refuse tip, in use for 40 years, taking all manner of domestic and industrial waste. Construction on such sites is advised against by governmental and industrial bodies worldwide, as the gases and pollution released can have extremely hazardous to health. Developments on the edge of the site, have had to include noxious gas monitoring as standard, to ensure the well being of staff. 8. The application should be denied as all could be achieved on existing brownfield sites, within the current airport footprint. The are large areas of derelict land and disused buildings along Percival Way, to enable an expansion of business use within that existing corridor. Saving valuable green space, and keeping traffic levels within the airport footprint.
9.	Yes 28.9.18	I have read the proposals for Luton Airport expansion and wish to register my concerns. Currently, aircraft arrivals to Luton Airport are designated on low noise routes and a holding "stack" clear of residential areas to the East of the airport. Unfortunately, aircraft are usually "radar vectored" over towns in Hertfordshire notably Letchworth, to avoid putting them in the designated holding pattern and provide a short cut to final approach. This results in additional and unnecessary noise over built up residential areas. Air travel will inevitably grow and it is vital to consider the impact of disregarding the approved arrival routes. I ask that stricter guidance be adopted by air traffic control to revert to the published arrival routes for Luton Airport to avoid the adverse effects of any approved planning application.
10.	Yes 28.9.18	I am writing to register my objections to this planning application and is in addition to my earlier objections sent to you by mail on 25.2.18. Firstly, I was somewhat surprised to receive your notification dated 24.8.18 of this application after the disclosure by LLAL in the summer of their plans to use this location for the proposed site of Terminal 2 and a range of ancillary works, etc. A development

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		that had been kept secret by various parties from local residents, including the Council. So is this application just a ploy to deflect the amount of criticism expressed by residents and others, to cause confusion regarding the proposed expansion of the airport, or are these proposals for Century Park an opportunity for LLAL to use this application to commence works for Terminal 2 under the guise of a Business Park? If the Park was approved and built it would surely only need to be demolished again. So what is really going on? The height of stupidity for one, I would have thought. This application should be refused on the following grounds: REPEAT OF REP 348 Many of these points will be reiterated in other objection letters you will no doubt receive. In conclusion, residents do not want the loss of Wigmore Park when I'm sure there are other more suitable alternatives for a few industrial units, without the loss of a much needed natural amenity and green space, which with a little imagination from Luton Council could be made into a rich habitat for wildlife. This space is a vital buffer between where people live and an aiport which has become more obtrusive in recent years.
11.	Yes 1.10.18	I wish to object to the planning application on the grounds that there will be increased environmental, noise and air pollution. In addition I object to the destruction of Wigmore Valley Park. I have lived in St Albans since 1975 and over the last 5 years the increase level of aircraft noise has been unacceptable. Any increase in capacity at Luton Airport will have a detrimental effect on the existing level of aircraft noise and pollution. Further development of the airport will in turn place additional burden on the local network of roads which currently struggle to cope with the volume of traffic generated by the Airport.
12.	Yes 3.10.18	I wish to lodge a strong objection on behalf of my wife and myself to any further expansion/development of Luton airport. The objection is on environment, noise and air pollution grounds.
13.	Yes 4.10.18	As your website to object to planning permissions is not working properly I have had to resort to sending you an email as I wish to raise 2 objections to the planning reference 17/02300/EIA on the grounds of design and self interest. 1 A major study published by Kings College London (Senior author Frank Kelly) on the 19th October 2018 suggests that air pollution could be responsible for 60000 cases of dementia in the UK. It further states that scientists found that people living in areas polluted by traffic and industry were 40% more likely to develop dementia. It also stated that it is increasing appreciated that the impacts of air pollution on health are seen far beyond the lungs. As in the short to medium term you intend to destroy trees and shrubs around the Wigmore area and only replace them with inmature plants this will have an increasingly detrimental effect on all the people living near to the proposed development. The propasals need to include a considerable increase in the

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		planting plans. 2 The second objection is relating to the council voting on its own plans. For any of these plans to go ahead the proposals should be overseen by a higher authority not the people who want the changes. You can dress it up as much as you want it's still the council's plans. As you will almost certainly be going ahead with these plans as per your planning application, you will be subjecting the people of Wigmore to a life of pollution, bad health, and grime from the bad air quality you will bring down on the area
14.	Yes 4.10.18	In respect of the massive purchase of land surrounding Luton Airport ... for more expansion eventually of the airport ... NO NO NO ! The local districts just do not have the capacity or the infrastructure to substantiate such expansion - a (planned) dual carriageway would not be sufficient for the added traffic. No room for more trunk roads. And, our local roads already struggle. Think carefully Luton ....
15.	Yes 3.10.18	I refer to the letter in this week's Stevenage Comet by Chris Haden saying that Luton Airport and Luton Borough Council are planning to build a dual carriageway through the airport, which will destroy Wigmore Valley Park and allow Luton Airport to expand even more by building a second terminal. I assume you have read the same letter. Mr Haden is rightly very worried that this whole thing will have a really bad effect on the environment by ever increasing pollution levels in the area. We know that already 40,000 people die every year because of pollution, and the more we carry on expanding airports and building motorways etc, the more diseases such as diabetes and cancer, and the more people will die every year. The Health Secretary, Matt Hancock is quoted as saying "I'll go round the world looking for the best technology to save lives." Poor Matt Hancock! It's not going to be technology that saves lives with airport developers rampaging around! Why is it that such developers and big business generally are so disinterested in the environment, climate change, and the welfare of people generally? If Brexit goes ahead it might turn out to be a great big white elephant. There won't be so many people coming or going via Luton Airport. And if Ryan Air is already struggling, you might find that WizzAir pulls out of Luton altogether. So PLEASE, for the Planet's sake, for all our sakes, STOP NOW! DON'T DO IT!

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16.	Yes 4.10.18	I am lodging my objections to the Century Park Development in Luton on the grounds of the impact of noise, air pollution, lost sleep and possible health implications to the almost one million people living in the towns and countryside near Luton airport. The constant drone of aircraft starting at 5:30am, continuing all day and going on past midnight is just awful. Add to that the cargo planes flying in and out of the airport in the early hours, this is making our lives pretty miserable. I urge you to abandon these plans.
17.	Yes 11.10.18	Firstly, the back of my apartment faces the A505 which is heavy with traffic throughout the day and night. Creating more offices and jobs at the airport would pull in more traffic along the Hitching road, more noise, more pollution. As it is we are opposite the crematorium. Secondly, across the road to me is Butterfield Green with lots of unoccupied fairly newly built offices, These should be occupied first of all. People working there from the Hitchin side of town would not have to pass my end of the A505. My appartment block is occupied by elderly retired people and we are all very vulnerable to the pollution when we open our windows in this area. The views of current residents must be taken into account and not exacerbate our failing health.
18.	Yes 11.10.18	Having read and studied numerous documents I believe this planning application should be refused on the following grounds: REPEAT OF REP 348 The transport assessment also claims that the development contributes to health and wellbeing whilst protecting and enhancing biodiversity. This take on the proposed benefits of the development are repeated through many of the the council's publicised documents and yet the council is not taking serious the dangerous high levels of pollution already occurring in the area of Luton. We are told they are to measure pollution with most sophisticated equipment made available to them at great cost and yet to date this exercise has not commenced. This is not a council that can be taken serious on its promises to look after health and well-being for the community and residents of Luton. From a personal perspective I can say my health has been compromised by pollution in Luton. At a local community meeting on Monday 8/10/2018 members of LLAL and the council attended. The expansion of the airport was rightly discussed amongst other issues and in particular the new DART transport system. On the current figures available around 16.5 million passengers now use the airport. Of this total total just 15.7% (2,590,500) use the train and the shuttle service from Luton Parkway. This leaves 13.9 million people arriving by road. It is a known fact that motor vehicles are probably the single biggest polluter and yet expansion will encourage more vehicles.

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		If ultimately the airport builds a second terminal these numbers are set to become massively significant and in a bad way. Assuming the number of people that use rail does not alter significantly and based on the projected 38 million passengers using the airport that would leave over 24 million people attending the area by car.This is an increase of 75% and yet the council wants to build more car parking spaces rather than discourage drivers. This is for one reason only. MONEY. It cannot be right that the monetary gain is valued more than the health of of the community. The resultant impact will be to have an adverse effect on the health of the community, not forgetting the many thousands of visitors and workers at the airport. Recently the House of Commons Communities and Local Government Committee published a paper on the value and threats to local parks. It included the following statement. "Parks and green spaces are treasured assets and are often central to the lives of their communities. They provide opportunities for leisure, relaxation and exercise, but are also fundamental to community cohesion, physical and mental health and wellbeing, biodiversity, climate change mitigation, and local economic growth. "Parks and green spaces matter. They make a vital contribution to many of our most important strategic objectives, such as climate change mitigation, public health and community integration. However parks are at a tipping point, and failure to match their value and the contribution they make with the resources they need to be sustained could have severe consequences. We believe that our recommendations will help to ensure that parks receive the priority they deserve, and to prevent a period of decline". The above statement in its own right should be considered as justification for refusing planning permission as no viable alternate has been offered that is comparable with what local residents already have. Lastly having registered my objection to this application I feel that this matter should be referred to the Secretary of State for Transport. It cannot be right that Luton Borough Council intends to deliver a decision on what is essentially its own planning application which if granted without being challenged will have enormous ramifications on this part of Luton which accounts for 20% of the town as a whole. Cc Secretary of State for Transport - James Brockenshaw Cc The Planning Inspectorate
19.	Yes 11.10.18	Wigmore Valley Park is a vital and much used community asset. The park not only provides important social and recreational facilities for many people in Luton and local surrounding areas. It also contains a County Wildlife Site with important varieties of fauna and flora that should be protected (many of these are rare.). Finally, and very importantly, the park provides a buffer regarding sound and chemical pollution between the built-up areas and the airport; the park therefore provides a incredibly

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		important element of protection from the worst excesses of these. From what I understand of the planning details that I have had access to, the planning application fails to take all the above into consideration. A replacement park should be like for like in terms of what I've described above. That includes fully the recreational and social function, ecology role and facilities. I've seen no evidence that any replacement park will provide that. For example, the application still supports the loss of playing fields with no alternative proposed. The replacement Wigmore Park has no provision for playing fields, as the land is not flat. Most importantly, the role in terms of the noise and pollution buffer would be gone. The same with the protected species of fauna and flora (I was really very disturbed by the relocation of the orchids; the way it was done was really not right at all; it was illegal). A key factor of the planning application is the new Wigmore Park being created. The application's detail is of a park created next to the existing Wigmore Park. However, this will not have the trees and scrubland; the fauna and flora will have nothing at all of the same environment in which to thrive as they do now. The revised planning application still involves the loss of most of the County Wildlife Site and the admittance that it cannot be replicated at a new site. The application also admits there will be no replacement grass wetlands. Nothing in the revised application satisfies policy LLP29. The application still does not address policies LLP6(D) and LLP27 for the provision of open space and sports pitches and that the influx of new workers would not have any sports facilities that they could use. The replacement trees are shown in locations that the applicant wishes to expand the airport and its associated infrastructure into, so if they were planted they would be removed if LLAL were successful in their desire to expand the airport using its preferred options. The new park is planned as a featureless farmer's field. Yes, not ideal for a replacement Wigmore Valley Park but perfectly ideal as a car park; which I believe is the real purpose of that planned replacement park. Yet more duplicity. The applicant has no desire to follow its own planning application if approved So, as I've said, it has come to notice in the 'consultation' (I use that word euphemistically here) that the applicant is intending to use the location of the New Wigmore Park as a site for a long term car park for airport expansion. Trust is vital here. There is no evidence we will have a park in the end. The park must be protected for all the reasons I've mentioned. Another example is that the country wildlife site will be destroyed for redevelopment: the applicant has published consultation documents that show a Terminal 2 located on the remainder of the country wildlife site. The fact that this hasn't been mentioned in this planning application should vitally be taken into consideration. It is transparent to me the underlying (but not expressed in this application) plan is for airport expansion which includes building on the country wildlife site. I am very clear in my mind that the statement that "the largest and most significant part of this site will be kept and incorporated in the proposed scheme" is deliberately deceptive, as the majority of the country wildlife site will become a car park.

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		The convoluted and contradictory plans set out in the 'consultation' had very limited meaning in substance. Everything was 'proposed this or that ?.' and similar expressions. There's nothing solid to grasp on. What we were shown then would most likely be completely different in reality a few years down the line. For example, I asked a man who had 'Planning' on his I.D. label if he could show me on the blown-up photograph of the airport and surrounding areas where the proposed business park (Centenary Park, if I remember correctly) was going to be and he said he didn't know. I believe the reason for him saying that was because he didn't want to tell me it was planned to be on Wigmore Park i.e. that they were trying to keep the fact that Wigmore Valley Park was going to be developed away from what they thought were naïve public. However, it's my belief that actually building Terminal 2 is what this is really about. This is not mentioned in the planning application. Why the duplicity? This will be the real reason why Wigmore Valley Park is being taken from the people of Luton and local areas' usage. The proposed business park already has outline planning permission on land that has a boundary with Luton Airport. A physical connection to the airport was given as a reason for using Wigmore Valley Park. Similarly intentionally duplicitous for the same reason is the fact that the planning application seeks full planning permission only for a dual carriageway, a link road from Eaton Green Road and the construction of airport related parking. The only reason for this application is to build infrastructure to support a later planning application for the expansion of Luton Airport. It is not about the construction of a business park. The application sets out to deceive. The link road from Eaton Green Road is contrary to policy LLP6 which was only adopted late in 2017 and remains in the latest amended applications. Anyone who lives in the area local to the airport knows full well how congested the roads get, leading right from the M1, from the Bedford Road side (and even through the countryside it can be challenging). These areas would be further congested and that is a very core reason why the application should be refused if the planned link road from Eaton Green Road remains. Everywhere around the local areas and more widespread would become seriously congested rat-runs. I already have to zigzag at times, during the mornings and evenings especially, just to get to the M1, Harpenden, Bedford Road area, etc. There are schools that already lead to very congested passageways for traffic and public even trying to walk past these. The area was not designed for such massive amounts of traffic to be using it. Everything is too compacted and impacted. Ashcroft Road, Wigmore Lane and Eaton Green Road are already rat-runs for traffic from the A505 and A1 but would be considerably more so for not only a business park, but also for a Terminal 2 and even the existing terminal. Road junctions associated with access via Eaton Green Road will be over capacity and that doesn't take into account the applicant's plans to put a terminal for up to 22 million passengers opposite this entrance. Once this link road is built there will be a point of no return with the predictable traffic impact when they build Terminal 2 (the real reason for the link-road, as if we don't know). The construction of the dual carriageway will result in the loss of many company car park spaces that will be replaced by car

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		parks on Wigmore Park and is contrary to policy LLP6. On top of the congestion we have the further problem of added noise and chemical pollution. Luton is seriously polluted already (to illegal levels in some parts) and this along with the airport industrial and airplane noise and chemical pollutions will create a massive problem for the people in these areas that will cause health problems to be very much worse than they are now. I don't claim to be an expert on the toxic waste that's buried underneath parts of the airport and park domain. However, digging has already begun in some parts (without the planning permission having been granted yet?), causing serious concern. The waste is unregulated and risks being exposed, as it was when past works were undertaken. This could put the public in danger; and there are no guarantees that additional contamination would not occur. It has also been noted that (recent work undertaken) bore hole and test pit dig samples of waste were discovered outside cordoned off areas. The application has not dealt with the fact that the existing park sits higher than many residential roads that front the existing park so any new buildings will dominate the landscape. This will be in part due the removal of a wood of mature trees bordering Eaton Green Road that would be cut down to facilitate the construction of the Eaton Green Link Road. The Transport Assessment makes no mention of a second terminal or the plan to add up to 22 million passengers to that second terminal. This is despite the applicant promoting a second terminal in their own consultation for airport expansion. Also it does not take into account additional traffic generated by the airport or from the Bloor Homes and Crown Estates developments making the application untenable. Traffic modelling has ignored existing traffic congestion or the impact from a second terminal. This should be included as the applicant is also the sponsor for airport expansion and has made reference to the new road as a gateway to terminal 2. It should be noted that the proposed dual carriageway/Eaton Green Link Road is already one of the reasons LLAL is justifying a terminal on Wigmore Park. LLAL cannot promote a route in a consultation while at the same time ignoring its own consultation when it seeks planning permission. This is just another example of the applicant withholding key information that will give false traffic forecasts if it is not included. So, the revised application is still in breach of the local plan, as it still contains a link road from Eaton Green Road, which is in breach of policy LLP6D(i). Highways England have not been approached for comment about the new dual carriageway potentially serving terminal 2, which is the clear intention of the applicant. This omission need to be urgently addressed.

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		There will be major disruption to the airport operator, local businesses and residents if the dual carriageway receives approval. One of the justifications for the business park is to create jobs yet much of the existing land LLAL owns behind Percival Way has been derelict for years with no attempt made to create jobs within it. The dual carriageway will cut through much of this derelict land that could have been redeveloped. The above statement in its own right should be considered as justification for refusing planning permission as no viable alternate has been offered that is comparable with what local residents already have. In summary, I am very much against the application as it stands. I believe that much of what is proposed is unnecessary and alternatives can be achieved. The 'consultation'; and other engagements with those involved have been a dishonest process with real intentions clear to me but unexpressed by those presenting. In that sense I do not feel properly consulted with. The planning application itself is deceptive. What is really planned is not in these plans. It is my firm belief that these plans will do immense unnecessary harm to the local area; including Wigmore Valley Park and the areas around it. All of this is part of a large but not well joined-up or communicated complex of developments planned in Luton and the surrounding areas that will cause significant increases in chemical and noise pollution, traffic jams and journey times, and further stress the areas around the airport and further afield including routes into Luton from various directions. The airport itself is very close to built-up areas and those areas are too compacted for such expansion. The risks of the works in terms of disturbing the toxic waste buried in the airport area and the park area are considerable and seem to be being done in a way that would not meet my expectation in terms of protecting the public or even the workers around there. There are alternative routes that could be developed for the road building project, if that did have to be done. The destruction of Wigmore Valley Park though for me is the biggest concern. There are clear alternatives to this but people are not being listened to. The park for me has the most vital function of providing a noise and chemical pollution buffer and that is crucial. On top of that we have the wildlife site and the recreational purposes which are fully utilised by people, animals and flora. Under no circumstance can I support this application as it stands. I wish to make it crystal clear that I am not against development or the promotion of Luton as a prosperous and energetic domain. What I am against is the plans that are false. Two things to ask in the most earnest way; 1: ask the planners to go back to the drawing board and come up with an acceptable and honest upfront alternative; 2: Save Wigmore Valley Park for the people of Luton and surrounding areas.
20.	Yes 12.10.18	REPEAT OF REP 257
21.	Yes 12.10.18	REPEAT OF REP 257

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22.	Yes 29.10.18	The access road and Century Park has once again raised its ugly head and I have to comment as a resident of Stopsley and on behalf of the residents of Wigmore as their Councillor. 1 OUTLINE PLANNING PERMISSION FOR MIXED EMPLOYMENT. I ask that you explain why this vast additional space is required when, looking around Luton, many existing office spaces etc are left empty. As an example, Butterfield Green was designated for offices and small industrial units many years ago and only part of that acreage has been used whilst existing offices lie empty. The plans for Century Park have insufficient parking spaces for employees. Wigmore residential streets are already congested because office workers and holiday makers leave their cars on our roads and get taxis to the airport. Please explain how you propose to mitigate the increased risk to residents. Equally important is the loss of the valuable community space at Wigmore Valley Park. It is home to a wide variety of wild life, plants, and trees and provides a recreational space important for health and well being. It will take at least 30 years to recreate to a similar habitat not only for wild life but for residents alike. This area acts as barrier to the fumes that are produced by an increasing number of aircraft taking off 24 hours a day. At this point I would also like to mention that the Orchids, some very rare, were removed during the heat of a hot summer and placed elsewhere, without water or care. This demonstrated a clear disregard to the environmental impact of the proposal. Residents are extremely concerned about this lack of care and any future planning of the park. If Terminal 2 and and a smaller mixed employment area were planned in a different position it would be possible to avoid Wigmore Valley Park. 2 ACCESS ROAD TO CENTURY PARK This road was not on the original plans and is causing great concern to the people that use the road to get to Luton, M1 and Airport. The roads leading on to Eaton Green Road are already congested at peak times. There are 5 schools in the area and I, along with residents, have great concern for the welfare of our children who are vulnerable at an early age to the pollution already being caused.. The traffic comes from Hertfordshire, Ashcroft Road, Wigmore Lane, Lalleford Road and the A505. Ideally the road should come off the A505 along Airport Way. This road was originally designed

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		to be a dual carriageway. Wigmore and Stopsley Wards have not had appropriate Air Quality monitoring completed for all the particles of concern to health and now with the Airport expansion it is even more critical. On behalf of residents and the users of Eaton Green I ask that you rethink the present plans proposed.. I will make every effort to encourage the residents to write to the Secretary of State for Transport stating their concerns.
23.	Yes 9.10.18	This planning application should be refused on the following grounds: Protecting our environment. Wigmore Valley Park is a much loved community asset containing playing fields and a County Wildlife Site. By building an unnecessary road and buildings, this planning application contributes to the health, noise, and environment issues that currently exist in Luton and surrounding areas. It will also contribute to the global warming issues that the world faces which has been widely reported this week. If you know someone who has suffered from a lifestyle change, such as obesity, diabetes, diseases of the cardiovascular and nervous systems, cancer, reproductive and mental health problems, asthma and allergies, then stop and prove that this development won't contribute towards that. This week there has been lots in the paper about the IPCC research into Global warming. Stop this planning application. How would you feel if in 40 years time your children or grand children ask you why you supported this planning application, when they could be suffering as a result? Perhaps your justification would be that it is so small a planning application that it would have made no impact to the greater picture, however we all know that's not the case, as the planned airport expansion would take full advantage of what is agreed now. Increased jobs, revenues and economic growth don't compare with the misery to be faced by the health and environmental issues that could result as a result of this planning application. Think of tomorrow and the ordinary person in the street, not those who would financially gain.
24.	Yes 10.10.18	I would like to oppose this application for these reasons: 1. The roads cannot cope presently with the traffic situation. The road system is a bottle neck in this area and will only get worse with the increase in airport passenger numbers. More passengers, more cars, more car park space required! As Luton lacks land for development, surely multi-storey construction is much more sensible than huge areas of open parking taking up so much space? Also park and rides could be used at areas at which the traffic enters Luton from the motorway and other main road connections.

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		2. Wigmore Park is a much needed green area for Luton containing many species of wildlife now under threat as the British countryside is being destroyed and ruined by development at a rapid rate. Luton is already one of the most developed towns in the country and one of the worst in the country for natural green areas, which is not good for the people living here. 3. The land on which Wigmore Park is situated is a former landfill site and recent borehole drill tests that were completed in the summer, have left the park with numerous pipes protruding from the ground. These pipes are open to abuse from the public and also a threat to the public. There has already been one pipe knocked from its fixing, leaving internal tubes and pipes exposed. I refer to pipe WS218 (reported to police and council) Also keys left bby pipes and lid open. (Pipe WS217B) Unreported. I myself locked this lid and removed keys from site. As WS218 was damaged I only reported this case. But a worrying lack of security being observed regarding these structures that are placed all over the park as it seems they can easily be knocked over and unsecured. 4. With recent findings by Climate Change Scientists that we have to stop polluting the atmosphere or risk Global Warming and face terrible consequences in the future for our planet, there needs to be a decrease in carbon emissions, not an increase, which this development will bring with increased flights and added traffic. 5. Health problems will increase and more costs for NHS. We need Green solutions to these problems to improve the lives of people, not create worse ones.
25.	Yes 11.10.18	Photographs provided re WS218 damage
26.	12.10.18	Breach of NPPF guidance in terms of air, noise, water integrity and ground stability. Within the UK is the National Planning Policy Framework states Government Policies to govern planning and development decisions, including yours'. It was recently updated and the latest version as of July 2018, was issued by the Ministry of Housing, Communities and Local Government. These are rules to be followed by both Local Authorities and the Planning Inspectorate. What does the National Planning Framework say about air pollution, noise pollution, water pollution and ground stability? These are all concerns due to the fact your chosen site is on top of a massive unlined toxic landfill, above a vast groundwater

Ref.	Objection	Comments
		conservation zone, providing Thames Valley much of its potable water for distribution hundreds of kilometres around. NPPF - p.49 "15. Conserving and enhancing the natural environment 170. Planning policies and decisions should contribute to and enhance the natural and local environment by: e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans…." The Planning Application for New Century Park, AKA Terminal Two via the Backdoor, definitely flouts this workable advice because it swivels the policy to the absolute polar reverse. Instead of "preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability." ….this development application would enthusiastically bound towards catastrophe, it would "ensure new and existing development contributes to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution and land instability." This application has all the negatives, meant to be avoided, completely covered in its goals! The digging up of a toxic landfill, on top of an unlined chalk-base aquifer, will ensure that potable water in a ground water conservation zone is placed at risk. Slowly it can leach quantities of poison into the environment and into peoples' bodies. The extra traffic congestion from both vehicles and millions of extra passengers and those additional, 7000 claimed new jobs, will guaranteed air pollution can worsen and worsen on already awful roads.

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		As the Road Assessment Document dated 31 Jan 2018 reveals - by its many glaring red designations, indicating "above maximum capacity already reached". Followed by the orange – "very soon to be above maximum capacity". The noise pollution that disturbs all surrounding areas already as far as Stevenage, Harpenden and St Albans can become even more intolerable. The instability of the landfill can be wonderfully maximized when you place large heavy structures on top of it – just like when B&Q collapsed under its own weight on the other side of Luton a few years ago. And none of these have any mitigating solutions whatsoever!!!
27.	12.10.18	NO ANNUAL AIR STATUS REPORTING THIS APPLICATION BREACHES NATIONAL PLANNING POLICY FRAMEWORK GUIDANCE BY ITS COMPLETE FAILURE TO PRODUCE ANY AIR POLLUTION MONITORING WHATSOEVER, IN THE RESIDENTIAL AREAS SURROUNDING THE PROPOSED DEVELOPMENT. The most recent Annual Air Status Report produced by Luton Borough Council is from 2016. It revealed that no air pollution monitoring AT ALL was taking place in the wards of Wigmore, Stopsley, Round Green and High Town. These are the wards containing and surrounding the Airport. NPPF - p.52 181. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan. NPPF - p.30 103. The planning system should actively manage patterns of growth in support of these objectives. Significant development

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Ref.	Objection	Comments
		should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making. Furthermore is was discovered that there has been no Annual Air Status Report produced by the Council AKA Planning Application Applicant for the last TWO YEARS!! Keith Dove confirmed today that there is not one even published – and possibly not even written, for both 2017 and 2018!
28.	Yes 12.10.18	I strongly object to PA 17/02300/EIA for the following reasons. NO PUBLIC SUPPORT OR ECONOMIC IMPACT REPORT Full details of this objection are ATTACHED. 3 documents attached: PowerPoint presentation, survey results from LLAL consultation, email response (below) THIS APPLICATION IS BEING PLACED FROM A COMPANY IN TO ITSELF. THE OWNERS OF THE APPLICANT COMPANY ARE THE SAME AS THAT OF THE APPROVING LOCAL AUTHORITY. THERE IS NO GETTING AWAY FROM THAT FACT. FURTHERMORE BOTH APPLICANT AND THAT SAME LOCAL AUTHORITY ARE DESPERATELY TRYING TO PERSUADE THE PUBLIC TO BELIEVE A LOAD OF RUBBISH IN PLACE OF SOLID DATA, AND ACCEPT A COMPLETELY INFERIOR SET OF PLANS. THEY ARE ALSO FINANCIALLY QUESTIONABLE AT BEST, BUT WOULD ULTIMATELY RUIN THE WHOLE TOWN AT WORST. Further proof that the Council fully intends to pass its own planning application to itself, was Robin Porter's presentation at the "Let's Talk/ Have Your Say Meeting" at Ramridge School on Monday 8th October 2018. Newspaper articles covering this: Robin Porter, the Director of LLAL, Hazel Simmons (Council Leader) and Trevor Holden (Council CEO) were invited by me, in order to answer directly residents' concerns about these planning applications. Robin proceeded to make a presentation (presentation is attached) where he claimed that the survey data they had gathered

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		from the summertime consultations, proved that there was public support for the developments. However nobody has ever been allowed to see the results of the surveys to date, as they will never be published. He presented certain figures in order to attempt to show public support. However besides proving without doubt, that the Council is entirely biased towards itself and its own applicant company – naturally….conflict of interests as stated before….there were some gaping great holes in his figures. Firstly the figures were presented as though they were final. But Robin later admitted in writing the following day, when I requested a copy of the report where he got these figures; that they were not final figures and the report would not be ready until December sometime… We can presume then that Robin Porter plucked only the best most favourable statistics available to him. In which case they were not very favourable…clearly indicating the unpopularity of the development, in spite of his desperate attempts to claim otherwise. We re-framed his statistics and came up with entirely different conclusions from the same data. In spite of him claiming overwhelming support…the survey sample of 1,716, is just 0.4% of the populations of Luton, Hitchin, Stevenage, Beachwood Green, Harpenden, Dunstable and Caddington; since the total population of those areas is 435,951. If we break down their preferred options:- 4A - 858 are against/ don't know/ don't care 4B - 789-927 are against/ don't know/ don't care 4C - 617-1,099 are against/ don't know/ don't care YET STILL THEY THROW MILLIONS AT IT! All the comments about jobs/ income etc. have no source allocated, so they are just of their own making – fictitious and not rooted in anything solid. We ask how can you have chronic deprivation, and yet fastest growing jobs and wages? Why do all the figures state regional and national growth/ economy, and yet nothing about money into Council budgets for us all? LLAL's income in ratio to LBC income since 2010, needs careful examination. They expect £113 million cuts from Central Government, which should be about £14.125 million a year. So how can they afford to risk this precious Council nest egg, of 300 million? Where are the economic impact reports for the application detailing all of this? [PW121018] Furthermore, we have re-framed their survey results; graphs are attached.

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Ref.	Objection	Comments
		We looked at the number of attendees based on the potential Luton South population which we took as our denominator, which comes out at 2%, as shown in a pie chart. So hardly an overwhelming mandate, however you look at it! Highways Department should always factor in the 'economic cost of congestion' when dealing with road planning. Have LBC done this? If so is the report available? We don't think so – because we have looked and can't find it. By some estimates, the economic cost of congestion to the UK economy is estimated at £4.3bn a year and as much as £307bn by 2030. The economic argument for LLA expansion with Heathrow about to gobble up entire villages and with Gatwick serving the south and Stansted a few miles away is weak to say the least. Factor in BREXIT, the global economic slowdown and next recession which is not too far away and the country's still parlous finances, and LBC's plans seem at best short-sighted - at worst environmental, economic and financial madness.
29.	Yes 22.10.18	The proposed new access road via Eaton Green Road will worsen congestion in the local ara, causing breaches of air pollution limits in this highly populated area. Access must remain via M1/A1081 only.
30.	Yes 12.10.18	This planning application should be refused on the following grounds: REPEAT OF REP 348 The noise of the piling works will be unbearable and this already affected xxxxxxxxxxxxxxxxxxx. xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx is xxxxxxxxxxxxxxxxxxxx

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Ref.	Objection	Comments
31.	Yes 10.10.18	This is to register my objection to the planning application for the following reasons: Wigmore Valley Park is a much-loved community asset containing playing fields and a County Wildlife Site. The planning application fails to take this into consideration nor does it intend to replicate these existing features at its proposed new location for the new Wigmore Park. This is a facility which has been well used by us as a growing family over the used - and also still now for walks, foraging and well-being including fresh air and exercise. It should be noted that the applicant has already identified the location of the New Wigmore Park as a site for a long term car park in its consultation for airport expansion so there has to be doubt if the park will actually open and if it does for how long. REPEAT OF REP 348

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
1.	Petition by Friends of Wigmore Valley Park and Friends of the Earth Petition 26 signatures 24.1.18	In response to the above notice in Luton News 3 Jan 2018, asking if any owner or tenant of the land wishes to make representations about the above application: We assert that Wigmore Valley Park was given to residents in 1982 when the Wigmore estate was built. Residents were told this open space was the minimum necessary per 1000 population. The land was landscaped, planted, then managed for us by Luton Council, elected to represent us. Three generations have enjoyed the park, the trees have matured splendidly, and a big part has become an important County Wildlife Site, with many birds and orchids, a wonderful place for children and adults to connect with nature, and see countryside only a short distance from their homes — it is also designated an Area of Local Landscape Value. We were therefore hugely shocked to find that, without telling residents, our 'public servant', Luton Council has in 2015 either leased or licensed the land to a company, LLAL, which wants to build large 'units' and car parks on it, and has now submitted plans. As a large group of residents (over 1200 facebook members who live across the east of Luton), Friends of Wigmore Park own the park, as it has been in constant use and a right of way for residents for 35 years. A piece of land needs only to be used for 12 years to be assumed to be owned by the user, and can then be registered with the Land Registry. We would like to declare our park Local Green Space, and an Asset of Community Value, and wish to set up a Neighbourhood Forum to oversee the wider area. We therefore strongly object to losing our land for development. We believe we have a legal right to continue to use it, and that we have a contract of understanding with Luton Council for the park to be used in perpetuity, that has been broken. Luton is overdeveloped and our roads are heavily and increasingly congested due partly to the applicant — we cannot afford to lose our parks and be subjected to further health risks. The agricultural fields offered as a substitute for the loss of our park do not compare. They're further away, less convenient and of no wildlife value. People greatly value the park's wildlife, and are aghast that part of the County Wildlife Site would be built on. The smaller area that would be left would have less wildlife next to vehicles, roads and buildings. The view from the park would no longer be attractive near big buildings, and traffic would be noisy and pollute our park. The park was created over a landfill site, and building on it could be dangerous.

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Ref.	Objection	Comments
2.	Petition by Friends of Wigmore Valley Park and Friends of the Earth Petition 85 (64+21) signatures 9.8.18	I object to any airport development on Wigmore Valley Park (This was in fact an objection in response to LLAL's press notice informing anyone with an interest in the land that an application had been submitted)
Proforma Letter		
1.	Proforma letter 31.5.18	I object to any development on Wigmore ValleyPark. Residents were given this important green park when the Wigmore estate was built. Council officers thoughtfully landscaper it. They planted many trees for us, to act as a green buffer and as a country park between the airport and residential properties. This great work should not be undone. People have grown up with this park and have childhood memories. Over the last 35 years it has become a County Wildlife Site and 60 bird species and a wide range of plands including hundreds of orchids of 4 different species. These qualities could not be replaced by a new park located next to a runway where land is noisy and polluted by aircraft. Due to the proximity of the runway, for safety reasons bird life would be discouraged. Trees would be removed. The proposed new park would also be too far from where people live. We have lost too much green space. Rapid airport expansion has caused huge congestion and pollution affecting people's health. It is also fuelling climate change, harming people now and in the future. This cannot continue. The park and its hundreds of trees help to reduce pollution and noise. The trees must be protected. Build – only if you must – on Century Park fields, which has had planning permission for 20 yearsm not on our beautiful park.

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		An access road should go from the proposed route at President Way and follow the airport boundary, running inside it. It must not go across the park, which would sandwich our children's playground between two busy roads, stunting growth of our children's lungs and causing asthma and other health issues to our children. Pollution is also killing our grandparents! The Council must protect our health and our green spaces. *Once green space goes it never reappears.*
2.	Proforma letter	REPEAT OF REP 1 *Our green spaces should never be built on, only use brown fill land*
3.	Proforma letter	REPEAT OF REP 1 *Luton town has at least 20% too little greenery for the size of town. Enough is enough LBC. Too much stick and not enough carrot.*
4.	Proforma letter	REPEAT OF REP 1 *I have lived in my house for 28 years and have used it for my children and now my grandchildren and daily dog walks. Vital area to not only us local residents but people visit from all over Luton!!!*
5.	Proforma letter	REPEAT OF REP 1 *A wonderful place for dog walking, family picnics and only decent skate board.*
6.	Proforma letter	REPEAT OF REP 1 *We have enough noise from airport we do not need any more.*
7.	Proforma letter	REPEAT OF REP 1 *It will take years for the trees to reach the size they are now. I won't see it.*

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Ref.	Objection	Comments
		The landfill is still an unknown quantity, test sites may not have uncovered it all. *We need the lungs of Luton to stay. Enjoyed this for 28 years – 3 generations – it has to stay. The pollution that will affect Wigmore residents is unthinkable. As well as affect quality of life.*
8.	Proforma letter	REPEAT OF REP 1 *We have brought our grandchildren over this beautiful park for years and they love to run in the wide, safe environment.*
9.	Proforma letter	REPEAT OF REP 1 *As a grandparent my wife and I have spent many hours with our dog and children walking and playing in this park.*
10.	Proforma letter	REPEAT OF REP 1 *For this generation and future ones to enjoy outdoor spaces*
11.	Proforma letter	REPEAT OF REP 1 *To enable us to enjoy fresh air and for future generations*
12.	Proforma letter	REPEAT OF REP 1 *The increased loss of green spaces will turn this country into a concrete jungle*
13.	Proforma letter	REPEAT OF REP 1
14.	Proforma letter	REPEAT OF REP 1 *The pollution and noise from the runway is terrible and dangerous for the new proposed site*
15.	Proforma letter	REPEAT OF REP 1 *I love my park*
16.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*Please don't take our children playground*
17.	Proforma letter	REPEAT OF REP 1
18.	Proforma letter	REPEAT OF REP 1 *Unfair and ludicrous plans. Loss of green space and pollution are my issues. Planners seem to plan for now and not the future.*
19.	Proforma letter	REPEAT OF REP 1 *I pick blackberries every year. Grandchildren love it. Walk my GSD who loves her freedom. Not many places left.*
20.	Proforma letter	REPEAT OF REP 1 *Love spending time here with my children in our play area and blackberry picking*
21.	Proforma letter	REPEAT OF REP 1 *Blackberry picking and spending time with the family*
22.	Proforma letter	REPEAT OF REP 1
23.	Proforma letter	REPEAT OF REP 1
24.	Proforma letter	REPEAT OF REP 1
25.	Proforma letter	REPEAT OF REP 1
26.	Proforma letter	REPEAT OF REP 1 *Why can't the buildings be put on the farm land. Keep Wigmore Park as it is!*
27.	Proforma letter	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		It will be extremely dangerous to build on landfill. The proposed dual carriageway does not have the necessary local road infrastructure and the resultant increase in road traffic will be detrimental to the area
28.	Proforma letter	REPEAT OF REP 1 *Wigmore Valley Park is the only park I feel safe and comfortable with my child and dog. Don't ruin it for our next generation*
29.	Proforma letter	REPEAT OF REP 1 *Think of the well being of all residents*
30.	Proforma letter	REPEAT OF REP 1
31.	Proforma letter	REPEAT OF REP 1 *I use the park everyday and would be very upset if we lose it*
32.	Proforma letter	REPEAT OF REP 1 *And put the interests of residents before profit*
33.	Proforma letter	REPEAT OF REP 1 *Don't take away a park that is so close to the hearts of the community. There are other alternatives nearby that would be more suitable.*
34.	Proforma letter	REPEAT OF REP 1 *I have been walking here for 20+ years. I understand the need for development, however I think the important stakeholders i.e. us views need to be taken on board and acted upon!*
35.	Proforma letter	REPEAT OF REP 1 *My family have been using this park for decades. We are passionately about the wildlife and will fight development tooth and nail*
36.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*Keep our park for avoid over crowding and not to very trafficy*
37.	Proforma letter	REPEAT OF REP 1 *Keep our parks for future generations*
38.	Proforma letter	REPEAT OF REP 1 *We all need open spaces for our children to play on*
39.	Proforma letter	REPEAT OF REP 1
40.	Proforma letter	REPEAT OF REP 1
41.	Proforma letter	REPEAT OF REP 1 *To build on this beautiful park – so full of wildlife, amazing nature and enjoyed by so many – would be an absolute tragedy*
42.	Proforma letter	REPEAT OF REP 1 *No development on the park as the community enjoy it please*
43.	Proforma letter	REPEAT OF REP 1 *Our children need spaces to play*
44.	Proforma letter	REPEAT OF REP 1
45.	Proforma letter	REPEAT OF REP 1 *I believe the ground under the park resides on an infill site and is therefore not safe to build on*
46.	Proforma letter	REPEAT OF REP 1 *Please think again*
47.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*We need this park to have out children to have green spaces to grow up and walk their dogs*
48.	Proforma letter	REPEAT OF REP 1 *All Luton Council is concerned about is greed, the local residents are seen as a hssle. Wigmore was a beautiful place and the Council has let it go the way the rest of Luton. Leave something for the children to enjoy and for once stop greed letting decisions get made*
49.	Proforma letter	REPEAT OF REP 1 *With the proposed housing estate to the back of Wigmore the community are losing their green space. We will have very little left onec these developments go ahead. Luton's 'progress' is at a massive cost to local people.*
50.	Proforma letter	REPEAT OF REP 1 *It is a joke that corporate profit is thought of as more important than health and nature*
51.	Proforma letter	REPEAT OF REP 1 I have lived here all my life and use the park regularly to walk my dog and take my child to the only park (within walking distance0
52.	Proforma letter	REPEAT OF REP 1 *This is a much needed green space for the community. Do not build on it!*
53.	Proforma letter	REPEAT OF REP 1 *This proposal is to the complete detriment of residents of Luton. We need our beautiful Wigmore Park left as it is.*
54.	Proforma letter	REPEAT OF REP 1 *We need the park for bees, butterflys, dogs and wilflife etc. Hands off.*
55.	Proforma letter	REPEAT OF REP 1
56.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*Many parks nationwide are long established, centuries or more. This is a fledgling park, leave it alone.*
57.	Proforma letter	REPEAT OF REP 1 *Put our children before big business*
58.	Proforma letter	REPEAT OF REP 1 *Feel very strongly re above. We have enjoyed this wonderful open space for years*
59.	Proforma letter	REPEAT OF REP 1 *I want to keep my park, clean air, plants, wildlife. Please leave our park and no pollution*
60.	Proforma letter	REPEAT OF REP 1 *Protect our green space, think of people and their health rather than profit. Once it's gone it's gone forever*
61.	Proforma letter	REPEAT OF REP 1 *Disgusting how the Council want to put our health at risk, disrupt the environment and a space which allows people to join together as a community*
62.	Proforma letter	REPEAT OF REP 1 *Having used the park for over 25 years I do not want to see it changed*
63.	Proforma letter	REPEAT OF REP 1 *I'm one of the grandparents and I can personally state that the air pollution has a detrimental effect on my chest condition*
64.	Proforma letter	REPEAT OF REP 1 *For the sake of our children and their children keep Wigmore green*
65.	Proforma letter	REPEAT OF REP 1 *Yes keep it green. Please*

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
66.	Proforma letter	REPEAT OF REP 1 *We don't need a new business park. Existing ones are not fully used. This is one of the best wildlife sites in the town and has taken many years to develop*
67.	Proforma letter	REPEAT OF REP 1 *We do not think the proposed 'benefits' are of any benefit. There are so many unused brownfield sites that could be made use of instead*
68.	Proforma letter	REPEAT OF REP 1 *Why strip out what has been established beautifully at Council taxpayers expense – this wonderful established park – only to start again with land too far removed for the locals with asthma and breathing problems (no doubt airport related) to walk to.*
69.	Proforma letter	REPEAT OF REP 1
70.	Proforma letter	REPEAT OF REP 1 *Absolutely critical to maintain wildlife habitat corridors. This area has evolved over many years to sustain numerous species. If built on landfill, would release toxic chemicals into watercourses*
71.	Proforma letter	REPEAT OF REP 1 *Totally opposed to the loss of this open space*
72.	Proforma letter	REPEAT OF REP 1 *We cannot lose so much of our open spaces in so small an area when other options are available. People should come before convenience for cars (see point above)*
73.	Proforma letter	REPEAT OF REP 1
74.	Proforma letter	REPEAT OF REP 1 *To redevelop this area will be a criminal act and should never be allowed*

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
75.	Proforma letter	REPEAT OF REP 1 *The park and wildlife area is precious. We must not lose anymore of it*
76.	Proforma letter	REPEAT OF REP 1
77.	Proforma letter	REPEAT OF REP 1 *We love this park for our grandchildren and dogs. Not much open space left in Luton now.*
78.	Proforma letter	REPEAT OF REP 1
79.	Proforma letter	REPEAT OF REP 1
80.	Proforma letter	REPEAT OF REP 1 *Building on this site will be a nightmare for the park. We Wigmore residents put up with the noise and pollution from the airport, yet we benefit from nothing in our area, and now you want to take away our beautiful park*
81.	Proforma letter	REPEAT OF REP 1 *Please leave our green space alone for families to use and not increase the noise and pollution for the residents of Stopsley*
82.	Proforma letter	REPEAT OF REP 1 *Why alter present green space for business which there is plent of land at J10.*
83.	Proforma letter	REPEAT OF REP 1 *Our children have grown up using the park and surrounding area*
84.	Proforma letter	REPEAT OF REP 1 *Because it is home to yummy blackberries and many adorable animals such as rabbits and foxes*
85.	Proforma letter	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		This is a beautiful place that my son loves to play in. His children will wonder where it went
86.	Proforma letter	REPEAT OF REP 1
87.	Proforma letter	REPEAT OF REP 1 *Keep a healthy area*
88.	Proforma letter	REPEAT OF REP 1 *Please do not build on our park. We enjoy all the health benefits it offers*
89.	Proforma letter	REPEAT OF REP 1 *Wildlife is real life*
90.	Proforma letter	REPEAT OF REP 1 *Keep our parks for future generations*
91.	Proforma letter	REPEAT OF REP 1 *Parks are precious keep ours*
92.	Proforma letter	REPEAT OF REP 1
Officially Anonymous		
1.	Proforma letter	REPEAT OF REP 1 *We use this area on a regular basis and it makes a great difference to our lives.*
2.	Proforma letter	REPEAT OF REP 1 *Space to think. Keep Wigmore wild and keep our happy spaces. "When the last tree has been cut down, the last fish caught, the last river poisoned, only then will we realise that one cannot eat money"*
3.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*Support #clean air for a clean conscience*
4.	Proforma letter	REPEAT OF REP 1 *It would be a shame to lose a wonderful well used green space in Luton. There are far too few green spaces in Luton already. Luton should set an example to the rest of UK airports.*
5.	Proforma letter	REPEAT OF REP 1 *I grew up in Stopsley so remember the environment over many years, particularly experiencing my connection with nature. I do not oppose technology and appreciate change, however, we must above all maintain a balance for our future children! This commercial proposal has no balance, no or zero balance, like life, creates disharmony. Fundamentally we are first nation people, intrinsically part of nature and our mother earth. It is no exaggeration that we are heading to a catastrophic conclusion. By abusing the earth we abuse our and all other life.* *Wigmore Park is a small but relative example of how we can literally save ourselves. Act now.*
Proforma Bullet Points		
1.	Proforma bullet list	Objection to application 17/02300/EIA for the following reasons indicated by crosses: **Viewpoint/Principle.** Wigmore Park is an asset given by Hitchin Homes to the people of Luton as a condition of their 1982 planning permission and as such belongs to the people. **Breach of the Luton Local Plan.** The Council produced Policy LLP6 that prohibits access via Eaton Green Road, except for bicycles, buses and taxis. **Traffic generation/Traffic and pollution.** Local roads were designed for local anticipated traffic conditions only. The application with access via Eaton Green Road will encourage traffic away from the A05 and to use Wigmore Lane, Crawley Green Road and Ashcroft Road. **Loss of Trees.** The application includes the destruction of many groups of mature trees within the existing Wigmore Park.

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Destruction of a county wildlife site. The majority of Wigmore Park's county wildlife designated site will be turned into car parks with the loss of special habits that won't and can't be replaced. **Location (and landscape).** The proposed New Wigmore Park is too remote for many existing users who walk to the park. A green corridor leading to the new park cannot be classed as parkland. **Toxic Tip.** The proposed development is on the town's former unregulated tip. It has been identified in document 17_02300_EIA DAS Part 2-68521 page 16/24 that piling and disturbing the clay cap could cause safety, odour, pollution and drainage issues through later settlement. **Density of development is too great.** The proposal claims that it will create 1000s of new jobs but only 1674 car park spaces have been created to serve the buildings. **Many existing businesses** located in numerous modern premises will have to relocate due to the route of the proposed dual carriageway causing uncertainty to the businesses and workers. **Other.**
2.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
3.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
4.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Toxic tip'. 'breach of LLP', 'traffic generation', 'loss of trees', 'location' and 'density of development'
5.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Destruction of CWS', 'location' and 'toxic tip'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Other. *Strongly disagree with building on Wigmore Park.*
6.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic generation', 'loss of trees', 'destruction of CWS', 'location', 'toxic tip' and 'density'
7.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
8.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density' or 'existing businesses'
9.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Location', 'density' or 'existing businesses' **Other.** *Increase in street planting following new plans.*
10.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
11.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
12.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development' **Other.** *Health and safety issues due to traffic increase, air pollution, children's safety, etc.*
13.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Loss of trees', 'location', 'toxic tip' or 'existing businesses'
14.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	bullet list	Did not tick 'Location', 'toxic tip', 'density' or 'existing business'
15.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Toxic tip'
16.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Loss of trees' and 'toxic tip'
17.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
18.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
19.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
20.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
21.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Access to Eaton Green Road, traffic is bad enough now.*
22.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Viewpoint', 'location' or 'existing businesses' **Other.** *Access from Eaton Green Road, traffic is far busy enough now.*

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
23.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
24.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
25.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
26.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
27.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Location', 'density of development' and 'existing businesses' **Other.** *I often walk my dog on Wigmore Park*
28.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development' and 'existing businesses'
29.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Principle', 'location and landscape', 'density of development' and 'existing businesses'
30.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'Location', 'density of development' and 'existing businesses'
31.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'Location', 'density of development' and 'existing businesses'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Other. *Used by many locals and children who would be affected by closing the park*
32.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic generation' **Other.** *Parking in local residential roads*
33.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Loss of trees', 'location' or 'density of development
34.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Destruction of CWS', 'location' or 'density of development'
35.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *This land was given to the people of Wigmore and now the Council have given the land to LLA. There is too much congestion as it is now. Infrastructure cannot cope with this development and the double passenger numbers that the airport is proposing.*
36.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *The area cannot already deal with the traffic there is at the moment. Getting out/in the estate at rush hour is a nightmare. All the green space in Wigmore is slowly being taken away. It is so sad that the park is being destroyed and the surrounding area.*
37.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'loss of trees', 'desnisty of development' or 'existing businesses'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Other. *Wigmore park was a landfill site*
38.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Toxic tip', 'destruction of CWS' and 'traffic generation' **Other.** *Concern over excess traffic*
39.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
40.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
41.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development' or 'existing businesses'
42.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Breach of LLP', 'traffic and pollution', 'loss of trees' and 'destruction of CWS'
43.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Existing businesses'
44.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
45.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
46.	Proforma bullet list	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Ticked all boxes
47.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Traffic generation', 'location' or 'existing businesses'
48.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
49.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
50.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *There are cycleways in the proposal. Nobody will cycle to the airport. More disruption on existing roads during construction.*
51.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *There has already been a land grab at Wigmore Park when an area was given over to a car park with the then assurance from the Council that no further incursion would take place.*
52.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *1. Only area for recreation. 2. Rare plants will be destroyed.*
53.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Other. *Fumes from Luton airport will be a threat to health*
54.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Very concerned about car parking – lack of*
55.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Parking in residential areas*
56.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'destruction of CWS' and 'location and landscape'
57.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'principle', 'destruction of CWS' or 'location and landscape' **Other.** *The new development twould increase inconsiderate parking on local roads outside residents houses.*
58.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
59.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
60.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
61.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	bullet list	Only ticked 'Traffic and pollution', 'loss of trees' and 'destruction of CWS' **Other.** *I live in Keeble Close but actually on Eaton Green Road and am concerned about disruption caused by new road and traffic lights*
62.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Loss of trees', 'destruction of CWS' and 'location and landscape'
63.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development'
64.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'loss of trees', 'destruction of CWS' and 'location and landscape'
65.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development'
66.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
67.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP' or 'location and landscape'
68.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
69.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP' or 'existing businesses'
70.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	bullet list	Only ticked 'Principle', 'traffic and pollution', 'loss of trees' and 'destruction of CWS'
71.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
72.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
73.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *All above*
74.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Breach of LLP', 'principle' and 'traffic and pollution'
75.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Breach of LLP', 'traffic and pollution', 'destruction of CWS' and 'toxic tip'
76.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Viewpoint', 'traffic generation' and 'loss of trees'
77.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
78.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Toxic tip', 'traffic generation' and 'density of development' **Other.** *Density/transit of traffic generated by development*

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
79.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Traffic generation', 'loss of trees', 'destruction of CWS', 'location' and 'toxic tip' **Other.** *Great opposition to building on natural park on a tip – toxic waste*
80.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
81.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
82.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
83.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
84.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
85.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Existing businesses' or 'density of development' **Other.** *The new proposed park is no substitute for an established park and it is too far to get to. Also by disturbing the landfill site would be like opening 'Pandora's Box'*
86.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
87.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	bullet list	Did not tick 'Breach of LLP' or 'density of development'
88.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'existing businesses', 'loss of trees' or 'location'
89.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Location'. 'density of development' or 'existing businesses'
90.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Viewpoint', 'breach of LLP', 'density of development' or 'existing businesses' **Other.** *Access for disabled people*
91.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
92.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
93.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Principle', 'traffic and pollution', and 'existing businesses' **Other.** *Impact on traffic near Gypsy Lane*
94.	Proforma bullet list	REPEAT OF REP 1 **Other.** *I can never trust this Labour run Council*
95.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
96.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
97.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *More traffic*
98.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
99.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Increased aircraft noise pollution*
100.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
101.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
102.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Traffic tailbacks causing chaos! Bad enough on Stockingstone Road as it is!*
103.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'location and landscape' and 'existing businesses'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
104.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
105.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
106.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Existing businesses'
107.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP'
108.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
109.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
110.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Street parking will increase*
111.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
112.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Viewpoint', 'traffic generation', 'loss of trees' and 'toxic tip'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Other. *I take my children to the park there and they enjoy going there*
113.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Concern about development of traffic and distance as people will find quickest route using local routes*
114.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Traffic generation' and 'toxic tip' **Other.** *Insufficient infrastructure consideration on the access roads from M1 Junction 10 – already identified as over capacity*
115.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Viewpoint', 'breach of LLP', 'toxic tip' or 'existing businesses' **Other.** *Building on green land when you've allowed other office blocks to be changed to hotels.*
116.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'loss of trees' and 'destruction of CWS'
117.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Destruction of CWS'. 'loss of trees' and 'existing businesses'
118.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** No matter how much work is done on modifying junctions the fact remains that Wigmore Lane cannot take any more traffic.
119.	Proforma bullet list	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Ticked all boxes **Other.** This area already suffers from air pollution generated by increased traffic on the roads and in the airport area as well as from the planes.
120.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Viewpoint' and 'density of development' **Other.** Major concern is parking. We currently have people parking on our roads now so they evade parking charges. Airport parking losing revenue but we are having to subsidise these people. If new development (which I support) goes ahead then residnts should have support from the Council in ensuring measures are put in place to ensure our roads are policed by: 1. Residents parking only 2. Time limit for any parking People who leave cards and go abroad for 6-8 weeks should be penalised not residents.
121.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
122.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Existing businesses' **Other.** The car parking issue is doubly concerning for me as the Council has been unable to fix the issue of businesses parking on the Raynham Way estate as it is.
123.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'loss of trees', 'destruction of CWS', 'toxic tip' and 'density of development'
Officially Anonymous		
1.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'density' or 'existing businesses'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
2.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'location and landscape' and 'toxic tip'
3.	Proforma bullet list	REPEAT OF REP 1 Did not tick any boxes **Other.** *Leave well alone, otherwise this will be an eyesore and there will be no green space left.*
4.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Principle', 'destruction of CWS' and 'toxic tip'. **Other.** *Destruction of green belt land. Business park should be built on brown field sites.*

N

WIGMORE PAVILION

WIGMORE VALLEY PARK

EXISTING CAR HIRE

LONG STAY CARPARK

EXISTING TECHNICAL SERVICES BUILDING (HANGAR 24)

LUTON AIRPORT TERMINAL

AIRPORT MAIN APPROACH

London Luton Airport

KEY

PLANNING APPLICATION BOUNDARY

EXTENT OF LLAL OWNERSHIP

EXTENT OF PROPOSED ACCESS ROAD

Rev	By	Chkd	Appd		Date
PL 01	JL	LS	GU	PLANNING ISSUE	13 Dec 2017
PL 02	JR	LS	GU	Outline planning area revised. Existing site plan updated to show changes within the airport area. Existing Car Hire location indicated	04 Jul 2018

Client London Luton Airport Ltd
Date May 2017
Dwg No. 050_00

Project Luton - New Century Park Masterplan
Title Luton - Existing Site
Scale 1:2500@A0

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esa

CS_073849

AGENDA ITEM

2.1

DEVELOPMENT CONTROL COMMITTEE

27TH MARCH 2019 at 14.00

PRESENT: Councillors D. Taylor (Chair), Lewis (Vice-Chair), M. Ayub, Agbley, Campbell, Chowdhury, MJ Dolling, Franks, Hussain and Rivers.

23. APOLOGY FOR ABSENCE (REF: 1)

An apology for the meeting was received on behalf of Councillor Dr Saleem.

24. MINUTES (REF: 2.1)

Resolved: That subject to apologies for absence from Councillor MJ Dolling in respect of the meeting held on 11th March 2019, being noted, that the Minutes of the meeting of the Committee held on 11th March 2019 be taken as read, approved as a correct record and signed by the Chair.

25. NEW CENTURY PARK PLANNING APPLICATION, LUTON (REF: 7)

The Planning Consultant reported on Application No. 17/02300/EIA submitted by London Luton Airport Ltd for planning permission in relation to (1) outline permission for a new business park comprising office space (class B1), warehouse and industrial space (class B2 and B8), mixed employment space (class B1/B2/B8), a hotel (class C1), cafe space (class A3); energy centre (sui generis), internal access roads; car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection; and relocation of the airport car hire centre; (2) full permission for the construction of a 2km Century Park Access Road incorporating a new junction on the A1081, alterations to the existing airport way roundabout, alterations to Frank Lester Way, a newly created access from Eaton Green Road, a new roundabout providing access into the business park, demolition of buildings, provision of replacement car parking (temporary and permanent), associated earthworks, landscaping, surface water drainage and utilities diversions; the creation of new public open space including footpaths, landscaping and ecological mitigation; extension and alterations to Wigmore pavilion building to provide cafe (class A3) and additional community space; construction of a new skate park and children's play area; and construction of a replacement airport technical services building and associated parking at Luton Airport, Luton.

The Planning Consultant further reported that 975 neighbours had been notified and consulted on the application, and site notices were displayed in 12 locations in the area. The application was also advertised in the local newspaper, when it was first received and in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011; the application was again advertised when the further information was submitted. Furthermore, the application was advertised again prior to the meeting taking place. Whilst the initial advertisement mentioned the requirement under the Town and Country Planning (Development Management Procedure) Order 2015, it was not explicit that the application was being advertised as a major application or a departure from the development plan.

In accordance with the right to speak procedure the Applicants addressed the Committee, 2 objection letters were read out by the Joint Interim Development Management Service Managers and several Objectors addressed the Committee.

Councillors MJ Dolling and Chapman also addressed the Committee as ward councillors.

Resolved: (a) That Application No. 17/02300/EIA be **GRANTED** subject to: 1) Referral to Secretary of State as set out in 2(c) below, 2) the satisfactory completion of a S106 Agreement as set out in 2(b)(i) (3) the final date for any further comments from departure consultation (10.04.19) and review thereof as set out in 2(b)(ii); and 4) subject to the following conditions, (Appendix 1) some of which were amended pursuant to delegated authority being given to the Development Control Manager to amend the wording of conditions to ensure their effectiveness, delete any repetitive conditions and add any missing conditions

(01) The requirements of Part II of Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (as amended) are satisfied by reason of the Environmental Statement, and the Addendum, attached thereto including at least the following information:

(i) a description of development comprising information on the site, design and size of the development;
(ii) a description of the measures required in order to avoid, reduce and, remedy significant adverse effects;
(iii) the data required to identify and assess the main effects which the development is likely to have on the environment;
(iv) an outline of the main alternatives studied by the applicants and an indication of the main reasons for their choice, taking into account the environmental effects;
(v) a non-technical summary of the information under (i) to (iv) above.

(02) It be recorded that, in making the decision on the application, the Committee has taken into account the environmental information comprising the Environmental Statement and the Addendum and that this information meets the minimum requirements of Part II of Schedule

4 to the Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 2011 (as amended).

(b) The Committee further resolved to grant planning permission subject to (as set out below):

(i) The satisfactory completion of an agreement under Section 106 of the Town and Country Planning Act 1990 to contain the following:

1. Public art contribution (£ 250,000) to provide public art in the main office plaza;
2. County Wildlife Site contribution (£ 250,000) to compensate for the loss of 5ha of County Wildlife Site with management of 7.5ha of Dallow Downs County Wildlife Site;
3. Biodiversity contribution (£ 30,000) to provide for the creation and management of new habitats within the site;
4. Replacement trees contribution (£ 35,000) to compensate for loss of trees with replacement planting across the borough;
5. Raynham Way Neighbourhood Park Play contribution (£ 35,000);
6. Roads and highway improvements contribution (£ 3,455,917) to secure highway improvements at a number of junctions in the vicinity to improve capacity, safety and reliability and a requirement to ensure that the junction improvements are completed before the New Century Park access road is brought into use;
7. Sports pitch and changing room re-provision contribution (£1,196,737) to offset the loss of playing fields and ancillary facilities with the contribution being used towards implementing one or more of the following projects:
   i. Provision of a Step 5 Football Facility (an artificial grass pitch suitable for non-league senior football up to step 5 of the football pyramid and associated facilities (including parking provision and changing rooms) at Stopsley / Lothair Recreational Ground; Ely Way or Lewsey Park; and/or;
   ii. The replacement of or improvements to existing adult football facilities (playing pitches and supporting facilities such as changing and parking) at either one or more than one of the following locations:
      - Stopsley/Lothair Recreation Ground, Luton, Bedfordshire; and / or
      - Lewsey Park Recreation Ground, Luton Bedfordshire
8. Measures to ensure the new open space for Wigmore Valley Park is provided in advance of any development taking place on the existing park and the provision of a maintenance specification to ensure the long term maintenance and management of the park;

9. Construction, employment, training and skills initiatives; and

10. An administration and monitoring fee of £6,000 associated with the provision of the enhanced Wigmore Valley Park and its maintenance/management specification).

(ii) Subject to the delegated authority regarding conditions referred to above, grant planning permission subject to the imposition of the conditions as set out belowand that the grant of planning permission should be delegated to the

Development Control Manager upon the expiry of the consultation period and subject to no new material planning considerations being raised.

(c) The Committee further resolved that the resolution to grant would be subject to its referral to the Secretary of State (following the expiry of the further consultation period), as required by the Town and Country Planning (Consultation) (England) Direction 2009.

General conditions

(01) The development hereby permitted shall be begun not later than the expiration of three years beginning with the date of this permission. (Reason: To limit the duration of the permission in accordance with the provisions of Sections 91-96 of the Town and Country Planning Act, 1990).

(02) Applications for approval of the access, appearance, landscaping, layout and scale (herein after called the "reserved matters") for the first phase of the outline development hereby permitted shall be made to the Local Planning Authority before the expiration of three years from the date of this permission. Thereafter, applications for approval of all reserved matters relating to subsequent phases of the development shall be made to the Local Planning Authority before the expiration of two years from the date of approval of the last of the reserved matters of the preceding phase. (Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(03) Full details and particulars of the reserved matters referred to in condition 02 above shall be submitted to and approved in writing by the Local Planning Authority before any development of the outline element of the scheme is commenced (phases 2, 3 or 4). (Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(04) The development hereby permitted shall not be carried out other than in complete accordance with the approved plans and documents listed in Appendix 2, or as shall have been otherwise approved in writing by the Local Planning Authority. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP2, LLP6, LLP13, LLP14, LLP31, LLP32, LLP36, LLP37 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the aims and objectives of the NPPF).

(05) The development hereby permitted shall be limited to the following:

- 29,400sqm B1(a) office floorspace;
- 13,000sqm flexible office/industrial floorspace;
- 11,700sqm B2 general industrial and B8 storage;
- 2,950sqm Technical Services Building;
- 685sqm sui generis use comprising two buildings, one an energy centre and the other a recycling centre;
- 7,200sqm (145 bedroom) hotel;

- 225sqm ancillary retail;
- Between 3,200 and 3,500 car parking spaces within New Century Park, the extended long stay car park and the relocated car hire facility in the Central Terminal Area;
- New and enhanced park (including refurbished Pavilion Building, children's play areas, skate park, parkland, footpaths, ancillary park furniture, orchard, woodland and shrub planting, and habitats); and
- Associated access, highways, structures (including bridge, retaining walls and embankments), public realm, landscaping and ancillary works.

(Reason: To ensure the development is carried out in accordance with the planning permission and to ensure that any development that is carried out is that which has been assessed. To accord with the objectives of Policies LLP1, LLP25 and LLP31 of the Luton Local Plan 2011-2031 (November 2017)).

Archaeology condition

(06) No development shall take place until a written scheme of heritage asset resource management (SHARM) has been submitted to and approved in writing by the Local Planning Authority. The SHARM shall include provision for preservation and management in situ (where possible); archaeological investigation and recording and an outline strategy for post excavation analysis and publication. The development hereby approved shall only be implemented in full accordance with the approved archaeological scheme. (Reason: This condition is pre-commencement as a failure to secure appropriate archaeological investigation in advance of development would be contrary to paragraph 141 of the National Planning Policy Framework (NPPF) that requires developers to record and advance of understanding of the significance of any heritage assets affected by development before they are lost (wholly or in part) and Policy LLP30 of the Luton Local Plan 2011-2031 (November 2017)).

Demolition/construction conditions

(07) No development shall commence until a detailed Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority, and the plan shall include the following:

a. The construction programme and phasing;
b. Hours of operation, delivery and storage of materials;
c. Details of any highway works necessary to enable construction to take place;
d. Parking and loading arrangements;
e. Details of piling operations and mitigation measures to be employed (including the acoustic screen adjacent to the Holiday Inn);
f. Details of hoarding;
g. Traffic Management Plan to reduce congestion (including route signage and travel demand management);

h. Materials Management Plan (to include topsoil removal, storage and re-use);
i. Provision of a Dust Management Plan (including control of dust during demolition, construction, earthworks and the control of dust and dirt on the public highway);
j. Details of consultation and complaint management with local businesses and neighbours;
k. Site Waste Management Plan;
l. Mechanisms to deal with environmental impacts such as noise, air quality, light and odour.

The development shall be carried out in accordance with the Construction Environmental Management Plan as approved. (Reason: To enable the Local Planning Authority to exercise proper control over the development proposed, in the interests of securing a satisfactory standard of work and of highway safety and the control of environmental impacts. To accord with the objectives of Policies LLP1, LLP25, LLP31 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and to ensure the M1 Motorway continues to serve its purpose as part of a national system in accordance with section 10 of the Highways Act 1980).

(08) No impact piling shall commence until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to control noise and measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement. (Reason: To ensure adequate safeguards are taken during construction of the development, having regard to existing ground conditions, and to prevent pollution of the water environment and risk to other receptors. To accord with the objectives of Policies LLP1, LLP36 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Air quality conditions

(09) No development shall commence until a scheme of air quality mitigation measures has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme prior to the first occupation of any buildings. (Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(10) No development within Phase 3 or Phase 4 (as shown on drawing 089916_050_40 RevPL02) shall commence until a suitable Air Quality Assessment has been undertaken, submitted to and approved in writing by the Local Planning Authority to address the inclusion of any combined Heat and Power plant or similar installations. The assessment shall be undertaken in line with all current relevant guidance and standards. The report shall identify suitable measures to mitigate the impacts to any

sensitive receptors identified. The development shall be carried out in accordance with any approved plant or mitigation. (Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Unexploded ordnance condition

(11) No development shall commence until an Unexploded Ordnance (UXO) site safety and emergency procedures plan has been submitted to and approved in writing by the Local Planning Authority. (The Development shall only be carried out in accordance with the approved UXO site safety and emergency procedures plan). (Reason: To reduce risk from Unexploded Ordnance to an acceptable level, as the site lies within an area that has been identified as being at potential risk from buried explosive ordnance due to wartime bombing).

Contamination/remediation conditions

(12) No phase of development shall commence until a remediation strategy to deal with the risks associated with contamination of the site for that phase has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
   i. all previous uses;
   ii. potential contaminants associated with those uses;
   iii. a conceptual model of the site indicating sources, pathways and receptors considering both the current condition and proposed future usage of the site; and
   iv. potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors (current and future) that may be affected, including those off site. This must include a detailed hydrogeological risk assessment using site specific groundwater level and quality data to assess risks to controlled waters considering the current site conditions and the anticipated conditions post development. In addition, the hydrogeological risk assessment must assess the potential for leachate mobilisation / expulsion caused by disturbance and changes in loading in the historical Eaton Green landfill area that may occur as a result of the development.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the Local Planning Authority. The scheme shall be implemented as approved. (Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses. This condition is required to ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with and in order to protect human health. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF).

(13) Before each phase of development is brought into use a verification report demonstrating the completion of works set out in the approved remediation strategy for that phase, and the effectiveness of the remediation, shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. (Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses that may have resulted in soil and or groundwater contamination. Where such contamination is identified to present an unacceptable risk to groundwater within the context of the conceptual site model (CSM), controlled waters risk assessment, remediation strategy and verification plan, a verification report is required to demonstrate the remediation of the site has been successful and that residual contamination at the site no longer presents a risk to controlled waters. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF)

(14) The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority. (Reason: The Addendum to the Environmental Statement (GL Hearn Ltd, August 2018) submitted in support of this application indicates that groundwater beneath the proposed development site is already impacted with contaminants associated with the historical usage of the site. The groundwater monitoring and maintenance programme will provide data to demonstrate that no further deterioration of groundwater quality beneath the site has occurred as a result of the proposed development. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(15) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. (Reason: No

site investigation can completely characterise a site and contamination may exist or in areas where contamination was not expected and therefore not included in the original remediation proposals. To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF).

(16) No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details. (Reason: The previous use of part of the proposed development site as a landfill receiving mixed inert, industrial, commercial and domestic wastes presents a high risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS) leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(17) Piling and other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority with details to be submitted to and approved in writing by the Local Planning Authority (including details of a piling risk assessment to detail steps to prevent overlying contaminated materials from impacting the chalk aquifer). The development shall be carried out in accordance with the approved details. (Reason: Piling using penetrative methods can result in risks to groundwater from by introducing pollutants / turbidity, mobilising contamination, drilling through different aquifers and creating preferential pathways. Groundwater is particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and with paragraph 170 of the NPPF).

(18) A scheme for managing any redundant boreholes, shafts, tunnels and adits, including boreholes installed for the investigation of soils, groundwater or geotechnical purposes, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of how redundant boreholes, tunnels, shafts and adits are to be decommissioned and how any boreholes that need to be retained, post development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to of each phase of development. (Reason: To ensure that redundant boreholes, shafts, tunnels and adits are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and Position Statement A8 of the Environment Agency's Groundwater Protection: Principles and Practice. If these ground penetrations are not decommissioned correctly they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the

proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Drainage conditions

(19) Before each phase of the development commences, a detailed surface water drainage design for that phase shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. The design should include a maintenance and management schedule for the lifetime of the development.

The surface water scheme should be generally in accordance with the submitted flood risk assessment and drainage strategy with subsequent amendments and associated drawings as follows: New Century Park, Luton Flood Risk Assessment by Pell Frischmann, dated Dec 2017; London Luton Airport Century Park Access Road and New Century Park Drainage Strategy by Pell Frischmann, dated Dec 2017; Century Park Access Road Proposed Drainage Layout KQ30131H146 and KQ30131H147, Wigmore Valley Park Drainage Layout 083075 CA 0 GF DR CE 001 P02; New Century Park Outline Drainage Strategy Revised surface water layout KQ30131H182, Revision P4; Wigmore Valley Skate park Surface Drainage Plan WGMR-DLP01; Addendum to Century Park Access Road and New Century Park Drainage Strategy, August 2018; New Century Park, Luton Addendum to Flood Risk Assessment, RE30131/V006/P4A, July 2018. The surface water drainage scheme shall be implemented in accordance with the approved design before occupation of that phase. (Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the NPPF).

(20) Before each phase of the development is brought into use, a set of 'as built' drawings of the above drainage scheme together with a written statement by a suitably qualified person should be submitted to the Local Planning Authority, confirming that the scheme operates as designed. (Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the National Planning Policy Framework (NPPF)).

(21) No phase of the development shall be occupied until confirmation has been provided that either:- all wastewater network upgrades required to accommodate the additional flows from that phase of the development have been completed; or - a commercial buildings and infrastructure phasing plan has been agreed with the Local Planning Authority (in consultation with Thames Water) to allow additional buildings to be occupied. Where a commercial buildings and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed

commercial buildings and infrastructure phasing plan. (Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any network reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Noise conditions

(22) Noise emitted from any fixed plant on site shall be at least 10dB lower than the existing background noise level as measured at the nearest noise sensitive location outside the site and the measurement should be made in accordance with BS4142:1997. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(23) No development shall commence until details of the acoustic screen associated with the proposed New Century Park Access Road to the west of the Holiday Inn hotel (illustrated on drawing D-Q30131-H-0101 have been submitted to and approved in writing by the Local Planning Authority. Such details shall include acoustic reduction properties, height, materials and colour. The scheme shall be implemented in accordance with the approved plans and thereafter permanently retained and maintained. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Design and sustainability conditions

(24) Details of a Design Code for the light industrial quarter (Phase 2), the office quarter and the hybrid quarter (both Phase 3), as shown on drawing 089916_050_01 RevPL02, shall be submitted to and approved in writing by the Local Planning Authority prior to the submission of the details reserved for subsequent approval for each phase. The Code shall identify all details to maximise the quality and legibility of the spaces, to help reinforce local character and accessibility, the details should ensure that these areas would be high quality. The construction of the proposed development shall then be carried out in accordance with the details set out within the approved Design Code. (Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017)).

(25) No above ground works associated with the New Century Park access road shall take place until details of all structures (including embankments, retaining walls, bridges, fences and walls) have been submitted to and

approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details. (Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017)).

(26) No above ground works within a phase of the development shall take place until a detailed scheme of feasible on-site sustainability measures covering:

1. The sourcing of materials to be used in the construction of and fitting out of the buildings (involving reuse, recycling and other sustainable sourcing);
2. Certification that the hotel, industrial units and offices would achieve a BREEAM Very Good rating and that the Technical Services Building would achieve at least a BREEAM Good rating;
3. The use of passive ventilation and other passive measures;
4. Reducing carbon emissions from the total energy needs (heating, cooling and power) by 25% from the 2010 Part L Building Regulations Standards for the overall outline phases (including from the on-site generation of renewable energy);
5. Details of arrangements to allow future connection to a centralised energy centre either on the site or in the locality (district heating network); and
6. Rainwater harvesting

has been submitted for each phase and approved in writing by the Local Planning Authority. The scheme as approved for each phase shall be implemented prior to occupation of that phase unless otherwise approved in writing by the Local Planning Authority and retained and maintained thereafter.

7. Within 3 months of first use of the buildings a BREEAM Post Construction Certificate for the relevant buildings, issued by the BRE or equivalent licensing organisation, must be submitted to the Local Planning Authority to demonstrate that BREEAM targets in (b) above have been achieved. All the measures integrated shall be retained for as long as the development is in existence.

(Reason: To prevent an unsatisfactory form of permanent development. To accord with the objectives of Policies LLP1, LLP25 and LLP37 of the Luton Local Plan 2011-2031 (November 2017)).

(27) No above ground works within a phase of the development shall take place until a scheme has been submitted to and approved in writing by the Local Planning Authority, giving details of how the buildings, open spaces and car parking address 'Secured by Design' principles. Each phase of the development shall be carried out in full accordance with the approved details and maintained thereafter. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(28) No above ground works within a phase of the development shall take place until an external lighting strategy and details of CCTV for that phase of the development have been submitted to and approved in writing by the Local Planning Authority. Lighting and CCTV for each phase shall be completed in accordance with the approved strategy for each phase prior to occupation of that phase, and shall be maintained in accordance with the approved details permanently thereafter. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(29) No above ground works within a phase of the development shall take place until details of the arrangements for storage and collection of refuse and recycling for the approved buildings and uses, have been submitted to and approved in writing by the Local Planning Authority. The development shall be completed in accordance with the approved details prior to occupation of each phase, and shall be maintained permanently thereafter. (Reason: To ensure adequate provision is made for storage and management of refuse and recycling, and to ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Landscaping and tree conditions

(30) Before any building or engineering works within a phase are commenced on site the existing trees, shrubs and/or hedges to be retained shall be safeguarded against damage or injury by the erection of fencing or other suitable protection at a distance of not less than 2 metres from the tree trunk(s) or shrubs or hedging, and no plant, materials or other objects shall be stored or placed against any of the trees, shrubs or hedges. The protection measures referred to above shall be maintained during the whole period of site excavation and construction. (Reason: To safeguard the existing trees, shrubs and/or hedges on the site. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(31) The Wigmore Valley Park landscaping shown on the approved drawings (series WVP-CAP-DR-L-101 to WVP-CAP-DR-L-109) shall be undertaken within the first planting season following commencement of development and shall incorporate the tree, hedgerow, groundcover and grassland species and quantities set out in the submitted Planting Schedule and Specification (ref; WVP-CAP-DR-L-210).

If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation. (Reason: To

enable the Local Planning Authority to monitor the implementation of the approved landscaping scheme. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(32) The landscaping reserved matter for each phase (referred to in condition 02) shall include full details of all hard surfaces, grassed areas, tree and shrub plantings and the proposed times of planting. The landscaping scheme approved for a phase shall be carried out by a date not later than the end of the full planting season immediately following the completion of building operations within that phase. If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(33) A landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for each phase of the areas covered by the outline permission for all hard and soft landscape areas shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of above ground works in that phase. The maintenance schedule shall be for a minimum period of ten years (for each phase) and include details of the arrangements for its implementation. The landscape management plan shall be carried out as approved. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

Transport and parking conditions

(34) No above ground works within a phase of the development shall take place until details of cycle parking in accordance with the Local Plan cycle parking standards for that phase have been submitted to and approved in writing by the Local Planning Authority. The approved cycle parking shall be implemented prior to occupation of buildings within that phase and maintained in perpetuity afterwards. (Reason: To maximise cycling as a mode of travel to the site. To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP32 of the Luton Local Plan 2011-2031 (November 2017)).

(35) No occupation of any phase of the development shall commence until details of parking in accordance with the Local Plan parking standards for that phase has been submitted to and approved in writing by the Local Planning Authority. Parking shall be provided in accordance with the approved details prior to the first use of the approved phase, with these facilities to be permanently maintained thereafter. (Reason: To avoid the

creation of traffic congestion on the highway in the interests of safety and convenience of pedestrians and other road users. To accord with the objectives of Policies LLP1, LLP2 and LLP31 of the Luton Local Plan 2011-2031 (November 2017)).

(36) No phase of the development shall be brought into use until a Travel Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be broadly in line with the Framework Travel Plan prepared by Pell Frischmann (December 2017) and shall be in line with the prevailing policy and best practice and shall include as a minimum:

- The identification of targets for trip reduction and modal shift;
- The methods to be employed to meet these targets;
- The mechanisms for monitoring and review;
- The mechanisms for reporting;
- The penalties to be applied in the event that the targets are not met;
- The mechanisms for mitigation;
- Implementation of the Travel Plan to an agreed timetable and its operation thereafter; and
- Mechanisms to secure variations to the Travel Plan following monitoring and review.

The Travel Plan shall be implemented as approved before occupation of the development. (Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017)).

(37) No part of phase 3 or 4 (as shown on drawing 089916_050_40 RevPL02) shall be occupied until the New Century Park access road and the link to Eaton Green Road have been completed and are ready for use. The link road between the New Century Park access road and Eaton Green Road shall not be provided and available for use in advance of the completion and opening of the New Century Park access road. (Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017)).

(38) No buildings within the Office Quarter, the Hybrid/Industrial Quarter or the Hotel, identified on drawing 089916_050_01 RevPL02 (proposed illustrative masterplan), are to be occupied until such time as the effects of traffic generated by such development and any identified relevant mitigation measures have been submitted to and approved in writing by the Local Planning Authority (in consultation with the Highways Authority and Highways England). The mitigation measures shall be carried out in accordance with the approved scheme. (Reason: To ensure the M1 Motorway continues to serve its purpose as part of a national system of routes for through traffic, to satisfy the reasonable requirements of road safety on the M1 Motorway and connecting roads in accordance with section 10 of the Highways Act 1980).

26. 63 RIDGEWAY ROAD (REF: 8)

The Development Control Officer reported on Application No. **18/01306/FUL** submitted by Miritrad Holdings Ltd for planning permission in relation to the erection of 6 two bedroom flats in a three storey building together with associated parking, bin and cycle storage, at land rear of 45 - 63 Ridgway, Luton. She further reported on Application No: **19/00019/FUL** submitted by Playturf Ltd for planning permission in relation to the erection of three storey building comprising of 6 two bedroom flats together with associated parking, bin and cycle storage in the Land rear of 45-63 Ridgeway, Luton.

She further reported that 35 neighbours had been notified of the application, and a site notice displayed on Scheme 1. One member of the public had responded to the consultation in objection. In relation to scheme 2, 25 adjoining neighbours had been notified and a site notice displayed. Four members of the public had responded to the consultation in objection to the proposed development.

In accordance with the right to speak procedure an Objector addressed the committee.

Resolved: That Application Nos. 18/01306/FUL and **19/00019/FUL** be **GRANTED** subject to the satisfactory completion of a S106 Agreement to secure the provision of affordable housing and financial contributions towards Education, Waste Management, Libraries and Museum improvements made necessary by the developments, subject to the following conditions:.

(01) The development hereby permitted shall be begun not later than the expiration of three years beginning with the date of this permission. (Reason: To limit the duration of the permission in accordance with the provisions of Sections 91-96 of the Town and Country Planning Act, 1990)

(02) The development hereby permitted shall not be carried out other than in complete accordance with the following approved plan no's and specifications.

18/01306/FUL- ATK/18/MHXF/TP1, ATK/18/MHXF/TP2A ATK/18/MHXF/TP3 – Site Plan, ATK/18/MHXF/TP3 – Site Sections ATK/18/MHXF/TP4A, ATK/18/MHXF/TP5A, ATK/18/MHXF/TP6A, ATK/18/MHXF/T7A and DC01- Planning Justification Statement and DC02 – Design & Access Statement

19/00019/FUL - ATK/18/PTXF/TP2, ATK/18/PTXF/TP2A, ATK/18/PTXF/TP3A, ATK/18/PTXF/TP4, ATK/18/PTXF/TP5A, ATK/18/PTXF/TP6A, ATK/18/PTXF/TP7A and DC01 Design & Access Statement and DC02 – Planning Justification.

(Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) LLP1, LLP14, LLP15, LLP25, LLP31 and LLP32 of the Luton Local Plan and the aims and objectives of the NPPF).

(03) Full details of the materials to be used in the construction of the walls, roof, doors and windows of the buildings shall be submitted to and approved by the Local Planning Authority before the development is commenced. The development shall be carried out using the approved materials unless otherwise agreed in writing by the Local Planning Authority.
(Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) LLP1, LLP15 and LLP25 of the Luton Local Plan and the aims and objectives of the NPPF).

(04) No works or development shall take place until full details of a landscaping scheme to include all hard surfaces, grassed areas, tree and shrub plantings and the proposed times of planting, has been approved in writing by the Local Planning Authority, and all grassed areas shall be laid out and all tree and shrub planting shall be carried out in accordance with those details and at those times. Within one month of the completion of the landscaping scheme written confirmation of the completion date shall be submitted to the Local Planning Authority. If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.
(Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) LLP1, LLP15 and LLP25 of the Luton Local Plan and the aims and objectives of the NPPF).

(05) The parking area for the flats, as identified on the approved plans, shall be laid out and ready for use prior to occupation of the building hereby permitted.
(Reason: In the interests of highway and pedestrian safety. To accord with the objectives of Policy(ies) LLP31 and LLP32 of the Luton Local Plan).

(06) A management plan, including management responsibilities and maintenance schedules, for all external and shared/common areas of the development shall be submitted to and approved by the Local Planning Authority prior to the occupation of the development for its permitted use. The management plan shall be carried out as approved. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) LLP1 of the Luton Local Plan and the aims and objectives of the NPPF).

(07) Details of the surfacing and drainage of any parking service area(s) hereby approved shall be submitted to and approved by the Local Planning Authority before the development hereby permitted is commenced. The details thereby approved shall be installed prior to the occupation of any building on the site.

(Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) LLP36 and LLP38 of the Luton Local Plan and the aims and objectives of the NPPF).

(08) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for: (i) Operating hours No demolition, construction or contaminated land remediation activities, movement of traffic, or deliveries to and from the premises, shall occur other than within the hours agreed with the Local Planning Authority. Any proposed extension to these agreed hours, other than for emergency works, shall be agreed with the Local Planning Authority before work commences; (ii) the parking of vehicles of site operatives and visitors; (iii) loading and unloading of plant and materials; (iv) storage of plant and materials used in constructing the development; (v) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate; (vi) wheel washing facilities; (vii) measures to control the emission of dust and dirt during construction; (viii) a scheme for recycling/disposing of waste resulting from demolition and construction works. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) LLP1, LLP15, LLP25 and LLP31 of the Luton Local Plan and the aims and objectives of the NPPF).

(09) Full details of the proposed boundary treatment of the site shall be submitted to and approved by the Local Planning Authority before the development is commenced and the approved treatment shall be installed before the building(s) hereby permitted is/are occupied. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) LLP1, LLP15 and LLP25 of the Luton Local Plan and the aims and objectives of the NPPF).

(10) No external lighting shall be installed on the site, other than in accordance with a scheme to be submitted to and approved by the Local Planning Authority beforehand. The scheme, lighting equipment and levels of illumination shall comply with guidance issued by the Institution of Lighting Engineers in their publication "The ILE Outdoor Lighting Guide" and shall be accompanied by a statement from the developer confirming that compliance. The scheme shall thereafter be retained and maintained for so long as the development remains in existence and shall not be varied without the prior written permission of the Local Planning Authority. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) LLP1, LLP15 and LLP25 of the Luton Local Plan and the aims and objectives of the NPPF).

(11) Notwithstanding the provisions of Section 55 of the Town and Country Planning Act 1990 or of the Town and Country Planning (General Development) Order, 2015, (or any Order revoking and re-enacting that Order with or without modification) no additional openings shall be fitted in the north

and south flank elevation(s) of the building(s) without the prior permission of the Local Planning Authority. (Reason: To protect the amenities of neighbouring properties. To accord with the objectives of Policy(ies) LLP1 and LLP25 of the Luton Local Plan).

(12) Notwithstanding the submitted plans full details of the proposed cycle and refuse stores shall be submitted to and approved by the Local Planning Authority and installed before occupation of the development hereby approved. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) LLP1 and LLP25 of the Luton Local Plan and the aims and objectives of the NPPF).

(13) The common areas of amenity space approved as part of the development hereby permitted shall be completed and available for use prior to the occupation of any flat and shall be accessible to the occupants of all dwelling units in the scheme. (Reason: To protect the amenities of the future residents of the accommodation hereby approved. To accord with the objectives of Policy(ies) LLP1 and LLP25 of the Luton Local Plan).

(14) A car parking management plan shall be submitted to and approved by the Local Planning Authority and the associated parking shall be carried out in full accordance with the approved details prior to the occupation of the development hereby permitted and maintained for so long as the development remains in existence. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policy(ies) (LLP1 and LLP38) of the Luton Local Plan)

(15) Prior to the commencement of development hereby permitted, the developer will complete a desktop study to establish whether the site is potentially contaminated. The desktop study shall be submitted to the Local Planning Authority for consideration in consultation with the Environment Agency and the Council's Environmental Health Service and no development shall take place on the site until the Local Planning Authority has formally discharged this condition. (Reason: To prevent the pollution of groundwater. To accord with the objectives of Policies LLP1, LLP36 and LLP38 of the Luton Local Plan).

(16) Pursuant to the satisfactory discharge of condition 15 and, if the desktop study required by that condition has so indicated, an intrusive soil investigation shall be undertaken to assess the degree and nature of any contamination present, and to determine its potential for pollution of the water environment and risk to other receptors via a qualitative risk assessment. The method and extent of the investigation shall be agreed with the Local Planning Authority in consultation with the Environment Agency and the Council's Environmental Health Service beforehand and the investigation shall be undertaken prior to the commencement of the development. (Reason: To prevent the pollution of groundwater. To accord with the objectives of Policies LLP1, LLP36 and LLP38 of the Luton Local Plan).

(17) Subject to the result of the studies required by conditions 14 and 15, a remediation strategy setting out a timetable of works and the proposed means of dealing with any contamination on site, including provisions for monitoring any specified actions and validating the outcomes, shall then be submitted to and approved by the Local Planning Authority in consultation with the Environment Agency and the Council's Environmental Health Service before the development commences. The development shall then proceed in strict accordance with the approved remediation strategy. (Reason: To prevent the pollution of groundwater. To accord with the objectives of Policies LLP1, LLP36 and LLP38 of the Luton Local Plan).

(18) Following completion of any remediation works, the developer should submit a Verification Report to the Local Planning Authority for approval. The Verification report should provide confirmation that all measures outlined in the approved Remediation Strategy have been completed including where appropriate validation testing. (Reason: To prevent the pollution of groundwater. To accord with the objectives of Policies LLP1, LLP36 and LLP38 of the Luton Local Plan).

(19) No soakaways shall be constructed in contaminated ground. If there is no or only inconclusive evidence as to whether or not the ground is contaminated a detailed site investigation must be carried out to determine this before any construction is commenced. (Reason: To prevent an increased risk of flooding and surface and ground water pollution and to accord with the objectives of policies LLP36 and LLP38 of the Luton Local Plan and the National Planning Policy Framework).

27. 40-45 COLLINGDON STREET (REF: 9)

The Development Control Officer reported on Application No. 18/01793/FUL submitted by Acre Invest Luton Ltd for planning permission in relation to the creation of 15 additional flats by the formation of a sixth storey and provision of 2 additional parking spaces, at 40-58 Collingdon Street, Luton.

He further reported that 119 adjoining occupiers had been notified of the application, a site notice displayed and a press notice had been issued. No letters of representation to the proposal had been received.

In accordance with the right to speak, the Agent addressed the committee.

Resolved: That application No. 18/01793/FUL be **GRANTED** subject to the satisfactory completion of a Planning Obligation to secure on-site Affordable Housing provision and financial contributions towards Education, Transport Infrastructure, Car Club, Waste Management, Libraries, Museums and Open Space Maintenance as set out in para 2, and subject to the following conditions, including an amendment to condition 4 for which delegated authority was granted to ensure its effectiveness:-

(01) The development hereby permitted shall be begun not later than the expiration of three years beginning with the date of this permission. (Reason: To limit the duration of this permission in accordance with the provisions of Sections 91-96 of the Town and Country Planning Act 1990).

(02) The development hereby permitted shall not be carried out other than in complete accordance with the approved plans and specifications as set out on plan numbers 1815/P/100 Rev A, 1815/P/101, 1815/P/102, 1815/P/103 Rev A, 1815/P/104, 1815/P/105, 1815/P/106, 1815/P/107, 1815/P/108, 1815/P/109, 1815/P/110 and 1815/P/111. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan).

(03) Full details of the materials to be used in the construction of the elevations, roofs, balconies and windows of the buildings of the development shall be submitted to and approved by the Local Planning Authority prior to sixth storey works commencing. The development shall be carried out using the approved materials unless otherwise agreed in writing by the Local Planning Authority. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan).

(04) Prior to sixth storey works commencing full details of a landscaping scheme for the sixth storey to include all hard surfaces, grassed areas, tree and shrub plantings and the proposed times of planting, shall be submitted to and approved in writing by the Local Planning Authority, and all grassed areas shall be laid out and all tree and shrub planting shall be carried out in accordance with those details and at those times. Within one month of the completion of the landscaping scheme written confirmation of the completion date shall be submitted to the Local Planning Authority. If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation. (Reason: To enhance the appearance of the proposed development. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan).

(05) No external lighting shall be installed on the sixth storey, other than in accordance with a scheme to be submitted to and approved by the Local Planning Authority beforehand. The scheme, lighting equipment and levels of illumination shall comply with guidance issued by the Institution of Lighting Engineers in their publication “The ILE Outdoor Lighting Guide” and shall be accompanied by a statement from the developer confirming that compliance. The scheme shall thereafter be retained and maintained for so long as the development remains in existence and shall not be varied without the prior written permission of the Local Planning Authority. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the

surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan).

(06) A management plan, including management responsibilities and maintenance schedules, for all external and shared/common areas of the development on the sixth storey shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the development for its permitted use. The management plan shall be carried out as approved. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan).

(07) No sixth storey works shall commence until a Construction Method Statement has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for: (i) Operating hours; No demolition, construction or contaminated land remediation activities, movement of traffic, or deliveries to and from the premises, shall occur other than within the hours agreed with the Local Planning Authority. Any proposed extension to these agreed hours, other than for emergency works, shall be agreed with the Local Planning Authority before work commences; (ii) the parking of vehicles of site operatives and visitors; (iii) loading and unloading of plant and materials; (iv) storage of plant and materials used in constructing the development; (v) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate; (vi) wheel washing facilities; (vii) measures to control the emission of dust and dirt during construction; (viii) a scheme for recycling/disposing of waste resulting from demolition and construction works. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP15, LLP25 and LLP31 of the Luton Local Plan).

28. 10 MIDLAND ROAD, LUTON (REF: 10)

Resolved: That Application No. 18/01207/OUT be **WITHDRAWN** from this Agenda only as application was still live.

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29. VENUE 360 – GYPSY LANE, LUTON (REF: 11)

The Development Control Officer reported on Application No. 18/00884/FUL submitted by Mr I Jackson – Hampton Brook (UK) Limited for planning permission in relation to the proposed demolition of vacant pavilion building, followed by erection of discount foodstore together with alterations to access off Gipsy Lane, provision of car parking, landscaping and associated works, at Venue 360 – Gipsy Lane, Luton.

He further reported that 16 adjoining occupiers had been notified of the application, and a site notice displayed and press notices were issued. 18 letters of representation to the proposal had been received.

In accordance with the right to speak procedure, the Applicant spoke. Councillor Castleman also spoke as a ward Councillor and Portfolio holder.

Following discussions and deliberations by Members of the Committee Councillor David Taylor (Chair) moved the recommendation to refuse the application as stated in the report. Accordingly, on being put to vote Members of the Committee voted against the Officers recommendation to refuse the application and determine to approve the application.

The Solicitor to the Committee advised that in accordance with the right to speak procedure, if Members were minded to determine the application contrary to Officer recommendation, as stated in the report, the application would need to be deferred to a future meeting, to provide objectors the opportunity to speak on the application if they so wish as they had not already addressed the Committee.

He further advised that deferring the application to a future meeting of the Committee would enable officers to recommend any potential conditions and/or s106 obligations in a future report.

Resolved: (i), to defer Application No. 18/00884/FUL to be reported to a future meeting to include suggested conditions and/or s106 obligations considered appropriate in light of Members being mindful to approve the application.

30. DEPOSITED PLANS & APPLICATIONS FOR PLANNING PERMISSION (REF: 12)

The Development Control Officer reported on certain applications for planning permission. He also reported on representations of objection or support to the grant of planning permission referred to below, which were made available to the Committee. Also detailed below are those Applications where the Applicant (A) and/or Objector (O) addressed the Committee under the Council's Right to Speak Policy.

Application No.	Number of representations Objection / Support	Right to Speak
18/01553/FULHH	**4 letters of representation in objection to the Application were received.**	**3**
Councillor Shaw spoke on the application as a ward councillor.		
19/00032/FUL	**No representations received.**	**O**

Resolved: That the Applications detailed in Schedule 'A (1)' to these Minutes be **REFUSED** for the reasons stated.

(Notes: (i) Agenda Items were considered in the following order: Agenda Items 7 (Century Park Planning Application) considered at 14.00; 12.1, 11, 8, 9, and 12.2.

(ii) Councillor David Taylor (Chair of the Development Control Committee) declared personal interest in relation to Agenda Item 7 of the Agenda in respect of Century Park Planning Application in that his nephew was a Member of the Board of Directors of the London Luton Airport Limited. He left the Committee room during consideration of this matter.

(iii) Councillor David Agbley declared pecuniary interest in relation to Item 7 of the Agenda in respect of Century Park Planning Application in that he was a Member of the Board of Directors of the London Luton Airport Limited. He left the Committee room during consideration of this matter.

(iv) Councillor Lewis chaired the meeting as Vice Chair of the Committee in respect of Agenda Item 7 only, Century Park Planning Application.

(v) Councillor Franks was absent during the consideration of Item 7 only, Century Park Planning Application.

(vi) Councillor MJ Dolling requested that his vote against the Committee's decision to approve Century Park Planning Application Agenda Item 7 be recorded.

(vii) Councillor Rivers declared personal interest in relation to Agenda Item 8 of the Agenda (63 Ridgeway Road) in that his property was located within close proximity of the development site, almost back to back. He left the Committee room during consideration of this matter and returned at the conclusion of Agenda Item 9 40-58 Collingdon Street but did not take part in the decision thereof.

(viii) Councillor Agbley declared pecuniary interest in relation to Agenda Item 8 of the Agenda (63 Ridgeway Road) in that his property was located within close proximity of the development site. He left the Committee room during consideration of this matter and did not return to take part in other Agenda Items.

(ix) The meeting ended at 20.10

(1) Applications for Planning Permission REFUSED

Application No.	Proposal	Reasons
18/01553/FULHH	Erection of a two storey front and single storey side extension, raising roof by 290mm to the main house, raising the roof to single storey rear extension, erection of a rear dormer extension, conversion of roof space into habitable accommodation and installation of three roof lights to the front-facing roof slopes. [redacted] **WARDS AFFECTED:** Icknield	(01) The development, as indicated on plan numbers DC01, P1, P2 and P3, by reason of its size, scale, detailed design and prominence, would comprise an incongruous form of development that would fail to adequately integrate with both the original dwellinghouse and the surrounding built environment. The scheme would thereby cause material harm to the character of the site and the visual amenities of the surrounding area, contrary to Policies LLP1, LLP19 and LLP25 of the Luton Local Plan 2011-2031 and the aims and objectives of section 12 of the National Planning Policy Framework (NPPF).
19/00032/FUL	Retrospective planning permission for change of use from retail (Class A1) to restaurant/café (Class A3). [redacted] **WARDS AFFECTED:** Limbury	(01) The development, as shown on plan numbers 01/03, 02/03 and 03/03, would result in the loss of a retail unit within an identified shopping frontage that would lead to the further over-proliferation of non-Class A1 uses within the relevant frontage, which would both materially harm the character and detract from the functionality of the Marsh Road District Centre, contrary to the aims and objectives of Policies LLP1, LLP21, LLP23 and LLP25 of the Luton Local Plan 2011-2031 and the relevant principles relating to well-designed places and retail within sections 7 and 12 of the National Planning Policy Framework (NPPF, or the Framework).
		(02) The development, as shown on plan numbers 01/03, 02/03 and 03/03, by reason of

Application No.	Proposal	Reasons
19/00032/FUL (Continued)		failing to provide requisite information in relation to the extraction system used/to-be-used at the premises, would injuriously affect the amenities of the adjoining properties by reason of noise, disturbance and odour. The proposal would thereby be contrary to Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 and contrary to the aims and objectives of section 12 of the National Planning Policy Framework (NPPF, or the Framework).

Luton

AGENDA ITEM

7

COMMITTEE: **DEVELOPMENT CONTROL**

DATE: **27 MARCH 2019**

SUBJECT: **1) OUTLINE PERMISSION FOR A NEW BUSINESS PARK COMPRISING OFFICE SPACE (CLASS B1), WAREHOUSE AND INDUSTRIAL SPACE (CLASS B2 AND B8), MIXED EMPLOYMENT SPACE (CLASS B1/B2/B8), A HOTEL (CLASS C1), CAFE SPACE (CLASS A3); ENERGY CENTRE (SUI GENERIS), INTERNAL ACCESS ROADS; CAR PARKING, LANDSCAPING AND ASSOCIATED WORKS INCLUDING EARTHWORKS, UTILITY DIVERSIONS, SUSTAINABLE DRAINAGE SYSTEMS, TREE REMOVAL AND TREE PROTECTION; AND RELOCATION OF THE AIRPORT CAR HIRE CENTRE.**
2) FULL PERMISSION FOR THE CONSTRUCTION OF A 2KM CENTURY PARK ACCESS ROAD INCORPORATING A NEW JUNCTION ON THE A1081, ALTERATIONS TO THE EXISTING AIRPORT WAY ROUNDABOUT, ALTERATIONS TO FRANK LESTER WAY, A NEWLY CREATED ACCESS FROM EATON GREEN ROAD, A NEW ROUNDABOUT PROVIDING ACCESS INTO THE BUSINESS PARK, DEMOLITION OF BUILDINGS, PROVISION OF REPLACEMENT CAR PARKING (TEMPORARY AND PERMANENT), ASSOCIATED EARTHWORKS, LANDSCAPING, SURFACE WATER DRAINAGE AND UTILITIES DIVERSIONS; THE CREATION OF NEW PUBLIC OPEN SPACE INCLUDING FOOTPATHS, LANDSCAPING AND ECOLOGICAL MITIGATION; EXTENSION AND

ALTERATIONS TO WIGMORE PAVILION BUILDING TO PROVIDE CAFE (CLASS A3) AND ADDITIONAL COMMUNITY SPACE; CONSTRUCTION OF A NEW SKATE PARK AND CHILDREN'S PLAY AREA; AND CONSTRUCTION OF A REPLACEMENT AIRPORT TECHNICAL SERVICES BUILDING AND ASSOCIATED PARKING.
(APPLICANT: LONDON LUTON AIRPORT LTD)
(APPLICATION NO: 17/02300/EIA)

REPORT BY: **DEVELOPMENT CONTROL MANAGER**

CONTACT OFFICER: **DAVID GURTLER 546317**

IMPLICATIONS:

LEGAL	**COMMUNITY SAFETY**
EQUALITIES	**ENVIRONMENT**
FINANCIAL	**CONSULTATIONS**
STAFFING	**OTHER**

WARDS AFFECTED: WIGMORE

PURPOSE

1. To advise Members of a current application for planning permission and to seek their decision.

RECOMMENDATION(S)

2. **Development Control Committee is recommended to:**

(a) Resolve that:

(01) The requirements of Part II of Schedule 4 of the Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 2011 (as amended) are satisfied by reason of the Environmental Statement, and the Addendum, attached thereto including at least the following information:

(i) a description of development comprising information on the site, design and size of the development;
(ii) a description of the measures required in order to avoid, reduce and, remedy significant adverse effects;
(iii) the data required to identify and assess the main effects which the development is likely to have on the environment;
(iv) an outline of the main alternatives studied by the applicants and an indication of the main reasons for their choice, taking into account the environmental effects;
(v) a non-technical summary of the information under (i) to (iv) above.

(02) That it be recorded that, in making the decision on the application, the Committee has taken into account the environmental information comprising the Environmental Statement and the Addendum and that this information meets the minimum requirements of Part II of Schedule 4 to the Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 2011 (as amended).

(b) Grant planning permission subject to:

(i) The satisfactory completion of an agreement under Section 106 of the Town and Country Planning Act 1990 to contain the following:

1. **Public art contribution (£ 250,000) to provide public art in the main office plaza;**
2. **County Wildlife Site contribution (£ 250,000) to compensate for the loss of 5ha of County Wildlife Site with management of 7.5ha of Dallow Downs County Wildlife Site;**
3. **Biodiversity contribution (£ 30,000) to provide for the creation and management of new habitats within the site;**
4. **Replacement trees contribution (£ 35,000) to compensate for loss of trees with replacement planting across the borough;**
5. **Raynham Way Neighbourhood Park Play contribution (£ 35,000);**
6. **Roads and highway improvements contribution (£ 3,455,917) to secure highway improvements at a number of junctions in the vicinity to improve capacity, safety and reliability and a requirement to ensure that the junction improvements are**

completed before the New Century Park access road is brought into use;

7. **Sports pitch and changing room re-provision contribution (£1,196,737) to offset the loss of playing fields and ancillary facilities with the contribution being used towards implementing one or more of the following projects:**
   i. **Provision of a Step 5 Football Facility (an artificial grass pitch suitable for non-league senior football up to step 5 of the football pyramid and associated facilities (including parking provision and changing rooms) at Stopsley / Lothair Recreational Ground; Ely Way or Lewsey Park; and/or;**
   ii. **The replacement of or improvements to existing adult football facilities (playing pitches and supporting facilities such as changing and parking) at either one or more than one of the following locations:**
      - **Stopsley/Lothair Recreation Ground, Luton, Bedfordshire; and / or**
      - **Lewsey Park Recreation Ground, Luton Bedfordshire**
8. **Measures to ensure the new open space for Wigmore Valley Park is provided in advance of any development taking place on the existing park and the provision of a maintenance specification to ensure the long term maintenance and management of the park; and**
9. **Construction, employment, training and skills initiatives**

(ii) Grant planning permission subject to the imposition of the conditions as detailed in Appendix 1 to this report and that the grant of planning permission should be delegated to the Development Control Manager upon the expiry of the consultation period and subject to no new material planning considerations being raised.

(c) In the event that Members resolve to grant planning permission for the development, the subject of this application, then this would be subject to its referral to the Secretary of State (following the expiry of the further consultation period), as required by the Town and Country Planning (Consultation)(England) Direction 2009.

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REPORT

The Application for Consideration

3. The planning application is submitted in part as a full application and in part as an outline application (referred to as a hybrid application).

4. The application falls within the area referred to in the Local Plan as the London Luton Airport Strategic Allocation. This is a large area of land that

includes not only the operational area of the airport, but commercial/industrial buildings on Percival Way to the north and west of the airport, Wigmore Valley Park to the north and open fields to the north-east that have been identified since 1988 as a new employment area.

5. The application has been the subject of extensive consultation (two separate periods of six weeks), with press and site notices advertising the application. The application has recently been further advertised for a period of 21 days in accordance with the Town and Country Planning (Development Management Procedure)(England) Order 2015.

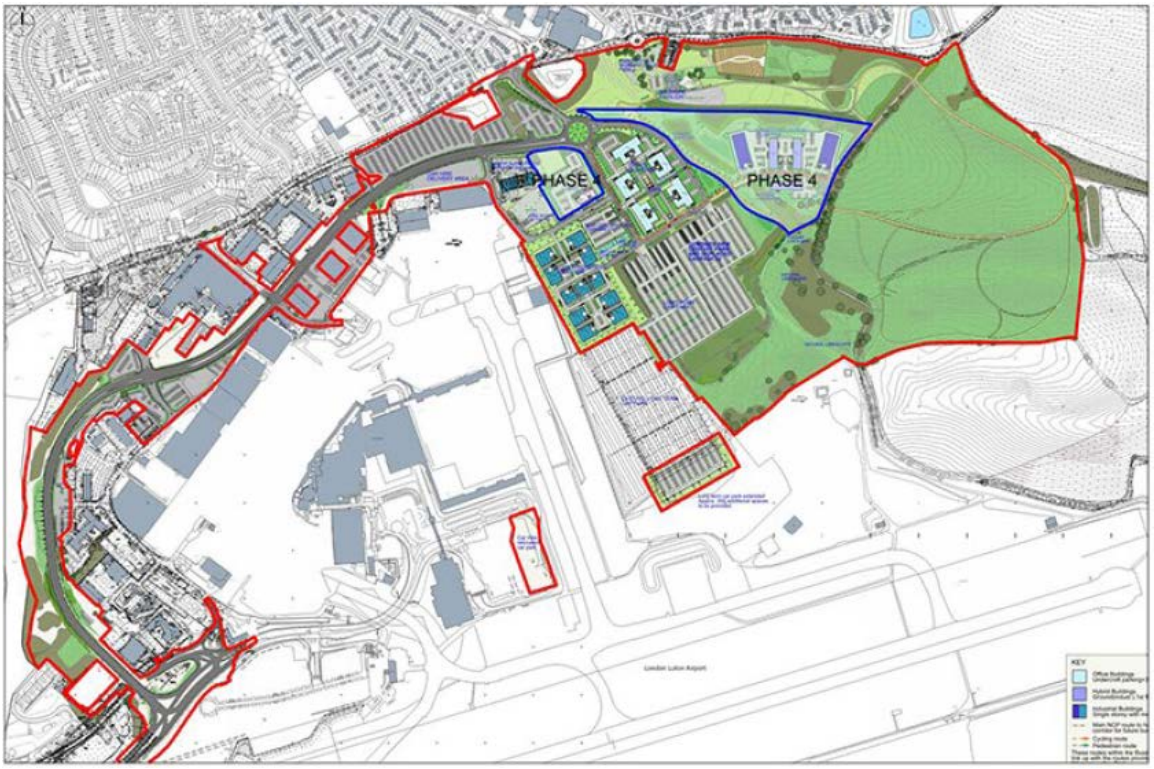
6. During the period that the planning application has been with the Local Planning authority for determination, London Luton Airport Limited has also announced and carried out early engagement (with consultation) in relation to its aspirations to expand the capacity of the airport by promoting a Development Consent Order (DCO) under the Planning Act 2008. Recently London Luton Airport Limited published the results of its non-statutory consultation and a preferred option. However, it should be noted that the Planning Act 2008 sets up an entirely different process for a DCO application and when that application comes forward it will be considered by the Secretary of State rather than the Local Planning Authority. At present there is no certain timetable for the presentation of any such application.

7. The application for New Century Park is a planning application in its own right, properly made and validated and is therefore to be considered on its merits.

The Site and Surroundings

8. The planning application site covers approximately 95ha and encompasses an area that stretches round the periphery of Luton Airport.

9. There are two distinct parcels of land covered by the planning application site, the first, comprises a corridor that connects New Airport Way (the A1081) in the south-west to the second area, a much larger parcel of land composed of Wigmore Valley Park and Century Park to the north and north-east of the airport.



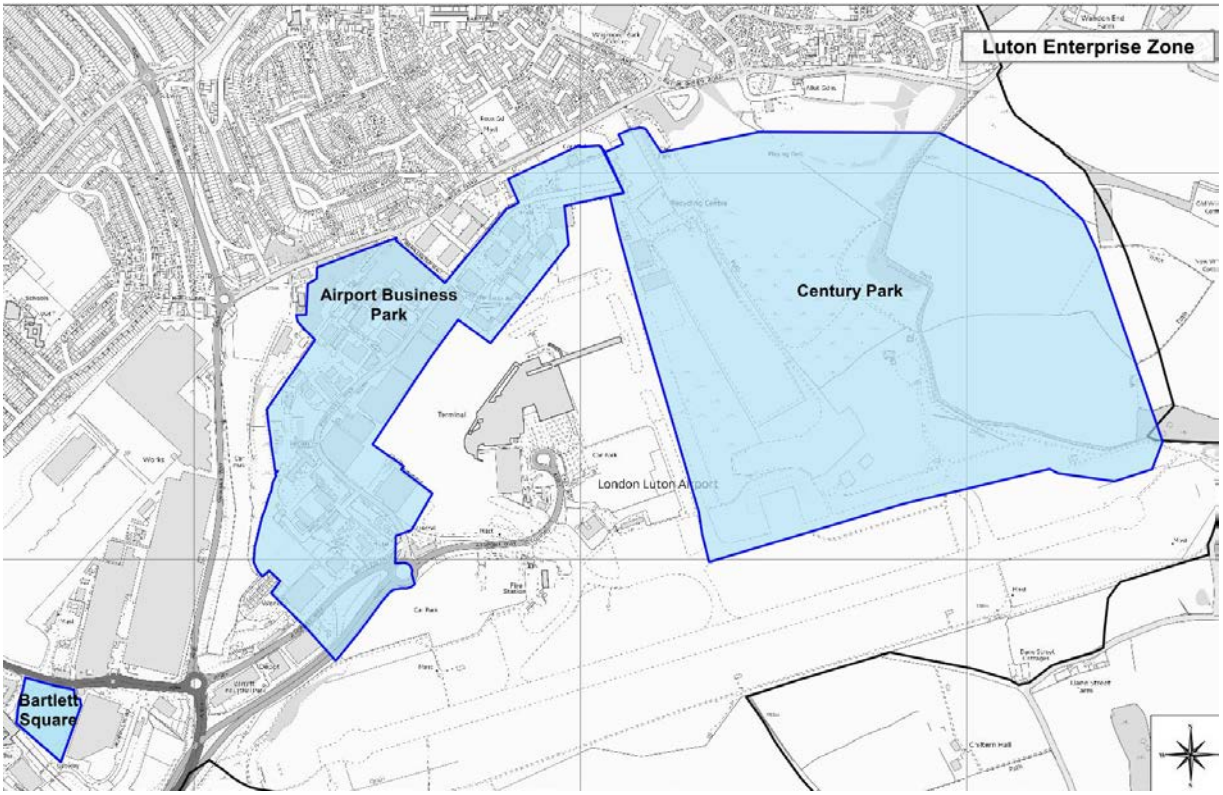
10. The first parcel of land linking Wigmore Valley Park and the A1081 is approximately 2km in length. The southern element, adjacent to Airport Way, passes between the Holiday Inn hotel and Eden Farm Preservations factory. To the north of these buildings between Proctor Way/Prospect Way and car parking associated with the Vauxhall works, the site passes over the Dairyborn Scarp. The site than turns east and links up to President Way, passing through the business parks associated with the airport (predominantly two storey warehouse and industrial buildings), before cutting across the car parks belonging to the car rental companies and TUI.

11. The eastern part of the site includes part of the airport's long term car park, the Tidy Tip (the Council's household waste recycling centre) Wigmore Valley Park and agricultural land. Within the Wigmore Valley Park element of the site there are currently two buildings, namely the Pavilion building, housing Wigmore Valley Park Community Centre, with a separate single storey maintenance building. Just to the north of the Pavilion building is the Wigmore Hall Conference Centre, a Grade II listed building. To the south-west of the Pavilion building is a children's play area, whilst to the east is a skate park. Further east are local allotments.

12. To the south of the application site is Luton airport. The application site extends to the eastern boundary of the borough where land in the adjoining authority, North Herts District Council, is agricultural land within the green belt. Eaton Green Road defines the northern boundary of this

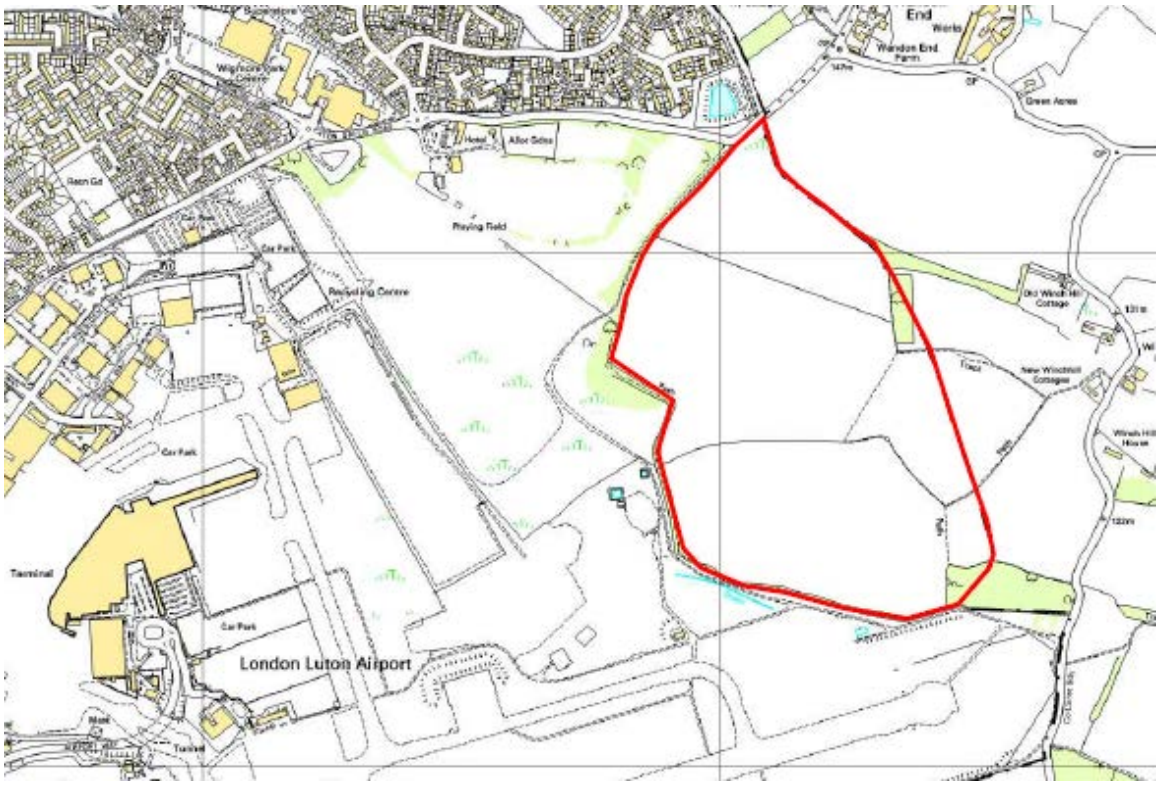
second parcel of land, with the residential area comprising the Wigmore estate being on the northern side of the road.

13. The planning application site is also within the area covered by the Luton Enterprise Zone depicted on the plan below. The Enterprise Zone was designated on 25 November 2015 and covers some 395 hectares, consisting of three linked sites around the airport (Bartlett Square to the west, Airport Business Park to the north/north-west and Century Park to the north/north-east). Sector focus within the Enterprise Zone is aerospace, advanced manufacturing and engineering, associated leisure, and hotel and catering businesses.



Relevant Planning History

14. The planning history of a site is a material planning consideration in the determination of a planning application. Within the red line covered by this planning application there are a series of applications that relate to land to the south of Eaton Green Road, described as the Wigmore Employment Area in the 1988 North-East Luton Local Plan, and subsequently in an allocation as Century Park. The plan below shows the area covered by the Century Park applications.



15. Following the submission of an outline planning application in 1989, permission was granted for the development of land at Century Park (the north-eastern element of the application site) in May 1991 for the development of B1 and B8 uses, with ancillary leisure and retail facilities (ref: 89/00865/OUT). This application proposed access from Eaton Green Road, which accorded with the 1985 Development Brief for the Wigmore Employment Area. The application was never proceeded with as it would appear that the company that submitted the application went into receivership.

16. The next relevant application was submitted by the receivers for the previous owners, and involved an outline application for development of the land to provide B1, B2 and B8 buildings with ancillary leisure, retail, professional services and food and drink facilities was submitted in 1994 and approved in December 1995 (ref: 94/00760/OUT).

17. An outline application by new owners was submitted in March 1998, with a proposal to provide an access road to Century Park via a tunnel under the airport, and including the construction of a roundabout and junction works. This was granted planning permission in June 1998 (ref: 98/00457/OUT). The same owners then submitted an application to vary the time limit for the submission of the reserved matters relating to this in April 2001 and this was approved in August 2002 (ref: 01/00460/VARCON).

18. In 1999 Prologis submitted an outline application to vary conditions on the 1995 permission for Century Park. This was reported to Committee in December that year with the recommendation for approval subject to the completion of a Section 106 legal agreement (ref: 99/01083/FUL). A decision on that application was not issued until July 2010 when the Section 106 agreement was signed, since details of an Environmental Statement were submitted in February 2009 (ref: 09/00197/OUTEIA).

19. The Environmental Statement in respect of that application evaluated the impacts for the renewal scheme based on the quantum of development proposed in the outline application, namely:

i. 111,480sqm of B1, B2 and B8 employment floorspace
ii. 18,573sqm of hotel floorspace
iii. 1,161sqm of D2 leisure uses
iv. 10,446sqm of ancillary retail (classes A1, A2 and A3).

20. In May 2013 Prologis submitted an application to vary conditions of the outline planning permission granted in July 2010 was received (ref: 99/01083/RENEW). Planning permission was granted on 4 July 2015 subject to a number of conditions, one of which required the first phase of the development to be commenced within four years of the date of the approval or within one year of the date of the approval of the last reserved matter (whichever was the later). Condition 9 of the planning permission restricted the total floorspace for the development to 153,471sqm and set out the floorspace for the individual uses, namely:

i. 123,291sqm of B1, B2 and B8 employment floorspace
ii. 18,573sqm of hotel floorspace
iii. 1,161sqm of D2 leisure uses
iv. 10,446sqm of ancillary retail (classes A1, A2 and A3).

21. Whilst there are numerous smaller applications within the area covered by the red line site, these are not directly relevant to the current proposal. However, it is worth drawing Members attention to the applications that led to the construction of the residential area to the north of Eaton Green Road in Wigmore and also the creation of Wigmore Valley Park, between 1976 and 1986.

22. The creation of the residential estate in Wigmore was informed by a planning brief (July 1985), which envisaged around 2,000 dwellings being constructed on a site of 67ha. It was anticipated that additional public open space and allotments would be required as part of this development, to be laid out at the developers expense. The brief did note that the former Airport Tip to the south of Eaton Green Road and the field immediately to the south of Wigmore Hall might accommodate some of the

public open space (outline planning permission had been granted in 1982 for use of these areas for public open space purposes), thereby releasing more land in Wigmore for residential development.

23. The principle of the development of land to the north of Eaton Green Road for residential purposes was first approved in June 1976 with the grant of an outline planning permission (ref: L/10382) with subsequent applications throughout the 1980s for further parcels of land for residential development. The most relevant applications in terms of the current proposal are

i. L/10382 – development of land for residential purposes together with shops and amenity building was granted outline consent on 30 June 1976 subject to a Section 52 agreement (the predecessor to Section 106 agreements) which related to junction improvements;
ii. L/10382/ /0 – renewal of outline planning permission for the development of land for residential purposes together with shops and amenity buildings was granted planning permission on 15 July 1977;
iii. 86/01285/OUT – development of land for residential purposes approved 21 October 1986 with a Section 52 agreement requiring, inter alia, the laying out of an additional area of 7.87 acres of land at Wigmore Valley Park as public open space;
iv. 86/01326/FUL – erection of 68 dwellinghouses approved 9 March 1987 with a Section 52 agreement requiring, inter alia, the payment of £42,000 by the developer with the Council providing not less than 0.414 acres of additional open space to Wigmore Valley Park

<u>The Proposal</u>

24. The planning application is a hybrid application, meaning that part of it is submitted in full (for all aspects to be determined at this stage) and part is submitted in outline form (with all matters reserved for later determination).

25. The planning application was originally submitted in December 2017 and validated in January 2018 following the confirmation of the service of notice on those with an interest in the land by the applicant. Following a review of the planning application and the accompanying Environmental Statement, together with consultation responses, a request for further information was made in accordance with Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.

26. This further information was received in August 2018, with amendments made to the scheme that had been submitted. The amendments included: changes to the proposed New Century Park access road (including the junction with New Airport Way); changes to replacement car parking

provision adjacent to the access road; reduction in the number of car parking spaces within New Century Park; alterations to the arrangements of the parking; and some minor changes to the landscaping proposals. The paragraphs below describe the scheme that is before members following the amendments that were received in August 2018.

Full element of planning application:

27. The full element of the application relates to the access road (and associated structures, junction alterations and link to Eaton Green Road), the Technical Services Building, some areas of car parking and the altered and extended Wigmore Valley Park.

28. The main constraint to bringing forward development of the strategic employment site has been the lack of suitable access. The tunnel proposal through the airport has not proved viable, whilst the existing highway network through the business parks (Percival Way and President Way) is constrained and significant alterations to this route would disrupt the existing businesses in the Airport Business Park as well as the operational integrity of the airport. The Transport Assessment that accompanied the planning application was informed by an Options Assessment Report, which included:

    i. Upgrading Vauxhall Way and Eaton Green Road to a dual carriageway and providing the access to the employment site from Eaton Green Road;
    ii. Upgrading Percival Way and President Way to a dual carriageway;
    iii. Tunnel access to the employment site; and
    iv. A new link road.

29. The alternatives were also assessed within the Environmental Statement that accompanies the planning application, with the proposed New Century Park access road performing best overall in respect of deliverability and strategic fit.

30. The New Century Park access road would be a 2km long dual carriageway that starts at a new junction proposed for the A1081 (New Airport Way) heading north skirting around the western periphery of the airport, before cutting in to the east and joining Percival Way just before the junction with Frank Lester Way. The road then roughly follows the line of President Way before passing through the car hire and TUI car parks and entering the part of Wigmore Valley Park that is located on the former Airport Tip.

31. The new junction on the A1081 will be a signalised junction, with a bus lane to allow buses to turn up Airport Way towards the airport. There will

also be a taxi staging area where taxis can service the hotels and also be held to ease pressure on the taxi ranks within the core terminal area of the airport. A bridge will then take traffic from the new junction over Airport Way and along the new access road, passing between the Holiday Inn hotel and the commercial building on the Eden Farms site.

32. A number of new junctions are proposed on the dual carriageway, the first would be close to the current location of Provost Way, providing access to the GKN site and linking to Percival Way. The next junction at Frank Lester Way would be upgraded from a mini-roundabout to a signalised junction (with Frank Lester Way being closed to private cars, and open to buses and taxis only). The final junction at the end of the proposed dual carriageway would be a roundabout, which would provide access to the New Century Park business park to the south (as well as the long term car parking), with a link to the north connecting to Eaton Green Road.

33. The new access road will necessitate the demolition of 15 commercial buildings (approximately 16,500sqm GIA), with a number of the buildings being located within the existing airport including the airport operator's (LLAOL) Technical Services Building (Hangar 24). The Technical Services Building is proposed to be relocated to the north of the Tidy Tip and is included within the detailed element of the planning application. The building would provide 2,950sqm of replacement floorspace and would be circa 75m in length, 25m in width and 10.5m high to ridge level (8m to eaves). The building would have three bays for the service, repair and maintenance of airport vehicles and would contain stores, workshops, offices, meeting rooms, etc. currently housed in Hangar 24.

34. In addition to the loss of the commercial buildings, the alignment of the proposed access road would impact upon existing car parking provision. The Car Parking Strategy submitted as part of the application identifies around 3,200 parking spaces within the area through which the New Century Park access road passes. Approximately 40% of the existing spaces would be lost as a consequence of the development (1,281 spaces). The planning application makes provision for the relocation of spaces on a temporary basis, so as not to adversely impact upon the operation of the businesses at the airport. The realignment of parking spaces and re-provision of parking results in an overall increase of 254 spaces compared to the existing situation.

35. Along the route of the access road the construction works will not only result in impacts upon car parking, but there will also be impacts on trees and landscaping. Consequently as part of the detailed application there are a series of landscape Masterplans which provide details of retaining walls, embankments, planting and retention of trees. The overall

approach is to enhance and re-provide the landscaping along the route of the New Century Park access road.

36. The final element of the detailed application is within the existing Wigmore Valley Park and also land within the area of the Century Park employment allocation – both of these parcels of land fall within the area that is covered by the London Luton Airport strategic allocation in the Local Plan. Since the New Century Park business park is proposed on land currently forming part of Wigmore Valley Park, the detailed plans make provision for replacement public open space within the area allocated for employment purposes.

37. The detailed plans include renovation and alteration to the existing Wigmore Pavilion building, with alterations to provide a new front entrance, the provision of a café with glazed doors to provide indoor and outdoor seating areas. Children's play areas will be provided to the south and east of the café, with aviation themed play equipment. To the west of the Pavilion Building and visitors' car park, a new skate park is proposed.

38. With the loss of part of Wigmore Valley Park to the New Century Park business park, much of which is the area of landfill and the area formerly used as sports pitches, it is proposed to create a new area of public open space, on the area that was allocated for employment provision. The northern element of Wigmore Valley Park, closest to Eaton Green Road and the residential areas of Wigmore would be retained, and this would link via a series of footpaths and greenspaces to the new area of parkland. In total it is proposed to provide just over 40ha of public open space, resulting in an additional 2ha of open space above that already existing.

Outline element of planning application:

39. The earlier section on 'Relevant Planning History' showed that the principle of the development of a business park to the north of the airport has been long established. The quantum of development previously approved was much greater, and the location of the employment site was not the same, however, the Luton Local Plan 2011-2031 now incorporates both Wigmore Valley Park and Century Park within the area defined as the London Luton Airport strategic allocation. The outline element of the planning application therefore seeks approval of the principle of the business park, with the reconfiguration of land uses within this overall allocation.

40. All matters in the outline element of the application have been reserved, namely: appearance; means of access within the business park; layout; scale; and landscaping. The application drawings do include parameter plans that depict the use of different areas within the business park

together with the range of heights proposed for buildings within those areas.

41. The outline proposals provide for the following breakdown of floorspace and uses:

i. 29,400sqm B1(a) office floorspace (located in the centre and eastern side of the business park – referred to as the 'Office Quarter' on the Masterplan),
ii. 13,000sqm flexible office/industrial floorspace (B1/B2/B8 located at the eastern side of the business park – referred to as the 'Hybrid/Industrial Quarter'),
iii. 11,700sqm B2 general industrial and B8 storage (located at the western side of the business park – referred to as the 'Light Industrial Quarter'),
iv. 685sqm of sui generis use comprising two buildings, one an energy centre and the other a recycling centre (located in the centre of the business park),
v. 7,200sqm (145 bedroom) hotel (located to the south of the Technical Service Building) and
vi. 225sqm ancillary retail (a café is shown in the centre of the business park).

42. The plans show that these buildings will range from being single storey (the café), two storey (the buildings on the western and eastern sides of the business park), four storey (the office buildings) to five storey (the hotel).

43. The indicative plan of the internal access roads and associated car parking, together with pedestrian and cyclist access within the business park are shown on the Masterplan, whilst full details will be provided when the reserved matters are submitted. The earthworks and landscaping works associated with the business park are also reserved for later determination.

Planning Policy

National Planning Policy Framework (NPPF)

44. The National Planning Policy Framework (NPPF) was first published in March 2012 and was the relevant national policy at the time the planning application was prepared and submitted. During the period of determination of this application the Government published a revised version of the NPPF in July 2018, and more recently a replacement NPPF was published in February 2019. The latest version of the NPPF does not

materially differ from the previous versions in relation to matters of policy that are relevant to the determination of this application.

45. The NPPF is a material consideration in planning decisions (paragraph 2). The 2019 NPPF provides guidance as to how the government's planning policies are expected to be applied.

46. The NPPF states that "the purpose of the planning system is to contribute to the achievement of sustainable development" (paragraph 7), noting that to achieve this the planning system has three overarching objectives which are: economic, social and environmental (paragraph 8).

47. The "presumption in favour of sustainable development" remains at the heart of the NPPF (paragraph 10). In applying the presumption in favour of sustainable development, plan-making should "positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change" (paragraph 11[a]), whilst decision-taking should approve "development proposals that accord with an up-to-date development plan without delay" (paragraph 11[c]).

48. Paragraph 11 of the NPPF sets out that for the decision maker "plans and decisions should apply a presumption in favour of sustainable development." For the decision taker, this means:

"c) approving development proposals that accord with an up-to-date development plan without delay, or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
   i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or
   ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

49. Paragraph 38 of the NPPF advises that Local Planning Authorities should approach decision taking in a positive and creative way and should work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. The paragraph further states that decision-makers at every level should seek to approve applications for sustainable development where possible.

50. Paragraph 47 confirms that “planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.”

51. Paragraph 54 of the NPPF indicates that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations.

52. Paragraph 80 records that planning decisions should help create the conditions in which businesses can invest, expand and adapt, stating that “significant weight should be placed on the need to support economic growth and productivity.” Whilst paragraph 82 notes that provision should address specific locational requirements of different sectors.

53. The NPPF records that planning policies should support the role that town centres play at the heart of local communities (paragraph 85) and that local planning authorities should apply a sequential test to planning applications for main town centre uses (such as offices) which are neither in an existing centre nor in accordance with an up-to-date plan (paragraph 86).

54. Planning decisions should aim to achieve “healthy, inclusive and safe places” which amongst other things promote social interaction and enable and support healthy lifestyles (paragraph 91). Whilst paragraph 92 addresses the need to provide the social, recreational and cultural facilities and services the community needs.

55. Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields should not be built on unless, amongst other things, “the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.”

56. Chapter 9 of the NPPF promotes sustainable transport, with paragraph 103 noting that significant development should be focused on locations which are or can be made sustainable. Paragraph 109 states that “development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

57. Local planning authorities are encouraged to “take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs” (paragraph 119)

58. Chapter 12 addresses the need to achieve well-designed places, whilst chapter 14 considers the challenge of planning for climate change as well as flood risk.

59. Chapter 15 focuses on conserving and enhancing the natural environment. Paragraph 170 requires planning decisions to contribute to and enhance the natural environment by, inter alia, protecting and enhancing valued landscapes in a manner commensurate with their statutory status; preventing new development from contributing to unacceptable risk; and remediating and mitigating despoiled and contaminated land where appropriate. Paragraph 175 notes that if significant harm to biodiversity resulting from a development cannot be avoided, mitigated or adequately compensated, then planning permission should be refused. Whilst if a site has risks associated with contamination, planning decisions should ensure that adequate site investigation is prepared and suitable remediation secured (paragraph 178). Likewise planning decisions should mitigate and reduce to a minimum potential adverse impacts resulting from noise (paragraph 180) and steps to mitigate impacts on air quality should be identified (paragraph 181)

60. Conserving and enhancing the historic environment is addressed in chapter 16 of the NPPF, requiring planning applications that may affect any heritage asset to describe its significance (paragraph 189), whilst the local planning authority should take into account the impact of the proposal on a heritage asset to avoid or minimise conflict with its conservation (paragraph 190). The NPPF states that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of the heritage asset, the positive contribution the conservation of the asset can make to sustainable communities and the desirability of new development to make a positive contribution to local character (paragraph 192).

61. Great weight should be given to the asset's conservation when considering the impact of the proposed development on its significance (paragraph 193), with any harm, or loss of significance being given clear and convincing justification (paragraph 194). Where development will lead to substantial harm to a designated heritage asset, consent should normally be refused (paragraph 195). Where the harm is less than substantial, the harm should be weighed against the public benefits of the proposal (paragraph 196).

National Planning Practice Guidance

62. National Planning Practice Guidance (NPPG) has been published in support of the NPPF.

The Local Plan

63. The promotion of employment in the borough is one of the primary aims of the Council and this has consistently been reflected in the adopted local plans. The North East Luton Local Plan (adopted in January 1988) established that the only major area that was suitable and could contribute to the need for further employment development was the Wigmore Employment Area, to the south of Eaton Green Road. The need for the Wigmore Employment Area was subsequently repeated in the Borough of Luton Local Plan (adopted 1997) which saw it as a fundamental means of meeting Luton's employment needs, and in the Luton Local Plan 2001-2011 (adopted 2006) and the current development plan, the Luton Local Plan 2011-2031 (adopted November 2017).

Luton Local Plan 2011-2031

64. Since the application site covers such a large area there are quite a number of allocations on the proposals map that are relevant. Part of the site through which the access road passes (both to the west and north of the airport) is a Category A Employment Area. On the western side of the airport, adjacent to the areas of parking by Vauxhall Way is an area designated as a District Wildlife Site (Dairyborn Scarp). Much of the rest of the site is covered by the London Luton Airport Strategic Allocation. This strategic allocation covers not only the operational airport, but also some of the commercial buildings on Percival Way, Century Park (Category A Employment Area) and Wigmore Valley Park (a District Park). There are further designations within the area of Wigmore Valley Park, including a County Wildlife Site, and an Area of Local Landscape Value, whilst the access to the Strategic Allocation is also indicated on the western periphery of the park. The outer edge of the Public Safety Zone clips the southern end of Century Park.

65. The policies from the adopted Luton Local Plan that are applicable to this application are: LLP1, LLP2, LLP3, LLP6, LLP13, LLP14, LLP25, LLP27, LLP28, LLP29, LLP30, LLP31, LLP32, LLP34, LLP36, LLP37, LLP38 and LLP39.

66. Policy LLP1 sets out a presumption in favour of sustainable development focusing the majority of development over the plan period on eight strategic locations set out in the Spatial Development Strategy. One of the eight locations identified in the Spatial Development Strategy (Policy LLP2) is the area covered by the London Luton Airport strategic allocation. Policy LLP3 notes that Luton Town Centre will be the focus for economic growth.

67. Policy LLP6 covers the airport strategic allocation, an area of approximately 325ha including land within the airport boundary, Century Park and Wigmore Valley Park. The allocation does not just serve the airport, but includes growth of business and industry. Sections in this policy include both airport and non-airport related matters:

A. Airport Safeguarding - not permitting development that would adversely affect the operational integrity or safety of the airport;
B. Airport Expansion - assessing proposals for expansion of the airport against policies in the Local Plan as a whole and only supporting proposals for development where they, inter alia, are: directly related to airport use; accord with an up to date Airport Master Plan; incorporate sustainable transportation measures and suitable road access;
C. Airport Related Car Parking – should be within the strategic allocation (excluding Century Park and Wigmore Valley Park); meet an objectively assessed need; does not adversely affect the adjoining highway network and will not lead to detriment to the surrounding area;
D. Century Park - proposals will be supported where they make provision for office, manufacturing and distribution employment (with particular support for engineering and manufacturing for both aerospace and automobile purposes). Small scale retail and related services to serve the needs of employees as well as a hotel will be permitted. The access was to be via Percival Way and so designed to ensure that no use was made of Eaton Green Road to service Century Park or the airport (except for public transport, cyclists and pedestrians);
E. Wigmore Valley Park - is considered integral to the strategic allocation in delivering development and access to Century Park, including any reconfiguration of land uses that may be necessary. The policy seeks to maintain the scale and quality of open space; enhance bio-diversity; provide new open space to replace Wigmore Valley Park offering facilities of at least equal quality (before development of the existing park takes place) and ensure the long term management is compatible with safe airport operations;
F. Design and Drainage at Century Park - design proposals to provide appropriate strategic landscaping; height of buildings to reflect the site's rural fringe; provide for sustainable drainage and fully assess the impacts upon heritage assets.

68. Policy LLP13 covers the Local Planning Authority's economic strategy, whilst policy LLP14 seeks to protect the Category A employment areas, resisting the loss of floorspace associated with B1, B2 and B8 uses in these areas.

69. Policy LLP25 requires buildings and spaces to be of a high quality design, with distinctive character and easily accessible. Proposals will need to demonstrate adherence to the best practice principles of urban design to

create quality places in the borough. The policy sets out a number of criteria, which essentially seek to enhance the distinctiveness and character of the area, create or enhance attractive safe, accessible and active open public spaces by creatively using hard and soft landscaping; and optimise and improve accessibility to walking and cycling and connections to public transport.

70. Policy LLP27 provides support for proposals that safeguard and enhance existing networks of open space and establish new green infrastructure. Losses of open space will be permitted where replacement open space of an equivalent type, quantity and quality can be provided or the proposal is for alternative sports or recreational provision where the need clearly outweighs the loss.

71. Policy LLP28 considers biodiversity and nature conservation, and requires that development proposals that impact adversely on statutory or other designated sites, and ecological networks, will need to demonstrate that they have complied with sequential criteria, namely:

- avoidance, wherever possible, otherwise:
- the benefits of the proposal must clearly outweigh the intrinsic nature conservation interest;
- mitigation must be used (including retention, protection and enhancement); and
- compensation through acquisition and management of an alternative habitat of equivalent wildlife value in the vicinity.

72. Policy LLPP28D explains that where there is a reasonable likelihood of a development proposal having an adverse effect of habitats or species of biodiversity interest an ecological assessment will be required.

73. Policy LLP29 addresses Landscape and Geological Conservation. The Policy is underpinned by the premises that “Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas.” There are two tiers in the hierarchy, notably: national landscapes such as the Area of Outstanding Natural Beauty (AONB) (Tier 1); and local landscape areas including the more important Areas of Great Landscape Value, and as is the case for part of the application site the Areas of Local Landscape Valley notably Wigmore Rural (Tier 2).

74. Policy LLP30 seeks to protect, conserve and enhance Luton’s heritage, requiring development to take account of the character, setting and local distinctiveness of affected heritage assets, including registered parks and gardens at Luton Hoo, listed buildings, the scheduled monument at Someries Castle and archaeological heritage. Development proposals will

be supported where they conserve heritage assets, whilst any harm to a heritage asset will require clear and convincing justification. Proposals affecting heritage assets will have to be supported by a Heritage Statement and where there is potential for the site to include archaeological interest an appropriate desk based assessment should accompany the application.

75. The Council's sustainable transport strategy is covered by policy LLP31, which states that planning permission will be granted for developments that, inter alia, minimise the need to travel and reduce road congestion. LLP31D supports the continued economic success of London Luton Airport with measures to ensure capacity at strategically important junctions and the continued enhancement of sustainable modes of transport to the airport. LLP31E recognises the need for a number of strategic infrastructure schemes and safeguards land for this purpose, including the access road to link Century Park to the wider transport network. The management of parking provision within Luton is addressed in policy LLP32, noting that parking provision should not exceed the maximum standards set out in Appendix 2 of the Local Plan.

76. The risk and impact of flooding is addressed in Policy LLP36, whilst policy LLP37 sets out to support development which contributes to the mitigation of climate change and carbon and waste reduction.

77. Policy LLP38 covers pollution and contamination, requiring development proposals to provide for: the satisfactory disposal of surface water; and assess contamination risks and provide remediation measures as appropriate.

78. Policy LLP39 sets out the expectation of the Local Planning Authority regarding infrastructure and developer contributions to support development. The policy states that proposals should provide or adequately contribute towards the infrastructure and services needed to support them.

Consultation Responses

79. Affinity Water: noted that the site is located close to or within the Environment Agency defined Groundwater Source Protection Zone and that the construction works may exacerbate any existing pollution. They therefore recommended conditions covering: the identification of contamination; piling risk assessment; and interceptors where infiltrative drainage is proposed.

80. Archaeologist: considered that there was insufficient information with the original application to allow the Archaeology Team to provide comments

on the impact of the development proposals on the known and potential archaeological resource of the application area. Consequently the application does not currently comply with the NPPF, policies LLP6E(iv) and LLP30D of the Local Plan.

The Archaeology Team provided comments following the receipt of further information, noting that in subsequent discussions with the Local Planning Authority and the applicant's archaeological consultant it became apparent that trial trenching could not be undertaken before the determination of the planning application because of the requirement to maintain public access to Wigmore Valley Park. The Archaeology Team accept that a trial trench evaluation could be delayed post decision and the application could be determined on the basis of the Environmental Statement and Geophysical Survey Report.

The Archaeology Team comment on the impact upon the Scheduled Monument at Someries Castle and state that "given the topographical location of Someries Castle and the distance between it and the proposed development … any impact would be very limited and certainly amount to far less than substantial harm to the significance of Someries Castle Scheduled Monument (paragraph 195 of NPPF). Therefore, there is no objection to the application on the grounds of the impact of the proposed development on the setting of the designated heritage asset at Someries Castle."

The Archaeology Team also comment upon the WWII Airfield Battle HQ on the northern edge of the application site, noting that there will be a slight adverse impact upon its setting given that it will be separated from the airfield by the development. They accept the mitigation measures, protecting the structure and providing interpretive material, but consider that a more positive approach to managing the structure is required. These management proposals should be secured through the implementation of an approved scheme of heritage asset resource management.

With regard to archaeological assets, the geophysical survey identified the partial extent of a substantial Roman building and associated settlement. The Archaeology Team commented that overall the development would result in creating a better environment for the protection of the Roman building heritage asset and that any impact on archaeological deposits could be satisfactorily mitigated through an appropriate programme of archaeological monitoring with investigation and recording as necessary – secured through the implementation of an approved scheme of heritage asset resource management.

In relation to the western part of the site which has the potential to contain archaeological deposits, the Archaeology Team suggested that mitigation could be achieved through a programme of archaeological monitoring, with a programme of archaeological investigation in advance (trial trenching to identify and characterise the archaeological remains present followed by further substantive investigation if the initial results require). Consequently, the Archaeological team recommend that a planning condition be attached to any permission.

81. Bedfordshire Fire and Rescue: Suggest that a condition should be subject to the Council's CCTV system being extended to the development and a management plan being approved to ensure appropriate monitoring. Also recommend a condition to cover measures for car parks and open spaces to prevent illegal encampments.

82. Campaign for the Protection of Rural England: any response received will be reported at the Meeting.

83. Central Beds DC: have responded and raise no objection to the proposal.

84. Chamber of Commerce: any response received will be reported at the Meeting.

85. Chiltern Conservation Board (CCB): submitted identical representations to the original application and the further information which were part holding objection and part comments. The response noted that the land to the east of Luton (in North Herts) is highly valued and recorded in the Herts Landscape Character Study as LCA212 and in 2013 CCB proposed a boundary change to Natural England to include the land within the Area of Outstanding Natural Beauty (AONB).

CCB note that they have made representations to two applications for residential development in North Herts in relation to their harm to the AONB and the potential boundary change as well as representations to North Herts Local Plan and consider that this application should not be determined prior to the Inspector ruling on the soundness of that plan. CCB consider that 1) the cumulative impact with these developments and the impact upon the submitted Transport Assessment should be considered. 2) Assurances that mechanisms will be in place to control the impacts of traffic from the airport and to protect the Chilterns cycleway. 3) Until these things are resolved it is not possible to assess the full impacts of the development.

CCB considered that the cumulative effects of the North Herts developments in terms of their implications for transport and landscape designation should be taken into account and that the development should

not promote vehicular generation to the east that would diminish the tranquillity and qualities of the prospective extension to the AONB.

Additionally CCB note that careful consideration should be given to lighting details to limit the potential for light pollution.

86. EDF Energy: any response received will be reported at the Meeting.

87. Environment Agency: The Environment Agency comment that the information presented in Appendix GCC of the Environmental Statement report (GL Hearn Ltd, December 2017) including the document Century Park Development, Airport Way – Landfill Area, Contamination Quantitative Risk Assessment (Ove Arup and Partners, 21 September 2017) submitted in support of this planning application provides them with confidence that it will be possible to suitably manage the risk posed to controlled waters by this proposed development.

The Environment Agency note that preliminary environmental site assessment works have been completed across the proposed development site, however further detailed environmental assessment works will be required to refine the conceptual site model such that robust risk management / remediation strategies can be developed for the entirety of the proposed development. It is the Environment Agency's opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the Local Planning Authority.

In light of the above, the Environment Agency consider that the proposed development will be acceptable subject to a number of planning conditions being imposed, noting that without these conditions the Environment Agency would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it could not be guaranteed that the development would not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

88. Fire Safety Officer: any response received will be reported at the Meeting.

89. Friends of the Earth: provided a number of detailed responses to the consultation. In response to the initial consultation in January 2018 FoE commented that although over 180 documents were provided with the application there was not a detailed report to the Environment Agency to address the concerns raised in relation to potential groundwater contamination from the landfill site. FoE considered it unacceptable to submit an outline application covering development over landfill. FoE

wished to receive confirmation that Wigmore Valley Park was gifted to the people of Luton when the Wigmore estate was created in the 1980s.

FoE assumed that the Country Wildlife Site would be sacrosanct and would not be sacrificed to a surface car park when other sites were available and a multi-storey car park would take less land.

It was considered that the proposal conflicts with the Local Plan in that it involves the loss of a large number of trees, creates a new road into Wigmore Valley Park, removes an attractive and convenient area of park nearest to the residential areas and is full of flaws in the traffic flow assumptions. The new road and access to Eaton Green Road, together with a continued increase in airport traffic, would combine to make the current levels of congestion worse.

A request was made to extend the consultation from four weeks to six weeks and it was considered that the application was of such a major scale and had effects beyond the borough boundary that the proposal should be called in by the Secretary of State.

The second representation was in two parts, the first provided an objection to the planning application with the second part of the objection referring to the 'secret intentions.'

The objections can be summarised as follows: 1) Loss of Wigmore Valley Park which was provided for the people of Wigmore and is a vital community asset, with nothing in the Local Plan supporting its redevelopment; 2) Luton is over developed and green space provision is below people's needs; 3) The development on Wigmore Valley Park would reduce the quality of open space and landscaping and is therefore contrary to policies LLP6E and LLP29; 4) The development is speculative and would result in the loss of much of the County Wildlife Site (CWS) and adversely impact the Area of Local Landscape Value (ALLV); 5) The proposal would result in the loss of over 2ha of trees which form a barrier to noise and air pollution from the area; 6) the replacement park would be further from residential areas and not as attractive as the existing Wigmore Valley Park; 7) the new link road to Eaton Green Road would generate more traffic, increase noise and create danger and is contrary to policy LLP6D; 8) the roads in the area are already congested due to airport expansion and the proposal would result in increased congestion and gridlock; 9) the proposal will result in increased air pollution which is already a problem in the area surrounding the airport; 10) surface level parking should not be provided in the CWS and multi-storey car parks could be located elsewhere; 11) building offices over landfill could cause contamination of the groundwater, result in release of gasses, lead to subsidence of buildings, and adversely affect people's health; 12) the

development will increase the impact of climate change; 13) the new access road seems far bigger than is needed for the business park and should be fully justified; 14) The new café, toilets, playground and skate park are welcomed but should have been funded without the proposed development; and 15) no development should take place on the public park, but if development is to occur than it should be on the Century Park site that already has planning permission.

In relation to the second part of the objection, FoE state that there is no explanation as to why the area with planning permission for Century Park has been dropped, nor why a dual carriageway is needed for a few offices. FoE are concerned that because the application is in outline a road that was shown previously could reappear and provide a link to the residential development in North Herts.

Following the re-consultation after the receipt of further information, FoE raised a number of points, notably: a) the Council has a moral and legal duty of care to act on behalf of its residents and it has acted undemocratically in issuing a licence to LLAL; b) the New Century Park application is the first stage in a bigger expansion of the airport which relies on the new access road (reference to the consultation on the Development Consent Order that ended in August 2018); c) the further information submitted ignores 400 letters of objection, two petitions and “a damning internal report which amounts to a recommendation for refusal”; d) recommends that the application should be refused as it proposes inappropriate development on a valuable community asset that does not comply with key relevant policies in the Local Plan.

The further representations repeat the concerns re: climate change; air pollution; as well as reiterating points in relation to conflicts with policy (the loss of the CWS, ALLV, public park, location of the business park, link to Eaton Green Road and potential pollution from building on landfill). In addition FoE consider there to be a conflict of interest (with the Council owning LLAL and determining the application), misuse of public finances (with consultants drawing up this application and working on the DCO), misrepresentation (considering this to be the first stage for airport expansion and believing the claims about benefits to the local economy to be false) and lack of democracy.

90. Health and Safety Executive: raise no objection to the planning application.

91. Hertfordshire County Council: any response received will be reported at the Meeting.

92. Historic England: in relation to the initial consultation Historic England noted that although the tallest buildings would be on the far side of the airport from Someries Castle and Luton Hoo, since there did not appear to be any photomontages, the Local Planning Authority should be satisfied that it has sufficient information to be confident about any potential impacts.

In relation to the construction of the development (including the business park and the access road and junction), Historic England considered that it will result in some harm to the significance of Luton Hoo and Someries Castle and the introduction of further development at the airport would further erode the historic landscape setting of these heritage assets. Any harm should be weighed against the public benefits and if the Local Planning Authority is minded to grant permission this should be conditional upon the continued management of any mitigating landscaping. Consequently Historic England were concerned that the application would result in some harm during the construction phase and considered that the issues above needed to be addressed in order for the application to meet the requirements of the NPPF.

The further information pursuant to the Regulation 22 request provided viewpoints identifying the existing airport development and the extent of the New Century Park development. Historic England responded that the additional assessments have helped to further understand the potential impact and that "there is some potential, and particularly the hotel building, to be visible from areas of the parkland at Luton Hoo and the wider setting of Someries Castle. We acknowledge this would be in the context of the existing airport development but it would exacerbate the impact of this resulting in some harm to the significance of these sites."

Historic England again conclude that the harm should be weighed against the public benefits the proposal would deliver in line with the NPPF and recommend that if the Local Planning Authority is minded to grant consent, this should be conditional upon the approval of, and the continued management, of any mitigating landscaping and further details.

93. Highways England: a number of holding requests were received from Highways England in order to provide them and their consultants with the opportunity to review the Transport Assessment.

Highways England's initial comments were provided in the form of two technical notes from their consultants Aecom in April 2018 in relation to the original submission. Following the consultation on the further information pursuant to the Regulation 22 request, additional comments were received in November 2018 (two further technical notes).

In March 2019 Highway's England withdrew their holding objection and confirmed that they had no objection subject to the imposition of two planning conditions.

94. Kings Walden Parish Council: any response received will be reported at the Meeting.

95. LBC Drainage: raised an objection to the initial proposals due to lack of sufficient information, seeking clarification on the changes to existing overland flow routes to the River Mimram and greenfield runoff rates and recommended that storage calculations in the Drainage Strategy be reappraised. Following the receipt of further information the Drainage team consider the strategy to be acceptable in principle subject to the provision of appropriate attenuation systems (including oversize pipes within the perimeter of the carriageway, underground attenuation storage, green SuDS within the New Century Park business park). The development is considered acceptable subject to planning conditions.

96. LBC Ecology: The Council's ecologist commented that the airport battlefield HQ was once used as a bat hibernaculum and it would be beneficial for it to be reinstated to this purpose as part of any mitigation proposals.

The south-east corner of Wigmore Valley Park CWS should be left in its current condition apart from the grassed areas that do require maintenance. Existing and new calcareous and neutral grassland are unlikely to be of CWS status and off-site mitigation is preferred. The potential new site of special scientific interest at Dallow Downs would be an appropriate location for grassland mitigation.

The Dairyborn Scarp DWS contains a fragment of ancient woodland. Substantial mitigation for its loss should be provided in a location away from the airport, potentially at Stopsley Common.

In summary, one or more detailed management plans are required, covering:

- Retained habitats
- New habitats created in the new park
- Landscaping along the access road
- Offsite mitigation

97. LBC Economic Development: any response received will be reported at the Meeting.

98. LBC Environmental Protection Unit (EPU): Recommended that conditions should be attached to mitigate impacts in the locality from the

development. In the construction phase the impacts in terms of noise and air quality could be mitigated through a Construction Environmental Management and a condition is recommended.

EPU comment that noise, air quality and land contamination for the operational phase are also addressed in the Environmental Statement. In relation to noise the Environmental Statement concludes that limits can be set for mechanical plant and equipment, consequently a condition is recommended. In relation to contamination EPU concur with the conclusion in the Quantitative Risk Assessment, submitted as part of the application, that more work is required to fully delineate the extent and type of contamination. The Environment Agency recommend conditions to secure this additional work, remediation and subsequent validation and EPU are satisfied with this approach since it will protect not only the water environment but also human health.

With regard to air quality EPU comment that the air quality assessment submitted with the application included predictions in relation to NO2, PM10 and PM2.5 levels in the locality. The report concludes that for PM10 and PM2.5 concentrations are predicted to be well below the annual mean objectives at all receptors with or without the development. Additionally, the annual mean PM10 concentrations are predicted to be below 32 $\mu g/m^3$ concluding that the 24 hour mean PM10 objective will not be exceeded at any of the receptors.

For NO2, the conclusions are that whilst there will be an increase in concentrations at the majority of receptors (with concentration changes in the order of 0-2%) it is predicted that there will be no breach of the objective at the receptors. Despite these conclusions, the air quality assessment recommends that mitigation by design measures should be included as suggested in the Environmental Statement. Accordingly EPU have proposed an appropriate planning condition.

99. LBC Fixed Assets: any response received will be reported at the Meeting.

100. LBC Heritage: comment that whilst there are no heritage assets within the site, there are various assets nearby, including the Grade II* registered park and garden at Luton Hoo, the Grade I Luton Hoo mansion itself, and a number of Grade II listed buildings (the closest being Wigmore Hall Farmhouse). Whilst the development is generally reasonably low key, the proposed 4-5 storey hotel building will need to be carefully considered – noting that at this stage it is in outline form and the visual impact assessment does not appear to adequately address the implications of this element of the development.

The Heritage Assessment suggests that the proposals will have a minor adverse impact upon the Grade II* registered park and garden at Luton Hoo and also be slightly visible from Someries Castle, particularly during the construction phase. The construction of the access road and particularly the bridge, is likely to be visible and have a minor adverse visual impact. This will result in 'less than substantial harm' in NPPF terms to the heritage assets and should be weighed against the public benefit of the proposal.

The Local Planning Authority should ensure the public benefit would outweigh any harm if a decision is made to grant consent. A condition requiring landscaping to be made good and maintained is recommended.

101. LBC Highways: The Council's Highways Engineer comments that since the formal submission of revised document in August 2018, the Highway Authority has been in further discussion with the applicant in relation to a number of unresolved issues with the Transport Assessment. The majority of those issues were of a technical nature related to the modelling undertaken and reflect similar concerns raised by Highways England. The discussions have resulted in agreement between the Highway Authority and the applicant with a number of the outstanding issues being resolved. Other issues can be resolved through the use of planning conditions.

The Highways Engineer comments that if the proposed link to Eaton Green Road is provided in advance of the New Century Park access road being completed then there would be disbenefits for the adjoining highway network and residential areas. The same approach was taken as Highways England in relation to the delivery of the New Century Park access road, noting that if it was not fully operational before the later phases of the development were occupied, there would be adverse impacts on the surrounding highway network.

Since the status of the proposed access road will be public highway following completion and given that there are off-site junction improvements required, the Highways Engineer commented that it was likely that there would need to be a Section 38/278 agreement under the Highways Act. Additional the Highways Engineer commented that these junction improvements should be delivered ahead of later phases of the development.

It was noted that there are a significant number of structures associated with the proposed access road where only general arrangements have been provided. As a consequence, any grant of planning permission should be conditional upon the submission and approval of full details of all structures.

Finally, given the constrained nature of the application site, construction works will inevitably have an impact on the surrounding public highway, therefore any grant of permission should be conditional upon the submission and approval of a construction method statement prior to works commencing. The statement should also make provision for a dilapidation survey of the roads and footways adjoining the site to be carried out prior to any works, with the applicant responsible for repairing or meeting the costs of repairing any defect identified that is a result of the construction works.

102. LBC Parks Manager: The proposals for improvements to the recreational provision at Wigmore Valley Park are welcome as for many years local people have requested improvements particularly to the play provision at the site.

The refurbishment of the existing pavilion building with the addition of a café and toilet facilities is also welcome as this will improve the visitor experience and provide a measure of supervision not currently enjoyed at the site.

In order to ensure the future sustainability of the park consideration should be given to how future management and maintenance of the park will be financed. An appropriate agreement should be in place in this respect.

There is a significant loss of trees across the development area and although there are also new trees proposed for re-provision within the landscaping proposals. I am aware from my experience of managing the site that the airport operator LLOLL seeks to ensure that any landscaping proposals do not increase the risk of 'bird strike'.

I would suggest therefore that any landscaping proposals for the site should include the minimum quantity of trees required to frame the open spaces and that mitigation for loss of trees be through off-site provision at other areas of parkland in the borough. A sum of £35k is required to enable tree planting at other district parks across the town.

The loss of areas of County Wildlife Site is of concern and as the mosaic of habitats is unlikely to be replicated in the short term on the replacement area of open space proposed in the agricultural area - it would seem reasonable that some form of mitigation should be sought for loss of habitat.

The council's ecologist will be able to advice on the most appropriate form of compensation in this respect.

The site has, in the past suffered greatly from unauthorised encampments and associated fly-tipping. I would request that site security is given consideration within the proposal.

103. LBC Public Health: The proposed community centre and cafes have a potentially positive impact on public health through providing meeting space and community activities; potentially enhancing social capital and community involvement. Further positive effects on public health could be seen if the café offers a range of health eating options.

New public open space is being proposed in the plans, with an overall slight increase in open space available. Depending on how this public space is used this should have a positive impact.

The proposed play areas and skate park would also have a positive impact on wellbeing of young people through providing a space for social connection and interaction as well as opportunities for physical activity and enhancing healthy lifestyle.

Some potentially negative impacts on air quality have been identified in the assessment completed with the planning application. Mitigations have been proposed which should be followed to limit impact on public health.

A sustainable waste management plan is proposed which is positive.

Some potential public health risks have been identified through contamination, as the proposed development is on filled landfill. Recommendations have been made regarding this, including further investigations. These should be followed to obtain as much information around these risks as possible.

The economic impact has been assessed to be positive overall, which would have a positive impact on health and wellbeing for those affected. However there has been no assessment on the population groups this would affect and the impact on inequalities.

A draft framework travel plan has been provided, this development will be accessible by public transport, pedestrian and cycle accessibility will be feasible and is recognised as being vital in improving sustainability. Recommends that travel behaviour should be monitored annually.

104. LBC Strategic Planning: Comments were provided in relation to the initial consultation with revised comments being received following the receipt of further information pursuant to the Regulation 22 request. Strategic Planning noted that the Local Plan envisaged that Century Park would support 1,882 jobs, whilst the proposal provides for 3,201 jobs, with only

15 jobs indicated as being lost due to demolition. Strategic Planning considered that the transport modelling would need to be re-run to identify wider impacts.

Given that the majority of accommodation is proposed to be for hi-tech office use, Strategic Planning considered that this may undermine Butterfield Green Technology Park which has yet to be built out and that the impacts should be identified.

In relation to Playing Pitches, Strategic Planning recognised that the loss of playing fields was addressed and that an agreement to fund off-site enhancements in line with policy LLP24 has been reached with Sport England. A comment was made that given the high intensity of the proposed B1 elements of the development and the generous landscaping proposed there could be scope to provide some formal sports/recreation facilities to serve employees as well as the wider community.

The application proposes an additional 2ha of open space provision, though this needs to be shown clearly on additional plans, detailing the extent of current and future open space. Policy LLP27 is relevant in relation to loss of open space and alternative re-provision.

Part E of policy LLP6 states that the development of Century Park should maintain the scale and quality of open space, if not result in net gains. Considering the overall deficiency of open space across the borough, the new provision through this development would constitute a significant part of the overall supply. It is therefore reasonable to ensure that a high quality and sustainable district level park facility is delivered in this location to meet the needs of the community and that could achieve a Green Flag award.

Given that the proposals make provision for a significant amount of car parking justification is needed to demonstrate how the proposals and configuration meet the directions of policy LLP6C. It is understood that parking provision will replace existing long stay car parks for the airport. The applicants should therefore need to demonstrate why the airport's parking requirements cannot be met elsewhere, in-line with the directions of local planning policy.

Part LLP6D directs that no use is to be made of Eaton Green Road to provide access to Century Park except for sustainable travel modes and emergency vehicles. The application does, however, propose access on to this road. This issue is briefly covered by paragraph 320 of the inspector's Report on the Examination of the Luton Local Plan (August 2017), where the need to avoid channelling traffic onto Eaton Green Road justified the need to use Wigmore Valley Park for an access route. If

Eaton Green Road is to be used for access, the applicants should demonstrate why access across Wigmore Valley Park is still required. The significance of this concern is increased by the fact that many more jobs are being proposed than previously expected, which would mean more people accessing the development from Eaton Green Road.

Policy LLP29 explains that development will be supported where it protects, conserves or enhances the character, setting and natural beauty of national and local landscape areas. The development site encompasses the Wigmore Rural Area of Local Landscape Value. The proposed development will undermine the character, setting and natural beauty of this asset and will likely result in the complete loss of this land as an allocated landscape area.

105. LBC Street Services (Trees): any response received will be reported at the Meeting.

106. LBC Waste Management: any response received will be reported at the Meeting.

107. LLAOL Safeguarding: the following concerns were raised in relation to the original consultation: a) the modelling in the Transport Assessment is not sufficient as it considers junctions individually and does not consider the interaction between junctions; b) the Transport Assessment shows that many junction will be operating over capacity and therefore no indication that it will ease pressure; c) the Travel Plan measures will not be sufficient to mitigate the proposals; d) the closure of Percival Way may adversely affect the operation of the airport since it is one of the predominant approaches to the airport and its car parks; e) little assessment of the impact of the cumulative effect of the DART project and this application on the operation of the airport; f) insufficient details provided as to how the relocated car hire centre would impact traffic flow in the core terminal area; g) the proposed replacement car parking requires additional information on pedestrian access and phasing of provision; h) further information required in relation to proposed mitigation for loss of habitats to ensure that hazard risks are not increased; and i) additional information should be provided to demonstrate that airport operations are safeguarded during construction.

In response to the further consultation, LLAOL confirmed they were satisfied that 1) the proposed lighting and building design met their requirements; 2) the principles behind the landscaping were discussed with no permanent water bodies proposed, planting schemes to take into account the need to discoursing roosting and flocking birds; and 3) the development does not conflict with safeguarding criteria relating to

obstacle limitation surfaces. Consequently LLAOL safeguarding has no objection to the proposed development.

108. National Grid: commented that there was apparatus in the vicinity of the development consisting of low or medium pressure gas pipes and associated equipment. Consequently the developer would need to contact National Grid/Cadent Gas before any works are carried out to ensure the apparatus is not affected by the development.

109. Natural England: raise no objection.

110. North Herts District Council: any response received will be reported at the Meeting.

111. Offley Parish Council: any response received will be reported at the Meeting.

112. Police Architecture: any response received will be reported at the Meeting.

113. Ramblers Association: any response received will be reported at the Meeting.

114. Sport England: provided initial comments in relation to the original proposal with a holding objection to the grant of planning permission since the development would result in the loss of the entire playing field area within Wigmore Valley Park and the supporting changing facilities. They noted that the potential exists to address the objection if playing field mitigation was to be made in the form of a financial contribution towards off-site replacement and recommended further discussion.

Sport England considered the proposal with regard to the specific exception criteria in their Playing Fields Policy and concluded that it has not been demonstrated that there is an excess of playing pitches in the borough (referring to the Council's Playing Pitch Strategy which identified a need to provide additional junior football pitches and cricket pitches to meet current and future need), nor that the replacement park would make provision for formal sports pitches and consequently would not represent equivalent/better replacement.

In their initial response Sport England agreed that the most appropriate form of mitigation would be to make off-site replacement provision in accordance with exception E4 of their Playing Fields Policy. The replacement provision would be in the form of an appropriate financial contribution towards the delivery of one or more project that the Council was to identify, with further discussion required on the level of financial

contribution, the projects that would be promoted and the trigger points for making the financial contributions through a section 106 agreement.

Following further discussion Sport England have confirmed that the information provided in the draft heads of terms for the section 106 agreement address the request for further information set out in their original formal response to the planning application. Consequently, Sport England now advise that the holding objection is withdrawn and that they are in a position to provide a substantive formal response to the planning application. Based on the information provided in the draft heads of terms, Sport England advise that their position will be "no objection subject to various matters being addressed through a Section 106 agreement."

Sport England indicate that the formal response will be provided once they have received a copy of the phasing diagram that is to inform the legal agreement. Any further response will be reported verbally to the Committee.

115. Thames Water Utilities: indicated that the existing foul water network infrastructure cannot accommodate the needs of this development and have consequently recommended the imposition of a planning condition.

116. Three Valleys Water: any response received will be reported at the Meeting.

117. Transco Gas: any response received will be reported at the Meeting.

118. The Wildlife Trust: any response received will be reported at the Meeting.

119. The Woodland Trust: any response received will be reported at the Meeting.

120. Statutory Publicity: On receipt of the original application, 584 neighbours were notified on 9 January 2018, with consultation lasting for six weeks. Following receipt of the further information in response to the Regulation 22 request 975 neighbours were consulted (reflecting the additional numbers that had responded to the first consultation), with the consultation taking place from 24 August 2018 and again allowing six weeks for representations to be received. On both occasions, site notices were displayed in 12 locations in the area where members of the public were likely to see them. The application was also advertised in the local newspaper, when it was first received and in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 the application was again advertised when the further information was submitted. However, the application has recently been advertised again since whilst the initial advertisement mentioned the

requirement under the Town and Country Planning (Development Management Procedure) Order 2015, it was not explicit that the application was being advertised as a major application or a departure from the development plan.

121. Responses were received from the occupiers of 427 separate properties (this includes representations from local residents, residents from further afield, councillors, businesses and their representatives), though there were multiple replies sent in by some respondents. There were 342 objection letters received to the original consultation, together with 16 anonymous responses. To the second consultation there have been 31 objection letters. In addition there have been 92 proforma letters received (together with a further five anonymous proforma letters) and 123 proforma 'tick box' objections (together with four anonymous proforma tick box responses). Two petitions have been received objecting to the development, the first contained 26 signatures from the Friends of Wigmore Valley Park and the second contained 85 signatures. The responses have been tabulated and are included as Appendix 3 (objection letters/emails) and Appendix 4 (petitions and proforma letters) to this report – the names and addresses have been deleted from this public document.

122. The matters raised in the representations from local residents (and those from further afield) can be summarised as follows:

i. The principle of development (including compliance with the local plan policies);
ii. Loss of Wigmore Valley Park, depletion of green space, loss of sports pitches, loss of buffer with the airport and inappropriate location for the re-provided park;
iii. Lack of improved connectivity across the proposed park for walkers, cyclists and horse riders, and existing rights of way not shown on plans;
iv. Loss of County Wildlife Site and impact upon flora and fauna;
v. Adverse impact upon the Area of Local Landscape Value;
vi. Loss of green belt land;
vii. Impact upon heritage assets (including archaeology);
viii. Contamination and risk associated with development over landfill;
ix. Risk of groundwater contamination and impact upon public health;
x. Inability of existing drainage to cope currently;
xi. Risk from unexploded ordnance;
xii. Traffic and transport implications, with new link to Eaton Green Road, closure of Frank Lester Way to private cars, existing congestion and inadequate parking provision;
xiii. Unnecessary provision of employment space given the availability of space elsewhere and loss of existing parking;

xiv. Loss of existing businesses arising from the new access road;
xv. Cumulative effects with other developments (including the proposed residential developments in Cockenhoe and the doubling of the airport capacity);
xvi. Noise and disturbance;
xvii. Impact on visual amenity and overlooking;
xviii. Air quality and odour;
xix. Lack of clarity on the energy recovery centre/incinerator;
xx. Loss of direct access to the tidy tip;
xxi. Inadequate consultation on the proposals;
xxii. Overdevelopment and layout (including large areas of surface parking), impact on the nearby residential properties;
xxiii. The proposal is for airport related development and that sector is the fastest growing source contributing to climate change.

123. There were other matters raised in the representations that are not directly relevant to the local planning authority determining this application, such as comments that the park was gifted to the people of Wigmore; links between LLAL and another company that had been set up with a similar name; the Council loaning money to LLAL; illegal disposal of Wigmore Valley Park to LLAL; loss of view/outlook.

124. In addition to the responses from residents there were a number of responses sent on behalf of businesses, including: the airport operator (LLAOL); TUI, Airport Executive Park and the Holiday Inn. The points raised in those representations can be summarised as follows:

i. LLAOL's initial comments to the planning application raised a number of concerns as it was considered that the development would have a significant adverse impact on the airport's operations and on the broader surrounds. Key areas of concern raised by LLAOL's representatives were: the Transport Assessment analysed junctions in isolation rather than in a co-ordinated way and also noted that many of the junctions will be operating over their capacity when the development is fully occupied; Percival Way was proposed to be closed to through traffic which would have resulted in major operational disruption to the airport; greater clarity needed to be provided in relation to the car hire centre relocation together with the replacement car parks to enable an assessment to be made of the extent of operational disruption; new habitats proposed in Wigmore Valley Park could attract roosting or flocking birds and prove hazardous to the operation of the airport; and construction without adequate safeguards could (in conjunction with the DART project) cause disruption to the operation of the airport.
ii. The representatives of the TUI Group noted that "whilst the principles of the New Century Business Park proposals are supported by TUI

Group, without proper and full consideration and mitigation, the proposed Century Park access road will severely compromise TUI Group operations." TUI Group did not consider that the mitigation measures within the original proposals were adequate and that they fell short of what was required to prevent significant disruption to their operations. The representations provided comments in relation to specific car parks that were referenced in the original Car Parking Strategy, and sought further explanation and assurances in relation to the temporary relocation of parking spaces and required permanent replacement for spaces that were shown as being lost.

iii. The Airport Executive Park is owned by Industrial Property Investment Fund and representations were sent in on their behalf. It was noted that the proposed development was in conflict with the development plan since the proposal results in the loss of part of the County Wildlife Site, the District Wildlife Site, the Area of Local Landscape Value and part of the district park, whilst proposing open space on a designated Category A Employment Area. The representations argued that alternative sites have consistently been advanced which are more suitable with less environmental and highways impacts. Comments were also provided on the Transport Assessment, questioning the methodology and considering the assumptions, since baseline data and modelling of trip generation details were not available. Additionally it was considered that the proposed development would have a significant detrimental impact in highway terms with: the level of construction traffic having not been forecast; a number of junctions operating beyond capacity with significant queuing; and the provision of replacement car parking being for tenants of Airport Executive Park some distance from their premises.

iv. The Holiday Inn hotel is owned by London Luton Hotel BPRA Property Fund LLP and its representatives raised a number of concerns regarding the impact that the proposed New Century Park access road would have on their client's property. It was noted that there were some forty-four bedrooms which face directly towards the new access road which would be less than 10m from the rooms. Concerns were raised about the noise, air quality and visual impact (including from lighting) of the proposed access road, since whilst the hotel is on raised ground above the adjoining property, because of the bridge and embankment for the road, the access road would be significantly elevated, similar to first floor level. The agents were concerned that whilst the Environmental Statement predicted an increase in noise levels there appeared to be no mitigation proposed. The agents also commissioned traffic consultants who raised concerns about the Transport Assessment methodology, the modelling that was used and the infrastructure improvements to mitigate the impact of the proposals on the wider highway network.

125. Within the representations received there were a limited number of comments supporting the provision of some of the enhanced facilities within the park, such as a café, toilets, enhanced playground and skate park, but there were no individual letters of support.

THE ENVIRONMENTAL STATEMENT

126. The Environmental Statement submitted in December 2017 with the original planning application has been updated in August 2018 when the further information in response to the Regulation 22 request was submitted. The Environmental Statement comprises a Non-Technical Summary (NTS), Technical Chapters (Volume 2) and Technical Appendices (Volume 3).

127. The chapters in Volume 2 provides an introduction, a description of the project and alternatives that were considered, potential cumulative effects within the project and with other developments that might proceed in the area and a description of the methodology used to predict impacts. The key impacts upon the environment were then considered in chapters under the following headings:

i. Townscape and visual impact
ii. Traffic and transport
iii. Socio-economic
iv. Ecology and nature conservation
v. Noise and vibration
vi. Air quality
vii. Cultural heritage
viii. Archaeology
ix. Ground conditions and contamination
x. Hydrology
xi. Agricultural and soils

128. The assessment for each subject, both from the original Environmental Statement and the Addendum, is summarised below.

i. Townscape and Visual

129. The Townscape and Visual Impact chapter of the Environmental Statement was supported by technical appendices covering: the methodology used; the assessment viewpoints; the townscape character; the visual impact and landscape mitigation. A Zone of Theoretical Visibility was mapped, indicating the area within which the likely townscape and visual effects could be expected to occur, with a selection of representative views being chosen covering, long range, medium and

local views from which the development could be assessed both during the construction and operation phases.

130. Because of the nature and size of the site, during construction and operation, elements of the development will be seen from different locations. Thus for instance, within Wigmore Valley Park and the commercial estates at the airport, there are roads, paths and a bridleway from which local views will be obtained both during construction and operational phases. Whilst further afield, because of changes in levels, such as the raised levels with the Dairyborn Scarp, there will be views of the development from further afield.

131. The landscape and visual assessment identifies different character areas within the development, such as the Wigmore Rural Area of Local Landscape Character and the Dairyborn Scarp on the western side of the airport. Additionally, the landscape and townscape character areas, both within and surrounding the proposed development, are described and the impact upon these character areas is assessed.

132. The assessment identifies locations from which there are likely to be effects on the visual amenity and views of visitors, residents and motorists during the construction of the development and concludes that, with mitigation, the proposed development will have a minor negative effect during construction.

133. For the operational phased of the development, once the scheme is built and in use, there is considered to be a small negative effect on the character of the area in the early years, though once the planting and landscaping has been established and is mature, the assessment concludes that there is likely to be a small positive effect upon the townscape of the immediate area.

134. In terms of the effects on the visual amenity and views of residents and those using roads and footpaths in the area, the townscape and visual assessment concludes that there will be some negative effects. Some mitigation measures are therefore proposed, including landscaping, woodland and hedgerow planting, in order to reduce the impacts.

135. The chapter also considered the cumulative effects with other major developments that are taking place in the vicinity of the development site and concluded that these would either not be perceived in conjunction with the New Century Park proposals or else would not result in additional effects to those set out in the townscape and visual assessment.

ii. Traffic and Transportation

136. The traffic and transportation chapter of the Environmental Statement assesses the potential impact of the development upon the surrounding highway network. In addition to this chapter a Transport Assessment was provided with the planning application, together with a Parking Strategy and a Framework Travel Plan.

137. The Transport Assessment (and Supplementary Transport Assessment submitted with the further information) considers the existing highway conditions (extracting data from the Council's SATURN model) and the impact of the proposed development upon the transport network (using VISSIM software). The Transport Assessment also considered public transport facilities, including buses, rail and the proposed DART, together with pedestrian and cycle facilities.

138. Conditions on the local road network in the immediate area (including Eaton Green Road, Percival Way, Presidents Way and Frank Lester Way) was assessed, together with junction capacity on those roads. The wider road network was also assessed (including roads such as New Airport Way [A1081], Vauxhall Way [A505], Lower Harpenden Road [B653] and junction 10 of the M1).

139. During the construction phase the traffic and transportation chapter identified impacts from on average 55 daily HGV movements, with traffic predicted to use the A1081 and Vauxhall Way and Percival Way/President Way in order to gain access to the site. In order to minimise adverse impacts during the construction phase the Environmental Statement advocates a Construction Phase Traffic Management Plan.

140. The trip generation arising from the various uses within the New Century Park development has been calculated using the TRICS database, whilst the modelling also includes forecast growth in traffic over the period (including cumulative effects of the airport growth to 18mppa and the introduction of the DART). This indicates that there will be additional traffic generated and consequently the impact upon various existing and modified junctions was assessed. The assessment indicated that a number of junctions would operate with adequate reserve capacity with and without the development, a few would be improved with the development proposed and four would be operating far in excess of their capabilities with or without the development (Eaton Green Road/Wigmore Lane roundabout, Crawley Green Road/Wigmore Lane roundabout, Vauxhall Way/Crawley Green Road roundabout and Vauxhall Way/Hitchin Road/Stopsley Way roundabout). As a consequence the Supplementary Transport Assessment proposed mitigation measures for these junctions.

141. The Environmental Statement advocated further mitigation during the operational phase of the development, this would include an effective

transport strategy (route signage, travel demand management, and measures to encourage use of public transport with Travel Plans for businesses operating within the New Century Park development).

iii. Socio-economic

142. The Socio-economic chapter of the Environmental Statement is supported by two technical appendices, one provides an Economic Impact Assessment and the other considers the existing and proposed open space provisions.

143. The Addendum to the Environmental Statement provided additional information to address comments made in the Regulation 22 request. The chapter provides, inter alia, a breakdown of the existing floorspace and employment on the site that will be affected by demolition in order to accommodate the new access road, cumulative assessment with the Bartlett Square development, and updated information on parks and sports pitch provision.

144. The assessment considered the baseline conditions, using data from the 2011 census since this provides the most up-to-date data. The baseline was established in terms of population and age profile, skills and employment and the open space network. The assessment considered the impact upon people's general health, employment skills levels, existing businesses on site and public facilities within Wigmore Valley Park.

145. The socio-economic assessment considered that during the construction phase there would be both positive and negative effects. The negative impacts included public areas within Wigmore Valley Park being inaccessible during construction, whether areas set aside for archaeological excavation, or areas lost during construction of the access road and business park, or the refurbishment of the Pavilion. However,, these would be temporary with new areas of public open space being created and new facilities, such as the children's play area and skate park being provided.

146. Within the planning application site there are fifteen buildings that are likely to be affected by the development. The proposal will result in the loss of 16,640sqm of floorspace, though 43% of that space is currently vacant. The chapter estimates that there are 373 employees within these buildings, with almost all the companies having relocation strategies in place, with the exception of one where it is anticipated that the proposal will result in the loss of 15 jobs.

147. Positive impacts arising from the construction phase would include the creation of an estimated 559 jobs with a contribution of £85 million to UK

GDP. Additionally, there would be opportunity for training and skills provision, with support for local recruitment.

148. In terms of longer term socio-economic impacts of the development, whilst there will be a permanent loss of sports pitches from the site, these pitches are considered to be of 'poor quality' (findings of the Council's Playing Pitch Strategy 2014) and suitable equivalent replacement is proposed (in consultation with Sport England). Whilst part of Wigmore Valley Park will be lost to the New Century Park business development, the re-provision of open space will see an overall increase of 2ha, with new and improved facilities.

149. In economic terms, during the operational phase it is anticipated that by 2025 there will be an additional 2,800 jobs created on the site, whilst by the time the development is fully occupied it is anticipated that this number will have risen to 3,201 jobs. It is predicted that the development will make an annual contribution to GDP of £167 million, support £135 million of wages and provide £63 million of tax revenue in the local area.

iv. Ecology and Nature Conservation

150. This chapter of the Environmental Statement provided information on the existing ecological condition of the site and surrounding area and was supported by a significant number of reports in the technical appendices, covering, amongst other things, bats, badgers, birds, dormice, reptiles, invertebrates and hedgerows. The number of reports reflects the fact that the site includes Wigmore Valley Park which contains habitats likely to support a wide range of fauna.

151. The chapter noted that there were no international or national ecological designations within the site or the immediate surrounding area, though the site did include one County Wildlife Site (Wigmore Rural) and one District Wildlife Site (Dairyborn Scarp).

152. The addendum to the Environmental Statement recognised that the proposals would impact significantly on the County and District Wildlife Sites, with 5ha of each being lost during the construction phase. As a consequence a range of biodiversity mitigation measures are proposed, though it is not practical to deliver all within the site as some habitats (such as the calcareous grassland) could not be replicated without other environmental effects arising, consequently a range or measures are proposed (including financial contributions for improvements to other sites within the borough – Dallow Downs in particular was identified).

153. Additional mitigation measures identified within the chapter include: site wide native planting to ensure habitats are not lost and protected species

not impacted; creation of skylark plots in adjoining land; and in addition to the offsite works, the proposal includes the long term maintenance, management and enhancement of the existing and new habitats.

v. Noise and Vibration

154. The Noise and Vibration chapter assessed the existing noise levels across the site and considered the impacts of development during the construction and operational phases upon these levels. The study area was taken as 500m either side of the proposed dual carriageway access road and considered principally the residential properties on the northern side of Eaton Green Road. Both attended and unattended noise meters were used in order to establish the baseline.

155. During the construction phase there will be an increase in noise, though the impacts can be controlled and mitigated through the use of planning conditions. The most noticeable increases in noise during construction are associated with the construction of the access road near the Holiday Inn hotel (including piling for the new bridge) and the new link road to Eaton Green Road. The imposition of a condition requiring a Construction Environmental Management Plan to be submitted which would specify hours of operation, require details of piling methods and controls over equipment (noise attenuation) would help to mitigate any adverse effects.

156. The main noise source during the operational phase will be from the proposed New Century Park access road. Short term and long term changes to sound levels were assessed, with it being noted that the only deterioration of significance in noise arising from traffic levels would be at the Holliday Inn, where a road embankment and bridge is proposed for the new access road as it crosses Airport Way. However, whilst the assessment predicts the traffic sound level will rise by between 4dB and 5dB, this is still below the ambient background noise level of 61dB $L_{A10\ 18hr}$, with other sources (industrial activities and the airport) contributing to the overall soundscape. The conclusion is that although noise levels at the Holiday Inn will rise, when other sources are taken into account the increase will only be moderate, a minor adverse impact. Mitigation measures for this location are advocated in the Environmental Statement.

157. Noise from plant associated with new buildings in the proposed business park can also be controlled through planning conditions.

vi. Air Quality

158. The potential air quality impacts of the development during the construction and operational phases are set out in a chapter in the Environmental Statement. The addendum to the Environmental

Statement noted that no specific request was made for further information with regard to air quality, though it was noted that if the transport modelling changed than this could affect the air quality assumptions (as would have been the case for noise).

159. The chapter notes that existing air quality conditions have been established by collating the results of monitoring carried out by the Council and London Luton Airport, covering both the study area and nearby sites (which provide the context for the assessment). The results show that mean nitrogen dioxide concentrations at locations in proximity to the proposed development have generally been below the objective, with the representative monitoring point at the site boundary and close to sensitive receptors showing nitrogen dioxide levels below the objective. In terms of particulate matter (PM_{10} and $PM_{2.5}$) concentrations at the two monitoring points (one on the airport and one in the Town Centre Air Quality Management Area [AQMA]) are well below relevant objectives.

160. The estimated background concentrations for the opening year (2021) and the assumed year of completion (2023) have been derived for each receptor and are well below the objectives for nitrogen dioxide, PM_{10} and $PM_{2.5}$.

161. During the construction phase the predicted 55 annual average daily traffic heavy duty movements is below the 100 trips per day screening threshold for sites outside AQMAs and consequently is considered insignificant. Effects from dust were considered since the development is within relatively close proximity to sensitive receptors (notably 110 residential properties within 50m of the site and an operational airport), with the potential for dust being generated from the demolition of buildings, from earthworks associated with the construction, and from vehicle movements to and from the site during construction. The assessment concluded that there was a high risk of dust soiling impacts arising from the earthworks and construction, with a medium risk during demolition and trackout, whilst in all cases there was a low risk to human health. The mitigation measures envisaged arise from best practice and include a dust management plan, with dust monitoring, site maintenance and specific measures to reduce dust associated with construction activities.

162. The impacts of the development during the operational phase were also considered, with the assessment concluding that:

- The impacts of the energy plant would be negligible since there were no land uses relevant to the annual mean objective within the screening contours and no locations where members of the public might reasonably be expected to spend one hour within the 1-hour mean 99.79^{th} percentile contour (a very small area around the plant).

- The predicted annual mean nitrogen dioxide concentrations are below the objective at all receptors and a reduction in concentrations is predicted at a number of receptors, with an increase of between 1% to 3% at 27 of the receptors (out of a total of 68 receptors). Additionally, due to the redistribution of traffic, a reduction in concentrations is predicted along Eaton Green Road and Stopsley Way.
- The annual mean PM_{10} and $PM_{2.5}$ concentrations are predicted to be well below the annual mean objectives and the percentage changes in PM_{10} relative to the air quality objective is predicted to range from -1% to 1%. The $PM_{2.5}$ impacts are described as negligible.

163. The imposition of a planning condition requiring the submission of travel plans for the businesses and the promotion of sustainable transport measures will benefit local air quality during the operational phase of the development.

vii. Cultural Heritage

164. This chapter of the Environmental Statement considers the likely significant effects in particular upon the setting of heritage assets. The assessment was informed by a zone of theoretical visibility, though the impact upon heritage assets is not assessed solely in terms of visual impact. The study area for the assessment on cultural heritage extends 1.5km from the perimeter of the site, but in response to the scoping opinion, the impact of the development upon the setting of a couple of heritage assets that were slightly further from the site was considered.

165. Within the development site there is only one local historical area of value, namely the non-designated World War II Airfield Battle Headquarters (a pillbox). However, within the vicinity of the development there are a number of designated heritage assets, 25 listed buildings were identified the closest being the Grade II listed Wigmore Hall, located to the north of Wigmore Valley Park. In addition, two heritage assets within Central Bedfordshire were identified for consideration in the scoping opinion, namely: the Grade II* registered park and gardens at Luton Hoo together with the Grade I listed building, to the south-west of the airport; and the scheduled monument at Someries Castle to the south of the airport.

166. For the majority of the listed buildings (20) it was considered that the significance of the effect of the development, both during construction and operation, would be neutral, whilst for four there was considered to be a slight adverse effect in both phases. For Wigmore Hall the effect was assessed as moderate adverse during construction and minor adverse during operation. For the registered park at Luton Hoo and the scheduled monument at Someries Castle, the assessment concluded that there would be a slight adverse impact during construction, but once completed

the development would have a neutral impact upon these heritage assets. The effect upon the non-designated heritage asset, the World War II Airfield Battle Headquarters is considered minor adverse during construction, though this non-designated heritage asset has low heritage significance and has suffered damage from graffiti and unlawful entry.

167. The only mitigation measure proposed to address the impacts on heritage assets relates to the World War II Airfield Battle Headquarters, with proposals to secure the asset and provide interpretative signage to explain its historic role. However new and enhanced landscaping will also affect and screen the development from some views and further limit the impact of the development upon the setting of designated heritage assets.

viii. Archaeology

168. The impact of the proposed development on buried archaeological assets was considered in the archaeology chapter of the Environmental Statement, with further comments being made in the subsequent addendum. The desk based assessment was provided as a technical appendix to the Environmental Statement, providing the baseline data for the site, together with the wider environs within 1km of the site. A geophysical survey of the eastern part of the site was also provided as a technical appendix to the Environmental Statement.

169. In terms of the baseline data within the site, there are eight Historic Environment Records which range from the Palaeolithic period (Iron Age to Romano-British) to modern times (Luton Airport being a former World War II military training airfield and now an international airport).

170. The construction phase of the development would have the most impact upon archaeological heritage. In the western side of the site the heritage assets have been documented and subsequently removed and it is considered that the proposed development will have a neutral effect. However, where the new business park is proposed, with associated drainage and infrastructure, it is considered that should any archaeological remains be present they would be of medium value, but would be completely removed. The impact is assessed as moderate adverse and appropriate mitigation would be through an agreed programme of archaeological monitoring secured by a planning condition.

171. Within the area of agricultural fields to the south-east of Wigmore Valley Park there is a site of a possible Romano-British enclosure that would be of medium heritage value. The assessment concludes that the end of annual ploughing that would occur as a result of the land being converted to parkland, would remove further on-going damage, thereby preserving any remains in-situ. Whilst there may be localised impacts from the

creation of pathways and provision of furniture, the impact is considered slight beneficial. For the construction of the business park a programme of archaeological recording would be required to mitigate the impacts, whilst for the creation of the new park archaeological monitoring as part of an archaeological mitigation strategy would be necessary.

172. During operation of the development it is considered that there would be no effects to buried archaeological assets and consequently no mitigation is considered necessary.

ix. Ground Conditions and Contamination

173. The ground conditions assessment considered the site of the New Century Park access road, the area of landfill and the site for the New Century Park business park. Due to the nature of the ground, a number of technical reports, including three reports on the landfill (one being a Quantitative Risk Assessment) were provided as technical appendices to the Environmental Statement.

174. Ground conditions vary substantially across the site, consequently the assessment considered different areas, namely: Airport Way/Dairyborn Scarp; Percival Way/President Way; landfill; and greenfield areas of Wigmore Valley Park. The first section from Airport Way to the Dairyborn Scarp has considerable made ground with the escarpment rising up to 35m in height. A number of retaining structures and a bridge are proposed in this section. Low levels of contamination were identified in the made ground. Percival Way/President Way also has made ground, again with some evidence of contamination, and no substantial earthworks are required in this section. The former Airport Tip occupies an area of 53 hectares with evidence of filling from around 1941, continuing until the early 1990s – with landscaping taking place between 2000-2002. The preliminary risk assessment indicated that the fill material was a variety of industrial, commercial and domestic waste, with a maximum proved depth of 22m. Since the access road is to be at grade in this area, little generation of waste is anticipated. The final area, Wigmore Valley Park is a greenfield site, underlain by clay-with-flints above the chalk.

175. The potential impacts during the construction phase could be to expose workers to localised ground contamination, whilst in areas of bulk excavation dust could be generated which could affect residential properties and commercial buildings in the area. There could also be disturbance to contamination with the made ground which, without appropriate mitigation, could result in pollutant linkages to the groundwater.

176. One of the technical appendices was an Unexploded Ordnance Survey (UXO) required due to the fact that the site was a former World War II airfield surrounded by strategic manufacturing works.

177. Mitigation measures envisaged during the construction phase include: appropriate Personal Protective Equipment (PPE) for the workforce; a Construction and Environmental Management Plan; a Piling Risk Assessment to control any risks to controlled waters; a Materials Management Plan; Site Waste Management Plan; and UXO clearance if necessary.

178. During the operational phase large areas of the site would be hardsurfaced (buildings, roads, car parks, footpaths) and consequently the potential for impacts from any contamination would be limited. However, for landscaped areas there could be a risk from contamination or from water percolating down and leaching out. A remediation strategy should reduce the risks from contamination, with the mitigation measures being dependent upon what is encountered and any subsequent monitoring.

x. Hydrology

179. Hydrology, surface water drainage and flood risk were also assessed in the Environmental Statement. A stand-alone Flood Risk Assessment was submitted with the planning application (and updated with an Addendum in August 2018) as well as a Drainage Strategy (and associated addendum).

180. The baseline conditions were established and a conceptual model created that was used to understand the current hydrology and identify potential impacts. The site is within Flood Zone 1 and therefore at low risk from flooding (less than 1 in 1000 annual probability of flooding). The site is partially underlain by a major aquifer and a groundwater Source Protection Zone covers most of the area of the proposed access road.

181. During construction the impacts of the proposed development were identified as: a possible decrease in permeable areas and consequently an increase in surface water runoff, if unmitigated; an increase in the mobilisation of sediments as a consequence of ground disturbance; contamination of groundwater from construction plant and equipment; and creation of pathways to the underlying chalk aquifer from piling. Mitigation measures during construction were identified, including: production of a construction drainage design plan prior to construction works commencing; good practice in managing silt arisings and stockpiling of materials; spill kits; control and positioning of washing out facilities; and undertaking any piling in accordance with measures advocated in a piling risk assessment.

182. In relation to the operational phase there is also increased risk of runoff from the increased impermeable areas (buildings, roads, paths, parking), together with pollution from site runoff. To manage surface water generated by the proposed development, the surface water strategy allows for infiltration and incorporates sustainable urban drainage systems (SuDS). The assessment also concludes that there is sufficient capacity at East Hyde waste water treatment works to incorporate waste water arising from the proposed development.

xi. Agriculture and Soils

183. The potential impacts and associated likely significant effects of the proposed development were assessed in respect of land, including agricultural land quality, soil resources and agricultural holdings.

184. The baseline conditions were assessed, with 20ha of the site being previously developed land, 23ha in agricultural use (classed as 3a [good] and 3b [moderate]), and the rest of the 95ha site is open space (including the area of the former Airport Tip).

185. The main effects identified during the construction period relate to the change of use of the agricultural land to open space, though no significant earthworks are proposed and consequently the soil profiles will be maintained (though the agricultural land will be taken out of production). There is no mitigation for the loss of agricultural land. With regard to earthworks associated with the overall development, the chapter indicated that soils should be re-used where possible and that a Soil Resource Plan would be prepared to include such a requirement and ensure suitable techniques were in place for soil stripping, storage and re-use.

186. Since the construction phase results in the permanent loss of agricultural land and the earthworks are all undertaken at this stage, no further effects were identified in the operational phase and consequently no further mitigation is required.

Request for Further Information

187. Following the initial review of the planning application and associated Environmental Statement, in April 2018 a request for further information pursuant to Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 was made.

188. The formal areas that required addressing were highlighted as:

- A revised Non-Technical Summary that would be accessible and understandable to non-experts and technical consultees alike;

- Fully assess the townscape and visual impact of proposed structures in the Townscape and Visual Impact assessment;
- Justify the assumptions made in the Transport Assessment and address the formal comments from Highways England;
- Assess the impact of the loss of the 17 buildings that were identified as being demolished in the Socio-economic chapter;
- Within the Ecology and Nature Conservation assessment, ensure that the criteria for assessing the impact upon sites of nature conservation set out in the NPPF have been followed in relation to the County and District Wildlife Sites;
- Provide further information to address the comments raised by Historic England in relation to Someries Castle and Luton Hoo;
- Undertake further archaeological trial trenches in order to better inform the Archaeological assessment within the Environmental Statement; and
- Provide additional information in the Hydrology and Surface Water chapter so as to understand the impacts of overland flows, greenfield runoff rates and storage volumes.

189. Clarification was also sought on additional matters in an advice note that was submitted with the request for further information, and additional and updated drawings were requested to ensure that all elements of the detailed application were fully understood and the parameters for the outline element of the application were clearly set out.

190. The further information was provided in August 2018, with an addendum to the Environmental Statement, an addendum to the Planning Statement, a new 'user friendly' Non-Technical Summary, and addenda to various reports. Where appropriate the updates to the Environmental Statement chapters have been covered in the previous sections above.

191. It is considered that the Environmental Statement of December 2017 and the Environmental Statement Addendum of August 2018, satisfy the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and have provided the appropriate information in order for the impacts of the development on the environment to have been assessed.

MAIN PLANNING CONSIDERATIONS

192. The key planning issues are not dissimilar to the matters that have been raised in the representations and can be summarised as follows.

- The principle of the development;
- Impact upon Wigmore Valley Park;

- Impact upon the County Wildlife Site, Area of Local Landscape Value and the Area of Outstanding Natural Beauty;
- Contamination and risk;
- Archaeology and heritage;
- Urban design and impact;
- Traffic and parking;
- Other environmental matters;
- Economic impact;
- Third party representations; and
- Planning obligations.

The principle of the development

193. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (and Section 70[2] of the Town and Country Planning Act 1990) require that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

194. The development plan for the area is the Luton Local Plan 2011-2031 (adopted November 2017). As noted in paragraph 64 the site falls predominantly within the London Luton Airport strategic allocation (policy LLP6). This is a designation that identifies a physical area for growth, encompassing not just the operational airport but also the Luton Enterprise Zone. Whilst the description as London Luton Airport Strategic Allocation is a useful one for identification purposes, it includes much more than the airport, with existing commercial businesses, public open space, designated employment sites and arable land, all of which is located in the vicinity of the airport.

195. Due to the size of the planning application site there are a number of further designations on the Proposals Map that fall within the red line of the application, including Category A Employment Sties at Proctor Way, Prospect Way, Percival Way, Airport Executive Park and Century Park (policy LLP14); Wigmore Valley Park County Wildlife Site (policy LLP28); Wigmore Rural Area of Local Landscape Value (policy LLP29); and Dairyborn Scarp District Wildlife Site (policy LLP28).

196. Policy LLP6 is the starting point for the consideration of this application, since most of the site falls within the strategic allocation which covers 325ha of land and includes not only the operational airport, but also Century Park and Wigmore Valley Park (the yellow shading on the Proposals Map covers both these areas). The Local Plan recognises that these physical areas have a strategic role in the sub-regional economy.

197. The employment allocation, referred to as Century Park on the Proposals Map, is located to the east of Wigmore Valley Park, though the proposed

access to Century Park is indicated as being to the west of Wigmore Valley Park (and referenced in LLP31). Discussion of the implication for land uses within the strategic allocation took place at the Examination into the Local Plan with the Inspector noting in his final report in August 2017 that the proposal "will clearly have some effect on the amount of land available within the park and on its function…furthermore, the policy requires that any open space which is lost is replaced. The Council explained at the hearing that this is feasible because part of the Century Park allocation could be used to provide any replacement open space" (paragraph 320 of the Inspector's Final Report). This is recognised in policy LLP6E which allows for "any reconfiguration of land uses that may be necessary."

198. From the planning history it can be seen that planning permission for employment development at Century Place has been in place since 1991 (ref: 89/00865/OUT) with Century Park providing the main opportunity for employment development near to the airport (paragraph 124 of Inspector's Final Report).

199. The proposed development of a business park within the London strategic allocation accords with the broad principle of policy LLP6 which supports the Council's strategic objective of seeking to retain and enhance Luton's important sub-regional role as a place for economic growth and opportunity. Further, the proposed uses reflect those that policy LLP6D states will be supported, namely "office, manufacturing and distribution employment…including small scale affordable B2 units, to facilitate the expansion and relocation of existing Luton-based businesses, new business start-ups…small scale retail, related services and leisure (as defined in Use Classes A1 to A3 and D2)…as well as a hotel (Use Class C1)."

200. The proposed development makes provision for business and industrial floorspace, small scale ancillary retail and a hotel, with the following provision being set out in the planning application:

- 29,400sqm B1(a) office floorspace
- 13,000sqm flexible office/industrial floorspace
- 11,700sqm B2 general industrial and B8 storage
- 7,200sqm (145 bedroom) hotel
- 2,950sqm replacement Technical Services Building
- 685sqm sui generis use (energy centre and recycling facility), and
- 225sqm ancillary retail

201. The sui generis energy centre and recycling centre whilst not specifically set out in the policy, are ancillary facilities to serve the business park itself.

202. There are elements of policy LLP6 with which the proposed development of New Century Park does not accord, namely:

i. LLP6C states that proposals for airport related parking should be located within the strategic allocation, but excludes the areas covered by Century Park and Wigmore Valley Park (with some provisos);
ii. LLP6D covers the Century Park allocation (this should be read in conjunction with policies LLP13 and LLP14), which on the proposals map is shown to the east of the site where New Century Park is now proposed;
iii. LLP6D states that the proposed access to Century Park shall be designed so as to ensure that no use is made of Eaton Green Road, except for public transport, cyclists and pedestrians (this should also be read with policy LLP31).

203. In addition there are other policies within the adopted Local Plan with which the proposed development would be non-compliant if mitigation were not provided, these include:

- LLP28 which states that the Council will support development proposals which add to the net stock of wildlife habitats or where they help to deliver a net gain in the conservation and enhancement of such sites; and
- LLP29 which indicates that development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of local landscape areas.

204. These two policies both indicate support for developments that have a positive impact in relation to habitats and landscapes, but set criteria that need to be complied with where developments adversely affect such areas. Consequently, these issues will be picked up under the relevant headings of the main planning considerations below.

205. The three elements of policy LLP6 identified in paragraph 202 above, where the development could be said not to accord with policy are addressed below.

i. Airport related parking (LLP6C)

206. The issue in relation to airport related parking was picked up by in the LBC Strategic Planning comments and has been addressed by the applicant in the addendum to the Planning Statement. In total within the New Century Park business park there will be some 3,205 car parking spaces, whilst a further 300 car parking spaces are proposed to the south of the long stay car park (not within the New Century Park development).

207. Of the 3,205 parking spaces within New Century Park, 1,627 spaces will directly serve the development (in accordance with the Council's parking standards), these are not 'airport related parking spaces' but rather are provision for the users of the new development. A further 623 car parking spaces are relocated into the New Century Park development as a consequence of parking spaces for other businesses being lost by the construction of the access road. These spaces are also not 'airport related parking spaces' but are spaces re-provided for existing businesses as a consequences of the New Century Park access road displacing existing parking spaces.

208. The development results in the loss of 1,255 spaces within the long stay car park that will be lost as a consequence of the construction of the light industrial quarter development. 300 of these car parking spaces will be relocated to the south of the long stay car park (within the airport strategic allocation but not within New Century Park), which means that 955 airport related parking spaces will be provided within the New Century Park development.

209. Policy LLP6C provided for airport related parking within the London Luton Airport strategic allocation, though excluded Century Park and Wigmore Valley Park since these areas were intended for other purposes. The element of policy LLP6C that considers airport related parking outside the strategic allocation, is principally concerned with airport parking off-site, however, it defines some circumstances in which off-site parking may be permitted, namely where:

- There is demonstrated to be a long-term need that cannot be met on the airport;
- They accord with the sustainable development principles as defined within the plan as a whole;
- They relate well to the strategic road network and do not exacerbate traffic congestion;
- They do not have an adverse impact upon amenity; and
- Are in accordance with the most recently adopted London Luton Airport Surface Access Strategy (ASAS).

210. Whilst policy LLP6C may not be directly relevant to the circumstances of the proposed re-provision of the long stay parking lost as a consequence of the proposed development, the criteria under which off-airport parking might be acceptable are considered below.

211. With regard to demonstrating that a long-term need cannot be met on the airport, this is not directly relevant to the development proposed, since the airport related parking within the New Century Park business park is not additional parking, but rather involves replacing spaces that will be lost as

a result of the provision of the light industrial quarter development on what is currently part of the long stay car park.. As has been seen from the representations on behalf of the TUI Group and LLAOL, the concern is that the loss of existing parking spaces, without their re-provision will adversely affect existing businesses, the operation of the airport and further exacerbate the parking congestion in surrounding residential areas.

212. In terms of sustainable development principles, policy LLP1 states in relation to these principles that in order "to enable the delivery of sustainable development and sustainable communities, all development proposals will, where applicable, have regard to relevant plan policies." The Council's spatial development strategy seeks to focus the majority of new development in the borough on eight strategic allocations, one of which is the strategic allocation in and around London Luton Airport. The text in the Local Plan records that "there will be a presumption in favour of sustainable development and high quality development throughout the borough" (paragraph 4.1) and also notes that "Luton provides a clear example of an area with high pressure for different land uses where the economic, social and environmental roles for the planning system to perform (as set out on paragraph 7 of the NPPF) cannot be treated in isolation" (paragraph 4.3).

213. Policy LLP1 further explains that "growth in homes, jobs and services that constitutes sustainable development will be welcomed; provided growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further sustainable infrastructure investment within the plan period to 2031" noting that the strategic allocations will be the primary location for growth. As such the proposal accords with the objectives of policy LLP1.

214. With regard to airport related parking not exacerbating traffic congestion and relating well to the strategic road network, again it needs to be noted that the proposal does not provide new airport related car parking spaces, but rather relocates existing spaces. The implications of the development in terms of traffic and transport were evaluated in the Transport Assessment and Supplementary Transport Assessment and are addressed subsequently in this report.

215. A further criteria in relation to new airport related parking spaces is that they should not have an adverse impact upon amenity. The proposed areas of car parking would be within the existing Wigmore Valley Park and on land, part of which is designated a County Wildlife Site and all of which is an Area of Local Landscape Value, as such there will be an impact on amenity. Ultimately the benefits of the development have to be weighed against any adverse impacts and a planning judgement will be made by the decision taker when considering the development proposal as a whole.

These aspects are considered more fully in the section on the impact of the development on the Wigmore Valley Park and the subsequent section on the impacts on the Country Wildlife Site and the Area of Local Landscape Value. Ultimately

216. The final criteria in policy LLP6C requires airport related car parking to be in accordance with the latest adopted ASAS, the most recent strategy being that for 2018-22. The ASAS seeks to efficiently manage surface access, promote sustainable surface transport, improve access to the airport and minimise adverse impacts on the local community. In terms of parking at the airport, the ASAS seeks to ensure that as far as practically possible demand is closely aligned with supply, by providing a variety of car parks (long term, mid-term, short stay and drop-off), together with a targeted pricing regime the airport operator is able to achieve this. The relocated airport related car parking spaces will ensure that the supply remains the same and so will not put pressure on the community through further fly-parking in residential areas or further demand for airport related parking at a greater distance from the airport.

ii. Allocation on the Proposals Map (LLP6D)

217. Whilst the Proposals Map shows the historical allocation for Century Park being located further to the east, consistent with previous allocations and grants of planning permission, the London Luton Airport strategic allocation covers the whole of the area of Century Park and Wigmore Valley Park. This differs from the position in the previous versions of the Local Plan where the strategic allocation did not include these two areas of land.

218. At the Examination in Public into the Local Plan in January 2017, the issue of the access road cutting across Wigmore Valley Park and effectively severing the southern part of the park from the land to the north was discussed. As has been noted above (paragraph 197), it was indicated that a reallocation of space within Century Park could ensure that any open space that was lost could be replaced. Policy LLP6E recognises this by stating “in delivering development and access under clause D (i.e. Century Park) above, including any reconfiguration of the landuses, that may be necessary certain criteria will need to be satisfied.” These criteria are then listed as: the scale and quality of open space and landscaping is to be maintained and if feasible increased; biodiversity will be enhanced and improved within the borough; the new open space to replace Wigmore Valley Park will offer facilities of at least equal quality before development takes place; and the long term management of the open space, landscaping and habitats will be secured through a legal agreement.

219. The current planning application has moved on from that envisaged at the time of the Examination in Public, and rather than the access road bisecting Wigmore Valley Park, and new open space being created in the northern part of the Century Park allocation, the application proposes the relocation of the business park into part of Wigmore Valley Park (predominantly the area of the former Airport Tip – the sports pitches – and part of the southern part of the park below the allotments), whilst a new area of public open space would be created on the northern part of the site where Century Park had been proposed.

220. The proposed development, with the redistribution of land uses, would result in a development that is better related to the existing commercial businesses within the strategic allocation, and would also have less impact on open space and the green belt in North Herts, by bringing the development away from the borough boundary and closer to other commercial development within the airport.

221. Additionally, the proposed development would result in an increase of public open space by circa 2ha and would provide additional facilities within the park, including improved children's play areas, an enhanced skate park and refurbished Pavilion with new café. Off-site the proposed development makes provision for a financial contribution to secure improved sports and recreation provision within the borough. A further contribution would be secured for enhancement of 7.5ha of habitats at Dallow Downs, whilst habitat creation and management is proposed within the application site itself. The proposal therefore ensures that the scale and quality of open space and landscaping in the area is maintained, with a net increase in open space provision, and meets the other criteria set out policy LLP6E, including securing the long term management and maintenance of the park through the proposed legal agreement.

Link to Eaton Green Road (LLP6D)

222. Policy LLP6D(i) seeks to ensure that no use is made of Eaton Green Road to provide access to Century Park or the airport, except for public transport, cyclists and pedestrians. Paragraph 320 of the Inspector's Final Report into the examination of the Local Plan provided the reason for this restriction, which was "the need to avoid channelling traffic onto Eaton Green Road."

223. The planning application has included a link road that connects Eaton Green Road to the New Century Park access road. This has been shown in the modelling associated with the Transport Assessment and Supplementary Transport Assessment to be important in order to ease congestion on the local road network.

224. A technical note was provided within the Addendum to the Transport Assessment (Appendix AC) which assesses the transport reasons as to why a connection is proposed between Eaton Green Road and the New Century Park access road.

225. Currently vehicular traffic can access Percival Way/President Way from Eaton Green Road via a link connection at Frank Lester Way. A sensitivity test was run with Frank Lester Way being retained as open to all vehicular traffic to provide access to the New Century Park access road, but with no new link connection further to the east (i.e. the new link road in the planning application was removed for the sensitivity test). The sensitivity test showed that in the morning peak, by 8.15 traffic builds up on Vauxhall Way which then has knock on effects to the junctions with Crawley Green Road and Eaton Green Road leading to tailbacks to Wigmore Lane. Half an hour later the local road network is fully congested. In the afternoon peak a similar situation arises, with Vauxhall Way becoming congested and the north south flows causing tailbacks to traffic on Eaton Green Road (with traffic westbound tailing back to the Wigmore Lane roundabout).

226. An additional consequence of the congestion that would occur without the link to Eaton Green Road is that because of the tailbacks on Vauxhall Way these would have a knock on effect to the New Century Park access road. Traffic to and from the new business park, the existing commercial premises in Percival Way and President Way, as well as vehicles using the airport's long stay car park would all be affected. The technical note shows that without the link, many junctions will fail because of overcapacity, resulting in long delays and grid lock during the peak period,

227. Modelling demonstrates that with the new link proposed between Eaton Green Road and the New Century Park access road, considerable benefits are provided to traffic flow on Eaton Green Road and at its junctions, which have knock on benefits to the wider local road network. The New Century Park access road with the link to Eaton Green Road eases traffic congestion in the surrounding area.

228. The application also includes a proposal to close Frank Lester Way to private vehicles, so only allowing buses and taxis to use this road. The closure of Frank Lester Way to private cars removes one link between Eaton Green Road and the New Century Park access road that was previously available to all through traffic.

229. Whilst the proposed link between Eaton Green Road and the New Century Park access road may be contrary to policy LLP6D(i), there are traffic and transport benefits that will arise from its provision, whilst the existing connection at Frank Lester Way will only be open for buses and taxis, and

consequently the number of accesses for private vehicles will not have increased.

Impact upon Wigmore Valley Park

230. Wigmore Valley Park is located to the south of Eaton Green Road and is bounded on the west by the airport (predominantly the TUI and long stay car parks), to the south by the airport's fire training area, and to the east by a public footpath/bridle path and fields beyond. The park covers a little under 40ha and includes a Pavilion (with changing rooms), children's play area, skate park, allotments, sports pitches (no longer formally used), informal grassed areas, wooded areas and hedgerows.

231. The park was created in the 1980s at the time that Hitchin Homes was developing the Wigmore estate on the northern side of Eaton Green Road. The Council owned the land and created the park, with financial contributions from the developer towards securing some of the facilities within the park.

232. The former sports pitches are located on the raised ground that was the Airport Tip, this area has been subject to uneven settlement as can be seen from the manhole covers that sit above the ground and the ponds with standing water that occupy parts of the site. In total the former Airport Tip covers over 50ha, though part of that is within the airport boundary (land up to taxiway Foxtrot, with a large part of the area covered by the long stay car park), and around 20ha is within Wigmore Valley Park.

233. Policy LLP27 of the Local Plan refers to open space and natural green space, noting that the Council will work with developers and landowners and stakeholders to support proposals that safeguard and enhance existing networks of open space and establish new green infrastructure within the borough. The policy also covers loss of open space, including parks and allotments, noting that such losses will be permitted exceptionally, where replacement open space provision can be made which is of an equivalent type, quality and quantity and is accessible and within the vicinity.

234. The proposed development results in the loss of open space, a large section of which comprises of the former sports pitches. Under the Town and Country Planning (Consultation) (England) Direction 2009, Sport England is a statutory consultee on development which is on land that was used as playing field. The representations received from Sport England have been reported previously and it can be seen that following discussions and Sport England's initial representations, the contributions and commitments that are set out in the Heads of Terms at the start of this report will secure the appropriate replacement that Sport England has

indicated is necessary in order for their holding objection to have been withdrawn. The key elements in relation to the replacement provision within the Heads of Terms are:

- £270,000 replacement changing facilities
- £926,737 replacement of playing fields
- Use of the financial contributions to provide one or more of the following projects:
  - Provision of a Step 5 Football Facility (artificial pitch suitable for non-league senior football and associated facilities including parking provision and changing rooms) at either Stopsley/Lothair Recreation Ground; Ely Way or Lewsey Park; and/or
  - Replacement of or improvements to existing adult football facilities (playing fields and supporting facilities such as changing and parking) at either one or more of the following: Stopsley/Lothair Recreation Ground; and/or Lewsey Park Recreation Ground
- Timing of the provision of the various contributions to reflect the phasing of the development and the loss of the various existing facilities on site.

235. The proposed replacement provision for the playing fields and changing facilities meet the exception test in Sport England's Playing Fields Policy and consequently this is considered to be acceptable and to accord with policy LLP27 of the Local Plan.

236. The third party representations have opposed the loss of the parkland, with concerns about the loss of open space, loss of habitats, incursion of built development into the open space, the loss of the buffer between the airport and the residential areas and the relocation of the park to a less accessible location. In addition the representations have stated that Wigmore Valley Park is a community asset gifted to the people of Luton when Hitchin Homes developed the Wigmore estate. The issues relating to habitats will be addressed in the next section, whilst the other issues are considered in the paragraphs following.

237. In relation to the loss of open space, whilst the proposal does result in development taking place over parts of Wigmore Valley Park, the application does in fact result in the creation of a larger area of public open space than currently exists. The application documents indicate that Wigmore Valley Park measures 38.6ha, whereas the area of Wigmore Valley Park that is retained and combined with the new public open space that is to be created will be 40.6ha. The proposed development does not result in a loss of public open space but rather creates an additional 2ha of parkland.

238. Whilst there would be an incursion of built development into the open space, the proposed business park would be located closer to the existing industrial and commercial estates than was envisaged with the original Century Park proposal. Further, the access road that was indicated on the Proposals Map would have resulted in severance of the southern part of the park, this is no longer the case, rather the park now extends into the northern part of the area that was allocated for Century Park (as was discussed at the Examination in Public) and then wraps around the new business park. Consequently, the new business park would be less prominent, with less impact on the open countryside around and would utilise land that has previously been developed by the historic landfill activities.

239. The retained element of the park would also be enhanced, with the provision of a new children's play facility with robust equipment and bench/picnic seating for parents/carers, a new skate park suitable for a range of ages, and an upgrade of the current Pavilion building to provide a café (with indoor and outdoor seating, a meeting room and a multi-purpose space within the building).

240. The enhanced facilities would be located in the northern part of Wigmore Valley Park, being the area that is most accessible and closest to the residential areas (as well as to the car park for visitors who come from further afield). Whilst there is a concern that the newly created element of the new park would be less accessible than the existing Wigmore Valley Park, it is worth noting that the furthest part of the current park from the Pavilion building is approximately 730m distant, three quarters of the newly created open space (circa 31ha) would be within that distance, with only one quarter of the new provision being further afield (the maximum distance would be 970m). The elements that are closest to the residential areas are those that will be more heavily used, such as the play area, skate park and refurbished Pavilion building, whilst improved footpaths and enhanced planting will lead to the less formal open space.

241. Although the creation of the new business park will lead to built development being closer to the residential areas than is the current situation, it is worth noting that the nearest building in the office quarter (in the centre of the new business park) to residential properties in the Wigmore Estate is approximately 200m. The buildings in the office quarter would be up to four storeys in height with undercroft parking (18m). The hybrid industrial buildings located further to the east would be two storeys in height (9m) and would be circa 210m away from the residential properties in Wigmore. The hotel, which will be five storeys in height (20m), located on the western side of the development, would be around 250m from the nearest residential property. The buildings would not impact upon the amenity of occupiers of those residential properties. As a

comparison the TUI development at the junction of Wigmore Lane and Eaton Green Road is between 3-5 storeys in height and located within 25-75m of the surrounding residential properties.

242. Overall it is considered that the proposed works to Wigmore Valley Park will result in improvements, with a greater area of parkland and enhanced facilities (including children's play area, skate park and refurbished Pavilion building). The long term management of the park, with specific measures for the creation, conservation and management of the new habitats, will also be secured through the legal agreement and planning conditions. This would achieve the objectives of policies LLP6E and LLP27.

Impact upon the CWS, DWS, ALLV and AONB

243. The site does not fall within the Chiltern Area of Outstanding Natural Beauty (nor does it border the AONB), however the whole of the park falls within an area designated as an Area of Local Landscape Value. This landscape designation is based on a number of criteria including naturalness, landform, size, tranquillity, recreational use, community value and importance of setting in relation to the town. It represents the second tier of local landscape designations within the borough, with policy LLP29 stating that development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of these local landscapes.

244. In addition the southern part of the park (approximately 15ha) is designated a County Wildlife Site. County Wildlife Sites represent the principal components of the ecological network in the borough, with the designation covering sites that are important for their wildlife. The western part of the site, the Dairyborn Scarp, is designated a District Wildlife Site and covers approximately 4ha. The two areas provide habitats that are suitable for supporting birds, bats, badgers, reptiles and invertebrates. Policy LLP28 states that development proposals that adversely impact designated sites will need to demonstrate compliance with a number of criteria.

245. Clearly the rural and open character of Wigmore Valley Park plays an important role in the setting of this part of Luton and has an important community role. Further the area has important habitats for flora and fauna , with a number of assessments undertaken in order to inform the ecological chapter of the Environmental Statement.

246. The Environmental Statement described the landscape character areas covered by the planning application, with Wigmore Valley Park being in the Wigmore Rural character area (LBLCA13), considered to be a

landscape of high quality but of medium tranquillity (due to aircraft) with particular note to the value of the trees, hedges and small areas of woodland screening the airport, as well as its importance to users of the public park. The western part of the application site is within the Luton Airport character area (LBLCA14), considered to be a landscape of moderate quality, low tranquillity, but also essentially sterile and featureless.

247. The planning application proposes built development to occupy much of the area that has been subject to landfill and where the football pitches were previously laid out, as well as land further in to Wigmore Valley Park where informal recreation activities take place. The landscaping within the business park is considered to be varied, with formal treatments around the buildings and circulation routes, whilst on the periphery less formal and more naturalised landscapes are proposed, including hedgerows, woodland, scrub vegetation and meadow grassland.

248. Within Wigmore Valley Park itself the proposal retains and supplements the habitat in the northern part of the park (closest to Eaton Green Road) with additional landscaping and planting proposed. The proposal was also amended with the receipt of the further information to retain more of the habitat that is designated within the County Wildlife Site. The proposals relating to the treatment of Wigmore Valley Park is part of the detailed application, with additional woodland screen planting being proposed, an orchard area, and retention of tree and grass cover where possible, together with the reinstatement of hedgerows and meadow grassland.

249. Policy LLP29 states that development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of local landscape areas. Although the proposed development does not conserve the Area of Local Landscape Value, it is considered that the creation of additional open space, together with the associated landscaping and planting, will become established which may in the future be classed as part of the Area of Local Landscape Value. Thus, whilst the proposal does not comply with policy LLP29, since it involves development that affects the Area of Local Landscape Value, the proposal does provide additional green infrastructure and in the long term could add to the Area of Local Landscape Value.

250. With regard to the impact upon the Area of Outstanding Natural Beauty, which was a concern raised by the Chiltern Conservation Board, the proposed development is not seen as harming either the designated area of the AONB or the proposed extension within North Herts. The Transport Assessment does not indicate that significant traffic would flow towards the AONB itself, which is some 2.5km from the site (on the northern side of the A505 Hitchin Road). The lighting strategy submitted with the

application proposes that external luminaires will be selected to reduce light spillage and light pollution, which again should ensure that there is no significant impact on the AONB.

251. The proposed development results in a loss of approximately one third of the County Wildlife Site (5ha) and much of the District Wildlife Site. To compensate for this loss, the proposals involve enhancements to the existing Country Wildlife Site, through the production and implementation of a habitat management plan, the provision of improved calcareous grassland within the newly created area of parkland in Wigmore Valley Park, and through a financial contribution to improve the County Wildlife Site at Dallow Downs (identified as appropriate by the Council's ecologist). Around the route of the New Century Park access road it is proposed to provide landscaping consisting of native shrub species and to retain and enhance habitats through a management plan.

252. In terms of the criteria in policy LLP28 for development proposals that would adversely impact on designated sites, the amended plans submitted with the further information in August 2018 have sought to reduce the area of the County Wildlife Site impacted by the development. The benefits of the proposed development are considered to outweigh the harm to nature conservation interests, with the development providing a larger area of parkland, enhanced facilities within the park, financial contributions to ensure enhanced habitats within the borough, financial contributions to ensure the re-provision of recreational facilities elsewhere in the borough, the bringing forward of a strategic employment site that has failed to be delivered for nearly 30 years, and significant economic benefits through the creation of additional jobs and employment that will benefit the borough and the local region.

253. The mitigation that is proposed includes retention, protection, enhancement and management of elements of the District and County Wildlife Sites within the application area (5ha of each is lost), together with a contribution for the enhancement of the County Wildlife Site at Dallow Downs. As such, whilst the proposed development will result in harm to the ecological sites within the application boundary and consequently adversely affects the designated sites, it is considered that the proposed development demonstrates compliance with the criteria for mitigation set out in policy LLP28 of the Local Plan.

<u>Contamination and Risk</u>

254. Given the presence of landfill from the former Airport Tip and the fact that the access road will be passing over large areas of made ground and through sites that have been used for industrial purposes, there have been a considerable number of representations received raising concern about

the potential for contamination and pollution. A further area of concern raised in responses to the proposed development relates to the fact that since the airport was used during World War II and was surrounded by manufacturing industries, there is a risk of unexploded ordnance.

255. Policy LLP38 of the Local Plan requires proposal on or affecting contaminated land to carry out a site assessment to establish the full nature and extent of the contamination. The planning application was supported by a series of ground investigations, with a preliminary risk assessment and a Contamination Quantitative Risk Assessment undertaken to inform the environmental impact assessment. The results of these assessments and the likely significant effects are reported in the Ground Conditions and Contamination chapter of the Environmental Statement.

256. The Environment Agency indicated in their response that they were satisfied with the ground investigation that had been carried out and that with the imposition of planning conditions it would be possible to manage the risk associated with the proposed development. The Environment Agency recognised that further investigation would be required, but that this could be conditioned if the local planning authority were minded to approve the development. This would accord with policy LLP38 of the Local Plan which advises that if contamination is found remediation measures should be undertaken and completed prior to development.

257. The effects of the proposed development and the appropriate mitigation were set out in the Environmental Statement and summarised earlier in this report. In addition to conditions recommended by the Environment Agency, further conditions were advocated by the Council's environmental protection unit, including the requirement for a Construction and Environmental Management Plan.

258. With regard to the risk from unexploded ordnance, in the Regulation 22 request it was noted that an unexploded ordnance desk study was carried out in 2016 and referenced in the Environmental Statement, though the report was not attached. With the submission of further information in August 2018, three reports were attached, two from 2016 covering the site of the access road and the eastern part of the airport together with Wigmore Valley Park and a further one undertaken in 2018 in advance of borehole investigation.

259. The reports classified the airport as a medium risk area with the risk reducing to low to medium in areas up to 500m from the airport (the desk study in relation to the landfill area gave a high risk rating for areas that had been undeveloped since World War II). In order to mitigate risk from unexploded ordnance, it is recommended that a condition be attached

requiring an unexploded ordnance site safety and emergency procedures plan to be submitted prior to the commencement of development.

260. It is worth noting that the Health and Safety Executive was consulted in relation to the proposed development and raised no objection.

Archaeology and Heritage

261. Heritage interests within the area include listed buildings, historic parks and gardens, scheduled monuments, non-designated heritage assets (such as the WWII Airfield Battle HQ) and archaeology.

262. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory requirement on the local planning authority to have special regard to the desirability of preserving the setting of a listed building. The regime associated with scheduled monuments is set out in the Ancient Monuments and Archaeological Areas Act 1979.

263. The National Planning Policy Framework sets out the desirability of preserving and enhancing heritage assets (paragraph 192). It makes it clear that the significance of heritage assets can be harmed by development in their setting (paragraph 194). Local planning authorities are asked to look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance (paragraph 200). It defines setting as the surroundings in which the heritage asset is experienced.

264. The NPPF also advises that where development is proposed on a site which includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (paragraph 189).

265. The Environmental Statement (and the addendum submitted in August 2018) included chapters on cultural heritage and archaeology, which provided assessments of the impact of the development upon heritage assets (summarised previously in the report).

266. The visual impact upon the closest heritage asset, Wigmore Hall (Grade II listed building), was one that the Council's heritage consultant was concerned did not appear to have been adequately assessed in terms of the impact of the proposed four to five storey hotel. The Townscape and Visual Impact Assessment did reference this heritage asset and considered it as a potential receptor concluding that the impact during construction would be moderate adverse, but once the development was fully operational the impact as a visual receptor would be minor beneficial.

Further the heritage chapter of the Environmental Statement considered the impact to be moderate adverse during construction and minor adverse during the operation phase. Additionally, an archaeology and Built Heritage Technical Report was submitted with the application, which assessed the magnitude of change to be minimal in terms of the effects of the development on Wigmore Hall.

267. The details of buildings within the proposed business park have not been submitted at this stage since this element of the application is in outline from, with all matters reserved for subsequent consideration. However, the heights parameters plan does show that the closest building to Wigmore Hall would be the northern most building in the office quarter, with a height of up to 18m (approximately 90m from the listed building), with the proposed hotel at 20m in height being around 160m distant. Between these buildings is situated the Pavilion building, the park's car park, and part of Wigmore Valley Park itself. It is considered that whilst the new development will have some impact upon the setting of the listed building, the enhancements to the park will have a positive impact for the visitors to the conference centre as they make use of the surrounding open space, whilst the introduction of new commercial buildings will have a minor adverse impact upon the setting of the listed building. However, based on the listing description of Wigmore Hall (which describes the significance in terms of the fact that it was built in the 16th to 17th centuries and important features relate to the elevations of the building, its roof and some internal elements, though noting modern extensions/renewals have altered it), it is unlikely that the proposed development will affect the significance of the heritage asset.

268. With regard to the other heritage assets identified for assessment in the Council's Scoping Opinion, namely, the scheduled monument at Someries Castle and the Grade II* registered parks and gardens at Luton Hoo, the assessment in the Environmental Statement considered the impact to be slight adverse during construction and neutral during operation. Historic England required further clarification with regard to the impact upon these two significant heritage assets following an assessment of the initial submission. The further information submitted in August 2018 helped Historic England further understand the potential impact, though they considered that there was still potential for the hotel building to be visible from the grounds of Luton Hoo and the wider setting of Someries Castle.

269. With regard to the setting of Someries Castle and Luton Hoo, it is worth noting that the development site for the business park is separated from the two heritage assets by the airport. The proposed hotel would be located approximately 2km from Someries Castle and 2.75km from the park at Luton Hoo. Between the hotel and the heritage assets would be the core terminal area, which includes a number of significant commercial

buildings notably the two multi-storey car parks which are 16m high to the top of the parapet (170mAOD), the terminal building itself at 23.5m (172mAOD) and the easyJet hangar at 20m (176mAOD). To the south of these buildings is the airport runway which is on a plateau at 154mAOD, before the land drops away to Someries Castle and down to the River Lea and the parklands surrounding Luton Hoo.

270. Historic England consider that any impact during the operational phase of the development will cause less than substantial harm in NPPF terms and that the local planning authority in reaching its conclusions should weigh the harm against the public benefits. Some of the benefits of the scheme have been described previously, including the increased area of parkland, the enhanced public facilities within Wigmore Valley Park, the contributions towards improving recreational facilities elsewhere in the borough, the bringing forward of a significant employment generating site after nearly thirty years and the jobs and income that this will bring to the local and regional economy.

271. With regard to archaeology, it has been noted that the Environmental Statement accompanying the application is informed by desk based assessments. The Environmental Statement identified likely effects that would arise as a result of the proposed development during construction and recommended appropriate mitigation. The desk based assessment was reviewed by the Council's Archaeology Team, who concluded that any impacts on archaeological deposits could be satisfactorily mitigated, recommending a condition to secure a programme of archaeological monitoring, investigation and recording.

272. It is considered that in relation to the historic environment, including designated and non-designated heritage assets and archaeology, the proposal accords with policy LLP30 of the Local Plan, with the less than significant harm caused to heritage assets being outweighed by the public benefits.

Urban Design and Impact

273. The proposed development has been described previously (paragraphs 24-41). All matters associated with the proposed business park are reserved, consequently appearance, layout, scale, landscaping and access (including road layout and parking within the business park) will be dealt with as part of future reserved matters applications for the proposed development. Nevertheless the outline planning application must still demonstrate that the quantum of development being proposed can be satisfactorily accommodated on the site. To this end the applicant has submitted parameter plans to accompany the application, which are discussed below.

Site layout

274. The site's physical characteristics have been described at the beginning of this report (paragraphs 8-13) and the layout and quantum of development have been set out in the description of the proposal.

275. The detailed element of the proposed development includes the provision of the New Century Park access road, the airport operator's Technical Service Building (replacement of hangar 24) and Wigmore Valley Park with all its associated facilities. The outline element of the application covers the business park itself.

276. The phasing plan submitted with the planning application (drawing reference 089916_050_40 Rev PL02) shows the development being built out in the following phases:

- Phase 1:
  - Wigmore Valley Park, including the refurbishment of the Pavilion Building, the new children's play areas, the new skate park, as well as the landscaping, planting, paths, furniture, etc.
  - New Century Park access road up to the roundabout within Wigmore Valley Park.
- Phase 2:
  - Relocation of the car hire parking into the Central Terminal Area
  - Replacement of parking lost by the New Century Park Access Road
  - Replacement of the long stay parking that will be lost to the Technical Services Building and Light Industrial Quarter
  - Construction of the Light Industrial Quarter
  - Construction of the Technical Services Building
- Phase 3:
  - Construction of the Office Quarter (in the centre of the business park)
  - Construction of the energy and recycling centres
  - Provision of the surface car parks within New Century Park
- Phase 4:
  - Construction of the hybrid quarter (on the eastern side of the business park)
  - Construction of the hotel (to the west of the Office Quarter and east of the Technical Services Building)

277. The "Uses" parameters plan shows the broad location of the land uses described above, whilst the "Heights" parameters plan provides the maximum heights for the various buildings proposed. The illustrative plans submitted show how the buildings can be accommodated within the allocated space, whilst the Design and Access Statement provides more

detail behind the design process including: a summary of the design; the amount of development proposed; the layout, scale, height and mass; appearance and external materials; access and the visual impact.

278. Policy LLP25 promotes opportunities for designing out crime, and therefore requires proposals to take account of the principles of Safer Places and Secured by Design. The detailed design will need to clearly mark private and public spaces and incorporate appropriate security features and be well managed.

279. The proposed development will deliver a mix of uses across the site and introduce active uses at a variety of levels within the development. The illustrative plans and the Design and Access Statement, indicate that the proposals will be able to deliver a significant quantum of public realm and the scheme has the opportunity to create a number of individual character areas. Planning conditions to secure Design Codes to focus the final design for the various "Quarters" and establish a suitable palette of materials are therefore crucial in order to achieve high quality architecture and design integrity.

Public realm

280. Policy LLP25 seeks to ensure that both buildings and spaces will be of high quality. Policy LLP31 supports public realm improvements as well as encouraging cycling and walking.

281. The proposed development clearly has two different elements to it, the redesigned Wigmore Valley Park a completely public space, and the new business park, which will be publicly accessible, include areas of public realm, but also have private spaces formed by the buildings.

282. The business park has been designed to fit within the country park, with the landscaping changing from formal treatments within piazzas and around the buildings, to less formal towards the periphery of the site. Clear pathways are created, with permeability through the site and links to the footpath network within the extended Wigmore Valley Park. A planning obligation is proposed to secure public art in accordance with the Council's Planning Obligations SPD.

283. It is important that any future reserved matters applications ensure that the proposed public realm is both durable and attractive. It is considered, on the basis of the information submitted that this is achievable and high quality landscaping will be important to ensure the delivery of the architectural vision for the development. There is significant space around the buildings to ensure that suitable and high quality landscaping can be

achieved. to the Design Codes should ensure a high quality development is delivered on this site.

284. In summary, the development will create a significant quantum of new public realm, firstly with the enlarged Wigmore Valley Park (with its formal and informal recreation facilities) and secondly with the treatment of spaces within the various quarters of the business park. The proposal will provide a number of new opportunities for those who will work or visit the business park, as well as for those who live in the surrounding area or come to make use of the open space.

Impacts on the character of the surrounding area

285. The impact upon the landscape character and the ecology of the area has been described in previous sections of this report. The impacts upon the amenities of neighbouring occupiers are described in a subsequent section.

286. The Environmental Statement included a Landscape and Visual Impact Assessment and recognised that in the short term, during construction, there would be some adverse effects on local visual receptors.

287. During the operational phase, the landscape in the country park will mature with the new planting and the managed habitats contributing positively to the area. Whilst the buildings will introduce urban forms into what is currently a country park, the location of the proposed development will have less of an impact on the open countryside than the extant scheme for Century Park, based on the borough boundary and bordering the green belt within North Herts. Overall, it is considered that the proposed development, with the mitigation proposed, will be able to be accommodated into the surrounding landscape with limited adverse impacts upon the surrounding area.

<u>Traffic and Parking</u>

288. The planning application was accompanied by a Transport Assessment with a Supplementary Transport Assessment provided in response to the Regulation 22 request and the Technical Notes issued by Highways England. In addition a Framework Travel Plan and Parking Strategy were submitted with the planning application, with the Parking Strategy being updated following the request for further information.

289. The Transport Assessment considered a number of different options for providing access to the employment site within an Options Assessment Report (the use of Vauxhall Way and Eaton Green Road; upgrade to Percival Way and President Way; a tunnel under the airport; and the New

Century Park access road). The Transport Assessment (and Supplementary Transport Assessment) also took into account the existing traffic conditions, as well as forecast traffic generation for 2021 (the assumed first year of opening) and 2031 (the assumed year for full occupation), these calculations have informed the size and capacity of the proposed road, which in all scenarios is shown as a two way dual carriageway. The Transport Assessment and the assumptions underlying it, have taken into account the traffic generation when the development is fully occupied, together with the predicted growth of traffic in the area by 2031, and fully justify the provision of a dual carriageway to serve the New Century Park development.

290. The Transport Assessment sought to assess the impact of the New Century Park development on the surrounding transport network, reviewing the site's accessibility and including an indicative set of measures to reduce single occupancy car travel and improve the sustainability of the site. The Supplementary Transport Assessment provided more detailed transport modelling including: the use of an area wide SATURN model of the road network surrounding the proposed development (covering the whole of Luton and a section of the M1); and VISSIM micro-simulation models of the proposed transport infrastructure.

291. The SATURN model was used to derive future year traffic flows reflecting the growth in passengers at the airport (and associated with other developments coming forward in the area), the proposed development and the impact of the proposed link road to Eaton Green Road.

292. Trip generation for the New Century Park development was calculated for the morning peak, during the day and the evening peak based on the proposed floorspace and using the TRICS database. For the first year of opening (assumed to be 2021) the morning peak movements into the site was predicted as 249, with the evening peak out of the site as 219. For the assumed year of full occupancy these numbers increased to 676 and 597 respectively. The distribution of trips was also modelled in order to inform the impact on various junctions in the surrounding area. Modelling forecast growth over the years, it is predicted that between 2021 to 2031 total trips will increase, with circa 32,000 movements (off peak in 2021) rising to circa 46,000 movements in the peak period in 2031. Of these the trips generated by the proposed development represent between 0.4% and 1.8%.

293. Using the SATURN model, the Supplementary Transport Assessment showed that the existing highway network suffers from peak hour congestion which will significantly increase by 2031 (by approximately 17%) which will exacerbate the current congestion unless the highway authority intervenes. The highway authority commissioned a study by

ARUP to review the capacity of the highway network in the east of the town (the East Luton Study) with a view to identifying a series of highway improvement works to address the existing and forecast congestion. The Supplementary Transport Assessment had regard to the likely outcomes of this study.

294. The Transport Assessment evaluated eighteen junctions for predicted flows (including Junctions 10 and 10A on the M1) in the morning and evening for the base case and for the first year of opening and the year of full occupancy. The assessment showed that:

- the New Century Park access road and its junctions generally operated well;
- a number of existing junctions operated with adequate reserve capacity (in both the with and without development models);
- three junctions operated with improved conditions with the development;
- other junctions would need to be upgraded which would result in improved conditions;
- four junctions would operate far in excess of their design capabilities in 2021 with or without the development (two would require mitigation if the development were to go ahead, namely Eaton Green Road/Wigmore Lane roundabout and Crawley Green Road/Wigmore Lane roundabout).

295. The conclusion was that the existing network suffers severe peak hour congestion in the vicinity of the proposed development, hence the reason why the highway authority commissioned the East Luton Study. The East Luton Study is likely to recommend proposals that will supersede the modest mitigation measures that the Transport Assessment recommends in order to ease congestion at some of the junctions affected by the proposed New Century Park development.

296. The micro-simulation models considered the first year of operation (2021) and the first year of full occupancy (2031) and showed that generally conditions are better at peak morning periods, whilst considerable queuing is observed in peak evening periods. During the morning peak the new access road and the surrounding access roads function well, with the main points of congestion being at the following junctions:

- Vauxhall Way/Eaton Green Road
- Vauxhall Way/Crawley Green Road
- Wigmore Lane/Crawley Green Road

297. It is anticipated that the proposals from the East Luton Study will result in these three junctions being improved, which will result in enhanced

operation for the new access road and the junctions on it (Frank Lester Way, Provost Way, Airport Access and the new A1081 junction).

298. In the evening peak the congestion at junctions outside the development worsens significantly and results in adverse impacts for traffic on the New Century Park access road and the junctions off that road. The conclusion of the Supplementary Transport Assessment is that significant intervention is required on the existing highway network to accommodate growth identified in the Local Plan, with or without the proposed New Century Park development. Mitigation is proposed in the form of contributions to some junction improvements, however, given the overall conclusion, measures by the highway authority to implement the proposals from the East Luton Study will be more significant and will have greater benefits in terms of easing congestion within the area.

299. Although the application is in hybrid form, with most of the business park being covered by the outline element of the application (other than the proposed Technical Service Building to replace the airport operator's Hangar 24), car parking for the development has been determined with due consideration to the Council's parking standards and aspirations in order to ensure effective parking provision and encourage sustainable travel.

300. In accordance with the Council's parking standards and to ensure no over provision of car parking, a maximum of 1,627 spaces will be provided to directly serve the new development.

301. The New Century Park access road will result in the loss of parking spaces for businesses affected by its construction. The Parking Strategy estimates that 562 spaces will be lost to the west of Frank Lester Way, but with the demolition of buildings and the reconfiguration of space, it will be possible to re-provide 630 spaces (an additional 68 spaces). To the east of Frank Lester Way there will be a greater impact since the New Century Park access road passes through the car rental car park and the TUI car park. In this area 1,659 spaces will be lost, but again with reconfiguration it is possible to provide 1,845 replacement parking spaces.

302. With the loss of spaces from the long stay car park due to development of the light industrial quarter a further 1,278 spaces will be replaced within the business park, with 300 replaced through an extension to the south of the long stay car park.

303. A Framework Travel Plan has been produced in order to guide the preparation of detailed travel plans for the various uses proposed within the New Century Park development. Accessibility to the site is considered within the Framework Travel Plan, with proposals to increase access by

bicycle, walking and public transport being taken into account The parking proposals for the proposed development have also been assessed, together with deliveries and servicing.

304. The objectives of the Framework Travel Plan are to:

- Reduce car based trips
- Achieve 'buy-in' to the requirements of the travel plan
- Provide facilities and services to support and encourage more sustainable travel by those working/visiting the site
- Maximise the cross-use of facilities on site
- Increase the use of more sustainable forms of transport
- Avoid social exclusion

305. The Framework Travel Plan made use of staff travel surveys undertaken by the Airport Business Park in October 2016 (covering GKN, TUI, Monarch and easyJet amongst others). This survey showed that 67% of journeys are undertaken by car. The Airport Surface Access Strategy was also taken into account, with its aim to increase the proportion of passengers travelling to the airport by public transport to more than 40% and reduce the proportion of staff travelling alone by car to less than 60%. The Framework Travel Plan is more ambitious and aims for the number of single occupancy car trips to and from the proposed development to be no more than 55%. The Framework Travel Plan advocates a number of measures in order to achieve this target, with specific measures targeted at walking, cycling, public transport and car use.

306. Overall it is considered that the proposed measures in relation to traffic, transport and parking accord with the core principle in the NPPF in terms of actively managing patterns of growth It is also considered that the proposals accord with policies LLP6 and LLP31 of the Local Plan which aim to ensure traffic generated by development proposals does not prejudice the free and safe movement of pedestrians, cyclists, public transport services or existing traffic.

<u>Other environmental matters (noise, air quality, drainage)</u>

307. The NPPF requires sustainable development, and as part of this development should aim to minimise adverse effects on the local environment, which includes neighbouring properties. Policy LLP25 of the Local Plan requires development to "enhance the distinctiveness and character of the area by responding positively to the townscape, street scene, site and building context, form, scale, height, pattern and materials, distinctiveness, and natural features including bio diversity".

308. Policy LLP38 of the Local Plan requires development proposals to demonstrate whether they "will result in any significantly adverse effects with regard to air, land or water on neighbouring development, adjoining land or the wider environment." The various impacts of the development were assessed within the Environmental Statement and have been summarised in the earlier section of this report. However, since the third party representations raised many of these issues, this section addresses key aspects.

Outlook and privacy

309. It is not considered that there will be an adverse impact upon the outlook or privacy of residents within the Wigmore area given the layout and location of the development.

310. The new business park will be located in the region of 200m distant from the nearest residential properties in Wigmore, and the new buildings will be separated from the residential area by the existing Eaton Green Road and part of Wigmore Valley Park with its enhanced landscaping and planting.

311. Although new buildings will be apparent in views from the surrounding townscape where previously there were open views, the development would be viewed against the backdrop of the airport and existing industrial and commercial estates and there is sufficient separation to ensure that there would be no loss of privacy nor would the outlook be prejudiced.

Air quality

312. The NPPF requires planning decisions to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants and to mitigate impacts should any be identified.

313. Policy LLP38 of the Local Plan requires development to demonstrate that it will not individually or cumulatively significantly adversely affect, inter alia, air, land or neighbouring development. This policy covers air quality with reference to amongst other things fumes, dust, smoke and gaseous emissions.

314. The Environmental Statement included a chapter that assessed the impact of the proposed development upon local air quality. This assessment considered existing and future nitrogen dioxide levels as well as particulate emissions (PM_{10} and $PM_{2.5}$) and concluded that the development would not result in any significant adverse impacts. Mitigation measures, such as a Construction Environmental Management Plan during the construction phase and sustainable transport measures

(including the preparation of travel plans) were considered to be appropriate.

315. The Council's Environmental Protection Unit reviewed the submission and considered that the proposed development was acceptable subject to the imposition of planning conditions.

Noise and vibration

316. The NPPF states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment and mitigate and reduce to a minimum potential adverse impacts resulting from noise. Policy LLP38 of the Local Plan addresses noise effects as one of the pollutants that should be assessed in any new development.

317. Noise was addressed in the Environmental Statement, with the findings and outcomes of the relevant chapter summarised previously in this report. The main noise source during construction could be controlled through a Construction Environmental Management Plan, secured by an appropriate condition. Noise during the operational phase would predominantly be associated with traffic on the New Century Park access road, however, although levels would rise, the noise assessment concluded that this would be below the ambient background noise level (noise levels in the area are high associated with the operation of the airport and the industrial premises surrounding). The one receptor where specific mitigation was identified for the operation phase was the Holiday Inn hotel. Here, given the existing ambient noise level and the nature of the use, the impact was not considered to be significant, but mitigation in the form of acoustic screens is proposed.

318. A further potential source of noise during the operational phase would be plant associated with the different uses within the development. This should not be an issue given the distance of the new buildings from the nearest residential properties, but could be controlled through the imposition of an appropriate planning condition.

Drainage

319. The NPPF states that the planning system should take full account of flood risk and in determining applications ensure that flood risk is not increased elsewhere, with major development incorporating sustainable drainage systems.

320. Policy LLP36 of the Local Plan seeks to minimise the risk and impact of flooding by directing new development to areas with the lowest probability

of flooding and ensuring that new development does not increase the risk of flooding elsewhere.

321. Surface water and drainage were considered within the hydrology chapter of the Environmental Statement and the implications of the development in this regard were considered by Affinity Water, the Lead Local Flood Authority, the Council's Environmental Protection Unit, Thames Water Utilities and the Environment Agency, given the potential for contamination of the important aquifer underlying part of the site.

322. The site falls within Flood Zone 1, so the risk of flooding is limited. The detail of the buildings proposed for the new business park has not been provided, since this element of the application is in outline form, consequently that information is reserved for subsequent approval and measures such as sustainable urban drainage systems will be secured through condition.

323. The impacts of construction have been carefully considered and the statutory consultees have recommended conditions to secure suitable protection for the controlled waters.

Economic Impact

324. Policy LLP1 of the Local Plan reflects the NPPF's presumption in favour of sustainable development and goes on to state that the strategic allocations will be the primary location for growth. Policy LLP13 sets out the Council's economic strategy and states that planning applications will be granted where they deliver sustainable economic growth and prosperity to serve the needs of Luton and the wider sub region. The policy recognises that jobs will be generated through business and industrial development within the strategic allocations.

325. The proposed development will provide a range of economic benefits during both construction and operation. These have been set out in the chapter on Socio-Economic Effects within the Environmental Statement and have been summarised above. The conclusion of the Environmental Statement with regard to the socio-economic benefits is that the level of economic growth anticipated will have a major positive effect both at the local and sub-regional level.

326. The completed development will provide the following amount of commercial floorspace:

- 29,400sqm B1(c) office (within the Office Quarter)
- 11,700sqm B2/B8 general industry and warehouse (adjacent to the airport)

- 13,000sqm B1/B2/B8 (within the office/industrial quarter)
- 2,950sqm Technical Services Building (adjacent to the airport)
- 685sqm sui generis (energy and recycling centre)
- 7,200sqm CI (145 bedroom hotel)
- 225sqm A3 café (within the office quarter)

327. In terms of job creation and contribution to the economy, the Environmental Statement predicted the following benefits

- 559 jobs during the construction phase
- £85 million contribution to UK GDP during construction
- 3,201 jobs upon full occupation of the development
- annual contribution of £167 million to UK GDP
- £135 million of wages
- £63 million in tax revenue locally

328. Additional benefits would be secured through the Section 106 agreement, including and Employment, Training and Skills Strategy which would seek to help local people develop appropriate skills in order to access the jobs that would be created with the new development.

329. Reference was made to the impact of the development upon the Butterfield Technology Park. In terms of the quantum of development that is being promoted through the New Century Park business park. The application proposes just under 65,000sqm of total floorspace, whereas the last application permitted for the Century Park site (ref: 99/01083/RENEW) envisaged more than double that area of floorspace (in excess of 150,000sqm). The uses proposed reflect the high-tech focus of the enterprise zone, and the land uses considered appropriate in LLP6. The Employment Land Review that informed the Local Plan concluded that Luton would have a shortage of B1 premises, whilst competition with another employment site does not represent a material reason for refusing planning permission.

330. It is considered that the proposed development will create a significant number of jobs, both during the construction phase and once occupied, and will promote economic growth and development within the strategic allocation to the benefit of Luton and the sub-region. As such the proposals would accord with policy LLP1 and LLP13 in helping to achieve sustainable development and the objectives of economic growth, jobs and investment in set out in the Council's economic strategy.

<u>Third party representations</u>

331. The application has been the subject of two extended periods of consultation, the first in January through to February 2018 following the

initial receipt of the application, the second in August through September following the receipt of the further information. The application has recently been advertised for a third time to reflect the requirements of the Town and Country Planning (Development Management Procedure) Order 2015.

332. Appendix 3 provides a summary of the individual responses that were received (though where responses have repeated the contents from other representations these are usually noted). Appendix 4 provides a summary of the proforma responses, these were letters or bullet point lists that third parties were able to photocopy and submit with additional comments if they felt so inclined.

333. The applicant in submitting the further information provided a summary of the publicly available third party representations, together with a response to the issues that were raised. Within the further information that was submitted following the Regulation 22 request, the applicant also provided responses to the representations that were received from statutory and technical consultees.

334. In writing the report, the responses have been addressed in the individual sections of the report.

Planning obligations

335. A planning obligation can be required to mitigate the impact of a development, particularly in circumstances where the desired restrictions go beyond the scope of planning conditions. In accordance with section 106 of the Town and Country Planning Act 1990, the local authority will enter into a legal agreement with the applicant to secure planning obligations.

336. Paragraph 56 of the NPPF says local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Paragraph 56 advises obligations should only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

337. These tests reflect Regulation 122 of the CIL Regulations.

338. Planning obligations can include financial obligations requiring monetary contributions to the local authority to fund works or services as well as in-kind obligations requiring specific actions to be performed by specific parties.

339. The Council's Planning Obligations Supplementary Planning Document (SPD) sets out in principle what kinds of planning applications will require planning obligations and in broad terms how monies will be spent on projects related to the proposed development.

340. The following contributions and obligations are considered necessary in order to mitigate the impacts of the development and achieve the benefits that were set out in the Environmental Statement.

- Public art contribution (£ 250,000)
- County Wildlife Site contribution (£ 250,000)
- Biodiversity contribution (£ 30,000)
- Replacement trees contribution (£ 35,000)
- Raynham Way Neighbourhood Park Play contribution (£ 35,000)
- Roads and highway improvements contribution (£ 3,455,917)
- Sports pitch and changing room re-provision contribution (£1,196,737)
- Measures to ensure the new open space for Wigmore Valley Park is provided in advance of any development taking place on the existing park and the provision of a maintenance specification to ensure the long term maintenance and management of the park
- Construction, employment and training and skills initiatives.

CONCLUSIONS

341. There are a number of planning issues for consideration which are raised by this planning application. The assessment requires the evaluation of many impacts, both positive and negative, many of which require the exercise of planning judgement. This assessment has taken into account relevant Development Plan policies, the NPPF, information in the submitted Environmental Statement and other environmental information including that submitted in accordance with Regulation 22 of the EIA Regulations 2011.

342. The issues considered relate to the loss of parkland, including playing fields and natural habitats; the provision of a new business park; the construction of an access road with link to Eaton Green Road; and the impact upon the environment from the construction of the development. The application has attracted widespread public interest with large numbers of submissions from local residents as well as further afield. There have been a significant number of statutory consultees and local

interest groups that have responded to the consultations that have been carried out.

343. The primary objective of the planning application is to provide a new business park within the strategic allocation and bring forward one of the few remaining significant employment sites within Luton, in order to maintain and enhance Luton's important sub-regional role as a place for economic growth and opportunity.

344. Whilst the Council's Local Plan policy has consistently promoted employment provision to the south of Eaton Green Road since 1988 and planning permissions have been granted for development in the area since 1991, the Council's aspiration to deliver on this strategic allocation to date has been unfulfilled.

345. The proposed development is part compliant with policies LLP1, LLP2 and LLP6, since it is one of the strategic allocations where the Council's spatial development strategy seeks to focus major development. However, it does give rise to some apparent conflict with the development plan, with the link to Eaton Green Road, the loss of ecological habitats and areas of landscape value, development in Wigmore Valley Park and the loss of playing fields.

346. Policy LLP6E of the development plan does set criteria whereby development such as that proposed by this planning application is considered acceptable, thus the policy made provision for:

- the reallocation of land uses within the strategic allocation;
- the scale and quality of the open space and landscaping being maintained, and if feasible the provision of a net increase in open space;
- the enhancement and improvement of biodiversity within the borough;
- within replacement open space for Wigmore Valley Park the provision of facilities of at least equal quality prior to development; and
- the long term management of the open space, landscaping and bio-diversity

347. The planning application and proposed legal agreement would satisfy all of these criteria, with: an additional two hectares of public open space being provided; the provision of new areas of open space opened up before others are developed; the enhancement of the existing park with new facilities, additional planting; new footpaths; the improvement of biodiversity within the borough with enhancement of7.5ha of the Dallow Downs County Wildlife Site; the enhancement of other facilities within the area (the play area within Raynham Way Neighbourhood Park) before the existing children's play area is decommissioned and the new skate park

and children's play facilities provided; contribution to the sports field and changing room re-provision elsewhere in the borough having been agreed with Sport England; and provision for the long term management of the open space.

348. The benefits that the proposed development will deliver are considered to outweigh any conflict with the development plan. These benefits include:

- Delivering one of the borough's four strategic employment allocations which will help to achieve the strategic objectives set out in the Local Plan in relation to economic growth, investment and employment;
- Provision of high quality new office, light industrial, general industrial and storage/distribution floorspace through the various quarters provided in the New Century Park business park;
- Economic benefits which include an estimated 263 full time equivalent construction jobs over the period; 3,201 full time equivalent jobs once the development is fully operational; £135 million of gross wages contributing £63 million in tax revenue to the local area; and an annual contribution to GDP of £167 million;
- Creation of a larger area of open space than currently exists, with enhanced facilities within the park, together with benefits to the wider community with improved sports facilities elsewhere in the borough;
- Whilst there would be an impact on the County and District Wildlife Sites as a consequence of the development, the Section 106 agreement makes provision for enhancements to the site at Dallow Downs, whilst management and maintenance of retained areas of biodiversity and the creation of new habitats within the park will prove of benefit locally; and
- Opportunities for the enhancement of skills and knowledge of local people through the training initiatives included within the legal agreement.

349. Other issues relating to impacts from the proposed development on the environment that may arise during construction and operation of the development, such as traffic, noise, air quality, contamination and drainage have been the subject of consideration and addressed within the Environmental Statement as part of the environmental impact assessment process. It is considered that these are addressed satisfactorily through the use of the recommended planning conditions.

350. The NPPF and Policy LLP 30 emphasise that the conservation of archaeological interest is a material consideration in the planning process. The Archaeology team have confirmed that they do not object to the principle of development at this site. The Archaeology team do however, consider that any impact on archaeological deposits could be satisfactorily mitigated through an appropriate programme of archaeological monitoring

with investigation and recording as necessary and also a scheme of heritage asset resource management.

351. Historic England have concluded that from Luton Hoo the development would largely be screened by topography or planting, though there are some parts of the parkland where the existing airport buildings are visible and consequently the New Century Park development might also be visible. In relation to Someries Castle Historic England considered that there is some potential the development, particularly the hotel building, to be visible from the wider setting of Someries Castle, though this would constitute less than substantial harm and the Local Planning Authority would have to weigh this against the public benefits that might accrue. It is considered that the public benefits, to which reference has been made, outweigh the less than substantial harm to the heritage assets.

352. Careful consideration will still, however, need to be given to the proposed layout, scale, appearance and landscaping of the proposed development to minimise harm to these heritage assets. These are however, matters which will be dealt with through the submission of details which will ensure that there is sufficient scope in this application that the design and layout of the proposed development is appropriately addressed.

353. One of the main issues is the impact of the proposed uses, particularly those in the later phases of the development, on the transport network, including traffic on the local roads and the strategic network. Whilst it is estimated that construction traffic will generate an annual daily average of 55 HGV movements, the routes are likely to be restricted to the main A-roads and motorway and will be controlled through the Construction Traffic Management Plan (part of the overall Construction Environmental Management Plan). During the operational phase the morning and evening peaks have been calculated and the Transport Assessment (and Supplementary Transport Assessment) has included modelling taking into account growth over the period. Whilst the development will generate a significant number of movements necessitating the provision of a significant piece of infrastructure in the form of the New Century Park access road, the movements associated with the development only represent between 0.4% and 1.8% of the total movements over the period.

354. In order to ensure that the road network, including the strategic network, can accommodate the traffic arising from the proposed development, planning conditions have been proposed. Highways England have recommended a condition, requiring further assessments of the effects of traffic generated from the office quarter, hybrid industrial quarter or hotel, together with any mitigation before those phases of development are brought into use. A further condition is recommended by the Council's Highway Engineer, to ensure that the New Century Park access road and

the link road to Eaton Green Road are provided and operational before Phase 3 (the Light Industry quarter) is occupied, whilst also ensuring that the link road is not provided in advance of the New Century Park access road, since this is likely to adversely affect traffic on the local road network as well as amenities of residents in the area.

355. The Council's Highway Engineer has confirmed that the New Century Park access road and link road will be public highway upon completion and that for the offsite junction improvements identified it may be necessary to enter into a Section 38/278 Agreement. A condition is also recommended that these junction improvements should be carried out before the New Century Park and link road to Eaton Green Road come into use, but it is proposed that this be incorporated into the legal agreement.

356. Whilst it is clear that there is considerable growth forecast for traffic in east Luton, and a study has been undertaken on behalf of the Council which recommends (separate to this application) highway improvements in the area, overall, it can be concluded that the proposed development can be satisfactorily accommodated with some junction improvements that are included within the Section 106 agreement. Adoption of travel demand management measures and proposed mitigation will ensure that the impacts on the local and strategic highway network are further mitigated to the satisfaction of the developer and the responsible authorities.

357. Parking for the business park has been determined with consideration to the Council's adopted parking standards and to ensure effective parking provision to encourage sustainable travel. The re-provision of parking spaces for those lost as a result of the route of the New Century Park access road and the erection of the Light Industrial Quarter on the site of the existing long-stay car park, ensures that in line with policy LLP6A the operational integrity of the airport is not adversely affected.

358. Development should aim to minimise adverse effects on the local environment, which includes neighbouring properties. Given the distance of the development from the nearest residential properties in Wigmore, it is assessed that the proposed development should not cause unacceptable harm to the amenity of the surrounding land and buildings, in relation to privacy, overshadowing, noise and air quality. Given the layout of the development, and the characteristics of the site's location in relation to the siting and proximity of surrounding development the proposed buildings are on the whole not considered to be overbearing.

359. The business park is defined by a number of quarters, notably the light industrial quarter (located on the site of part of the long stay car park), the hotel (adjacent to the Technical Services Building in the north-west of the site), the office quarter (central to the business park), and the

hybrid/industrial quarter (on the eastern periphery). With most of the business park being part of the outline proposal with all matters reserved for later submission, it is important that any future reserved matters applications should ensure that the individual quarters are of high quality, with an attractive and durable design for the buildings and their associated public realm.

360. The proposed development seeks to achieve sustainability that incorporates, and exceeds BREEAM Very Good ratings for all buildings (other than the Technical Services Building which will aim to exceed Good). The proposal includes adequate measures to ensure the development is able to achieve current standards for energy efficiency and sustainable building design. Conditions will secure details of the various measures proposed and required.

361. There is a need to secure mitigation measures and to restrict the proposals to the parameters assessed in both the environmental impact assessment and the details comprised in the planning application, this will be ensured by conditions. A Section 106 agreement is also required to secure delivery the highway improvements, replacement playing field provision, wildlife and habitat enhancements, long term maintenance of the open space and other mitigation.

362. The development will give rise to an extensive range of positive impacts, which are considerable and widespread in their public benefit, not least those that arise from securing the regeneration of the site and especially the provision of new employment, new investment and spending in the area.

363. The weight to be given to these matters is ultimately a decision for Members. Taking all these matters into account, balancing the social, environmental and economic benefits of the development against the residual harm, approval is recommended.

LIST OF BACKGROUND PAPERS
LOCAL GOVERNMENT ACT 1972, SECTION 100D

364. Luton Local Plan 2011-2031
365. National Planning Policy Framework
366. National Planning Practice Guidance

DETERMINATION OF PLANNING APPLICATIONS

The Council is required in all cases where the Development Plan is relevant, to determine planning applications in accordance with policies in the Development Plan unless material considerations indicate otherwise.

Equality Implications

EQUALITY ACT 2010

In dealing with this planning application and in reaching the recommendation set out in this report, proper consideration has been given to the duty imposed on the Council under the Equality Act 2010 to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by that Act; to advance equality of opportunity and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics under the Act are a person's age, sex, gender assignment, sexual orientation, disability, marriage or civil partnership, pregnancy or maternity, race, religion or belief. In this case, no disproportionate effect on people with protected characteristics has been identified.

HUMAN RIGHTS ACT 1998

The determination of the application which is the subject of these reports is considered to involve the following human rights:-

1. Article 8: Right to respect for private and family life; and
2. Article 1 of the First Protocol: Protection of Property

The report considers in detail the competing rights and interests involved in the application. Having had regard to those matters in the light of the Convention rights referred to above, it is considered that the recommendations is in accordance with the law, proportionate and balances the needs of the applicant with the protection of the rights and freedoms of others in the public interest.

SECTION 17 CRIME AND DISORDER ACT 1998

In reaching the recommendations set out in each report, due regard has been given to the duty imposed upon the Council under Section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in its area.

Luton

AGENDA ITEM

7

COMMITTEE: **DEVELOPMENT CONTROL**

DATE: **27 MARCH 2019**

SUBJECT: **1) OUTLINE PERMISSION FOR A NEW BUSINESS PARK COMPRISING OFFICE SPACE (CLASS B1), WAREHOUSE AND INDUSTRIAL SPACE (CLASS B2 AND B8), MIXED EMPLOYMENT SPACE (CLASS B1/B2/B8), A HOTEL (CLASS C1), CAFE SPACE (CLASS A3); ENERGY CENTRE (SUI GENERIS), INTERNAL ACCESS ROADS; CAR PARKING, LANDSCAPING AND ASSOCIATED WORKS INCLUDING EARTHWORKS, UTILITY DIVERSIONS, SUSTAINABLE DRAINAGE SYSTEMS, TREE REMOVAL AND TREE PROTECTION; AND RELOCATION OF THE AIRPORT CAR HIRE CENTRE.**
2) FULL PERMISSION FOR THE CONSTRUCTION OF A 2KM CENTURY PARK ACCESS ROAD INCORPORATING A NEW JUNCTION ON THE A1081, ALTERATIONS TO THE EXISTING AIRPORT WAY ROUNDABOUT, ALTERATIONS TO FRANK LESTER WAY, A NEWLY CREATED ACCESS FROM EATON GREEN ROAD, A NEW ROUNDABOUT PROVIDING ACCESS INTO THE BUSINESS PARK, DEMOLITION OF BUILDINGS, PROVISION OF REPLACEMENT CAR PARKING (TEMPORARY AND PERMANENT), ASSOCIATED EARTHWORKS, LANDSCAPING, SURFACE WATER DRAINAGE AND UTILITIES DIVERSIONS; THE CREATION OF NEW PUBLIC OPEN SPACE INCLUDING FOOTPATHS, LANDSCAPING AND ECOLOGICAL MITIGATION; EXTENSION AND

ALTERATIONS TO WIGMORE PAVILION BUILDING TO PROVIDE CAFE (CLASS A3) AND ADDITIONAL COMMUNITY SPACE; CONSTRUCTION OF A NEW SKATE PARK AND CHILDREN'S PLAY AREA; AND CONSTRUCTION OF A REPLACEMENT AIRPORT TECHNICAL SERVICES BUILDING AND ASSOCIATED PARKING.
(APPLICANT: LONDON LUTON AIRPORT LTD)
(APPLICATION NO: 17/02300/EIA)

REPORT BY: **DEVELOPMENT CONTROL MANAGER**

CONTACT OFFICER: **DAVID GURTLER 546317**

IMPLICATIONS:

LEGAL	**COMMUNITY SAFETY**
EQUALITIES	**ENVIRONMENT**
FINANCIAL	**CONSULTATIONS**
STAFFING	**OTHER**

WARDS AFFECTED: WIGMORE

PURPOSE

1. To advise Members of a current application for planning permission and to seek their decision.

RECOMMENDATION(S)

2. **Development Control Committee is recommended to:**

(a) Resolve that:

(01) The requirements of Part II of Schedule 4 of the Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 2011 (as amended) are satisfied by reason of the Environmental Statement, and the Addendum, attached thereto including at least the following information:

(i) a description of development comprising information on the site, design and size of the development;
(ii) a description of the measures required in order to avoid, reduce and, remedy significant adverse effects;
(iii) the data required to identify and assess the main effects which the development is likely to have on the environment;
(iv) an outline of the main alternatives studied by the applicants and an indication of the main reasons for their choice, taking into account the environmental effects;
(v) a non-technical summary of the information under (i) to (iv) above.

(02) That it be recorded that, in making the decision on the application, the Committee has taken into account the environmental information comprising the Environmental Statement and the Addendum and that this information meets the minimum requirements of Part II of Schedule 4 to the Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 2011 (as amended).

(b) Grant planning permission subject to:

(i) The satisfactory completion of an agreement under Section 106 of the Town and Country Planning Act 1990 to contain the following:

1. **Public art contribution (£ 250,000) to provide public art in the main office plaza;**
2. **County Wildlife Site contribution (£ 250,000) to compensate for the loss of 5ha of County Wildlife Site with management of 7.5ha of Dallow Downs County Wildlife Site;**
3. **Biodiversity contribution (£ 30,000) to provide for the creation and management of new habitats within the site;**
4. **Replacement trees contribution (£ 35,000) to compensate for loss of trees with replacement planting across the borough;**
5. **Raynham Way Neighbourhood Park Play contribution (£ 35,000);**
6. **Roads and highway improvements contribution (£ 3,455,917) to secure highway improvements at a number of junctions in the vicinity to improve capacity, safety and reliability and a requirement to ensure that the junction improvements are**

completed before the New Century Park access road is brought into use;

7. **Sports pitch and changing room re-provision contribution (£1,196,737) to offset the loss of playing fields and ancillary facilities with the contribution being used towards implementing one or more of the following projects:**
   i. **Provision of a Step 5 Football Facility (an artificial grass pitch suitable for non-league senior football up to step 5 of the football pyramid and associated facilities (including parking provision and changing rooms) at Stopsley / Lothair Recreational Ground; Ely Way or Lewsey Park; and/or;**
   ii. **The replacement of or improvements to existing adult football facilities (playing pitches and supporting facilities such as changing and parking) at either one or more than one of the following locations:**
      - **Stopsley/Lothair Recreation Ground, Luton, Bedfordshire; and / or**
      - **Lewsey Park Recreation Ground, Luton Bedfordshire**
8. **Measures to ensure the new open space for Wigmore Valley Park is provided in advance of any development taking place on the existing park and the provision of a maintenance specification to ensure the long term maintenance and management of the park; and**
9. **Construction, employment, training and skills initiatives**

(ii) Grant planning permission subject to the imposition of the conditions as detailed in Appendix 1 to this report and that the grant of planning permission should be delegated to the Development Control Manager upon the expiry of the consultation period and subject to no new material planning considerations being raised.

(c) In the event that Members resolve to grant planning permission for the development, the subject of this application, then this would be subject to its referral to the Secretary of State (following the expiry of the further consultation period), as required by the Town and Country Planning (Consultation)(England) Direction 2009.

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REPORT

The Application for Consideration

3. The planning application is submitted in part as a full application and in part as an outline application (referred to as a hybrid application).

4. The application falls within the area referred to in the Local Plan as the London Luton Airport Strategic Allocation. This is a large area of land that

includes not only the operational area of the airport, but commercial/industrial buildings on Percival Way to the north and west of the airport, Wigmore Valley Park to the north and open fields to the north-east that have been identified since 1988 as a new employment area.

5. The application has been the subject of extensive consultation (two separate periods of six weeks), with press and site notices advertising the application. The application has recently been further advertised for a period of 21 days in accordance with the Town and Country Planning (Development Management Procedure)(England) Order 2015.

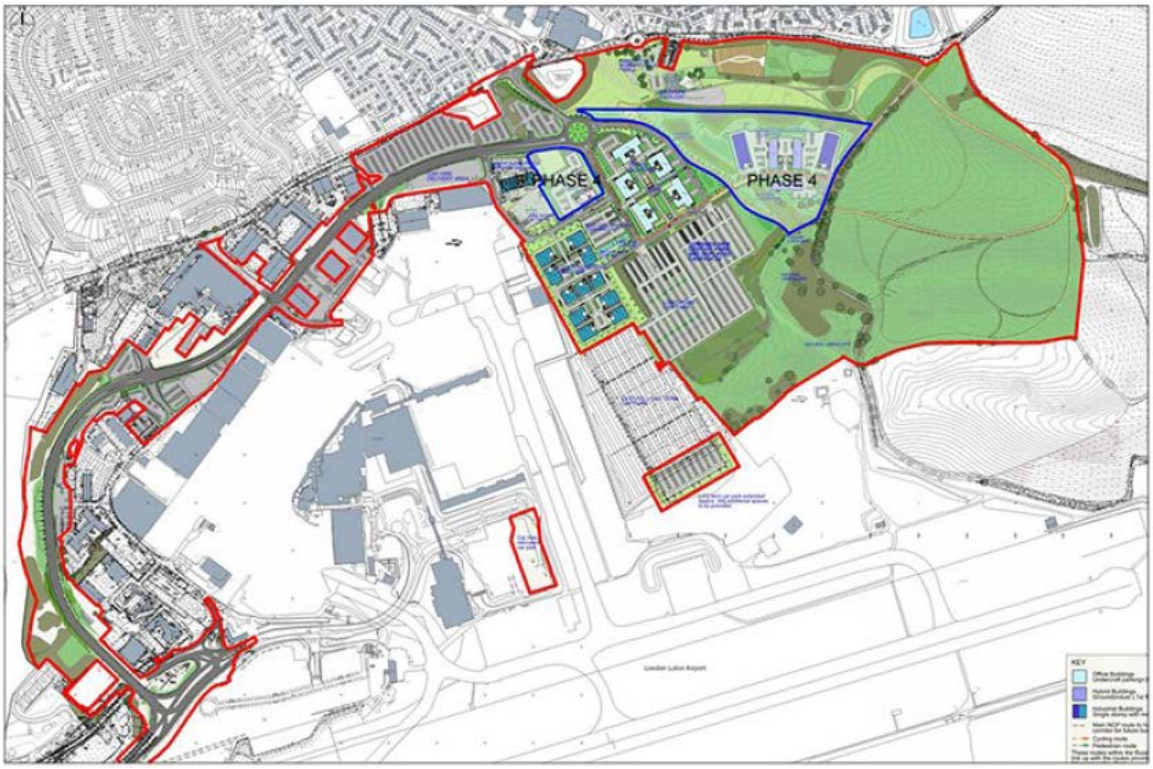
6. During the period that the planning application has been with the Local Planning authority for determination, London Luton Airport Limited has also announced and carried out early engagement (with consultation) in relation to its aspirations to expand the capacity of the airport by promoting a Development Consent Order (DCO) under the Planning Act 2008. Recently London Luton Airport Limited published the results of its non-statutory consultation and a preferred option. However, it should be noted that the Planning Act 2008 sets up an entirely different process for a DCO application and when that application comes forward it will be considered by the Secretary of State rather than the Local Planning Authority. At present there is no certain timetable for the presentation of any such application.

7. The application for New Century Park is a planning application in its own right, properly made and validated and is therefore to be considered on its merits.

The Site and Surroundings

8. The planning application site covers approximately 95ha and encompasses an area that stretches round the periphery of Luton Airport.

9. There are two distinct parcels of land covered by the planning application site, the first, comprises a corridor that connects New Airport Way (the A1081) in the south-west to the second area, a much larger parcel of land composed of Wigmore Valley Park and Century Park to the north and north-east of the airport.



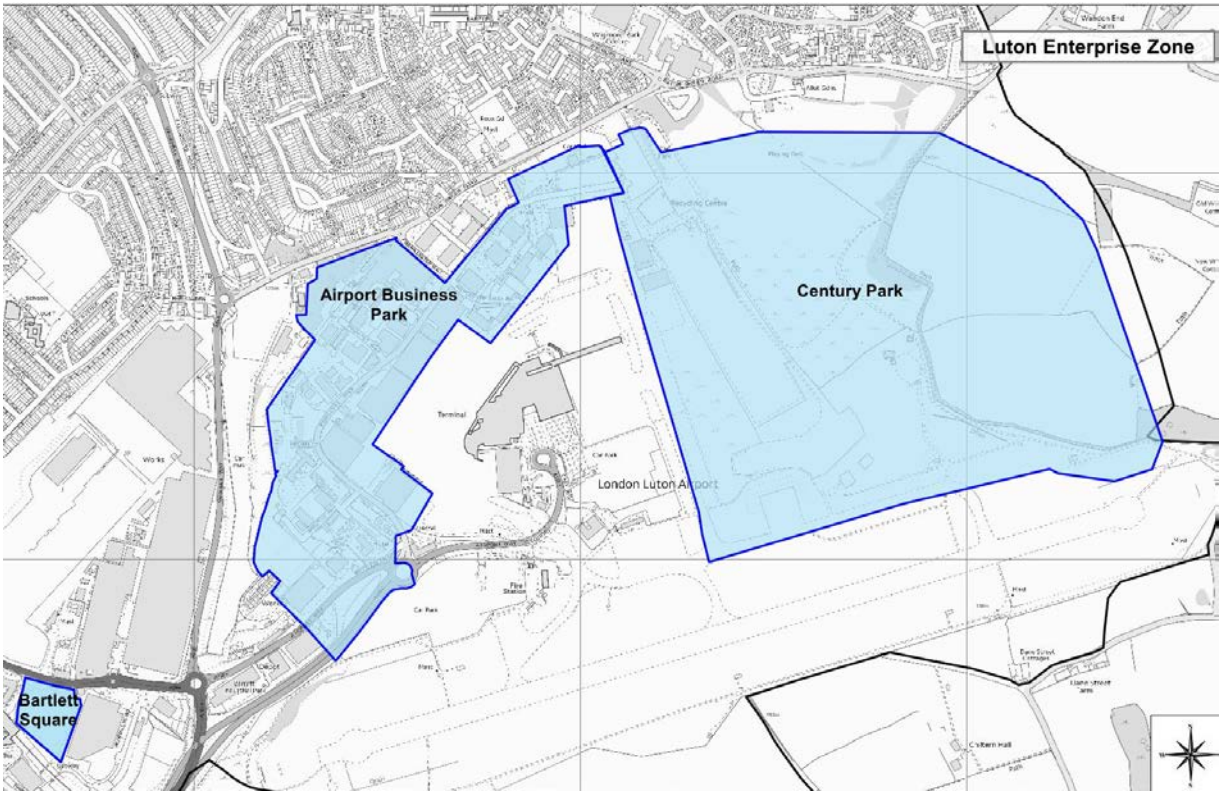
10. The first parcel of land linking Wigmore Valley Park and the A1081 is approximately 2km in length. The southern element, adjacent to Airport Way, passes between the Holiday Inn hotel and Eden Farm Preservations factory. To the north of these buildings between Proctor Way/Prospect Way and car parking associated with the Vauxhall works, the site passes over the Dairyborn Scarp. The site than turns east and links up to President Way, passing through the business parks associated with the airport (predominantly two storey warehouse and industrial buildings), before cutting across the car parks belonging to the car rental companies and TUI.

11. The eastern part of the site includes part of the airport's long term car park, the Tidy Tip (the Council's household waste recycling centre) Wigmore Valley Park and agricultural land. Within the Wigmore Valley Park element of the site there are currently two buildings, namely the Pavilion building, housing Wigmore Valley Park Community Centre, with a separate single storey maintenance building. Just to the north of the Pavilion building is the Wigmore Hall Conference Centre, a Grade II listed building. To the south-west of the Pavilion building is a children's play area, whilst to the east is a skate park. Further east are local allotments.

12. To the south of the application site is Luton airport. The application site extends to the eastern boundary of the borough where land in the adjoining authority, North Herts District Council, is agricultural land within the green belt. Eaton Green Road defines the northern boundary of this

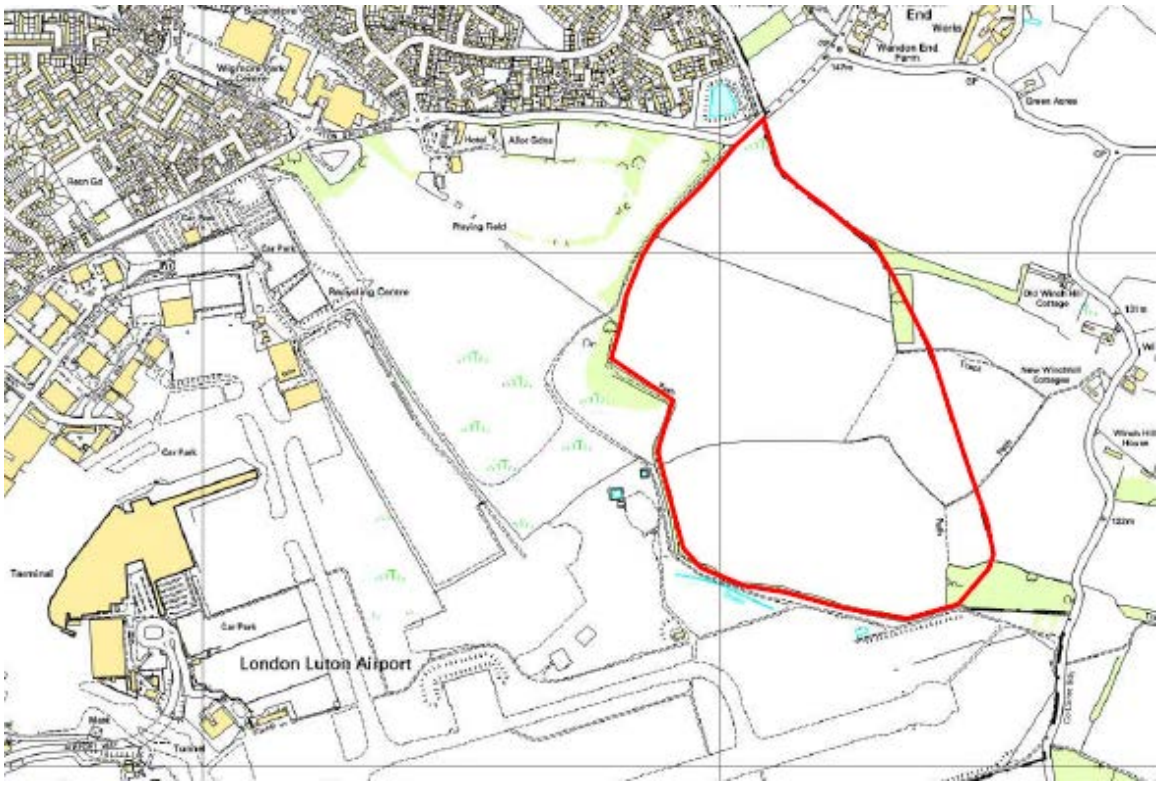
second parcel of land, with the residential area comprising the Wigmore estate being on the northern side of the road.

13. The planning application site is also within the area covered by the Luton Enterprise Zone depicted on the plan below. The Enterprise Zone was designated on 25 November 2015 and covers some 395 hectares, consisting of three linked sites around the airport (Bartlett Square to the west, Airport Business Park to the north/north-west and Century Park to the north/north-east). Sector focus within the Enterprise Zone is aerospace, advanced manufacturing and engineering, associated leisure, and hotel and catering businesses.



Relevant Planning History

14. The planning history of a site is a material planning consideration in the determination of a planning application. Within the red line covered by this planning application there are a series of applications that relate to land to the south of Eaton Green Road, described as the Wigmore Employment Area in the 1988 North-East Luton Local Plan, and subsequently in an allocation as Century Park. The plan below shows the area covered by the Century Park applications.



15. Following the submission of an outline planning application in 1989, permission was granted for the development of land at Century Park (the north-eastern element of the application site) in May 1991 for the development of B1 and B8 uses, with ancillary leisure and retail facilities (ref: 89/00865/OUT). This application proposed access from Eaton Green Road, which accorded with the 1985 Development Brief for the Wigmore Employment Area. The application was never proceeded with as it would appear that the company that submitted the application went into receivership.

16. The next relevant application was submitted by the receivers for the previous owners, and involved an outline application for development of the land to provide B1, B2 and B8 buildings with ancillary leisure, retail, professional services and food and drink facilities was submitted in 1994 and approved in December 1995 (ref: 94/00760/OUT).

17. An outline application by new owners was submitted in March 1998, with a proposal to provide an access road to Century Park via a tunnel under the airport, and including the construction of a roundabout and junction works. This was granted planning permission in June 1998 (ref: 98/00457/OUT). The same owners then submitted an application to vary the time limit for the submission of the reserved matters relating to this in April 2001 and this was approved in August 2002 (ref: 01/00460/VARCON).

18. In 1999 Prologis submitted an outline application to vary conditions on the 1995 permission for Century Park. This was reported to Committee in December that year with the recommendation for approval subject to the completion of a Section 106 legal agreement (ref: 99/01083/FUL). A decision on that application was not issued until July 2010 when the Section 106 agreement was signed, since details of an Environmental Statement were submitted in February 2009 (ref: 09/00197/OUTEIA).

19. The Environmental Statement in respect of that application evaluated the impacts for the renewal scheme based on the quantum of development proposed in the outline application, namely:

    i. 111,480sqm of B1, B2 and B8 employment floorspace
    ii. 18,573sqm of hotel floorspace
    iii. 1,161sqm of D2 leisure uses
    iv. 10,446sqm of ancillary retail (classes A1, A2 and A3).

20. In May 2013 Prologis submitted an application to vary conditions of the outline planning permission granted in July 2010 was received (ref: 99/01083/RENEW). Planning permission was granted on 4 July 2015 subject to a number of conditions, one of which required the first phase of the development to be commenced within four years of the date of the approval or within one year of the date of the approval of the last reserved matter (whichever was the later). Condition 9 of the planning permission restricted the total floorspace for the development to 153,471sqm and set out the floorspace for the individual uses, namely:

    i. 123,291sqm of B1, B2 and B8 employment floorspace
    ii. 18,573sqm of hotel floorspace
    iii. 1,161sqm of D2 leisure uses
    iv. 10,446sqm of ancillary retail (classes A1, A2 and A3).

21. Whilst there are numerous smaller applications within the area covered by the red line site, these are not directly relevant to the current proposal. However, it is worth drawing Members attention to the applications that led to the construction of the residential area to the north of Eaton Green Road in Wigmore and also the creation of Wigmore Valley Park, between 1976 and 1986.

22. The creation of the residential estate in Wigmore was informed by a planning brief (July 1985), which envisaged around 2,000 dwellings being constructed on a site of 67ha. It was anticipated that additional public open space and allotments would be required as part of this development, to be laid out at the developers expense. The brief did note that the former Airport Tip to the south of Eaton Green Road and the field immediately to the south of Wigmore Hall might accommodate some of the

public open space (outline planning permission had been granted in 1982 for use of these areas for public open space purposes), thereby releasing more land in Wigmore for residential development.

23. The principle of the development of land to the north of Eaton Green Road for residential purposes was first approved in June 1976 with the grant of an outline planning permission (ref: L/10382) with subsequent applications throughout the 1980s for further parcels of land for residential development. The most relevant applications in terms of the current proposal are

    i. L/10382 – development of land for residential purposes together with shops and amenity building was granted outline consent on 30 June 1976 subject to a Section 52 agreement (the predecessor to Section 106 agreements) which related to junction improvements;
    ii. L/10382/ /0 – renewal of outline planning permission for the development of land for residential purposes together with shops and amenity buildings was granted planning permission on 15 July 1977;
    iii. 86/01285/OUT – development of land for residential purposes approved 21 October 1986 with a Section 52 agreement requiring, inter alia, the laying out of an additional area of 7.87 acres of land at Wigmore Valley Park as public open space;
    iv. 86/01326/FUL – erection of 68 dwellinghouses approved 9 March 1987 with a Section 52 agreement requiring, inter alia, the payment of £42,000 by the developer with the Council providing not less than 0.414 acres of additional open space to Wigmore Valley Park

<u>The Proposal</u>

24. The planning application is a hybrid application, meaning that part of it is submitted in full (for all aspects to be determined at this stage) and part is submitted in outline form (with all matters reserved for later determination).

25. The planning application was originally submitted in December 2017 and validated in January 2018 following the confirmation of the service of notice on those with an interest in the land by the applicant. Following a review of the planning application and the accompanying Environmental Statement, together with consultation responses, a request for further information was made in accordance with Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.

26. This further information was received in August 2018, with amendments made to the scheme that had been submitted. The amendments included: changes to the proposed New Century Park access road (including the junction with New Airport Way); changes to replacement car parking

provision adjacent to the access road; reduction in the number of car parking spaces within New Century Park; alterations to the arrangements of the parking; and some minor changes to the landscaping proposals. The paragraphs below describe the scheme that is before members following the amendments that were received in August 2018.

Full element of planning application:

27. The full element of the application relates to the access road (and associated structures, junction alterations and link to Eaton Green Road), the Technical Services Building, some areas of car parking and the altered and extended Wigmore Valley Park.

28. The main constraint to bringing forward development of the strategic employment site has been the lack of suitable access. The tunnel proposal through the airport has not proved viable, whilst the existing highway network through the business parks (Percival Way and President Way) is constrained and significant alterations to this route would disrupt the existing businesses in the Airport Business Park as well as the operational integrity of the airport. The Transport Assessment that accompanied the planning application was informed by an Options Assessment Report, which included:

    i. Upgrading Vauxhall Way and Eaton Green Road to a dual carriageway and providing the access to the employment site from Eaton Green Road;
    ii. Upgrading Percival Way and President Way to a dual carriageway;
    iii. Tunnel access to the employment site; and
    iv. A new link road.

29. The alternatives were also assessed within the Environmental Statement that accompanies the planning application, with the proposed New Century Park access road performing best overall in respect of deliverability and strategic fit.

30. The New Century Park access road would be a 2km long dual carriageway that starts at a new junction proposed for the A1081 (New Airport Way) heading north skirting around the western periphery of the airport, before cutting in to the east and joining Percival Way just before the junction with Frank Lester Way. The road then roughly follows the line of President Way before passing through the car hire and TUI car parks and entering the part of Wigmore Valley Park that is located on the former Airport Tip.

31. The new junction on the A1081 will be a signalised junction, with a bus lane to allow buses to turn up Airport Way towards the airport. There will

also be a taxi staging area where taxis can service the hotels and also be held to ease pressure on the taxi ranks within the core terminal area of the airport. A bridge will then take traffic from the new junction over Airport Way and along the new access road, passing between the Holiday Inn hotel and the commercial building on the Eden Farms site.

32. A number of new junctions are proposed on the dual carriageway, the first would be close to the current location of Provost Way, providing access to the GKN site and linking to Percival Way. The next junction at Frank Lester Way would be upgraded from a mini-roundabout to a signalised junction (with Frank Lester Way being closed to private cars, and open to buses and taxis only). The final junction at the end of the proposed dual carriageway would be a roundabout, which would provide access to the New Century Park business park to the south (as well as the long term car parking), with a link to the north connecting to Eaton Green Road.

33. The new access road will necessitate the demolition of 15 commercial buildings (approximately 16,500sqm GIA), with a number of the buildings being located within the existing airport including the airport operator's (LLAOL) Technical Services Building (Hangar 24). The Technical Services Building is proposed to be relocated to the north of the Tidy Tip and is included within the detailed element of the planning application. The building would provide 2,950sqm of replacement floorspace and would be circa 75m in length, 25m in width and 10.5m high to ridge level (8m to eaves). The building would have three bays for the service, repair and maintenance of airport vehicles and would contain stores, workshops, offices, meeting rooms, etc. currently housed in Hangar 24.

34. In addition to the loss of the commercial buildings, the alignment of the proposed access road would impact upon existing car parking provision. The Car Parking Strategy submitted as part of the application identifies around 3,200 parking spaces within the area through which the New Century Park access road passes. Approximately 40% of the existing spaces would be lost as a consequence of the development (1,281 spaces). The planning application makes provision for the relocation of spaces on a temporary basis, so as not to adversely impact upon the operation of the businesses at the airport. The realignment of parking spaces and re-provision of parking results in an overall increase of 254 spaces compared to the existing situation.

35. Along the route of the access road the construction works will not only result in impacts upon car parking, but there will also be impacts on trees and landscaping. Consequently as part of the detailed application there are a series of landscape Masterplans which provide details of retaining walls, embankments, planting and retention of trees. The overall

approach is to enhance and re-provide the landscaping along the route of the New Century Park access road.

36. The final element of the detailed application is within the existing Wigmore Valley Park and also land within the area of the Century Park employment allocation – both of these parcels of land fall within the area that is covered by the London Luton Airport strategic allocation in the Local Plan. Since the New Century Park business park is proposed on land currently forming part of Wigmore Valley Park, the detailed plans make provision for replacement public open space within the area allocated for employment purposes.

37. The detailed plans include renovation and alteration to the existing Wigmore Pavilion building, with alterations to provide a new front entrance, the provision of a café with glazed doors to provide indoor and outdoor seating areas. Children's play areas will be provided to the south and east of the café, with aviation themed play equipment. To the west of the Pavilion Building and visitors' car park, a new skate park is proposed.

38. With the loss of part of Wigmore Valley Park to the New Century Park business park, much of which is the area of landfill and the area formerly used as sports pitches, it is proposed to create a new area of public open space, on the area that was allocated for employment provision. The northern element of Wigmore Valley Park, closest to Eaton Green Road and the residential areas of Wigmore would be retained, and this would link via a series of footpaths and greenspaces to the new area of parkland. In total it is proposed to provide just over 40ha of public open space, resulting in an additional 2ha of open space above that already existing.

Outline element of planning application:

39. The earlier section on 'Relevant Planning History' showed that the principle of the development of a business park to the north of the airport has been long established. The quantum of development previously approved was much greater, and the location of the employment site was not the same, however, the Luton Local Plan 2011-2031 now incorporates both Wigmore Valley Park and Century Park within the area defined as the London Luton Airport strategic allocation. The outline element of the planning application therefore seeks approval of the principle of the business park, with the reconfiguration of land uses within this overall allocation.

40. All matters in the outline element of the application have been reserved, namely: appearance; means of access within the business park; layout; scale; and landscaping. The application drawings do include parameter plans that depict the use of different areas within the business park

together with the range of heights proposed for buildings within those areas.

41. The outline proposals provide for the following breakdown of floorspace and uses:

i. 29,400sqm B1(a) office floorspace (located in the centre and eastern side of the business park – referred to as the 'Office Quarter' on the Masterplan),
ii. 13,000sqm flexible office/industrial floorspace (B1/B2/B8 located at the eastern side of the business park – referred to as the 'Hybrid/Industrial Quarter'),
iii. 11,700sqm B2 general industrial and B8 storage (located at the western side of the business park – referred to as the 'Light Industrial Quarter'),
iv. 685sqm of sui generis use comprising two buildings, one an energy centre and the other a recycling centre (located in the centre of the business park),
v. 7,200sqm (145 bedroom) hotel (located to the south of the Technical Service Building) and
vi. 225sqm ancillary retail (a café is shown in the centre of the business park).

42. The plans show that these buildings will range from being single storey (the café), two storey (the buildings on the western and eastern sides of the business park), four storey (the office buildings) to five storey (the hotel).

43. The indicative plan of the internal access roads and associated car parking, together with pedestrian and cyclist access within the business park are shown on the Masterplan, whilst full details will be provided when the reserved matters are submitted. The earthworks and landscaping works associated with the business park are also reserved for later determination.

Planning Policy

National Planning Policy Framework (NPPF)

44. The National Planning Policy Framework (NPPF) was first published in March 2012 and was the relevant national policy at the time the planning application was prepared and submitted. During the period of determination of this application the Government published a revised version of the NPPF in July 2018, and more recently a replacement NPPF was published in February 2019. The latest version of the NPPF does not

materially differ from the previous versions in relation to matters of policy that are relevant to the determination of this application.

45. The NPPF is a material consideration in planning decisions (paragraph 2). The 2019 NPPF provides guidance as to how the government's planning policies are expected to be applied.

46. The NPPF states that "the purpose of the planning system is to contribute to the achievement of sustainable development" (paragraph 7), noting that to achieve this the planning system has three overarching objectives which are: economic, social and environmental (paragraph 8).

47. The "presumption in favour of sustainable development" remains at the heart of the NPPF (paragraph 10). In applying the presumption in favour of sustainable development, plan-making should "positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change" (paragraph 11[a]), whilst decision-taking should approve "development proposals that accord with an up-to-date development plan without delay" (paragraph 11[c]).

48. Paragraph 11 of the NPPF sets out that for the decision maker "plans and decisions should apply a presumption in favour of sustainable development." For the decision taker, this means:

"c) approving development proposals that accord with an up-to-date development plan without delay, or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
   i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed, or
   ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

49. Paragraph 38 of the NPPF advises that Local Planning Authorities should approach decision taking in a positive and creative way and should work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. The paragraph further states that decision-makers at every level should seek to approve applications for sustainable development where possible.

50. Paragraph 47 confirms that “planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.”

51. Paragraph 54 of the NPPF indicates that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations.

52. Paragraph 80 records that planning decisions should help create the conditions in which businesses can invest, expand and adapt, stating that “significant weight should be placed on the need to support economic growth and productivity.” Whilst paragraph 82 notes that provision should address specific locational requirements of different sectors.

53. The NPPF records that planning policies should support the role that town centres play at the heart of local communities (paragraph 85) and that local planning authorities should apply a sequential test to planning applications for main town centre uses (such as offices) which are neither in an existing centre nor in accordance with an up-to-date plan (paragraph 86).

54. Planning decisions should aim to achieve “healthy, inclusive and safe places” which amongst other things promote social interaction and enable and support healthy lifestyles (paragraph 91). Whilst paragraph 92 addresses the need to provide the social, recreational and cultural facilities and services the community needs.

55. Paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields should not be built on unless, amongst other things, “the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.”

56. Chapter 9 of the NPPF promotes sustainable transport, with paragraph 103 noting that significant development should be focused on locations which are or can be made sustainable. Paragraph 109 states that “development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

57. Local planning authorities are encouraged to “take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs” (paragraph 119)

58. Chapter 12 addresses the need to achieve well-designed places, whilst chapter 14 considers the challenge of planning for climate change as well as flood risk.

59. Chapter 15 focuses on conserving and enhancing the natural environment. Paragraph 170 requires planning decisions to contribute to and enhance the natural environment by, inter alia, protecting and enhancing valued landscapes in a manner commensurate with their statutory status; preventing new development from contributing to unacceptable risk; and remediating and mitigating despoiled and contaminated land where appropriate. Paragraph 175 notes that if significant harm to biodiversity resulting from a development cannot be avoided, mitigated or adequately compensated, then planning permission should be refused. Whilst if a site has risks associated with contamination, planning decisions should ensure that adequate site investigation is prepared and suitable remediation secured (paragraph 178). Likewise planning decisions should mitigate and reduce to a minimum potential adverse impacts resulting from noise (paragraph 180) and steps to mitigate impacts on air quality should be identified (paragraph 181)

60. Conserving and enhancing the historic environment is addressed in chapter 16 of the NPPF, requiring planning applications that may affect any heritage asset to describe its significance (paragraph 189), whilst the local planning authority should take into account the impact of the proposal on a heritage asset to avoid or minimise conflict with its conservation (paragraph 190). The NPPF states that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of the heritage asset, the positive contribution the conservation of the asset can make to sustainable communities and the desirability of new development to make a positive contribution to local character (paragraph 192).

61. Great weight should be given to the asset's conservation when considering the impact of the proposed development on its significance (paragraph 193), with any harm, or loss of significance being given clear and convincing justification (paragraph 194). Where development will lead to substantial harm to a designated heritage asset, consent should normally be refused (paragraph 195). Where the harm is less than substantial, the harm should be weighed against the public benefits of the proposal (paragraph 196).

National Planning Practice Guidance

62. National Planning Practice Guidance (NPPG) has been published in support of the NPPF.

The Local Plan

63. The promotion of employment in the borough is one of the primary aims of the Council and this has consistently been reflected in the adopted local plans. The North East Luton Local Plan (adopted in January 1988) established that the only major area that was suitable and could contribute to the need for further employment development was the Wigmore Employment Area, to the south of Eaton Green Road. The need for the Wigmore Employment Area was subsequently repeated in the Borough of Luton Local Plan (adopted 1997) which saw it as a fundamental means of meeting Luton's employment needs, and in the Luton Local Plan 2001-2011 (adopted 2006) and the current development plan, the Luton Local Plan 2011-2031 (adopted November 2017).

Luton Local Plan 2011-2031

64. Since the application site covers such a large area there are quite a number of allocations on the proposals map that are relevant. Part of the site through which the access road passes (both to the west and north of the airport) is a Category A Employment Area. On the western side of the airport, adjacent to the areas of parking by Vauxhall Way is an area designated as a District Wildlife Site (Dairyborn Scarp). Much of the rest of the site is covered by the London Luton Airport Strategic Allocation. This strategic allocation covers not only the operational airport, but also some of the commercial buildings on Percival Way, Century Park (Category A Employment Area) and Wigmore Valley Park (a District Park). There are further designations within the area of Wigmore Valley Park, including a County Wildlife Site, and an Area of Local Landscape Value, whilst the access to the Strategic Allocation is also indicated on the western periphery of the park. The outer edge of the Public Safety Zone clips the southern end of Century Park.

65. The policies from the adopted Luton Local Plan that are applicable to this application are: LLP1, LLP2, LLP3, LLP6, LLP13, LLP14, LLP25, LLP27, LLP28, LLP29, LLP30, LLP31, LLP32, LLP34, LLP36, LLP37, LLP38 and LLP39.

66. Policy LLP1 sets out a presumption in favour of sustainable development focusing the majority of development over the plan period on eight strategic locations set out in the Spatial Development Strategy. One of the eight locations identified in the Spatial Development Strategy (Policy LLP2) is the area covered by the London Luton Airport strategic allocation. Policy LLP3 notes that Luton Town Centre will be the focus for economic growth.

67. Policy LLP6 covers the airport strategic allocation, an area of approximately 325ha including land within the airport boundary, Century Park and Wigmore Valley Park. The allocation does not just serve the airport, but includes growth of business and industry. Sections in this policy include both airport and non-airport related matters:

A. Airport Safeguarding - not permitting development that would adversely affect the operational integrity or safety of the airport;
B. Airport Expansion - assessing proposals for expansion of the airport against policies in the Local Plan as a whole and only supporting proposals for development where they, inter alia, are: directly related to airport use; accord with an up to date Airport Master Plan; incorporate sustainable transportation measures and suitable road access;
C. Airport Related Car Parking – should be within the strategic allocation (excluding Century Park and Wigmore Valley Park); meet an objectively assessed need; does not adversely affect the adjoining highway network and will not lead to detriment to the surrounding area;
D. Century Park - proposals will be supported where they make provision for office, manufacturing and distribution employment (with particular support for engineering and manufacturing for both aerospace and automobile purposes). Small scale retail and related services to serve the needs of employees as well as a hotel will be permitted. The access was to be via Percival Way and so designed to ensure that no use was made of Eaton Green Road to service Century Park or the airport (except for public transport, cyclists and pedestrians);
E. Wigmore Valley Park - is considered integral to the strategic allocation in delivering development and access to Century Park, including any reconfiguration of land uses that may be necessary. The policy seeks to maintain the scale and quality of open space; enhance bio-diversity; provide new open space to replace Wigmore Valley Park offering facilities of at least equal quality (before development of the existing park takes place) and ensure the long term management is compatible with safe airport operations;
F. Design and Drainage at Century Park - design proposals to provide appropriate strategic landscaping; height of buildings to reflect the site's rural fringe; provide for sustainable drainage and fully assess the impacts upon heritage assets.

68. Policy LLP13 covers the Local Planning Authority's economic strategy, whilst policy LLP14 seeks to protect the Category A employment areas, resisting the loss of floorspace associated with B1, B2 and B8 uses in these areas.

69. Policy LLP25 requires buildings and spaces to be of a high quality design, with distinctive character and easily accessible. Proposals will need to demonstrate adherence to the best practice principles of urban design to

create quality places in the borough. The policy sets out a number of criteria, which essentially seek to enhance the distinctiveness and character of the area, create or enhance attractive safe, accessible and active open public spaces by creatively using hard and soft landscaping; and optimise and improve accessibility to walking and cycling and connections to public transport.

70. Policy LLP27 provides support for proposals that safeguard and enhance existing networks of open space and establish new green infrastructure. Losses of open space will be permitted where replacement open space of an equivalent type, quantity and quality can be provided or the proposal is for alternative sports or recreational provision where the need clearly outweighs the loss.

71. Policy LLP28 considers biodiversity and nature conservation, and requires that development proposals that impact adversely on statutory or other designated sites, and ecological networks, will need to demonstrate that they have complied with sequential criteria, namely:

- avoidance, wherever possible, otherwise:
- the benefits of the proposal must clearly outweigh the intrinsic nature conservation interest;
- mitigation must be used (including retention, protection and enhancement); and
- compensation through acquisition and management of an alternative habitat of equivalent wildlife value in the vicinity.

72. Policy LLPP28D explains that where there is a reasonable likelihood of a development proposal having an adverse effect of habitats or species of biodiversity interest an ecological assessment will be required.

73. Policy LLP29 addresses Landscape and Geological Conservation. The Policy is underpinned by the premises that “Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas.” There are two tiers in the hierarchy, notably: national landscapes such as the Area of Outstanding Natural Beauty (AONB) (Tier 1); and local landscape areas including the more important Areas of Great Landscape Value, and as is the case for part of the application site the Areas of Local Landscape Valley notably Wigmore Rural (Tier 2).

74. Policy LLP30 seeks to protect, conserve and enhance Luton’s heritage, requiring development to take account of the character, setting and local distinctiveness of affected heritage assets, including registered parks and gardens at Luton Hoo, listed buildings, the scheduled monument at Someries Castle and archaeological heritage. Development proposals will

be supported where they conserve heritage assets, whilst any harm to a heritage asset will require clear and convincing justification. Proposals affecting heritage assets will have to be supported by a Heritage Statement and where there is potential for the site to include archaeological interest an appropriate desk based assessment should accompany the application.

75. The Council's sustainable transport strategy is covered by policy LLP31, which states that planning permission will be granted for developments that, inter alia, minimise the need to travel and reduce road congestion. LLP31D supports the continued economic success of London Luton Airport with measures to ensure capacity at strategically important junctions and the continued enhancement of sustainable modes of transport to the airport. LLP31E recognises the need for a number of strategic infrastructure schemes and safeguards land for this purpose, including the access road to link Century Park to the wider transport network. The management of parking provision within Luton is addressed in policy LLP32, noting that parking provision should not exceed the maximum standards set out in Appendix 2 of the Local Plan.

76. The risk and impact of flooding is addressed in Policy LLP36, whilst policy LLP37 sets out to support development which contributes to the mitigation of climate change and carbon and waste reduction.

77. Policy LLP38 covers pollution and contamination, requiring development proposals to provide for: the satisfactory disposal of surface water; and assess contamination risks and provide remediation measures as appropriate.

78. Policy LLP39 sets out the expectation of the Local Planning Authority regarding infrastructure and developer contributions to support development. The policy states that proposals should provide or adequately contribute towards the infrastructure and services needed to support them.

Consultation Responses

79. Affinity Water: noted that the site is located close to or within the Environment Agency defined Groundwater Source Protection Zone and that the construction works may exacerbate any existing pollution. They therefore recommended conditions covering: the identification of contamination; piling risk assessment; and interceptors where infiltrative drainage is proposed.

80. Archaeologist: considered that there was insufficient information with the original application to allow the Archaeology Team to provide comments

on the impact of the development proposals on the known and potential archaeological resource of the application area. Consequently the application does not currently comply with the NPPF, policies LLP6E(iv) and LLP30D of the Local Plan.

The Archaeology Team provided comments following the receipt of further information, noting that in subsequent discussions with the Local Planning Authority and the applicant's archaeological consultant it became apparent that trial trenching could not be undertaken before the determination of the planning application because of the requirement to maintain public access to Wigmore Valley Park. The Archaeology Team accept that a trial trench evaluation could be delayed post decision and the application could be determined on the basis of the Environmental Statement and Geophysical Survey Report.

The Archaeology Team comment on the impact upon the Scheduled Monument at Someries Castle and state that "given the topographical location of Someries Castle and the distance between it and the proposed development … any impact would be very limited and certainly amount to far less than substantial harm to the significance of Someries Castle Scheduled Monument (paragraph 195 of NPPF). Therefore, there is no objection to the application on the grounds of the impact of the proposed development on the setting of the designated heritage asset at Someries Castle."

The Archaeology Team also comment upon the WWII Airfield Battle HQ on the northern edge of the application site, noting that there will be a slight adverse impact upon its setting given that it will be separated from the airfield by the development. They accept the mitigation measures, protecting the structure and providing interpretive material, but consider that a more positive approach to managing the structure is required. These management proposals should be secured through the implementation of an approved scheme of heritage asset resource management.

With regard to archaeological assets, the geophysical survey identified the partial extent of a substantial Roman building and associated settlement. The Archaeology Team commented that overall the development would result in creating a better environment for the protection of the Roman building heritage asset and that any impact on archaeological deposits could be satisfactorily mitigated through an appropriate programme of archaeological monitoring with investigation and recording as necessary – secured through the implementation of an approved scheme of heritage asset resource management.

In relation to the western part of the site which has the potential to contain archaeological deposits, the Archaeology Team suggested that mitigation could be achieved through a programme of archaeological monitoring, with a programme of archaeological investigation in advance (trial trenching to identify and characterise the archaeological remains present followed by further substantive investigation if the initial results require). Consequently, the Archaeological team recommend that a planning condition be attached to any permission.

81. Bedfordshire Fire and Rescue: Suggest that a condition should be subject to the Council's CCTV system being extended to the development and a management plan being approved to ensure appropriate monitoring. Also recommend a condition to cover measures for car parks and open spaces to prevent illegal encampments.

82. Campaign for the Protection of Rural England: any response received will be reported at the Meeting.

83. Central Beds DC: have responded and raise no objection to the proposal.

84. Chamber of Commerce: any response received will be reported at the Meeting.

85. Chiltern Conservation Board (CCB): submitted identical representations to the original application and the further information which were part holding objection and part comments. The response noted that the land to the east of Luton (in North Herts) is highly valued and recorded in the Herts Landscape Character Study as LCA212 and in 2013 CCB proposed a boundary change to Natural England to include the land within the Area of Outstanding Natural Beauty (AONB).

CCB note that they have made representations to two applications for residential development in North Herts in relation to their harm to the AONB and the potential boundary change as well as representations to North Herts Local Plan and consider that this application should not be determined prior to the Inspector ruling on the soundness of that plan. CCB consider that 1) the cumulative impact with these developments and the impact upon the submitted Transport Assessment should be considered. 2) Assurances that mechanisms will be in place to control the impacts of traffic from the airport and to protect the Chilterns cycleway. 3) Until these things are resolved it is not possible to assess the full impacts of the development.

CCB considered that the cumulative effects of the North Herts developments in terms of their implications for transport and landscape designation should be taken into account and that the development should

not promote vehicular generation to the east that would diminish the tranquillity and qualities of the prospective extension to the AONB.

Additionally CCB note that careful consideration should be given to lighting details to limit the potential for light pollution.

86. EDF Energy: any response received will be reported at the Meeting.

87. Environment Agency: The Environment Agency comment that the information presented in Appendix GCC of the Environmental Statement report (GL Hearn Ltd, December 2017) including the document Century Park Development, Airport Way – Landfill Area, Contamination Quantitative Risk Assessment (Ove Arup and Partners, 21 September 2017) submitted in support of this planning application provides them with confidence that it will be possible to suitably manage the risk posed to controlled waters by this proposed development.

The Environment Agency note that preliminary environmental site assessment works have been completed across the proposed development site, however further detailed environmental assessment works will be required to refine the conceptual site model such that robust risk management / remediation strategies can be developed for the entirety of the proposed development. It is the Environment Agency's opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the Local Planning Authority.

In light of the above, the Environment Agency consider that the proposed development will be acceptable subject to a number of planning conditions being imposed, noting that without these conditions the Environment Agency would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it could not be guaranteed that the development would not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

88. Fire Safety Officer: any response received will be reported at the Meeting.

89. Friends of the Earth: provided a number of detailed responses to the consultation. In response to the initial consultation in January 2018 FoE commented that although over 180 documents were provided with the application there was not a detailed report to the Environment Agency to address the concerns raised in relation to potential groundwater contamination from the landfill site. FoE considered it unacceptable to submit an outline application covering development over landfill. FoE

wished to receive confirmation that Wigmore Valley Park was gifted to the people of Luton when the Wigmore estate was created in the 1980s.

FoE assumed that the Country Wildlife Site would be sacrosanct and would not be sacrificed to a surface car park when other sites were available and a multi-storey car park would take less land.

It was considered that the proposal conflicts with the Local Plan in that it involves the loss of a large number of trees, creates a new road into Wigmore Valley Park, removes an attractive and convenient area of park nearest to the residential areas and is full of flaws in the traffic flow assumptions. The new road and access to Eaton Green Road, together with a continued increase in airport traffic, would combine to make the current levels of congestion worse.

A request was made to extend the consultation from four weeks to six weeks and it was considered that the application was of such a major scale and had effects beyond the borough boundary that the proposal should be called in by the Secretary of State.

The second representation was in two parts, the first provided an objection to the planning application with the second part of the objection referring to the 'secret intentions.'

The objections can be summarised as follows: 1) Loss of Wigmore Valley Park which was provided for the people of Wigmore and is a vital community asset, with nothing in the Local Plan supporting its redevelopment; 2) Luton is over developed and green space provision is below people's needs; 3) The development on Wigmore Valley Park would reduce the quality of open space and landscaping and is therefore contrary to policies LLP6E and LLP29; 4) The development is speculative and would result in the loss of much of the County Wildlife Site (CWS) and adversely impact the Area of Local Landscape Value (ALLV); 5) The proposal would result in the loss of over 2ha of trees which form a barrier to noise and air pollution from the area; 6) the replacement park would be further from residential areas and not as attractive as the existing Wigmore Valley Park; 7) the new link road to Eaton Green Road would generate more traffic, increase noise and create danger and is contrary to policy LLP6D; 8) the roads in the area are already congested due to airport expansion and the proposal would result in increased congestion and gridlock; 9) the proposal will result in increased air pollution which is already a problem in the area surrounding the airport; 10) surface level parking should not be provided in the CWS and multi-storey car parks could be located elsewhere; 11) building offices over landfill could cause contamination of the groundwater, result in release of gasses, lead to subsidence of buildings, and adversely affect people's health; 12) the

development will increase the impact of climate change; 13) the new access road seems far bigger than is needed for the business park and should be fully justified; 14) The new café, toilets, playground and skate park are welcomed but should have been funded without the proposed development; and 15) no development should take place on the public park, but if development is to occur than it should be on the Century Park site that already has planning permission.

In relation to the second part of the objection, FoE state that there is no explanation as to why the area with planning permission for Century Park has been dropped, nor why a dual carriageway is needed for a few offices. FoE are concerned that because the application is in outline a road that was shown previously could reappear and provide a link to the residential development in North Herts.

Following the re-consultation after the receipt of further information, FoE raised a number of points, notably: a) the Council has a moral and legal duty of care to act on behalf of its residents and it has acted undemocratically in issuing a licence to LLAL; b) the New Century Park application is the first stage in a bigger expansion of the airport which relies on the new access road (reference to the consultation on the Development Consent Order that ended in August 2018); c) the further information submitted ignores 400 letters of objection, two petitions and “a damning internal report which amounts to a recommendation for refusal”; d) recommends that the application should be refused as it proposes inappropriate development on a valuable community asset that does not comply with key relevant policies in the Local Plan.

The further representations repeat the concerns re: climate change; air pollution; as well as reiterating points in relation to conflicts with policy (the loss of the CWS, ALLV, public park, location of the business park, link to Eaton Green Road and potential pollution from building on landfill). In addition FoE consider there to be a conflict of interest (with the Council owning LLAL and determining the application), misuse of public finances (with consultants drawing up this application and working on the DCO), misrepresentation (considering this to be the first stage for airport expansion and believing the claims about benefits to the local economy to be false) and lack of democracy.

90. Health and Safety Executive: raise no objection to the planning application.

91. Hertfordshire County Council: any response received will be reported at the Meeting.

92. Historic England: in relation to the initial consultation Historic England noted that although the tallest buildings would be on the far side of the airport from Someries Castle and Luton Hoo, since there did not appear to be any photomontages, the Local Planning Authority should be satisfied that it has sufficient information to be confident about any potential impacts.

In relation to the construction of the development (including the business park and the access road and junction), Historic England considered that it will result in some harm to the significance of Luton Hoo and Someries Castle and the introduction of further development at the airport would further erode the historic landscape setting of these heritage assets. Any harm should be weighed against the public benefits and if the Local Planning Authority is minded to grant permission this should be conditional upon the continued management of any mitigating landscaping. Consequently Historic England were concerned that the application would result in some harm during the construction phase and considered that the issues above needed to be addressed in order for the application to meet the requirements of the NPPF.

The further information pursuant to the Regulation 22 request provided viewpoints identifying the existing airport development and the extent of the New Century Park development. Historic England responded that the additional assessments have helped to further understand the potential impact and that "there is some potential, and particularly the hotel building, to be visible from areas of the parkland at Luton Hoo and the wider setting of Someries Castle. We acknowledge this would be in the context of the existing airport development but it would exacerbate the impact of this resulting in some harm to the significance of these sites."

Historic England again conclude that the harm should be weighed against the public benefits the proposal would deliver in line with the NPPF and recommend that if the Local Planning Authority is minded to grant consent, this should be conditional upon the approval of, and the continued management, of any mitigating landscaping and further details.

93. Highways England: a number of holding requests were received from Highways England in order to provide them and their consultants with the opportunity to review the Transport Assessment.

Highways England's initial comments were provided in the form of two technical notes from their consultants Aecom in April 2018 in relation to the original submission. Following the consultation on the further information pursuant to the Regulation 22 request, additional comments were received in November 2018 (two further technical notes).

In March 2019 Highway's England withdrew their holding objection and confirmed that they had no objection subject to the imposition of two planning conditions.

94. Kings Walden Parish Council: any response received will be reported at the Meeting.

95. LBC Drainage: raised an objection to the initial proposals due to lack of sufficient information, seeking clarification on the changes to existing overland flow routes to the River Mimram and greenfield runoff rates and recommended that storage calculations in the Drainage Strategy be reappraised. Following the receipt of further information the Drainage team consider the strategy to be acceptable in principle subject to the provision of appropriate attenuation systems (including oversize pipes within the perimeter of the carriageway, underground attenuation storage, green SuDS within the New Century Park business park). The development is considered acceptable subject to planning conditions.

96. LBC Ecology: The Council's ecologist commented that the airport battlefield HQ was once used as a bat hibernaculum and it would be beneficial for it to be reinstated to this purpose as part of any mitigation proposals.

The south-east corner of Wigmore Valley Park CWS should be left in its current condition apart from the grassed areas that do require maintenance. Existing and new calcareous and neutral grassland are unlikely to be of CWS status and off-site mitigation is preferred. The potential new site of special scientific interest at Dallow Downs would be an appropriate location for grassland mitigation.

The Dairyborn Scarp DWS contains a fragment of ancient woodland. Substantial mitigation for its loss should be provided in a location away from the airport, potentially at Stopsley Common.

In summary, one or more detailed management plans are required, covering:

- Retained habitats
- New habitats created in the new park
- Landscaping along the access road
- Offsite mitigation

97. LBC Economic Development: any response received will be reported at the Meeting.

98. LBC Environmental Protection Unit (EPU): Recommended that conditions should be attached to mitigate impacts in the locality from the

development. In the construction phase the impacts in terms of noise and air quality could be mitigated through a Construction Environmental Management and a condition is recommended.

EPU comment that noise, air quality and land contamination for the operational phase are also addressed in the Environmental Statement. In relation to noise the Environmental Statement concludes that limits can be set for mechanical plant and equipment, consequently a condition is recommended. In relation to contamination EPU concur with the conclusion in the Quantitative Risk Assessment, submitted as part of the application, that more work is required to fully delineate the extent and type of contamination. The Environment Agency recommend conditions to secure this additional work, remediation and subsequent validation and EPU are satisfied with this approach since it will protect not only the water environment but also human health.

With regard to air quality EPU comment that the air quality assessment submitted with the application included predictions in relation to NO2, PM10 and PM2.5 levels in the locality. The report concludes that for PM10 and PM2.5 concentrations are predicted to be well below the annual mean objectives at all receptors with or without the development. Additionally, the annual mean PM10 concentrations are predicted to be below 32 $\mu g/m^3$ concluding that the 24 hour mean PM10 objective will not be exceeded at any of the receptors.

For NO2, the conclusions are that whilst there will be an increase in concentrations at the majority of receptors (with concentration changes in the order of 0-2%) it is predicted that there will be no breach of the objective at the receptors. Despite these conclusions, the air quality assessment recommends that mitigation by design measures should be included as suggested in the Environmental Statement. Accordingly EPU have proposed an appropriate planning condition.

99. LBC Fixed Assets: any response received will be reported at the Meeting.

100. LBC Heritage: comment that whilst there are no heritage assets within the site, there are various assets nearby, including the Grade II* registered park and garden at Luton Hoo, the Grade I Luton Hoo mansion itself, and a number of Grade II listed buildings (the closest being Wigmore Hall Farmhouse). Whilst the development is generally reasonably low key, the proposed 4-5 storey hotel building will need to be carefully considered – noting that at this stage it is in outline form and the visual impact assessment does not appear to adequately address the implications of this element of the development.

The Heritage Assessment suggests that the proposals will have a minor adverse impact upon the Grade II* registered park and garden at Luton Hoo and also be slightly visible from Someries Castle, particularly during the construction phase. The construction of the access road and particularly the bridge, is likely to be visible and have a minor adverse visual impact. This will result in 'less than substantial harm' in NPPF terms to the heritage assets and should be weighed against the public benefit of the proposal.

The Local Planning Authority should ensure the public benefit would outweigh any harm if a decision is made to grant consent. A condition requiring landscaping to be made good and maintained is recommended.

101. LBC Highways: The Council's Highways Engineer comments that since the formal submission of revised document in August 2018, the Highway Authority has been in further discussion with the applicant in relation to a number of unresolved issues with the Transport Assessment. The majority of those issues were of a technical nature related to the modelling undertaken and reflect similar concerns raised by Highways England. The discussions have resulted in agreement between the Highway Authority and the applicant with a number of the outstanding issues being resolved. Other issues can be resolved through the use of planning conditions.

The Highways Engineer comments that if the proposed link to Eaton Green Road is provided in advance of the New Century Park access road being completed then there would be disbenefits for the adjoining highway network and residential areas. The same approach was taken as Highways England in relation to the delivery of the New Century Park access road, noting that if it was not fully operational before the later phases of the development were occupied, there would be adverse impacts on the surrounding highway network.

Since the status of the proposed access road will be public highway following completion and given that there are off-site junction improvements required, the Highways Engineer commented that it was likely that there would need to be a Section 38/278 agreement under the Highways Act. Additional the Highways Engineer commented that these junction improvements should be delivered ahead of later phases of the development.

It was noted that there are a significant number of structures associated with the proposed access road where only general arrangements have been provided. As a consequence, any grant of planning permission should be conditional upon the submission and approval of full details of all structures.

Finally, given the constrained nature of the application site, construction works will inevitably have an impact on the surrounding public highway, therefore any grant of permission should be conditional upon the submission and approval of a construction method statement prior to works commencing. The statement should also make provision for a dilapidation survey of the roads and footways adjoining the site to be carried out prior to any works, with the applicant responsible for repairing or meeting the costs of repairing any defect identified that is a result of the construction works.

102. LBC Parks Manager: The proposals for improvements to the recreational provision at Wigmore Valley Park are welcome as for many years local people have requested improvements particularly to the play provision at the site.

The refurbishment of the existing pavilion building with the addition of a café and toilet facilities is also welcome as this will improve the visitor experience and provide a measure of supervision not currently enjoyed at the site.

In order to ensure the future sustainability of the park consideration should be given to how future management and maintenance of the park will be financed. An appropriate agreement should be in place in this respect.

There is a significant loss of trees across the development area and although there are also new trees proposed for re-provision within the landscaping proposals. I am aware from my experience of managing the site that the airport operator LLOLL seeks to ensure that any landscaping proposals do not increase the risk of 'bird strike'.

I would suggest therefore that any landscaping proposals for the site should include the minimum quantity of trees required to frame the open spaces and that mitigation for loss of trees be through off-site provision at other areas of parkland in the borough. A sum of £35k is required to enable tree planting at other district parks across the town.

The loss of areas of County Wildlife Site is of concern and as the mosaic of habitats is unlikely to be replicated in the short term on the replacement area of open space proposed in the agricultural area - it would seem reasonable that some form of mitigation should be sought for loss of habitat.

The council's ecologist will be able to advice on the most appropriate form of compensation in this respect.

The site has, in the past suffered greatly from unauthorised encampments and associated fly-tipping. I would request that site security is given consideration within the proposal.

103. LBC Public Health: The proposed community centre and cafes have a potentially positive impact on public health through providing meeting space and community activities; potentially enhancing social capital and community involvement. Further positive effects on public health could be seen if the café offers a range of health eating options.

New public open space is being proposed in the plans, with an overall slight increase in open space available. Depending on how this public space is used this should have a positive impact.

The proposed play areas and skate park would also have a positive impact on wellbeing of young people through providing a space for social connection and interaction as well as opportunities for physical activity and enhancing healthy lifestyle.

Some potentially negative impacts on air quality have been identified in the assessment completed with the planning application. Mitigations have been proposed which should be followed to limit impact on public health.

A sustainable waste management plan is proposed which is positive.

Some potential public health risks have been identified through contamination, as the proposed development is on filled landfill. Recommendations have been made regarding this, including further investigations. These should be followed to obtain as much information around these risks as possible.

The economic impact has been assessed to be positive overall, which would have a positive impact on health and wellbeing for those affected. However there has been no assessment on the population groups this would affect and the impact on inequalities.

A draft framework travel plan has been provided, this development will be accessible by public transport, pedestrian and cycle accessibility will be feasible and is recognised as being vital in improving sustainability. Recommends that travel behaviour should be monitored annually.

104. LBC Strategic Planning: Comments were provided in relation to the initial consultation with revised comments being received following the receipt of further information pursuant to the Regulation 22 request. Strategic Planning noted that the Local Plan envisaged that Century Park would support 1,882 jobs, whilst the proposal provides for 3,201 jobs, with only

15 jobs indicated as being lost due to demolition. Strategic Planning considered that the transport modelling would need to be re-run to identify wider impacts.

Given that the majority of accommodation is proposed to be for hi-tech office use, Strategic Planning considered that this may undermine Butterfield Green Technology Park which has yet to be built out and that the impacts should be identified.

In relation to Playing Pitches, Strategic Planning recognised that the loss of playing fields was addressed and that an agreement to fund off-site enhancements in line with policy LLP24 has been reached with Sport England. A comment was made that given the high intensity of the proposed B1 elements of the development and the generous landscaping proposed there could be scope to provide some formal sports/recreation facilities to serve employees as well as the wider community.

The application proposes an additional 2ha of open space provision, though this needs to be shown clearly on additional plans, detailing the extent of current and future open space. Policy LLP27 is relevant in relation to loss of open space and alternative re-provision.

Part E of policy LLP6 states that the development of Century Park should maintain the scale and quality of open space, if not result in net gains. Considering the overall deficiency of open space across the borough, the new provision through this development would constitute a significant part of the overall supply. It is therefore reasonable to ensure that a high quality and sustainable district level park facility is delivered in this location to meet the needs of the community and that could achieve a Green Flag award.

Given that the proposals make provision for a significant amount of car parking justification is needed to demonstrate how the proposals and configuration meet the directions of policy LLP6C. It is understood that parking provision will replace existing long stay car parks for the airport. The applicants should therefore need to demonstrate why the airport's parking requirements cannot be met elsewhere, in-line with the directions of local planning policy.

Part LLP6D directs that no use is to be made of Eaton Green Road to provide access to Century Park except for sustainable travel modes and emergency vehicles. The application does, however, propose access on to this road. This issue is briefly covered by paragraph 320 of the inspector's Report on the Examination of the Luton Local Plan (August 2017), where the need to avoid channelling traffic onto Eaton Green Road justified the need to use Wigmore Valley Park for an access route. If

Eaton Green Road is to be used for access, the applicants should demonstrate why access across Wigmore Valley Park is still required. The significance of this concern is increased by the fact that many more jobs are being proposed than previously expected, which would mean more people accessing the development from Eaton Green Road.

Policy LLP29 explains that development will be supported where it protects, conserves or enhances the character, setting and natural beauty of national and local landscape areas. The development site encompasses the Wigmore Rural Area of Local Landscape Value. The proposed development will undermine the character, setting and natural beauty of this asset and will likely result in the complete loss of this land as an allocated landscape area.

105. LBC Street Services (Trees): any response received will be reported at the Meeting.

106. LBC Waste Management: any response received will be reported at the Meeting.

107. LLAOL Safeguarding: the following concerns were raised in relation to the original consultation: a) the modelling in the Transport Assessment is not sufficient as it considers junctions individually and does not consider the interaction between junctions; b) the Transport Assessment shows that many junction will be operating over capacity and therefore no indication that it will ease pressure; c) the Travel Plan measures will not be sufficient to mitigate the proposals; d) the closure of Percival Way may adversely affect the operation of the airport since it is one of the predominant approaches to the airport and its car parks; e) little assessment of the impact of the cumulative effect of the DART project and this application on the operation of the airport; f) insufficient details provided as to how the relocated car hire centre would impact traffic flow in the core terminal area; g) the proposed replacement car parking requires additional information on pedestrian access and phasing of provision; h) further information required in relation to proposed mitigation for loss of habitats to ensure that hazard risks are not increased; and i) additional information should be provided to demonstrate that airport operations are safeguarded during construction.

In response to the further consultation, LLAOL confirmed they were satisfied that 1) the proposed lighting and building design met their requirements; 2) the principles behind the landscaping were discussed with no permanent water bodies proposed, planting schemes to take into account the need to discoursing roosting and flocking birds; and 3) the development does not conflict with safeguarding criteria relating to

obstacle limitation surfaces. Consequently LLAOL safeguarding has no objection to the proposed development.

108. National Grid: commented that there was apparatus in the vicinity of the development consisting of low or medium pressure gas pipes and associated equipment. Consequently the developer would need to contact National Grid/Cadent Gas before any works are carried out to ensure the apparatus is not affected by the development.

109. Natural England: raise no objection.

110. North Herts District Council: any response received will be reported at the Meeting.

111. Offley Parish Council: any response received will be reported at the Meeting.

112. Police Architecture: any response received will be reported at the Meeting.

113. Ramblers Association: any response received will be reported at the Meeting.

114. Sport England: provided initial comments in relation to the original proposal with a holding objection to the grant of planning permission since the development would result in the loss of the entire playing field area within Wigmore Valley Park and the supporting changing facilities. They noted that the potential exists to address the objection if playing field mitigation was to be made in the form of a financial contribution towards off-site replacement and recommended further discussion.

Sport England considered the proposal with regard to the specific exception criteria in their Playing Fields Policy and concluded that it has not been demonstrated that there is an excess of playing pitches in the borough (referring to the Council's Playing Pitch Strategy which identified a need to provide additional junior football pitches and cricket pitches to meet current and future need), nor that the replacement park would make provision for formal sports pitches and consequently would not represent equivalent/better replacement.

In their initial response Sport England agreed that the most appropriate form of mitigation would be to make off-site replacement provision in accordance with exception E4 of their Playing Fields Policy. The replacement provision would be in the form of an appropriate financial contribution towards the delivery of one or more project that the Council was to identify, with further discussion required on the level of financial

contribution, the projects that would be promoted and the trigger points for making the financial contributions through a section 106 agreement.

Following further discussion Sport England have confirmed that the information provided in the draft heads of terms for the section 106 agreement address the request for further information set out in their original formal response to the planning application. Consequently, Sport England now advise that the holding objection is withdrawn and that they are in a position to provide a substantive formal response to the planning application. Based on the information provided in the draft heads of terms, Sport England advise that their position will be "no objection subject to various matters being addressed through a Section 106 agreement."

Sport England indicate that the formal response will be provided once they have received a copy of the phasing diagram that is to inform the legal agreement. Any further response will be reported verbally to the Committee.

115. Thames Water Utilities: indicated that the existing foul water network infrastructure cannot accommodate the needs of this development and have consequently recommended the imposition of a planning condition.

116. Three Valleys Water: any response received will be reported at the Meeting.

117. Transco Gas: any response received will be reported at the Meeting.

118. The Wildlife Trust: any response received will be reported at the Meeting.

119. The Woodland Trust: any response received will be reported at the Meeting.

120. Statutory Publicity: On receipt of the original application, 584 neighbours were notified on 9 January 2018, with consultation lasting for six weeks. Following receipt of the further information in response to the Regulation 22 request 975 neighbours were consulted (reflecting the additional numbers that had responded to the first consultation), with the consultation taking place from 24 August 2018 and again allowing six weeks for representations to be received. On both occasions, site notices were displayed in 12 locations in the area where members of the public were likely to see them. The application was also advertised in the local newspaper, when it was first received and in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 the application was again advertised when the further information was submitted. However, the application has recently been advertised again since whilst the initial advertisement mentioned the

requirement under the Town and Country Planning (Development Management Procedure) Order 2015, it was not explicit that the application was being advertised as a major application or a departure from the development plan.

121. Responses were received from the occupiers of 427 separate properties (this includes representations from local residents, residents from further afield, councillors, businesses and their representatives), though there were multiple replies sent in by some respondents. There were 342 objection letters received to the original consultation, together with 16 anonymous responses. To the second consultation there have been 31 objection letters. In addition there have been 92 proforma letters received (together with a further five anonymous proforma letters) and 123 proforma 'tick box' objections (together with four anonymous proforma tick box responses). Two petitions have been received objecting to the development, the first contained 26 signatures from the Friends of Wigmore Valley Park and the second contained 85 signatures. The responses have been tabulated and are included as Appendix 3 (objection letters/emails) and Appendix 4 (petitions and proforma letters) to this report – the names and addresses have been deleted from this public document.

122. The matters raised in the representations from local residents (and those from further afield) can be summarised as follows:

i. The principle of development (including compliance with the local plan policies);
ii. Loss of Wigmore Valley Park, depletion of green space, loss of sports pitches, loss of buffer with the airport and inappropriate location for the re-provided park;
iii. Lack of improved connectivity across the proposed park for walkers, cyclists and horse riders, and existing rights of way not shown on plans;
iv. Loss of County Wildlife Site and impact upon flora and fauna;
v. Adverse impact upon the Area of Local Landscape Value;
vi. Loss of green belt land;
vii. Impact upon heritage assets (including archaeology);
viii. Contamination and risk associated with development over landfill;
ix. Risk of groundwater contamination and impact upon public health;
x. Inability of existing drainage to cope currently;
xi. Risk from unexploded ordnance;
xii. Traffic and transport implications, with new link to Eaton Green Road, closure of Frank Lester Way to private cars, existing congestion and inadequate parking provision;
xiii. Unnecessary provision of employment space given the availability of space elsewhere and loss of existing parking;

xiv. Loss of existing businesses arising from the new access road;
xv. Cumulative effects with other developments (including the proposed residential developments in Cockenhoe and the doubling of the airport capacity);
xvi. Noise and disturbance;
xvii. Impact on visual amenity and overlooking;
xviii. Air quality and odour;
xix. Lack of clarity on the energy recovery centre/incinerator;
xx. Loss of direct access to the tidy tip;
xxi. Inadequate consultation on the proposals;
xxii. Overdevelopment and layout (including large areas of surface parking), impact on the nearby residential properties;
xxiii. The proposal is for airport related development and that sector is the fastest growing source contributing to climate change.

123. There were other matters raised in the representations that are not directly relevant to the local planning authority determining this application, such as comments that the park was gifted to the people of Wigmore; links between LLAL and another company that had been set up with a similar name; the Council loaning money to LLAL; illegal disposal of Wigmore Valley Park to LLAL; loss of view/outlook.

124. In addition to the responses from residents there were a number of responses sent on behalf of businesses, including: the airport operator (LLAOL); TUI, Airport Executive Park and the Holiday Inn. The points raised in those representations can be summarised as follows:

i. LLAOL's initial comments to the planning application raised a number of concerns as it was considered that the development would have a significant adverse impact on the airport's operations and on the broader surrounds. Key areas of concern raised by LLAOL's representatives were: the Transport Assessment analysed junctions in isolation rather than in a co-ordinated way and also noted that many of the junctions will be operating over their capacity when the development is fully occupied; Percival Way was proposed to be closed to through traffic which would have resulted in major operational disruption to the airport; greater clarity needed to be provided in relation to the car hire centre relocation together with the replacement car parks to enable an assessment to be made of the extent of operational disruption; new habitats proposed in Wigmore Valley Park could attract roosting or flocking birds and prove hazardous to the operation of the airport; and construction without adequate safeguards could (in conjunction with the DART project) cause disruption to the operation of the airport.
ii. The representatives of the TUI Group noted that "whilst the principles of the New Century Business Park proposals are supported by TUI

Group, without proper and full consideration and mitigation, the proposed Century Park access road will severely compromise TUI Group operations." TUI Group did not consider that the mitigation measures within the original proposals were adequate and that they fell short of what was required to prevent significant disruption to their operations. The representations provided comments in relation to specific car parks that were referenced in the original Car Parking Strategy, and sought further explanation and assurances in relation to the temporary relocation of parking spaces and required permanent replacement for spaces that were shown as being lost.

iii. The Airport Executive Park is owned by Industrial Property Investment Fund and representations were sent in on their behalf. It was noted that the proposed development was in conflict with the development plan since the proposal results in the loss of part of the County Wildlife Site, the District Wildlife Site, the Area of Local Landscape Value and part of the district park, whilst proposing open space on a designated Category A Employment Area. The representations argued that alternative sites have consistently been advanced which are more suitable with less environmental and highways impacts. Comments were also provided on the Transport Assessment, questioning the methodology and considering the assumptions, since baseline data and modelling of trip generation details were not available. Additionally it was considered that the proposed development would have a significant detrimental impact in highway terms with: the level of construction traffic having not been forecast; a number of junctions operating beyond capacity with significant queuing; and the provision of replacement car parking being for tenants of Airport Executive Park some distance from their premises.

iv. The Holiday Inn hotel is owned by London Luton Hotel BPRA Property Fund LLP and its representatives raised a number of concerns regarding the impact that the proposed New Century Park access road would have on their client's property. It was noted that there were some forty-four bedrooms which face directly towards the new access road which would be less than 10m from the rooms. Concerns were raised about the noise, air quality and visual impact (including from lighting) of the proposed access road, since whilst the hotel is on raised ground above the adjoining property, because of the bridge and embankment for the road, the access road would be significantly elevated, similar to first floor level. The agents were concerned that whilst the Environmental Statement predicted an increase in noise levels there appeared to be no mitigation proposed. The agents also commissioned traffic consultants who raised concerns about the Transport Assessment methodology, the modelling that was used and the infrastructure improvements to mitigate the impact of the proposals on the wider highway network.

125. Within the representations received there were a limited number of comments supporting the provision of some of the enhanced facilities within the park, such as a café, toilets, enhanced playground and skate park, but there were no individual letters of support.

THE ENVIRONMENTAL STATEMENT

126. The Environmental Statement submitted in December 2017 with the original planning application has been updated in August 2018 when the further information in response to the Regulation 22 request was submitted. The Environmental Statement comprises a Non-Technical Summary (NTS), Technical Chapters (Volume 2) and Technical Appendices (Volume 3).

127. The chapters in Volume 2 provides an introduction, a description of the project and alternatives that were considered, potential cumulative effects within the project and with other developments that might proceed in the area and a description of the methodology used to predict impacts. The key impacts upon the environment were then considered in chapters under the following headings:

i. Townscape and visual impact
ii. Traffic and transport
iii. Socio-economic
iv. Ecology and nature conservation
v. Noise and vibration
vi. Air quality
vii. Cultural heritage
viii. Archaeology
ix. Ground conditions and contamination
x. Hydrology
xi. Agricultural and soils

128. The assessment for each subject, both from the original Environmental Statement and the Addendum, is summarised below.

i. Townscape and Visual

129. The Townscape and Visual Impact chapter of the Environmental Statement was supported by technical appendices covering: the methodology used; the assessment viewpoints; the townscape character; the visual impact and landscape mitigation. A Zone of Theoretical Visibility was mapped, indicating the area within which the likely townscape and visual effects could be expected to occur, with a selection of representative views being chosen covering, long range, medium and

local views from which the development could be assessed both during the construction and operation phases.

130. Because of the nature and size of the site, during construction and operation, elements of the development will be seen from different locations. Thus for instance, within Wigmore Valley Park and the commercial estates at the airport, there are roads, paths and a bridleway from which local views will be obtained both during construction and operational phases. Whilst further afield, because of changes in levels, such as the raised levels with the Dairyborn Scarp, there will be views of the development from further afield.

131. The landscape and visual assessment identifies different character areas within the development, such as the Wigmore Rural Area of Local Landscape Character and the Dairyborn Scarp on the western side of the airport. Additionally, the landscape and townscape character areas, both within and surrounding the proposed development, are described and the impact upon these character areas is assessed.

132. The assessment identifies locations from which there are likely to be effects on the visual amenity and views of visitors, residents and motorists during the construction of the development and concludes that, with mitigation, the proposed development will have a minor negative effect during construction.

133. For the operational phased of the development, once the scheme is built and in use, there is considered to be a small negative effect on the character of the area in the early years, though once the planting and landscaping has been established and is mature, the assessment concludes that there is likely to be a small positive effect upon the townscape of the immediate area.

134. In terms of the effects on the visual amenity and views of residents and those using roads and footpaths in the area, the townscape and visual assessment concludes that there will be some negative effects. Some mitigation measures are therefore proposed, including landscaping, woodland and hedgerow planting, in order to reduce the impacts.

135. The chapter also considered the cumulative effects with other major developments that are taking place in the vicinity of the development site and concluded that these would either not be perceived in conjunction with the New Century Park proposals or else would not result in additional effects to those set out in the townscape and visual assessment.

ii. Traffic and Transportation

136. The traffic and transportation chapter of the Environmental Statement assesses the potential impact of the development upon the surrounding highway network. In addition to this chapter a Transport Assessment was provided with the planning application, together with a Parking Strategy and a Framework Travel Plan.

137. The Transport Assessment (and Supplementary Transport Assessment submitted with the further information) considers the existing highway conditions (extracting data from the Council's SATURN model) and the impact of the proposed development upon the transport network (using VISSIM software). The Transport Assessment also considered public transport facilities, including buses, rail and the proposed DART, together with pedestrian and cycle facilities.

138. Conditions on the local road network in the immediate area (including Eaton Green Road, Percival Way, Presidents Way and Frank Lester Way) was assessed, together with junction capacity on those roads. The wider road network was also assessed (including roads such as New Airport Way [A1081], Vauxhall Way [A505], Lower Harpenden Road [B653] and junction 10 of the M1).

139. During the construction phase the traffic and transportation chapter identified impacts from on average 55 daily HGV movements, with traffic predicted to use the A1081 and Vauxhall Way and Percival Way/President Way in order to gain access to the site. In order to minimise adverse impacts during the construction phase the Environmental Statement advocates a Construction Phase Traffic Management Plan.

140. The trip generation arising from the various uses within the New Century Park development has been calculated using the TRICS database, whilst the modelling also includes forecast growth in traffic over the period (including cumulative effects of the airport growth to 18mppa and the introduction of the DART). This indicates that there will be additional traffic generated and consequently the impact upon various existing and modified junctions was assessed. The assessment indicated that a number of junctions would operate with adequate reserve capacity with and without the development, a few would be improved with the development proposed and four would be operating far in excess of their capabilities with or without the development (Eaton Green Road/Wigmore Lane roundabout, Crawley Green Road/Wigmore Lane roundabout, Vauxhall Way/Crawley Green Road roundabout and Vauxhall Way/Hitchin Road/Stopsley Way roundabout). As a consequence the Supplementary Transport Assessment proposed mitigation measures for these junctions.

141. The Environmental Statement advocated further mitigation during the operational phase of the development, this would include an effective

transport strategy (route signage, travel demand management, and measures to encourage use of public transport with Travel Plans for businesses operating within the New Century Park development).

iii. Socio-economic

142. The Socio-economic chapter of the Environmental Statement is supported by two technical appendices, one provides an Economic Impact Assessment and the other considers the existing and proposed open space provisions.

143. The Addendum to the Environmental Statement provided additional information to address comments made in the Regulation 22 request. The chapter provides, inter alia, a breakdown of the existing floorspace and employment on the site that will be affected by demolition in order to accommodate the new access road, cumulative assessment with the Bartlett Square development, and updated information on parks and sports pitch provision.

144. The assessment considered the baseline conditions, using data from the 2011 census since this provides the most up-to-date data. The baseline was established in terms of population and age profile, skills and employment and the open space network. The assessment considered the impact upon people's general health, employment skills levels, existing businesses on site and public facilities within Wigmore Valley Park.

145. The socio-economic assessment considered that during the construction phase there would be both positive and negative effects. The negative impacts included public areas within Wigmore Valley Park being inaccessible during construction, whether areas set aside for archaeological excavation, or areas lost during construction of the access road and business park, or the refurbishment of the Pavilion. However,, these would be temporary with new areas of public open space being created and new facilities, such as the children's play area and skate park being provided.

146. Within the planning application site there are fifteen buildings that are likely to be affected by the development. The proposal will result in the loss of 16,640sqm of floorspace, though 43% of that space is currently vacant. The chapter estimates that there are 373 employees within these buildings, with almost all the companies having relocation strategies in place, with the exception of one where it is anticipated that the proposal will result in the loss of 15 jobs.

147. Positive impacts arising from the construction phase would include the creation of an estimated 559 jobs with a contribution of £85 million to UK

GDP. Additionally, there would be opportunity for training and skills provision, with support for local recruitment.

148. In terms of longer term socio-economic impacts of the development, whilst there will be a permanent loss of sports pitches from the site, these pitches are considered to be of 'poor quality' (findings of the Council's Playing Pitch Strategy 2014) and suitable equivalent replacement is proposed (in consultation with Sport England). Whilst part of Wigmore Valley Park will be lost to the New Century Park business development, the re-provision of open space will see an overall increase of 2ha, with new and improved facilities.

149. In economic terms, during the operational phase it is anticipated that by 2025 there will be an additional 2,800 jobs created on the site, whilst by the time the development is fully occupied it is anticipated that this number will have risen to 3,201 jobs. It is predicted that the development will make an annual contribution to GDP of £167 million, support £135 million of wages and provide £63 million of tax revenue in the local area.

iv. Ecology and Nature Conservation

150. This chapter of the Environmental Statement provided information on the existing ecological condition of the site and surrounding area and was supported by a significant number of reports in the technical appendices, covering, amongst other things, bats, badgers, birds, dormice, reptiles, invertebrates and hedgerows. The number of reports reflects the fact that the site includes Wigmore Valley Park which contains habitats likely to support a wide range of fauna.

151. The chapter noted that there were no international or national ecological designations within the site or the immediate surrounding area, though the site did include one County Wildlife Site (Wigmore Rural) and one District Wildlife Site (Dairyborn Scarp).

152. The addendum to the Environmental Statement recognised that the proposals would impact significantly on the County and District Wildlife Sites, with 5ha of each being lost during the construction phase. As a consequence a range of biodiversity mitigation measures are proposed, though it is not practical to deliver all within the site as some habitats (such as the calcareous grassland) could not be replicated without other environmental effects arising, consequently a range or measures are proposed (including financial contributions for improvements to other sites within the borough – Dallow Downs in particular was identified).

153. Additional mitigation measures identified within the chapter include: site wide native planting to ensure habitats are not lost and protected species

not impacted; creation of skylark plots in adjoining land; and in addition to the offsite works, the proposal includes the long term maintenance, management and enhancement of the existing and new habitats.

v. Noise and Vibration

154. The Noise and Vibration chapter assessed the existing noise levels across the site and considered the impacts of development during the construction and operational phases upon these levels. The study area was taken as 500m either side of the proposed dual carriageway access road and considered principally the residential properties on the northern side of Eaton Green Road. Both attended and unattended noise meters were used in order to establish the baseline.

155. During the construction phase there will be an increase in noise, though the impacts can be controlled and mitigated through the use of planning conditions. The most noticeable increases in noise during construction are associated with the construction of the access road near the Holiday Inn hotel (including piling for the new bridge) and the new link road to Eaton Green Road. The imposition of a condition requiring a Construction Environmental Management Plan to be submitted which would specify hours of operation, require details of piling methods and controls over equipment (noise attenuation) would help to mitigate any adverse effects.

156. The main noise source during the operational phase will be from the proposed New Century Park access road. Short term and long term changes to sound levels were assessed, with it being noted that the only deterioration of significance in noise arising from traffic levels would be at the Holliday Inn, where a road embankment and bridge is proposed for the new access road as it crosses Airport Way. However, whilst the assessment predicts the traffic sound level will rise by between 4dB and 5dB, this is still below the ambient background noise level of 61dB $L_{A10\ 18hr}$, with other sources (industrial activities and the airport) contributing to the overall soundscape. The conclusion is that although noise levels at the Holiday Inn will rise, when other sources are taken into account the increase will only be moderate, a minor adverse impact. Mitigation measures for this location are advocated in the Environmental Statement.

157. Noise from plant associated with new buildings in the proposed business park can also be controlled through planning conditions.

vi. Air Quality

158. The potential air quality impacts of the development during the construction and operational phases are set out in a chapter in the Environmental Statement. The addendum to the Environmental

Statement noted that no specific request was made for further information with regard to air quality, though it was noted that if the transport modelling changed than this could affect the air quality assumptions (as would have been the case for noise).

159. The chapter notes that existing air quality conditions have been established by collating the results of monitoring carried out by the Council and London Luton Airport, covering both the study area and nearby sites (which provide the context for the assessment). The results show that mean nitrogen dioxide concentrations at locations in proximity to the proposed development have generally been below the objective, with the representative monitoring point at the site boundary and close to sensitive receptors showing nitrogen dioxide levels below the objective. In terms of particulate matter (PM_{10} and $PM_{2.5}$) concentrations at the two monitoring points (one on the airport and one in the Town Centre Air Quality Management Area [AQMA]) are well below relevant objectives.

160. The estimated background concentrations for the opening year (2021) and the assumed year of completion (2023) have been derived for each receptor and are well below the objectives for nitrogen dioxide, PM_{10} and $PM_{2.5}$.

161. During the construction phase the predicted 55 annual average daily traffic heavy duty movements is below the 100 trips per day screening threshold for sites outside AQMAs and consequently is considered insignificant. Effects from dust were considered since the development is within relatively close proximity to sensitive receptors (notably 110 residential properties within 50m of the site and an operational airport), with the potential for dust being generated from the demolition of buildings, from earthworks associated with the construction, and from vehicle movements to and from the site during construction. The assessment concluded that there was a high risk of dust soiling impacts arising from the earthworks and construction, with a medium risk during demolition and trackout, whilst in all cases there was a low risk to human health. The mitigation measures envisaged arise from best practice and include a dust management plan, with dust monitoring, site maintenance and specific measures to reduce dust associated with construction activities.

162. The impacts of the development during the operational phase were also considered, with the assessment concluding that:

- The impacts of the energy plant would be negligible since there were no land uses relevant to the annual mean objective within the screening contours and no locations where members of the public might reasonably be expected to spend one hour within the 1-hour mean 99.79^{th} percentile contour (a very small area around the plant).

- The predicted annual mean nitrogen dioxide concentrations are below the objective at all receptors and a reduction in concentrations is predicted at a number of receptors, with an increase of between 1% to 3% at 27 of the receptors (out of a total of 68 receptors). Additionally, due to the redistribution of traffic, a reduction in concentrations is predicted along Eaton Green Road and Stopsley Way.
- The annual mean PM_{10} and $PM_{2.5}$ concentrations are predicted to be well below the annual mean objectives and the percentage changes in PM_{10} relative to the air quality objective is predicted to range from -1% to 1%. The $PM_{2.5}$ impacts are described as negligible.

163. The imposition of a planning condition requiring the submission of travel plans for the businesses and the promotion of sustainable transport measures will benefit local air quality during the operational phase of the development.

vii. Cultural Heritage

164. This chapter of the Environmental Statement considers the likely significant effects in particular upon the setting of heritage assets. The assessment was informed by a zone of theoretical visibility, though the impact upon heritage assets is not assessed solely in terms of visual impact. The study area for the assessment on cultural heritage extends 1.5km from the perimeter of the site, but in response to the scoping opinion, the impact of the development upon the setting of a couple of heritage assets that were slightly further from the site was considered.

165. Within the development site there is only one local historical area of value, namely the non-designated World War II Airfield Battle Headquarters (a pillbox). However, within the vicinity of the development there are a number of designated heritage assets, 25 listed buildings were identified the closest being the Grade II listed Wigmore Hall, located to the north of Wigmore Valley Park. In addition, two heritage assets within Central Bedfordshire were identified for consideration in the scoping opinion, namely: the Grade II* registered park and gardens at Luton Hoo together with the Grade I listed building, to the south-west of the airport; and the scheduled monument at Someries Castle to the south of the airport.

166. For the majority of the listed buildings (20) it was considered that the significance of the effect of the development, both during construction and operation, would be neutral, whilst for four there was considered to be a slight adverse effect in both phases. For Wigmore Hall the effect was assessed as moderate adverse during construction and minor adverse during operation. For the registered park at Luton Hoo and the scheduled monument at Someries Castle, the assessment concluded that there would be a slight adverse impact during construction, but once completed

the development would have a neutral impact upon these heritage assets. The effect upon the non-designated heritage asset, the World War II Airfield Battle Headquarters is considered minor adverse during construction, though this non-designated heritage asset has low heritage significance and has suffered damage from graffiti and unlawful entry.

167. The only mitigation measure proposed to address the impacts on heritage assets relates to the World War II Airfield Battle Headquarters, with proposals to secure the asset and provide interpretative signage to explain its historic role. However new and enhanced landscaping will also affect and screen the development from some views and further limit the impact of the development upon the setting of designated heritage assets.

viii. Archaeology

168. The impact of the proposed development on buried archaeological assets was considered in the archaeology chapter of the Environmental Statement, with further comments being made in the subsequent addendum. The desk based assessment was provided as a technical appendix to the Environmental Statement, providing the baseline data for the site, together with the wider environs within 1km of the site. A geophysical survey of the eastern part of the site was also provided as a technical appendix to the Environmental Statement.

169. In terms of the baseline data within the site, there are eight Historic Environment Records which range from the Palaeolithic period (Iron Age to Romano-British) to modern times (Luton Airport being a former World War II military training airfield and now an international airport).

170. The construction phase of the development would have the most impact upon archaeological heritage. In the western side of the site the heritage assets have been documented and subsequently removed and it is considered that the proposed development will have a neutral effect. However, where the new business park is proposed, with associated drainage and infrastructure, it is considered that should any archaeological remains be present they would be of medium value, but would be completely removed. The impact is assessed as moderate adverse and appropriate mitigation would be through an agreed programme of archaeological monitoring secured by a planning condition.

171. Within the area of agricultural fields to the south-east of Wigmore Valley Park there is a site of a possible Romano-British enclosure that would be of medium heritage value. The assessment concludes that the end of annual ploughing that would occur as a result of the land being converted to parkland, would remove further on-going damage, thereby preserving any remains in-situ. Whilst there may be localised impacts from the

creation of pathways and provision of furniture, the impact is considered slight beneficial. For the construction of the business park a programme of archaeological recording would be required to mitigate the impacts, whilst for the creation of the new park archaeological monitoring as part of an archaeological mitigation strategy would be necessary.

172. During operation of the development it is considered that there would be no effects to buried archaeological assets and consequently no mitigation is considered necessary.

ix. Ground Conditions and Contamination

173. The ground conditions assessment considered the site of the New Century Park access road, the area of landfill and the site for the New Century Park business park. Due to the nature of the ground, a number of technical reports, including three reports on the landfill (one being a Quantitative Risk Assessment) were provided as technical appendices to the Environmental Statement.

174. Ground conditions vary substantially across the site, consequently the assessment considered different areas, namely: Airport Way/Dairyborn Scarp; Percival Way/President Way; landfill; and greenfield areas of Wigmore Valley Park. The first section from Airport Way to the Dairyborn Scarp has considerable made ground with the escarpment rising up to 35m in height. A number of retaining structures and a bridge are proposed in this section. Low levels of contamination were identified in the made ground. Percival Way/President Way also has made ground, again with some evidence of contamination, and no substantial earthworks are required in this section. The former Airport Tip occupies an area of 53 hectares with evidence of filling from around 1941, continuing until the early 1990s – with landscaping taking place between 2000-2002. The preliminary risk assessment indicated that the fill material was a variety of industrial, commercial and domestic waste, with a maximum proved depth of 22m. Since the access road is to be at grade in this area, little generation of waste is anticipated. The final area, Wigmore Valley Park is a greenfield site, underlain by clay-with-flints above the chalk.

175. The potential impacts during the construction phase could be to expose workers to localised ground contamination, whilst in areas of bulk excavation dust could be generated which could affect residential properties and commercial buildings in the area. There could also be disturbance to contamination with the made ground which, without appropriate mitigation, could result in pollutant linkages to the groundwater.

176. One of the technical appendices was an Unexploded Ordnance Survey (UXO) required due to the fact that the site was a former World War II airfield surrounded by strategic manufacturing works.

177. Mitigation measures envisaged during the construction phase include: appropriate Personal Protective Equipment (PPE) for the workforce; a Construction and Environmental Management Plan; a Piling Risk Assessment to control any risks to controlled waters; a Materials Management Plan; Site Waste Management Plan; and UXO clearance if necessary.

178. During the operational phase large areas of the site would be hardsurfaced (buildings, roads, car parks, footpaths) and consequently the potential for impacts from any contamination would be limited. However, for landscaped areas there could be a risk from contamination or from water percolating down and leaching out. A remediation strategy should reduce the risks from contamination, with the mitigation measures being dependent upon what is encountered and any subsequent monitoring.

x. Hydrology

179. Hydrology, surface water drainage and flood risk were also assessed in the Environmental Statement. A stand-alone Flood Risk Assessment was submitted with the planning application (and updated with an Addendum in August 2018) as well as a Drainage Strategy (and associated addendum).

180. The baseline conditions were established and a conceptual model created that was used to understand the current hydrology and identify potential impacts. The site is within Flood Zone 1 and therefore at low risk from flooding (less than 1 in 1000 annual probability of flooding). The site is partially underlain by a major aquifer and a groundwater Source Protection Zone covers most of the area of the proposed access road.

181. During construction the impacts of the proposed development were identified as: a possible decrease in permeable areas and consequently an increase in surface water runoff, if unmitigated; an increase in the mobilisation of sediments as a consequence of ground disturbance; contamination of groundwater from construction plant and equipment; and creation of pathways to the underlying chalk aquifer from piling. Mitigation measures during construction were identified, including: production of a construction drainage design plan prior to construction works commencing; good practice in managing silt arisings and stockpiling of materials; spill kits; control and positioning of washing out facilities; and undertaking any piling in accordance with measures advocated in a piling risk assessment.

182. In relation to the operational phase there is also increased risk of runoff from the increased impermeable areas (buildings, roads, paths, parking), together with pollution from site runoff. To manage surface water generated by the proposed development, the surface water strategy allows for infiltration and incorporates sustainable urban drainage systems (SuDS). The assessment also concludes that there is sufficient capacity at East Hyde waste water treatment works to incorporate waste water arising from the proposed development.

xi. Agriculture and Soils

183. The potential impacts and associated likely significant effects of the proposed development were assessed in respect of land, including agricultural land quality, soil resources and agricultural holdings.

184. The baseline conditions were assessed, with 20ha of the site being previously developed land, 23ha in agricultural use (classed as 3a [good] and 3b [moderate]), and the rest of the 95ha site is open space (including the area of the former Airport Tip).

185. The main effects identified during the construction period relate to the change of use of the agricultural land to open space, though no significant earthworks are proposed and consequently the soil profiles will be maintained (though the agricultural land will be taken out of production). There is no mitigation for the loss of agricultural land. With regard to earthworks associated with the overall development, the chapter indicated that soils should be re-used where possible and that a Soil Resource Plan would be prepared to include such a requirement and ensure suitable techniques were in place for soil stripping, storage and re-use.

186. Since the construction phase results in the permanent loss of agricultural land and the earthworks are all undertaken at this stage, no further effects were identified in the operational phase and consequently no further mitigation is required.

Request for Further Information

187. Following the initial review of the planning application and associated Environmental Statement, in April 2018 a request for further information pursuant to Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 was made.

188. The formal areas that required addressing were highlighted as:

- A revised Non-Technical Summary that would be accessible and understandable to non-experts and technical consultees alike;

- Fully assess the townscape and visual impact of proposed structures in the Townscape and Visual Impact assessment;
- Justify the assumptions made in the Transport Assessment and address the formal comments from Highways England;
- Assess the impact of the loss of the 17 buildings that were identified as being demolished in the Socio-economic chapter;
- Within the Ecology and Nature Conservation assessment, ensure that the criteria for assessing the impact upon sites of nature conservation set out in the NPPF have been followed in relation to the County and District Wildlife Sites;
- Provide further information to address the comments raised by Historic England in relation to Someries Castle and Luton Hoo;
- Undertake further archaeological trial trenches in order to better inform the Archaeological assessment within the Environmental Statement; and
- Provide additional information in the Hydrology and Surface Water chapter so as to understand the impacts of overland flows, greenfield runoff rates and storage volumes.

189. Clarification was also sought on additional matters in an advice note that was submitted with the request for further information, and additional and updated drawings were requested to ensure that all elements of the detailed application were fully understood and the parameters for the outline element of the application were clearly set out.

190. The further information was provided in August 2018, with an addendum to the Environmental Statement, an addendum to the Planning Statement, a new 'user friendly' Non-Technical Summary, and addenda to various reports. Where appropriate the updates to the Environmental Statement chapters have been covered in the previous sections above.

191. It is considered that the Environmental Statement of December 2017 and the Environmental Statement Addendum of August 2018, satisfy the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and have provided the appropriate information in order for the impacts of the development on the environment to have been assessed.

MAIN PLANNING CONSIDERATIONS

192. The key planning issues are not dissimilar to the matters that have been raised in the representations and can be summarised as follows.

- The principle of the development;
- Impact upon Wigmore Valley Park;

- Impact upon the County Wildlife Site, Area of Local Landscape Value and the Area of Outstanding Natural Beauty;
- Contamination and risk;
- Archaeology and heritage;
- Urban design and impact;
- Traffic and parking;
- Other environmental matters;
- Economic impact;
- Third party representations; and
- Planning obligations.

The principle of the development

193. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (and Section 70[2] of the Town and Country Planning Act 1990) require that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

194. The development plan for the area is the Luton Local Plan 2011-2031 (adopted November 2017). As noted in paragraph 64 the site falls predominantly within the London Luton Airport strategic allocation (policy LLP6). This is a designation that identifies a physical area for growth, encompassing not just the operational airport but also the Luton Enterprise Zone. Whilst the description as London Luton Airport Strategic Allocation is a useful one for identification purposes, it includes much more than the airport, with existing commercial businesses, public open space, designated employment sites and arable land, all of which is located in the vicinity of the airport.

195. Due to the size of the planning application site there are a number of further designations on the Proposals Map that fall within the red line of the application, including Category A Employment Sties at Proctor Way, Prospect Way, Percival Way, Airport Executive Park and Century Park (policy LLP14); Wigmore Valley Park County Wildlife Site (policy LLP28); Wigmore Rural Area of Local Landscape Value (policy LLP29); and Dairyborn Scarp District Wildlife Site (policy LLP28).

196. Policy LLP6 is the starting point for the consideration of this application, since most of the site falls within the strategic allocation which covers 325ha of land and includes not only the operational airport, but also Century Park and Wigmore Valley Park (the yellow shading on the Proposals Map covers both these areas). The Local Plan recognises that these physical areas have a strategic role in the sub-regional economy.

197. The employment allocation, referred to as Century Park on the Proposals Map, is located to the east of Wigmore Valley Park, though the proposed

access to Century Park is indicated as being to the west of Wigmore Valley Park (and referenced in LLP31). Discussion of the implication for land uses within the strategic allocation took place at the Examination into the Local Plan with the Inspector noting in his final report in August 2017 that the proposal "will clearly have some effect on the amount of land available within the park and on its function…furthermore, the policy requires that any open space which is lost is replaced. The Council explained at the hearing that this is feasible because part of the Century Park allocation could be used to provide any replacement open space" (paragraph 320 of the Inspector's Final Report). This is recognised in policy LLP6E which allows for "any reconfiguration of land uses that may be necessary."

198. From the planning history it can be seen that planning permission for employment development at Century Place has been in place since 1991 (ref: 89/00865/OUT) with Century Park providing the main opportunity for employment development near to the airport (paragraph 124 of Inspector's Final Report).

199. The proposed development of a business park within the London strategic allocation accords with the broad principle of policy LLP6 which supports the Council's strategic objective of seeking to retain and enhance Luton's important sub-regional role as a place for economic growth and opportunity. Further, the proposed uses reflect those that policy LLP6D states will be supported, namely "office, manufacturing and distribution employment…including small scale affordable B2 units, to facilitate the expansion and relocation of existing Luton-based businesses, new business start-ups…small scale retail, related services and leisure (as defined in Use Classes A1 to A3 and D2)…as well as a hotel (Use Class C1)."

200. The proposed development makes provision for business and industrial floorspace, small scale ancillary retail and a hotel, with the following provision being set out in the planning application:

- 29,400sqm B1(a) office floorspace
- 13,000sqm flexible office/industrial floorspace
- 11,700sqm B2 general industrial and B8 storage
- 7,200sqm (145 bedroom) hotel
- 2,950sqm replacement Technical Services Building
- 685sqm sui generis use (energy centre and recycling facility), and
- 225sqm ancillary retail

201. The sui generis energy centre and recycling centre whilst not specifically set out in the policy, are ancillary facilities to serve the business park itself.

202. There are elements of policy LLP6 with which the proposed development of New Century Park does not accord, namely:

i. LLP6C states that proposals for airport related parking should be located within the strategic allocation, but excludes the areas covered by Century Park and Wigmore Valley Park (with some provisos);
ii. LLP6D covers the Century Park allocation (this should be read in conjunction with policies LLP13 and LLP14), which on the proposals map is shown to the east of the site where New Century Park is now proposed;
iii. LLP6D states that the proposed access to Century Park shall be designed so as to ensure that no use is made of Eaton Green Road, except for public transport, cyclists and pedestrians (this should also be read with policy LLP31).

203. In addition there are other policies within the adopted Local Plan with which the proposed development would be non-compliant if mitigation were not provided, these include:

- LLP28 which states that the Council will support development proposals which add to the net stock of wildlife habitats or where they help to deliver a net gain in the conservation and enhancement of such sites; and
- LLP29 which indicates that development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of local landscape areas.

204. These two policies both indicate support for developments that have a positive impact in relation to habitats and landscapes, but set criteria that need to be complied with where developments adversely affect such areas. Consequently, these issues will be picked up under the relevant headings of the main planning considerations below.

205. The three elements of policy LLP6 identified in paragraph 202 above, where the development could be said not to accord with policy are addressed below.

i. Airport related parking (LLP6C)

206. The issue in relation to airport related parking was picked up by in the LBC Strategic Planning comments and has been addressed by the applicant in the addendum to the Planning Statement. In total within the New Century Park business park there will be some 3,205 car parking spaces, whilst a further 300 car parking spaces are proposed to the south of the long stay car park (not within the New Century Park development).

207. Of the 3,205 parking spaces within New Century Park, 1,627 spaces will directly serve the development (in accordance with the Council's parking standards), these are not 'airport related parking spaces' but rather are provision for the users of the new development. A further 623 car parking spaces are relocated into the New Century Park development as a consequence of parking spaces for other businesses being lost by the construction of the access road. These spaces are also not 'airport related parking spaces' but are spaces re-provided for existing businesses as a consequences of the New Century Park access road displacing existing parking spaces.

208. The development results in the loss of 1,255 spaces within the long stay car park that will be lost as a consequence of the construction of the light industrial quarter development. 300 of these car parking spaces will be relocated to the south of the long stay car park (within the airport strategic allocation but not within New Century Park), which means that 955 airport related parking spaces will be provided within the New Century Park development.

209. Policy LLP6C provided for airport related parking within the London Luton Airport strategic allocation, though excluded Century Park and Wigmore Valley Park since these areas were intended for other purposes. The element of policy LLP6C that considers airport related parking outside the strategic allocation, is principally concerned with airport parking off-site, however, it defines some circumstances in which off-site parking may be permitted, namely where:

- There is demonstrated to be a long-term need that cannot be met on the airport;
- They accord with the sustainable development principles as defined within the plan as a whole;
- They relate well to the strategic road network and do not exacerbate traffic congestion;
- They do not have an adverse impact upon amenity; and
- Are in accordance with the most recently adopted London Luton Airport Surface Access Strategy (ASAS).

210. Whilst policy LLP6C may not be directly relevant to the circumstances of the proposed re-provision of the long stay parking lost as a consequence of the proposed development, the criteria under which off-airport parking might be acceptable are considered below.

211. With regard to demonstrating that a long-term need cannot be met on the airport, this is not directly relevant to the development proposed, since the airport related parking within the New Century Park business park is not additional parking, but rather involves replacing spaces that will be lost as

a result of the provision of the light industrial quarter development on what is currently part of the long stay car park.. As has been seen from the representations on behalf of the TUI Group and LLAOL, the concern is that the loss of existing parking spaces, without their re-provision will adversely affect existing businesses, the operation of the airport and further exacerbate the parking congestion in surrounding residential areas.

212. In terms of sustainable development principles, policy LLP1 states in relation to these principles that in order "to enable the delivery of sustainable development and sustainable communities, all development proposals will, where applicable, have regard to relevant plan policies." The Council's spatial development strategy seeks to focus the majority of new development in the borough on eight strategic allocations, one of which is the strategic allocation in and around London Luton Airport. The text in the Local Plan records that "there will be a presumption in favour of sustainable development and high quality development throughout the borough" (paragraph 4.1) and also notes that "Luton provides a clear example of an area with high pressure for different land uses where the economic, social and environmental roles for the planning system to perform (as set out on paragraph 7 of the NPPF) cannot be treated in isolation" (paragraph 4.3).

213. Policy LLP1 further explains that "growth in homes, jobs and services that constitutes sustainable development will be welcomed; provided growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further sustainable infrastructure investment within the plan period to 2031" noting that the strategic allocations will be the primary location for growth. As such the proposal accords with the objectives of policy LLP1.

214. With regard to airport related parking not exacerbating traffic congestion and relating well to the strategic road network, again it needs to be noted that the proposal does not provide new airport related car parking spaces, but rather relocates existing spaces. The implications of the development in terms of traffic and transport were evaluated in the Transport Assessment and Supplementary Transport Assessment and are addressed subsequently in this report.

215. A further criteria in relation to new airport related parking spaces is that they should not have an adverse impact upon amenity. The proposed areas of car parking would be within the existing Wigmore Valley Park and on land, part of which is designated a County Wildlife Site and all of which is an Area of Local Landscape Value, as such there will be an impact on amenity. Ultimately the benefits of the development have to be weighed against any adverse impacts and a planning judgement will be made by the decision taker when considering the development proposal as a whole.

These aspects are considered more fully in the section on the impact of the development on the Wigmore Valley Park and the subsequent section on the impacts on the Country Wildlife Site and the Area of Local Landscape Value. Ultimately

216. The final criteria in policy LLP6C requires airport related car parking to be in accordance with the latest adopted ASAS, the most recent strategy being that for 2018-22. The ASAS seeks to efficiently manage surface access, promote sustainable surface transport, improve access to the airport and minimise adverse impacts on the local community. In terms of parking at the airport, the ASAS seeks to ensure that as far as practically possible demand is closely aligned with supply, by providing a variety of car parks (long term, mid-term, short stay and drop-off), together with a targeted pricing regime the airport operator is able to achieve this. The relocated airport related car parking spaces will ensure that the supply remains the same and so will not put pressure on the community through further fly-parking in residential areas or further demand for airport related parking at a greater distance from the airport.

ii. Allocation on the Proposals Map (LLP6D)

217. Whilst the Proposals Map shows the historical allocation for Century Park being located further to the east, consistent with previous allocations and grants of planning permission, the London Luton Airport strategic allocation covers the whole of the area of Century Park and Wigmore Valley Park. This differs from the position in the previous versions of the Local Plan where the strategic allocation did not include these two areas of land.

218. At the Examination in Public into the Local Plan in January 2017, the issue of the access road cutting across Wigmore Valley Park and effectively severing the southern part of the park from the land to the north was discussed. As has been noted above (paragraph 197), it was indicated that a reallocation of space within Century Park could ensure that any open space that was lost could be replaced. Policy LLP6E recognises this by stating “in delivering development and access under clause D (i.e. Century Park) above, including any reconfiguration of the landuses, that may be necessary certain criteria will need to be satisfied.” These criteria are then listed as: the scale and quality of open space and landscaping is to be maintained and if feasible increased; biodiversity will be enhanced and improved within the borough; the new open space to replace Wigmore Valley Park will offer facilities of at least equal quality before development takes place; and the long term management of the open space, landscaping and habitats will be secured through a legal agreement.

219. The current planning application has moved on from that envisaged at the time of the Examination in Public, and rather than the access road bisecting Wigmore Valley Park, and new open space being created in the northern part of the Century Park allocation, the application proposes the relocation of the business park into part of Wigmore Valley Park (predominantly the area of the former Airport Tip – the sports pitches – and part of the southern part of the park below the allotments), whilst a new area of public open space would be created on the northern part of the site where Century Park had been proposed.

220. The proposed development, with the redistribution of land uses, would result in a development that is better related to the existing commercial businesses within the strategic allocation, and would also have less impact on open space and the green belt in North Herts, by bringing the development away from the borough boundary and closer to other commercial development within the airport.

221. Additionally, the proposed development would result in an increase of public open space by circa 2ha and would provide additional facilities within the park, including improved children's play areas, an enhanced skate park and refurbished Pavilion with new café. Off-site the proposed development makes provision for a financial contribution to secure improved sports and recreation provision within the borough. A further contribution would be secured for enhancement of 7.5ha of habitats at Dallow Downs, whilst habitat creation and management is proposed within the application site itself. The proposal therefore ensures that the scale and quality of open space and landscaping in the area is maintained, with a net increase in open space provision, and meets the other criteria set out policy LLP6E, including securing the long term management and maintenance of the park through the proposed legal agreement.

Link to Eaton Green Road (LLP6D)

222. Policy LLP6D(i) seeks to ensure that no use is made of Eaton Green Road to provide access to Century Park or the airport, except for public transport, cyclists and pedestrians. Paragraph 320 of the Inspector's Final Report into the examination of the Local Plan provided the reason for this restriction, which was "the need to avoid channelling traffic onto Eaton Green Road."

223. The planning application has included a link road that connects Eaton Green Road to the New Century Park access road. This has been shown in the modelling associated with the Transport Assessment and Supplementary Transport Assessment to be important in order to ease congestion on the local road network.

224. A technical note was provided within the Addendum to the Transport Assessment (Appendix AC) which assesses the transport reasons as to why a connection is proposed between Eaton Green Road and the New Century Park access road.

225. Currently vehicular traffic can access Percival Way/President Way from Eaton Green Road via a link connection at Frank Lester Way. A sensitivity test was run with Frank Lester Way being retained as open to all vehicular traffic to provide access to the New Century Park access road, but with no new link connection further to the east (i.e. the new link road in the planning application was removed for the sensitivity test). The sensitivity test showed that in the morning peak, by 8.15 traffic builds up on Vauxhall Way which then has knock on effects to the junctions with Crawley Green Road and Eaton Green Road leading to tailbacks to Wigmore Lane. Half an hour later the local road network is fully congested. In the afternoon peak a similar situation arises, with Vauxhall Way becoming congested and the north south flows causing tailbacks to traffic on Eaton Green Road (with traffic westbound tailing back to the Wigmore Lane roundabout).

226. An additional consequence of the congestion that would occur without the link to Eaton Green Road is that because of the tailbacks on Vauxhall Way these would have a knock on effect to the New Century Park access road. Traffic to and from the new business park, the existing commercial premises in Percival Way and President Way, as well as vehicles using the airport's long stay car park would all be affected. The technical note shows that without the link, many junctions will fail because of overcapacity, resulting in long delays and grid lock during the peak period,

227. Modelling demonstrates that with the new link proposed between Eaton Green Road and the New Century Park access road, considerable benefits are provided to traffic flow on Eaton Green Road and at its junctions, which have knock on benefits to the wider local road network. The New Century Park access road with the link to Eaton Green Road eases traffic congestion in the surrounding area.

228. The application also includes a proposal to close Frank Lester Way to private vehicles, so only allowing buses and taxis to use this road. The closure of Frank Lester Way to private cars removes one link between Eaton Green Road and the New Century Park access road that was previously available to all through traffic.

229. Whilst the proposed link between Eaton Green Road and the New Century Park access road may be contrary to policy LLP6D(i), there are traffic and transport benefits that will arise from its provision, whilst the existing connection at Frank Lester Way will only be open for buses and taxis, and

consequently the number of accesses for private vehicles will not have increased.

Impact upon Wigmore Valley Park

230. Wigmore Valley Park is located to the south of Eaton Green Road and is bounded on the west by the airport (predominantly the TUI and long stay car parks), to the south by the airport's fire training area, and to the east by a public footpath/bridle path and fields beyond. The park covers a little under 40ha and includes a Pavilion (with changing rooms), children's play area, skate park, allotments, sports pitches (no longer formally used), informal grassed areas, wooded areas and hedgerows.

231. The park was created in the 1980s at the time that Hitchin Homes was developing the Wigmore estate on the northern side of Eaton Green Road. The Council owned the land and created the park, with financial contributions from the developer towards securing some of the facilities within the park.

232. The former sports pitches are located on the raised ground that was the Airport Tip, this area has been subject to uneven settlement as can be seen from the manhole covers that sit above the ground and the ponds with standing water that occupy parts of the site. In total the former Airport Tip covers over 50ha, though part of that is within the airport boundary (land up to taxiway Foxtrot, with a large part of the area covered by the long stay car park), and around 20ha is within Wigmore Valley Park.

233. Policy LLP27 of the Local Plan refers to open space and natural green space, noting that the Council will work with developers and landowners and stakeholders to support proposals that safeguard and enhance existing networks of open space and establish new green infrastructure within the borough. The policy also covers loss of open space, including parks and allotments, noting that such losses will be permitted exceptionally, where replacement open space provision can be made which is of an equivalent type, quality and quantity and is accessible and within the vicinity.

234. The proposed development results in the loss of open space, a large section of which comprises of the former sports pitches. Under the Town and Country Planning (Consultation) (England) Direction 2009, Sport England is a statutory consultee on development which is on land that was used as playing field. The representations received from Sport England have been reported previously and it can be seen that following discussions and Sport England's initial representations, the contributions and commitments that are set out in the Heads of Terms at the start of this report will secure the appropriate replacement that Sport England has

indicated is necessary in order for their holding objection to have been withdrawn. The key elements in relation to the replacement provision within the Heads of Terms are:

- £270,000 replacement changing facilities
- £926,737 replacement of playing fields
- Use of the financial contributions to provide one or more of the following projects:
  - Provision of a Step 5 Football Facility (artificial pitch suitable for non-league senior football and associated facilities including parking provision and changing rooms) at either Stopsley/Lothair Recreation Ground; Ely Way or Lewsey Park; and/or
  - Replacement of or improvements to existing adult football facilities (playing fields and supporting facilities such as changing and parking) at either one or more of the following: Stopsley/Lothair Recreation Ground; and/or Lewsey Park Recreation Ground
- Timing of the provision of the various contributions to reflect the phasing of the development and the loss of the various existing facilities on site.

235. The proposed replacement provision for the playing fields and changing facilities meet the exception test in Sport England's Playing Fields Policy and consequently this is considered to be acceptable and to accord with policy LLP27 of the Local Plan.

236. The third party representations have opposed the loss of the parkland, with concerns about the loss of open space, loss of habitats, incursion of built development into the open space, the loss of the buffer between the airport and the residential areas and the relocation of the park to a less accessible location. In addition the representations have stated that Wigmore Valley Park is a community asset gifted to the people of Luton when Hitchin Homes developed the Wigmore estate. The issues relating to habitats will be addressed in the next section, whilst the other issues are considered in the paragraphs following.

237. In relation to the loss of open space, whilst the proposal does result in development taking place over parts of Wigmore Valley Park, the application does in fact result in the creation of a larger area of public open space than currently exists. The application documents indicate that Wigmore Valley Park measures 38.6ha, whereas the area of Wigmore Valley Park that is retained and combined with the new public open space that is to be created will be 40.6ha. The proposed development does not result in a loss of public open space but rather creates an additional 2ha of parkland.

238. Whilst there would be an incursion of built development into the open space, the proposed business park would be located closer to the existing industrial and commercial estates than was envisaged with the original Century Park proposal. Further, the access road that was indicated on the Proposals Map would have resulted in severance of the southern part of the park, this is no longer the case, rather the park now extends into the northern part of the area that was allocated for Century Park (as was discussed at the Examination in Public) and then wraps around the new business park. Consequently, the new business park would be less prominent, with less impact on the open countryside around and would utilise land that has previously been developed by the historic landfill activities.

239. The retained element of the park would also be enhanced, with the provision of a new children's play facility with robust equipment and bench/picnic seating for parents/carers, a new skate park suitable for a range of ages, and an upgrade of the current Pavilion building to provide a café (with indoor and outdoor seating, a meeting room and a multi-purpose space within the building).

240. The enhanced facilities would be located in the northern part of Wigmore Valley Park, being the area that is most accessible and closest to the residential areas (as well as to the car park for visitors who come from further afield). Whilst there is a concern that the newly created element of the new park would be less accessible than the existing Wigmore Valley Park, it is worth noting that the furthest part of the current park from the Pavilion building is approximately 730m distant, three quarters of the newly created open space (circa 31ha) would be within that distance, with only one quarter of the new provision being further afield (the maximum distance would be 970m). The elements that are closest to the residential areas are those that will be more heavily used, such as the play area, skate park and refurbished Pavilion building, whilst improved footpaths and enhanced planting will lead to the less formal open space.

241. Although the creation of the new business park will lead to built development being closer to the residential areas than is the current situation, it is worth noting that the nearest building in the office quarter (in the centre of the new business park) to residential properties in the Wigmore Estate is approximately 200m. The buildings in the office quarter would be up to four storeys in height with undercroft parking (18m). The hybrid industrial buildings located further to the east would be two storeys in height (9m) and would be circa 210m away from the residential properties in Wigmore. The hotel, which will be five storeys in height (20m), located on the western side of the development, would be around 250m from the nearest residential property. The buildings would not impact upon the amenity of occupiers of those residential properties. As a

comparison the TUI development at the junction of Wigmore Lane and Eaton Green Road is between 3-5 storeys in height and located within 25-75m of the surrounding residential properties.

242. Overall it is considered that the proposed works to Wigmore Valley Park will result in improvements, with a greater area of parkland and enhanced facilities (including children's play area, skate park and refurbished Pavilion building). The long term management of the park, with specific measures for the creation, conservation and management of the new habitats, will also be secured through the legal agreement and planning conditions. This would achieve the objectives of policies LLP6E and LLP27.

Impact upon the CWS, DWS, ALLV and AONB

243. The site does not fall within the Chiltern Area of Outstanding Natural Beauty (nor does it border the AONB), however the whole of the park falls within an area designated as an Area of Local Landscape Value. This landscape designation is based on a number of criteria including naturalness, landform, size, tranquillity, recreational use, community value and importance of setting in relation to the town. It represents the second tier of local landscape designations within the borough, with policy LLP29 stating that development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of these local landscapes.

244. In addition the southern part of the park (approximately 15ha) is designated a County Wildlife Site. County Wildlife Sites represent the principal components of the ecological network in the borough, with the designation covering sites that are important for their wildlife. The western part of the site, the Dairyborn Scarp, is designated a District Wildlife Site and covers approximately 4ha. The two areas provide habitats that are suitable for supporting birds, bats, badgers, reptiles and invertebrates. Policy LLP28 states that development proposals that adversely impact designated sites will need to demonstrate compliance with a number of criteria.

245. Clearly the rural and open character of Wigmore Valley Park plays an important role in the setting of this part of Luton and has an important community role. Further the area has important habitats for flora and fauna , with a number of assessments undertaken in order to inform the ecological chapter of the Environmental Statement.

246. The Environmental Statement described the landscape character areas covered by the planning application, with Wigmore Valley Park being in the Wigmore Rural character area (LBLCA13), considered to be a

landscape of high quality but of medium tranquillity (due to aircraft) with particular note to the value of the trees, hedges and small areas of woodland screening the airport, as well as its importance to users of the public park. The western part of the application site is within the Luton Airport character area (LBLCA14), considered to be a landscape of moderate quality, low tranquillity, but also essentially sterile and featureless.

247. The planning application proposes built development to occupy much of the area that has been subject to landfill and where the football pitches were previously laid out, as well as land further in to Wigmore Valley Park where informal recreation activities take place. The landscaping within the business park is considered to be varied, with formal treatments around the buildings and circulation routes, whilst on the periphery less formal and more naturalised landscapes are proposed, including hedgerows, woodland, scrub vegetation and meadow grassland.

248. Within Wigmore Valley Park itself the proposal retains and supplements the habitat in the northern part of the park (closest to Eaton Green Road) with additional landscaping and planting proposed. The proposal was also amended with the receipt of the further information to retain more of the habitat that is designated within the County Wildlife Site. The proposals relating to the treatment of Wigmore Valley Park is part of the detailed application, with additional woodland screen planting being proposed, an orchard area, and retention of tree and grass cover where possible, together with the reinstatement of hedgerows and meadow grassland.

249. Policy LLP29 states that development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of local landscape areas. Although the proposed development does not conserve the Area of Local Landscape Value, it is considered that the creation of additional open space, together with the associated landscaping and planting, will become established which may in the future be classed as part of the Area of Local Landscape Value. Thus, whilst the proposal does not comply with policy LLP29, since it involves development that affects the Area of Local Landscape Value, the proposal does provide additional green infrastructure and in the long term could add to the Area of Local Landscape Value.

250. With regard to the impact upon the Area of Outstanding Natural Beauty, which was a concern raised by the Chiltern Conservation Board, the proposed development is not seen as harming either the designated area of the AONB or the proposed extension within North Herts. The Transport Assessment does not indicate that significant traffic would flow towards the AONB itself, which is some 2.5km from the site (on the northern side of the A505 Hitchin Road). The lighting strategy submitted with the

application proposes that external luminaires will be selected to reduce light spillage and light pollution, which again should ensure that there is no significant impact on the AONB.

251. The proposed development results in a loss of approximately one third of the County Wildlife Site (5ha) and much of the District Wildlife Site. To compensate for this loss, the proposals involve enhancements to the existing Country Wildlife Site, through the production and implementation of a habitat management plan, the provision of improved calcareous grassland within the newly created area of parkland in Wigmore Valley Park, and through a financial contribution to improve the County Wildlife Site at Dallow Downs (identified as appropriate by the Council's ecologist). Around the route of the New Century Park access road it is proposed to provide landscaping consisting of native shrub species and to retain and enhance habitats through a management plan.

252. In terms of the criteria in policy LLP28 for development proposals that would adversely impact on designated sites, the amended plans submitted with the further information in August 2018 have sought to reduce the area of the County Wildlife Site impacted by the development. The benefits of the proposed development are considered to outweigh the harm to nature conservation interests, with the development providing a larger area of parkland, enhanced facilities within the park, financial contributions to ensure enhanced habitats within the borough, financial contributions to ensure the re-provision of recreational facilities elsewhere in the borough, the bringing forward of a strategic employment site that has failed to be delivered for nearly 30 years, and significant economic benefits through the creation of additional jobs and employment that will benefit the borough and the local region.

253. The mitigation that is proposed includes retention, protection, enhancement and management of elements of the District and County Wildlife Sites within the application area (5ha of each is lost), together with a contribution for the enhancement of the County Wildlife Site at Dallow Downs. As such, whilst the proposed development will result in harm to the ecological sites within the application boundary and consequently adversely affects the designated sites, it is considered that the proposed development demonstrates compliance with the criteria for mitigation set out in policy LLP28 of the Local Plan.

Contamination and Risk

254. Given the presence of landfill from the former Airport Tip and the fact that the access road will be passing over large areas of made ground and through sites that have been used for industrial purposes, there have been a considerable number of representations received raising concern about

the potential for contamination and pollution. A further area of concern raised in responses to the proposed development relates to the fact that since the airport was used during World War II and was surrounded by manufacturing industries, there is a risk of unexploded ordnance.

255. Policy LLP38 of the Local Plan requires proposal on or affecting contaminated land to carry out a site assessment to establish the full nature and extent of the contamination. The planning application was supported by a series of ground investigations, with a preliminary risk assessment and a Contamination Quantitative Risk Assessment undertaken to inform the environmental impact assessment. The results of these assessments and the likely significant effects are reported in the Ground Conditions and Contamination chapter of the Environmental Statement.

256. The Environment Agency indicated in their response that they were satisfied with the ground investigation that had been carried out and that with the imposition of planning conditions it would be possible to manage the risk associated with the proposed development. The Environment Agency recognised that further investigation would be required, but that this could be conditioned if the local planning authority were minded to approve the development. This would accord with policy LLP38 of the Local Plan which advises that if contamination is found remediation measures should be undertaken and completed prior to development.

257. The effects of the proposed development and the appropriate mitigation were set out in the Environmental Statement and summarised earlier in this report. In addition to conditions recommended by the Environment Agency, further conditions were advocated by the Council's environmental protection unit, including the requirement for a Construction and Environmental Management Plan.

258. With regard to the risk from unexploded ordnance, in the Regulation 22 request it was noted that an unexploded ordnance desk study was carried out in 2016 and referenced in the Environmental Statement, though the report was not attached. With the submission of further information in August 2018, three reports were attached, two from 2016 covering the site of the access road and the eastern part of the airport together with Wigmore Valley Park and a further one undertaken in 2018 in advance of borehole investigation.

259. The reports classified the airport as a medium risk area with the risk reducing to low to medium in areas up to 500m from the airport (the desk study in relation to the landfill area gave a high risk rating for areas that had been undeveloped since World War II). In order to mitigate risk from unexploded ordnance, it is recommended that a condition be attached

requiring an unexploded ordnance site safety and emergency procedures plan to be submitted prior to the commencement of development.

260. It is worth noting that the Health and Safety Executive was consulted in relation to the proposed development and raised no objection.

Archaeology and Heritage

261. Heritage interests within the area include listed buildings, historic parks and gardens, scheduled monuments, non-designated heritage assets (such as the WWII Airfield Battle HQ) and archaeology.

262. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory requirement on the local planning authority to have special regard to the desirability of preserving the setting of a listed building. The regime associated with scheduled monuments is set out in the Ancient Monuments and Archaeological Areas Act 1979.

263. The National Planning Policy Framework sets out the desirability of preserving and enhancing heritage assets (paragraph 192). It makes it clear that the significance of heritage assets can be harmed by development in their setting (paragraph 194). Local planning authorities are asked to look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance (paragraph 200). It defines setting as the surroundings in which the heritage asset is experienced.

264. The NPPF also advises that where development is proposed on a site which includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (paragraph 189).

265. The Environmental Statement (and the addendum submitted in August 2018) included chapters on cultural heritage and archaeology, which provided assessments of the impact of the development upon heritage assets (summarised previously in the report).

266. The visual impact upon the closest heritage asset, Wigmore Hall (Grade II listed building), was one that the Council's heritage consultant was concerned did not appear to have been adequately assessed in terms of the impact of the proposed four to five storey hotel. The Townscape and Visual Impact Assessment did reference this heritage asset and considered it as a potential receptor concluding that the impact during construction would be moderate adverse, but once the development was fully operational the impact as a visual receptor would be minor beneficial.

Further the heritage chapter of the Environmental Statement considered the impact to be moderate adverse during construction and minor adverse during the operation phase. Additionally, an archaeology and Built Heritage Technical Report was submitted with the application, which assessed the magnitude of change to be minimal in terms of the effects of the development on Wigmore Hall.

267. The details of buildings within the proposed business park have not been submitted at this stage since this element of the application is in outline from, with all matters reserved for subsequent consideration. However, the heights parameters plan does show that the closest building to Wigmore Hall would be the northern most building in the office quarter, with a height of up to 18m (approximately 90m from the listed building), with the proposed hotel at 20m in height being around 160m distant. Between these buildings is situated the Pavilion building, the park's car park, and part of Wigmore Valley Park itself. It is considered that whilst the new development will have some impact upon the setting of the listed building, the enhancements to the park will have a positive impact for the visitors to the conference centre as they make use of the surrounding open space, whilst the introduction of new commercial buildings will have a minor adverse impact upon the setting of the listed building. However, based on the listing description of Wigmore Hall (which describes the significance in terms of the fact that it was built in the 16th to 17th centuries and important features relate to the elevations of the building, its roof and some internal elements, though noting modern extensions/renewals have altered it), it is unlikely that the proposed development will affect the significance of the heritage asset.

268. With regard to the other heritage assets identified for assessment in the Council's Scoping Opinion, namely, the scheduled monument at Someries Castle and the Grade II* registered parks and gardens at Luton Hoo, the assessment in the Environmental Statement considered the impact to be slight adverse during construction and neutral during operation. Historic England required further clarification with regard to the impact upon these two significant heritage assets following an assessment of the initial submission. The further information submitted in August 2018 helped Historic England further understand the potential impact, though they considered that there was still potential for the hotel building to be visible from the grounds of Luton Hoo and the wider setting of Someries Castle.

269. With regard to the setting of Someries Castle and Luton Hoo, it is worth noting that the development site for the business park is separated from the two heritage assets by the airport. The proposed hotel would be located approximately 2km from Someries Castle and 2.75km from the park at Luton Hoo. Between the hotel and the heritage assets would be the core terminal area, which includes a number of significant commercial

buildings notably the two multi-storey car parks which are 16m high to the top of the parapet (170mAOD), the terminal building itself at 23.5m (172mAOD) and the easyJet hangar at 20m (176mAOD). To the south of these buildings is the airport runway which is on a plateau at 154mAOD, before the land drops away to Someries Castle and down to the River Lea and the parklands surrounding Luton Hoo.

270. Historic England consider that any impact during the operational phase of the development will cause less than substantial harm in NPPF terms and that the local planning authority in reaching its conclusions should weigh the harm against the public benefits. Some of the benefits of the scheme have been described previously, including the increased area of parkland, the enhanced public facilities within Wigmore Valley Park, the contributions towards improving recreational facilities elsewhere in the borough, the bringing forward of a significant employment generating site after nearly thirty years and the jobs and income that this will bring to the local and regional economy.

271. With regard to archaeology, it has been noted that the Environmental Statement accompanying the application is informed by desk based assessments. The Environmental Statement identified likely effects that would arise as a result of the proposed development during construction and recommended appropriate mitigation. The desk based assessment was reviewed by the Council's Archaeology Team, who concluded that any impacts on archaeological deposits could be satisfactorily mitigated, recommending a condition to secure a programme of archaeological monitoring, investigation and recording.

272. It is considered that in relation to the historic environment, including designated and non-designated heritage assets and archaeology, the proposal accords with policy LLP30 of the Local Plan, with the less than significant harm caused to heritage assets being outweighed by the public benefits.

Urban Design and Impact

273. The proposed development has been described previously (paragraphs 24-41). All matters associated with the proposed business park are reserved, consequently appearance, layout, scale, landscaping and access (including road layout and parking within the business park) will be dealt with as part of future reserved matters applications for the proposed development. Nevertheless the outline planning application must still demonstrate that the quantum of development being proposed can be satisfactorily accommodated on the site. To this end the applicant has submitted parameter plans to accompany the application, which are discussed below.

Site layout

274. The site's physical characteristics have been described at the beginning of this report (paragraphs 8-13) and the layout and quantum of development have been set out in the description of the proposal.

275. The detailed element of the proposed development includes the provision of the New Century Park access road, the airport operator's Technical Service Building (replacement of hangar 24) and Wigmore Valley Park with all its associated facilities. The outline element of the application covers the business park itself.

276. The phasing plan submitted with the planning application (drawing reference 089916_050_40 Rev PL02) shows the development being built out in the following phases:

- Phase 1:
  - Wigmore Valley Park, including the refurbishment of the Pavilion Building, the new children's play areas, the new skate park, as well as the landscaping, planting, paths, furniture, etc.
  - New Century Park access road up to the roundabout within Wigmore Valley Park.
- Phase 2:
  - Relocation of the car hire parking into the Central Terminal Area
  - Replacement of parking lost by the New Century Park Access Road
  - Replacement of the long stay parking that will be lost to the Technical Services Building and Light Industrial Quarter
  - Construction of the Light Industrial Quarter
  - Construction of the Technical Services Building
- Phase 3:
  - Construction of the Office Quarter (in the centre of the business park)
  - Construction of the energy and recycling centres
  - Provision of the surface car parks within New Century Park
- Phase 4:
  - Construction of the hybrid quarter (on the eastern side of the business park)
  - Construction of the hotel (to the west of the Office Quarter and east of the Technical Services Building)

277. The "Uses" parameters plan shows the broad location of the land uses described above, whilst the "Heights" parameters plan provides the maximum heights for the various buildings proposed. The illustrative plans submitted show how the buildings can be accommodated within the allocated space, whilst the Design and Access Statement provides more

detail behind the design process including: a summary of the design; the amount of development proposed; the layout, scale, height and mass; appearance and external materials; access and the visual impact.

278. Policy LLP25 promotes opportunities for designing out crime, and therefore requires proposals to take account of the principles of Safer Places and Secured by Design. The detailed design will need to clearly mark private and public spaces and incorporate appropriate security features and be well managed.

279. The proposed development will deliver a mix of uses across the site and introduce active uses at a variety of levels within the development. The illustrative plans and the Design and Access Statement, indicate that the proposals will be able to deliver a significant quantum of public realm and the scheme has the opportunity to create a number of individual character areas. Planning conditions to secure Design Codes to focus the final design for the various "Quarters" and establish a suitable palette of materials are therefore crucial in order to achieve high quality architecture and design integrity.

Public realm

280. Policy LLP25 seeks to ensure that both buildings and spaces will be of high quality. Policy LLP31 supports public realm improvements as well as encouraging cycling and walking.

281. The proposed development clearly has two different elements to it, the redesigned Wigmore Valley Park a completely public space, and the new business park, which will be publicly accessible, include areas of public realm, but also have private spaces formed by the buildings.

282. The business park has been designed to fit within the country park, with the landscaping changing from formal treatments within piazzas and around the buildings, to less formal towards the periphery of the site. Clear pathways are created, with permeability through the site and links to the footpath network within the extended Wigmore Valley Park. A planning obligation is proposed to secure public art in accordance with the Council's Planning Obligations SPD.

283. It is important that any future reserved matters applications ensure that the proposed public realm is both durable and attractive. It is considered, on the basis of the information submitted that this is achievable and high quality landscaping will be important to ensure the delivery of the architectural vision for the development. There is significant space around the buildings to ensure that suitable and high quality landscaping can be

achieved. to the Design Codes should ensure a high quality development is delivered on this site.

284. In summary, the development will create a significant quantum of new public realm, firstly with the enlarged Wigmore Valley Park (with its formal and informal recreation facilities) and secondly with the treatment of spaces within the various quarters of the business park. The proposal will provide a number of new opportunities for those who will work or visit the business park, as well as for those who live in the surrounding area or come to make use of the open space.

Impacts on the character of the surrounding area

285. The impact upon the landscape character and the ecology of the area has been described in previous sections of this report. The impacts upon the amenities of neighbouring occupiers are described in a subsequent section.

286. The Environmental Statement included a Landscape and Visual Impact Assessment and recognised that in the short term, during construction, there would be some adverse effects on local visual receptors.

287. During the operational phase, the landscape in the country park will mature with the new planting and the managed habitats contributing positively to the area. Whilst the buildings will introduce urban forms into what is currently a country park, the location of the proposed development will have less of an impact on the open countryside than the extant scheme for Century Park, based on the borough boundary and bordering the green belt within North Herts. Overall, it is considered that the proposed development, with the mitigation proposed, will be able to be accommodated into the surrounding landscape with limited adverse impacts upon the surrounding area.

<u>Traffic and Parking</u>

288. The planning application was accompanied by a Transport Assessment with a Supplementary Transport Assessment provided in response to the Regulation 22 request and the Technical Notes issued by Highways England. In addition a Framework Travel Plan and Parking Strategy were submitted with the planning application, with the Parking Strategy being updated following the request for further information.

289. The Transport Assessment considered a number of different options for providing access to the employment site within an Options Assessment Report (the use of Vauxhall Way and Eaton Green Road; upgrade to Percival Way and President Way; a tunnel under the airport; and the New

Century Park access road). The Transport Assessment (and Supplementary Transport Assessment) also took into account the existing traffic conditions, as well as forecast traffic generation for 2021 (the assumed first year of opening) and 2031 (the assumed year for full occupation), these calculations have informed the size and capacity of the proposed road, which in all scenarios is shown as a two way dual carriageway. The Transport Assessment and the assumptions underlying it, have taken into account the traffic generation when the development is fully occupied, together with the predicted growth of traffic in the area by 2031, and fully justify the provision of a dual carriageway to serve the New Century Park development.

290. The Transport Assessment sought to assess the impact of the New Century Park development on the surrounding transport network, reviewing the site's accessibility and including an indicative set of measures to reduce single occupancy car travel and improve the sustainability of the site. The Supplementary Transport Assessment provided more detailed transport modelling including: the use of an area wide SATURN model of the road network surrounding the proposed development (covering the whole of Luton and a section of the M1); and VISSIM micro-simulation models of the proposed transport infrastructure.

291. The SATURN model was used to derive future year traffic flows reflecting the growth in passengers at the airport (and associated with other developments coming forward in the area), the proposed development and the impact of the proposed link road to Eaton Green Road.

292. Trip generation for the New Century Park development was calculated for the morning peak, during the day and the evening peak based on the proposed floorspace and using the TRICS database. For the first year of opening (assumed to be 2021) the morning peak movements into the site was predicted as 249, with the evening peak out of the site as 219. For the assumed year of full occupancy these numbers increased to 676 and 597 respectively. The distribution of trips was also modelled in order to inform the impact on various junctions in the surrounding area. Modelling forecast growth over the years, it is predicted that between 2021 to 2031 total trips will increase, with circa 32,000 movements (off peak in 2021) rising to circa 46,000 movements in the peak period in 2031. Of these the trips generated by the proposed development represent between 0.4% and 1.8%.

293. Using the SATURN model, the Supplementary Transport Assessment showed that the existing highway network suffers from peak hour congestion which will significantly increase by 2031 (by approximately 17%) which will exacerbate the current congestion unless the highway authority intervenes. The highway authority commissioned a study by

ARUP to review the capacity of the highway network in the east of the town (the East Luton Study) with a view to identifying a series of highway improvement works to address the existing and forecast congestion. The Supplementary Transport Assessment had regard to the likely outcomes of this study.

294. The Transport Assessment evaluated eighteen junctions for predicted flows (including Junctions 10 and 10A on the M1) in the morning and evening for the base case and for the first year of opening and the year of full occupancy. The assessment showed that:

- the New Century Park access road and its junctions generally operated well;
- a number of existing junctions operated with adequate reserve capacity (in both the with and without development models);
- three junctions operated with improved conditions with the development;
- other junctions would need to be upgraded which would result in improved conditions;
- four junctions would operate far in excess of their design capabilities in 2021 with or without the development (two would require mitigation if the development were to go ahead, namely Eaton Green Road/Wigmore Lane roundabout and Crawley Green Road/Wigmore Lane roundabout).

295. The conclusion was that the existing network suffers severe peak hour congestion in the vicinity of the proposed development, hence the reason why the highway authority commissioned the East Luton Study. The East Luton Study is likely to recommend proposals that will supersede the modest mitigation measures that the Transport Assessment recommends in order to ease congestion at some of the junctions affected by the proposed New Century Park development.

296. The micro-simulation models considered the first year of operation (2021) and the first year of full occupancy (2031) and showed that generally conditions are better at peak morning periods, whilst considerable queuing is observed in peak evening periods. During the morning peak the new access road and the surrounding access roads function well, with the main points of congestion being at the following junctions:

- Vauxhall Way/Eaton Green Road
- Vauxhall Way/Crawley Green Road
- Wigmore Lane/Crawley Green Road

297. It is anticipated that the proposals from the East Luton Study will result in these three junctions being improved, which will result in enhanced

operation for the new access road and the junctions on it (Frank Lester Way, Provost Way, Airport Access and the new A1081 junction).

298. In the evening peak the congestion at junctions outside the development worsens significantly and results in adverse impacts for traffic on the New Century Park access road and the junctions off that road. The conclusion of the Supplementary Transport Assessment is that significant intervention is required on the existing highway network to accommodate growth identified in the Local Plan, with or without the proposed New Century Park development. Mitigation is proposed in the form of contributions to some junction improvements, however, given the overall conclusion, measures by the highway authority to implement the proposals from the East Luton Study will be more significant and will have greater benefits in terms of easing congestion within the area.

299. Although the application is in hybrid form, with most of the business park being covered by the outline element of the application (other than the proposed Technical Service Building to replace the airport operator's Hangar 24), car parking for the development has been determined with due consideration to the Council's parking standards and aspirations in order to ensure effective parking provision and encourage sustainable travel.

300. In accordance with the Council's parking standards and to ensure no over provision of car parking, a maximum of 1,627 spaces will be provided to directly serve the new development.

301. The New Century Park access road will result in the loss of parking spaces for businesses affected by its construction. The Parking Strategy estimates that 562 spaces will be lost to the west of Frank Lester Way, but with the demolition of buildings and the reconfiguration of space, it will be possible to re-provide 630 spaces (an additional 68 spaces). To the east of Frank Lester Way there will be a greater impact since the New Century Park access road passes through the car rental car park and the TUI car park. In this area 1,659 spaces will be lost, but again with reconfiguration it is possible to provide 1,845 replacement parking spaces.

302. With the loss of spaces from the long stay car park due to development of the light industrial quarter a further 1,278 spaces will be replaced within the business park, with 300 replaced through an extension to the south of the long stay car park.

303. A Framework Travel Plan has been produced in order to guide the preparation of detailed travel plans for the various uses proposed within the New Century Park development. Accessibility to the site is considered within the Framework Travel Plan, with proposals to increase access by

bicycle, walking and public transport being taken into account The parking proposals for the proposed development have also been assessed, together with deliveries and servicing.

304. The objectives of the Framework Travel Plan are to:

- Reduce car based trips
- Achieve 'buy-in' to the requirements of the travel plan
- Provide facilities and services to support and encourage more sustainable travel by those working/visiting the site
- Maximise the cross-use of facilities on site
- Increase the use of more sustainable forms of transport
- Avoid social exclusion

305. The Framework Travel Plan made use of staff travel surveys undertaken by the Airport Business Park in October 2016 (covering GKN, TUI, Monarch and easyJet amongst others). This survey showed that 67% of journeys are undertaken by car. The Airport Surface Access Strategy was also taken into account, with its aim to increase the proportion of passengers travelling to the airport by public transport to more than 40% and reduce the proportion of staff travelling alone by car to less than 60%. The Framework Travel Plan is more ambitious and aims for the number of single occupancy car trips to and from the proposed development to be no more than 55%. The Framework Travel Plan advocates a number of measures in order to achieve this target, with specific measures targeted at walking, cycling, public transport and car use.

306. Overall it is considered that the proposed measures in relation to traffic, transport and parking accord with the core principle in the NPPF in terms of actively managing patterns of growth It is also considered that the proposals accord with policies LLP6 and LLP31 of the Local Plan which aim to ensure traffic generated by development proposals does not prejudice the free and safe movement of pedestrians, cyclists, public transport services or existing traffic.

<u>Other environmental matters (noise, air quality, drainage)</u>

307. The NPPF requires sustainable development, and as part of this development should aim to minimise adverse effects on the local environment, which includes neighbouring properties. Policy LLP25 of the Local Plan requires development to "enhance the distinctiveness and character of the area by responding positively to the townscape, street scene, site and building context, form, scale, height, pattern and materials, distinctiveness, and natural features including bio diversity".

308. Policy LLP38 of the Local Plan requires development proposals to demonstrate whether they "will result in any significantly adverse effects with regard to air, land or water on neighbouring development, adjoining land or the wider environment." The various impacts of the development were assessed within the Environmental Statement and have been summarised in the earlier section of this report. However, since the third party representations raised many of these issues, this section addresses key aspects.

Outlook and privacy

309. It is not considered that there will be an adverse impact upon the outlook or privacy of residents within the Wigmore area given the layout and location of the development.

310. The new business park will be located in the region of 200m distant from the nearest residential properties in Wigmore, and the new buildings will be separated from the residential area by the existing Eaton Green Road and part of Wigmore Valley Park with its enhanced landscaping and planting.

311. Although new buildings will be apparent in views from the surrounding townscape where previously there were open views, the development would be viewed against the backdrop of the airport and existing industrial and commercial estates and there is sufficient separation to ensure that there would be no loss of privacy nor would the outlook be prejudiced.

Air quality

312. The NPPF requires planning decisions to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants and to mitigate impacts should any be identified.

313. Policy LLP38 of the Local Plan requires development to demonstrate that it will not individually or cumulatively significantly adversely affect, inter alia, air, land or neighbouring development. This policy covers air quality with reference to amongst other things fumes, dust, smoke and gaseous emissions.

314. The Environmental Statement included a chapter that assessed the impact of the proposed development upon local air quality. This assessment considered existing and future nitrogen dioxide levels as well as particulate emissions (PM_{10} and $PM_{2.5}$) and concluded that the development would not result in any significant adverse impacts. Mitigation measures, such as a Construction Environmental Management Plan during the construction phase and sustainable transport measures

(including the preparation of travel plans) were considered to be appropriate.

315. The Council's Environmental Protection Unit reviewed the submission and considered that the proposed development was acceptable subject to the imposition of planning conditions.

Noise and vibration

316. The NPPF states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment and mitigate and reduce to a minimum potential adverse impacts resulting from noise. Policy LLP38 of the Local Plan addresses noise effects as one of the pollutants that should be assessed in any new development.

317. Noise was addressed in the Environmental Statement, with the findings and outcomes of the relevant chapter summarised previously in this report. The main noise source during construction could be controlled through a Construction Environmental Management Plan, secured by an appropriate condition. Noise during the operational phase would predominantly be associated with traffic on the New Century Park access road, however, although levels would rise, the noise assessment concluded that this would be below the ambient background noise level (noise levels in the area are high associated with the operation of the airport and the industrial premises surrounding). The one receptor where specific mitigation was identified for the operation phase was the Holiday Inn hotel. Here, given the existing ambient noise level and the nature of the use, the impact was not considered to be significant, but mitigation in the form of acoustic screens is proposed.

318. A further potential source of noise during the operational phase would be plant associated with the different uses within the development. This should not be an issue given the distance of the new buildings from the nearest residential properties, but could be controlled through the imposition of an appropriate planning condition.

Drainage

319. The NPPF states that the planning system should take full account of flood risk and in determining applications ensure that flood risk is not increased elsewhere, with major development incorporating sustainable drainage systems.

320. Policy LLP36 of the Local Plan seeks to minimise the risk and impact of flooding by directing new development to areas with the lowest probability

of flooding and ensuring that new development does not increase the risk of flooding elsewhere.

321. Surface water and drainage were considered within the hydrology chapter of the Environmental Statement and the implications of the development in this regard were considered by Affinity Water, the Lead Local Flood Authority, the Council's Environmental Protection Unit, Thames Water Utilities and the Environment Agency, given the potential for contamination of the important aquifer underlying part of the site.

322. The site falls within Flood Zone 1, so the risk of flooding is limited. The detail of the buildings proposed for the new business park has not been provided, since this element of the application is in outline form, consequently that information is reserved for subsequent approval and measures such as sustainable urban drainage systems will be secured through condition.

323. The impacts of construction have been carefully considered and the statutory consultees have recommended conditions to secure suitable protection for the controlled waters.

Economic Impact

324. Policy LLP1 of the Local Plan reflects the NPPF's presumption in favour of sustainable development and goes on to state that the strategic allocations will be the primary location for growth. Policy LLP13 sets out the Council's economic strategy and states that planning applications will be granted where they deliver sustainable economic growth and prosperity to serve the needs of Luton and the wider sub region. The policy recognises that jobs will be generated through business and industrial development within the strategic allocations.

325. The proposed development will provide a range of economic benefits during both construction and operation. These have been set out in the chapter on Socio-Economic Effects within the Environmental Statement and have been summarised above. The conclusion of the Environmental Statement with regard to the socio-economic benefits is that the level of economic growth anticipated will have a major positive effect both at the local and sub-regional level.

326. The completed development will provide the following amount of commercial floorspace:

- 29,400sqm B1(c) office (within the Office Quarter)
- 11,700sqm B2/B8 general industry and warehouse (adjacent to the airport)

- 13,000sqm B1/B2/B8 (within the office/industrial quarter)
- 2,950sqm Technical Services Building (adjacent to the airport)
- 685sqm sui generis (energy and recycling centre)
- 7,200sqm CI (145 bedroom hotel)
- 225sqm A3 café (within the office quarter)

327. In terms of job creation and contribution to the economy, the Environmental Statement predicted the following benefits

- 559 jobs during the construction phase
- £85 million contribution to UK GDP during construction
- 3,201 jobs upon full occupation of the development
- annual contribution of £167 million to UK GDP
- £135 million of wages
- £63 million in tax revenue locally

328. Additional benefits would be secured through the Section 106 agreement, including and Employment, Training and Skills Strategy which would seek to help local people develop appropriate skills in order to access the jobs that would be created with the new development.

329. Reference was made to the impact of the development upon the Butterfield Technology Park. In terms of the quantum of development that is being promoted through the New Century Park business park. The application proposes just under 65,000sqm of total floorspace, whereas the last application permitted for the Century Park site (ref: 99/01083/RENEW) envisaged more than double that area of floorspace (in excess of 150,000sqm). The uses proposed reflect the high-tech focus of the enterprise zone, and the land uses considered appropriate in LLP6. The Employment Land Review that informed the Local Plan concluded that Luton would have a shortage of B1 premises, whilst competition with another employment site does not represent a material reason for refusing planning permission.

330. It is considered that the proposed development will create a significant number of jobs, both during the construction phase and once occupied, and will promote economic growth and development within the strategic allocation to the benefit of Luton and the sub-region. As such the proposals would accord with policy LLP1 and LLP13 in helping to achieve sustainable development and the objectives of economic growth, jobs and investment in set out in the Council's economic strategy.

<u>Third party representations</u>

331. The application has been the subject of two extended periods of consultation, the first in January through to February 2018 following the

initial receipt of the application, the second in August through September following the receipt of the further information. The application has recently been advertised for a third time to reflect the requirements of the Town and Country Planning (Development Management Procedure) Order 2015.

332. Appendix 3 provides a summary of the individual responses that were received (though where responses have repeated the contents from other representations these are usually noted). Appendix 4 provides a summary of the proforma responses, these were letters or bullet point lists that third parties were able to photocopy and submit with additional comments if they felt so inclined.

333. The applicant in submitting the further information provided a summary of the publicly available third party representations, together with a response to the issues that were raised. Within the further information that was submitted following the Regulation 22 request, the applicant also provided responses to the representations that were received from statutory and technical consultees.

334. In writing the report, the responses have been addressed in the individual sections of the report.

Planning obligations

335. A planning obligation can be required to mitigate the impact of a development, particularly in circumstances where the desired restrictions go beyond the scope of planning conditions. In accordance with section 106 of the Town and Country Planning Act 1990, the local authority will enter into a legal agreement with the applicant to secure planning obligations.

336. Paragraph 56 of the NPPF says local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Paragraph 56 advises obligations should only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

337. These tests reflect Regulation 122 of the CIL Regulations.

338. Planning obligations can include financial obligations requiring monetary contributions to the local authority to fund works or services as well as in-kind obligations requiring specific actions to be performed by specific parties.

339. The Council's Planning Obligations Supplementary Planning Document (SPD) sets out in principle what kinds of planning applications will require planning obligations and in broad terms how monies will be spent on projects related to the proposed development.

340. The following contributions and obligations are considered necessary in order to mitigate the impacts of the development and achieve the benefits that were set out in the Environmental Statement.

- Public art contribution (£ 250,000)
- County Wildlife Site contribution (£ 250,000)
- Biodiversity contribution (£ 30,000)
- Replacement trees contribution (£ 35,000)
- Raynham Way Neighbourhood Park Play contribution (£ 35,000)
- Roads and highway improvements contribution (£ 3,455,917)
- Sports pitch and changing room re-provision contribution (£1,196,737)
- Measures to ensure the new open space for Wigmore Valley Park is provided in advance of any development taking place on the existing park and the provision of a maintenance specification to ensure the long term maintenance and management of the park
- Construction, employment and training and skills initiatives.

CONCLUSIONS

341. There are a number of planning issues for consideration which are raised by this planning application. The assessment requires the evaluation of many impacts, both positive and negative, many of which require the exercise of planning judgement. This assessment has taken into account relevant Development Plan policies, the NPPF, information in the submitted Environmental Statement and other environmental information including that submitted in accordance with Regulation 22 of the EIA Regulations 2011.

342. The issues considered relate to the loss of parkland, including playing fields and natural habitats; the provision of a new business park; the construction of an access road with link to Eaton Green Road; and the impact upon the environment from the construction of the development. The application has attracted widespread public interest with large numbers of submissions from local residents as well as further afield. There have been a significant number of statutory consultees and local

interest groups that have responded to the consultations that have been carried out.

343. The primary objective of the planning application is to provide a new business park within the strategic allocation and bring forward one of the few remaining significant employment sites within Luton, in order to maintain and enhance Luton's important sub-regional role as a place for economic growth and opportunity.

344. Whilst the Council's Local Plan policy has consistently promoted employment provision to the south of Eaton Green Road since 1988 and planning permissions have been granted for development in the area since 1991, the Council's aspiration to deliver on this strategic allocation to date has been unfulfilled.

345. The proposed development is part compliant with policies LLP1, LLP2 and LLP6, since it is one of the strategic allocations where the Council's spatial development strategy seeks to focus major development. However, it does give rise to some apparent conflict with the development plan, with the link to Eaton Green Road, the loss of ecological habitats and areas of landscape value, development in Wigmore Valley Park and the loss of playing fields.

346. Policy LLP6E of the development plan does set criteria whereby development such as that proposed by this planning application is considered acceptable, thus the policy made provision for:

- the reallocation of land uses within the strategic allocation;
- the scale and quality of the open space and landscaping being maintained, and if feasible the provision of a net increase in open space;
- the enhancement and improvement of biodiversity within the borough;
- within replacement open space for Wigmore Valley Park the provision of facilities of at least equal quality prior to development; and
- the long term management of the open space, landscaping and bio-diversity

347. The planning application and proposed legal agreement would satisfy all of these criteria, with: an additional two hectares of public open space being provided; the provision of new areas of open space opened up before others are developed; the enhancement of the existing park with new facilities, additional planting; new footpaths; the improvement of biodiversity within the borough with enhancement of7.5ha of the Dallow Downs County Wildlife Site; the enhancement of other facilities within the area (the play area within Raynham Way Neighbourhood Park) before the existing children's play area is decommissioned and the new skate park

and children's play facilities provided; contribution to the sports field and changing room re-provision elsewhere in the borough having been agreed with Sport England; and provision for the long term management of the open space.

348. The benefits that the proposed development will deliver are considered to outweigh any conflict with the development plan. These benefits include:

- Delivering one of the borough's four strategic employment allocations which will help to achieve the strategic objectives set out in the Local Plan in relation to economic growth, investment and employment;
- Provision of high quality new office, light industrial, general industrial and storage/distribution floorspace through the various quarters provided in the New Century Park business park;
- Economic benefits which include an estimated 263 full time equivalent construction jobs over the period; 3,201 full time equivalent jobs once the development is fully operational; £135 million of gross wages contributing £63 million in tax revenue to the local area; and an annual contribution to GDP of £167 million;
- Creation of a larger area of open space than currently exists, with enhanced facilities within the park, together with benefits to the wider community with improved sports facilities elsewhere in the borough;
- Whilst there would be an impact on the County and District Wildlife Sites as a consequence of the development, the Section 106 agreement makes provision for enhancements to the site at Dallow Downs, whilst management and maintenance of retained areas of biodiversity and the creation of new habitats within the park will prove of benefit locally; and
- Opportunities for the enhancement of skills and knowledge of local people through the training initiatives included within the legal agreement.

349. Other issues relating to impacts from the proposed development on the environment that may arise during construction and operation of the development, such as traffic, noise, air quality, contamination and drainage have been the subject of consideration and addressed within the Environmental Statement as part of the environmental impact assessment process. It is considered that these are addressed satisfactorily through the use of the recommended planning conditions.

350. The NPPF and Policy LLP 30 emphasise that the conservation of archaeological interest is a material consideration in the planning process. The Archaeology team have confirmed that they do not object to the principle of development at this site. The Archaeology team do however, consider that any impact on archaeological deposits could be satisfactorily mitigated through an appropriate programme of archaeological monitoring

with investigation and recording as necessary and also a scheme of heritage asset resource management.

351. Historic England have concluded that from Luton Hoo the development would largely be screened by topography or planting, though there are some parts of the parkland where the existing airport buildings are visible and consequently the New Century Park development might also be visible. In relation to Someries Castle Historic England considered that there is some potential the development, particularly the hotel building, to be visible from the wider setting of Someries Castle, though this would constitute less than substantial harm and the Local Planning Authority would have to weigh this against the public benefits that might accrue. It is considered that the public benefits, to which reference has been made, outweigh the less than substantial harm to the heritage assets.

352. Careful consideration will still, however, need to be given to the proposed layout, scale, appearance and landscaping of the proposed development to minimise harm to these heritage assets. These are however, matters which will be dealt with through the submission of details which will ensure that there is sufficient scope in this application that the design and layout of the proposed development is appropriately addressed.

353. One of the main issues is the impact of the proposed uses, particularly those in the later phases of the development, on the transport network, including traffic on the local roads and the strategic network. Whilst it is estimated that construction traffic will generate an annual daily average of 55 HGV movements, the routes are likely to be restricted to the main A-roads and motorway and will be controlled through the Construction Traffic Management Plan (part of the overall Construction Environmental Management Plan). During the operational phase the morning and evening peaks have been calculated and the Transport Assessment (and Supplementary Transport Assessment) has included modelling taking into account growth over the period. Whilst the development will generate a significant number of movements necessitating the provision of a significant piece of infrastructure in the form of the New Century Park access road, the movements associated with the development only represent between 0.4% and 1.8% of the total movements over the period.

354. In order to ensure that the road network, including the strategic network, can accommodate the traffic arising from the proposed development, planning conditions have been proposed. Highways England have recommended a condition, requiring further assessments of the effects of traffic generated from the office quarter, hybrid industrial quarter or hotel, together with any mitigation before those phases of development are brought into use. A further condition is recommended by the Council's Highway Engineer, to ensure that the New Century Park access road and

the link road to Eaton Green Road are provided and operational before Phase 3 (the Light Industry quarter) is occupied, whilst also ensuring that the link road is not provided in advance of the New Century Park access road, since this is likely to adversely affect traffic on the local road network as well as amenities of residents in the area.

355. The Council's Highway Engineer has confirmed that the New Century Park access road and link road will be public highway upon completion and that for the offsite junction improvements identified it may be necessary to enter into a Section 38/278 Agreement. A condition is also recommended that these junction improvements should be carried out before the New Century Park and link road to Eaton Green Road come into use, but it is proposed that this be incorporated into the legal agreement.

356. Whilst it is clear that there is considerable growth forecast for traffic in east Luton, and a study has been undertaken on behalf of the Council which recommends (separate to this application) highway improvements in the area, overall, it can be concluded that the proposed development can be satisfactorily accommodated with some junction improvements that are included within the Section 106 agreement. Adoption of travel demand management measures and proposed mitigation will ensure that the impacts on the local and strategic highway network are further mitigated to the satisfaction of the developer and the responsible authorities.

357. Parking for the business park has been determined with consideration to the Council's adopted parking standards and to ensure effective parking provision to encourage sustainable travel. The re-provision of parking spaces for those lost as a result of the route of the New Century Park access road and the erection of the Light Industrial Quarter on the site of the existing long-stay car park, ensures that in line with policy LLP6A the operational integrity of the airport is not adversely affected.

358. Development should aim to minimise adverse effects on the local environment, which includes neighbouring properties. Given the distance of the development from the nearest residential properties in Wigmore, it is assessed that the proposed development should not cause unacceptable harm to the amenity of the surrounding land and buildings, in relation to privacy, overshadowing, noise and air quality. Given the layout of the development, and the characteristics of the site's location in relation to the siting and proximity of surrounding development the proposed buildings are on the whole not considered to be overbearing.

359. The business park is defined by a number of quarters, notably the light industrial quarter (located on the site of part of the long stay car park), the hotel (adjacent to the Technical Services Building in the north-west of the site), the office quarter (central to the business park), and the

hybrid/industrial quarter (on the eastern periphery). With most of the business park being part of the outline proposal with all matters reserved for later submission, it is important that any future reserved matters applications should ensure that the individual quarters are of high quality, with an attractive and durable design for the buildings and their associated public realm.

360. The proposed development seeks to achieve sustainability that incorporates, and exceeds BREEAM Very Good ratings for all buildings (other than the Technical Services Building which will aim to exceed Good). The proposal includes adequate measures to ensure the development is able to achieve current standards for energy efficiency and sustainable building design. Conditions will secure details of the various measures proposed and required.

361. There is a need to secure mitigation measures and to restrict the proposals to the parameters assessed in both the environmental impact assessment and the details comprised in the planning application, this will be ensured by conditions. A Section 106 agreement is also required to secure delivery the highway improvements, replacement playing field provision, wildlife and habitat enhancements, long term maintenance of the open space and other mitigation.

362. The development will give rise to an extensive range of positive impacts, which are considerable and widespread in their public benefit, not least those that arise from securing the regeneration of the site and especially the provision of new employment, new investment and spending in the area.

363. The weight to be given to these matters is ultimately a decision for Members. Taking all these matters into account, balancing the social, environmental and economic benefits of the development against the residual harm, approval is recommended.

LIST OF BACKGROUND PAPERS
LOCAL GOVERNMENT ACT 1972, SECTION 100D

364. Luton Local Plan 2011-2031
365. National Planning Policy Framework
366. National Planning Practice Guidance

DETERMINATION OF PLANNING APPLICATIONS

The Council is required in all cases where the Development Plan is relevant, to determine planning applications in accordance with policies in the Development Plan unless material considerations indicate otherwise.

Equality Implications

EQUALITY ACT 2010

In dealing with this planning application and in reaching the recommendation set out in this report, proper consideration has been given to the duty imposed on the Council under the Equality Act 2010 to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by that Act; to advance equality of opportunity and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics under the Act are a person's age, sex, gender assignment, sexual orientation, disability, marriage or civil partnership, pregnancy or maternity, race, religion or belief. In this case, no disproportionate effect on people with protected characteristics has been identified.

HUMAN RIGHTS ACT 1998

The determination of the application which is the subject of these reports is considered to involve the following human rights:-

1. Article 8: Right to respect for private and family life; and
2. Article 1 of the First Protocol: Protection of Property

The report considers in detail the competing rights and interests involved in the application. Having had regard to those matters in the light of the Convention rights referred to above, it is considered that the recommendations is in accordance with the law, proportionate and balances the needs of the applicant with the protection of the rights and freedoms of others in the public interest.

SECTION 17 CRIME AND DISORDER ACT 1998

In reaching the recommendations set out in each report, due regard has been given to the duty imposed upon the Council under Section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in its area.

APPENDIX 1 – LIST OF CONDITIONS

AGENDA ITEM
7

COMMITTEE: **DEVELOPMENT CONTROL**

DATE: **27 MARCH 2019**

NEW CENTURY PARK PLANNING APPLICATION

APPENDIX 1: List of Conditions

General conditions

(01) **The development hereby permitted shall be begun not later than the expiration of three years beginning with the date of this permission.**

Reason: To limit the duration of the permission in accordance with the provisions of Sections 91-96 of the Town and Country Planning Act, 1990.

(02) **Applications for approval of the access, appearance, landscaping, layout and scale (herein after called the "reserved matters") for the first phase of the outline development hereby permitted shall be made to the Local Planning Authority before the expiration of three years from the date of this permission. Thereafter, applications for approval of all reserved matters relating to subsequent phases of the development shall be made to the Local Planning Authority before the expiration of two years from the date of approval of the last of the reserved matters of the preceding phase.**

Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(03) **Full details and particulars of the reserved matters referred to in condition 02 above shall be submitted to and approved in writing by the Local Planning Authority before any development of the outline element of the scheme is commenced (phases 2, 3 or 4).**

APPENDIX 1 – LIST OF CONDITIONS

Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(04) The development hereby permitted shall not be carried out other than in complete accordance with the approved plans and documents listed in Appendix 2, or as shall have been otherwise approved in writing by the Local Planning Authority before the buildings are occupied.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP2, LLP6, LLP13, LLP14, LLP31, LLP32, LLP36, LLP37 and LLP38 of the Luton Local Plan* 2011-2031 (November 2017) *and the aims and objectives of the NPPF.

(05) The development hereby permitted shall be limited to the following:

- **29,400sqm B1(a) office floorspace;**
- **13,000sqm flexible office/industrial floorspace;**
- **11,700sqm B2 general industrial and B8 storage;**
- **2,950sqm Technical Services Building;**
- **685sqm sui generis use comprising two buildings, one an energy centre and the other a recycling centre;**
- **7,200sqm (145 bedroom) hotel;**
- **225sqm ancillary retail;**
- **Between 3,200 and 3,500 car parking spaces within New Century Park, the extended long stay car park and the relocated car hire facility in the Central Terminal Area;**
- **New and enhanced park (including refurbished Pavilion Building, children's play areas, skate park, parkland, footpaths, ancillary park furniture, orchard, woodland and shrub planting, and habitats); and**
- **Associated access, highways, structures (including bridge, retaining walls and embankments), public realm, landscaping and ancillary works.**

Reason: To ensure the development is carried out in accordance with the planning permission and to ensure that any development that is carried out is that which has been assessed. To accord with the objectives of Policies LLP1, LLP25 and LLP31 of the Luton Local Plan 2011-2031 (November 2017).

<u>Archaeology condition</u>

(06) No development shall take place until a written scheme of heritage asset resource management (SHARM) has been submitted to and approved in writing by the Local Planning Authority. The SHARM shall include provision for preservation and management in situ

(where possible); archaeological investigation and recording and an outline strategy for post excavation analysis and publication. The development hereby approved shall only be implemented in full accordance with the approved archaeological scheme.

Reason: This condition is pre-commencement as a failure to secure appropriate archaeological investigation in advance of development would be contrary to paragraph 141 of the National Planning Policy Framework (NPPF) that requires developers to record and advance of understanding of the significance of any heritage assets affected by development before they are lost (wholly or in part) and Policy LLP30 of the Luton Local Plan 2011-2031 (November 2017).

Demolition/construction conditions

(07) No development shall commence until a detailed Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority, and the plan shall include the following:

a) The construction programme and phasing;
b) Hours of operation, delivery and storage of materials;
c) Details of any highway works necessary to enable construction to take place;
d) Parking and loading arrangements;
e) Details of piling operations and mitigation measures to be employed (including the acoustic screen adjacent to the Holiday Inn);
f) Details of hoarding;
g) Traffic Management Plan to reduce congestion (including route signage and travel demand management);
h) Materials Management Plan (to include topsoil removal, storage and re-use);
i) Provision of a Dust Management Plan (including control of dust during demolition, construction, earthworks and the control of dust and dirt on the public highway);
j) Details of consultation and complaint management with local businesses and neighbours;
k) Site Waste Management Plan;
l) Mechanisms to deal with environmental impacts such as noise, air quality, light and odour.

The development shall be carried out in accordance with the Construction Environmental Management Plan as approved.

Reason: To enable the Local Planning Authority to exercise proper control over the development proposed, in the interests of securing a satisfactory standard of work and of highway safety and the control of environmental impacts. To accord with the objectives of Policies LLP1, LLP25, LLP31 and LLP38 of the Luton

APPENDIX 1 – LIST OF CONDITIONS

Local Plan 2011-2031 (November 2017) and to ensure the M1 Motorway continues to serve its purpose as part of a national system in accordance with section 10 of the Highways Act 1980.

(08) No impact piling shall commence until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to control noise and measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: To ensure adequate safeguards are taken during construction of the development, having regard to existing ground conditions, and to prevent pollution of the water environment and risk to other receptors. To accord with the objectives of Policies LLP1, LLP36 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

Air quality conditions

(09) No development shall commence until a scheme of air quality mitigation measures has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme prior to the first occupation of any buildings.

Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(10) No development within Phase 3 or Phase 4 (as shown on drawing 089916_050_40 RevPL02) shall commence until a suitable Air Quality Assessment has been undertaken, submitted to and approved in writing by the Local Planning Authority to address the inclusion of any combined Heat and Power plant or similar installations. The assessment shall be undertaken in line with all current relevant guidance and standards. The report shall identify suitable measures to mitigate the impacts to any sensitive receptors identified. The development shall be carried out in accordance with any approved plant or mitigation.

Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

Unexploded ordnance condition

APPENDIX 1 – LIST OF CONDITIONS

(11) No development shall commence until an Unexploded Ordnance (UXO) site safety and emergency procedures plan has been submitted to and approved in writing by the Local Planning Authority.

The Development shall only be carried out in accordance with the approved UXO site safety and emergency procedures plan.

Reason: To reduce risk from Unexploded Ordnance to an acceptable level, as the site lies within an area that has been identified as being at potential risk from buried explosive ordnance due to wartime bombing.

<u>Contamination/remediation conditions</u>

(12) No phase of development shall commence until a remediation strategy to deal with the risks associated with contamination of the site for that phase has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
   - **i. all previous uses;**
   - **ii. potential contaminants associated with those uses;**
   - **iii. a conceptual model of the site indicating sources, pathways and receptors considering both the current condition and proposed future usage of the site; and**
   - **iv. potentially unacceptable risks arising from contamination at the site.**

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors (current and future) that may be affected, including those off site. This must include a detailed hydrogeological risk assessment using site specific groundwater level and quality data to assess risks to controlled waters considering the current site conditions and the anticipated conditions post development. In addition, the hydrogeological risk assessment must assess the potential for leachate mobilisation / expulsion caused by disturbance and changes in loading in the historical Eaton Green landfill area that may occur as a result of the development.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses. This condition is required to ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with and in order to protect human health. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF.

(13) Before each phase of development is brought into use a verification report demonstrating the completion of works set out in the approved remediation strategy for that phase, and the effectiveness of the remediation, shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses that may have resulted in soil and or groundwater contamination. Where such contamination is identified to present an unacceptable risk to groundwater within the context of the conceptual site model (CSM), controlled waters risk assessment, remediation strategy and verification plan, a verification report is required to demonstrate the remediation of the site has been successful and that residual contamination at the site no longer presents a risk to controlled waters. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF

(14) The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority.

Reason: The Addendum to the Environmental Statement (GL Hearn Ltd, August 2018) submitted in support of this application indicates that groundwater beneath the proposed development site is already impacted with contaminants associated with the historical usage of the site. The groundwater monitoring and

maintenance programme will provide data to demonstrate that no further deterioration of groundwater quality beneath the site has occurred as a result of the proposed development. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(15) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: No site investigation can completely characterise a site and contamination may exist or in areas where contamination was not expected and therefore not included in the original remediation proposals. To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF.

(16) No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: The previous use of part of the proposed development site as a landfill receiving mixed inert, industrial, commercial and domestic wastes presents a high risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS) leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(17) Piling and other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority with details to be submitted to and approved in writing by the Local Planning Authority (including details of a piling risk assessment to detail steps to prevent overlying contaminated materials from impacting the chalk aquifer). The development shall be carried out in accordance with the approved details.

Reason: Piling using penetrative methods can result in risks to groundwater from by introducing pollutants / turbidity, mobilising contamination, drilling through different aquifers and creating preferential pathways. Groundwater is particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and with paragraph 170 of the NPPF.

(18) A scheme for managing any redundant boreholes, shafts, tunnels and adits, including boreholes installed for the investigation of soils, groundwater or geotechnical purposes, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of how redundant boreholes, tunnels, shafts and adits are to be decommissioned and how any boreholes that need to be retained, post development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to of each phase of development.

Reason: To ensure that redundant boreholes, shafts, tunnels and adits are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and Position Statement A8 of the Environment Agency's Groundwater Protection: Principles and Practice. If these ground penetrations are not decommissioned correctly they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

<u>Drainage conditions</u>

(19) Before each phase of the development commences, a detailed surface water drainage design for that phase shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. The design should include a maintenance and management schedule for the lifetime of the development.

The surface water scheme should be generally in accordance with the submitted flood risk assessment and drainage strategy with subsequent amendments and associated drawings as follows: New Century Park, Luton Flood Risk Assessment by Pell Frischmann, dated Dec 2017; London Luton Airport Century Park Access Road and New Century Park Drainage Strategy by Pell Frischmann, dated Dec 2017; Century Park Access Road Proposed Drainage Layout KQ30131H146 and KQ30131H147,

APPENDIX 1 – LIST OF CONDITIONS

Wigmore Valley Park Drainage Layout 083075 CA 0 GF DR CE 001 P02; New Century Park Outline Drainage Strategy Revised surface water layout KQ30131H182, Revision P4; Wigmore Valley Skate park Surface Drainage Plan WGMR-DLP01; Addendum to Century Park Access Road and New Century Park Drainage Strategy, August 2018; New Century Park, Luton Addendum to Flood Risk Assessment, RE30131/V006/P4A, July 2018.

Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the NPPF.

(20) Before each phase of the development is brought into use, a set of 'as built' drawings of the above drainage scheme together with a written statement by a suitably qualified person should be submitted to the Local Planning Authority, confirming that the scheme operates as designed.

Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the National Planning Policy Framework (NPPF).

(21) The proposed strategy incorporates sustainable urban drainage systems (SUDs) in the form of infiltrative drainage for parts of the site. Where there is a risk of hydrocarbons being present in surface water, run off appropriate pollution prevention techniques should be incorporated. The drainage strategy refers to by-pass separators which would be effective as long as they are maintained and do not allow cleaning detergents (e.g. from car washes) into them. This reduces the separators ability to remove the oil from the water. There should be no infiltrative drainage in the former landfill area due to the risk of mobilising contaminants within the landfill body. The siting of soakaways should also be mindful of the presence of clay with flints at the site as the low permeability of this strata is not suitable for infiltrative drainage.

Reason: To ensure adequate safeguards are taken during construction of the development and following its completion, having regard to the existing ground conditions, and to prevent pollution of the water environment and risk to other receptors. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(22) No phase of the development shall be occupied until confirmation has been provided that either:- all wastewater network upgrades required to accommodate the additional flows from that phase of

the development have been completed; or - a commercial buildings and infrastructure phasing plan has been agreed with the Local Planning Authority (in consultation with Thames Water) to allow additional buildings to be occupied. Where a commercial buildings and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed commercial buildings and infrastructure phasing plan.

Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any networky reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017),

Noise conditions

(23) Noise emitted from any fixed plant on site shall be at least 10dB lower than the existing background noise level as measured at the nearest noise sensitive location outside the site and the measurement should be made in accordance with BS4142:1997.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(24) No development shall commence until details of the acoustic screen associated with the proposed New Century Park Access Road to the west of the Holiday Inn hotel (illustrated on drawing D-Q30131-H-0101 have been submitted to and approved in writing by the Local Planning Authority. Such details shall include acoustic reduction properties, height, materials and colour. The scheme shall be implemented in accordance with the approved plans and thereafter permanently retained and maintained.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

Design and sustainability conditions

(25) Details of a Design Code for the light industrial quarter (Phase 2), the office quarter and the hybrid quarter (both Phase 3), as shown on drawing 089916_050_01 RevPL02, shall be submitted to and approved in writing by the Local Planning Authority prior to the submission of the details reserved for subsequent approval for

each phase. The Code shall identify all details to maximise the quality and legibility of the spaces, to help reinforce local character and accessibility, the details should ensure that these areas would be high quality. The construction of the proposed development shall then be carried out in accordance with the details set out within the approved Design Code.

Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017).

(26) No above ground works associated with the New Century Park access road shall take place until details of all structures (including embankments, retaining walls, bridges, fences and walls) have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017).

(27) No above ground works within a phase of the development shall take place until a detailed scheme of feasible on-site sustainability measures covering:

(a) The sourcing of materials to be used in the construction of and fitting out of the buildings (involving reuse, recycling and other sustainable sourcing);
(b) Certification that the hotel, industrial units and offices would achieve a BREEAM Very Good rating and that the Technical Services Building would achieve at least a BREEAM Good rating;
(c) The use of passive ventilation and other passive measures;
(d) Reducing carbon emissions from the total energy needs (heating, cooling and power) by 25% from the 2010 Part L Building Regulations Standards for the overall outline phases (including from the on-site generation of renewable energy);
(e) Details of arrangements to allow future connection to a centralised energy centre either on the site or in the locality (district heating network); and
(f) Rainwater harvesting
has been submitted for each phase and approved in writing by the Local Planning Authority. The scheme as approved for

each phase shall be implemented prior to occupation of that phase unless otherwise approved in writing by the Local Planning Authority and retained and maintained thereafter.

(g) Within 3 months of first use of the buildings a BREEAM Post Construction Certificate for the relevant buildings, issued by the BRE or equivalent licensing organisation, must be submitted to the Local Planning Authority to demonstrate that BREEAM targets in (b) above have been achieved. All the measures integrated shall be retained for as long as the development is in existence.

Reason: To prevent an unsatisfactory form of permanent development. To accord with the objectives of Policies LLP1, LLP25 and LLP37 of the Luton Local Plan 2011-2031 (November 2017).

(28) No above ground works within a phase of the development shall take place until a scheme has been submitted to and approved in writing by the Local Planning Authority, giving details of how the buildings, open spaces and car parking address 'Secured by Design' principles. Each phase of the development shall be carried out in full accordance with the approved details and maintained thereafter.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(29) No above ground works within a phase of the development shall take place until an external lighting strategy and details of CCTV for that phase of the development have been submitted to and approved in writing by the Local Planning Authority. Lighting and CCTV for each phase shall be completed in accordance with the approved strategy for each phase prior to occupation of that phase, and shall be maintained in accordance with the approved details permanently thereafter.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

(30) No above ground works within a phase of the development shall take place until details of the arrangements for storage and collection of refuse and recycling for the approved buildings and uses, have been submitted to and approved in writing by the Local Planning Authority. The development shall be completed in accordance with the approved details prior to occupation of each phase, and shall be maintained permanently thereafter.

Reason: To ensure adequate provision is made for storage and management of refuse and recycling, and to ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).

Landscaping and tree conditions

(31) Before any building or engineering works within a phase are commenced on site the existing trees, shrubs and/or hedges to be retained shall be safeguarded against damage or injury by the erection of fencing or other suitable protection at a distance of not less than 2 metres from the tree trunk(s) or shrubs or hedging, and no plant, materials or other objects shall be stored or placed against any of the trees, shrubs or hedges. The protection measures referred to above shall be maintained during the whole period of site excavation and construction.

Reason: To safeguard the existing trees, shrubs and/or hedges on the site. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(32) The Wigmore Valley Park landscaping shown on the approved drawings (series WVP-CAP-DR-L-101 to WVP-CAP-DR-L-109) shall be undertaken within the first planting season following commencement of development and shall incorporate the tree, hedgerow, groundcover and grassland species and quantities set out in the submitted Planting Schedule and Specification (ref; WVP-CAP-DR-L-210).

If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.

Reason: To enable the Local Planning Authority to monitor the implementation of the approved landscaping scheme. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(33) The landscaping reserved matter for each phase (referred to in condition 02) shall include full details of all hard surfaces, grassed areas, tree and shrub plantings and the proposed times of planting. The landscaping scheme approved for a phase shall be

carried out by a date not later than the end of the full planting season immediately following the completion of building operations within that phase. If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(34) A landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for each phase of the areas covered by the outline permission for all hard and soft landscape areas shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of above ground works in that phase. The maintenance schedule shall be for a minimum period of ten years (for each phase) and include details of the arrangements for its implementation. The landscape management plan shall be carried out as approved.

Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

<u>Transport and parking conditions</u>

(35) No above ground works within a phase of the development shall take place until details of cycle parking in accordance with the Local Plan cycle parking standards for that phase have been submitted to and approved in writing by the Local Planning Authority. The approved cycle parking shall be implemented prior to occupation of buildings within that phase and maintained in perpetuity afterwards.

Reason: To maximise cycling as a mode of travel to the site. To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP32 of the Luton Local Plan 2011-2031 (November 2017).

(36) No occupation of any phase of the development shall commence until details of parking in accordance with the Local Plan parking

standards for that phase has been submitted to and approved in writing by the Local Planning Authority. Parking shall be provided in accordance with the approved details prior to the first use of the approved phase, with these facilities to be permanently maintained thereafter.

Reason: To avoid the creation of traffic congestion on the highway in the interests of safety and convenience of pedestrians and other road users. To accord with the objectives of Policies LLP1, LLP2 and LLP31 of the Luton Local Plan 2011-2031 (November 2017).

(37) No phase of the development shall be brought into use until a Travel Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be broadly in line with the Framework Travel Plan prepared by Pell Frischmann (December 2017) and shall be in line with the prevailing policy and best practice and shall include as a minimum:

- **The identification of targets for trip reduction and modal shift;**
- **The methods to be employed to meet these targets;**
- **The mechanisms for monitoring and review;**
- **The mechanisms for reporting;**
- **The penalties to be applied in the event that the targets are not met;**
- **The mechanisms for mitigation;**
- **Implementation of the Tavel Plan to an agreed timetable and its operation thereafter; and**
- **Mechanisms to secure variations to the Travel Plan following monitoring and review.**

The Travel Plan shall be implemented as approved before occupation of the development.

Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017).

(38) No part of phase 3 or 4 (as shown on drawing 089916_050_40 RevPL02) shall be occupied until the New Century Park access road and the link to Eaton Green Road have been completed and are ready for use. The link road between the New Century Park access road and Eaton Green Road shall not be provided and available for use in advance of the completion and opening of the New Century Park access road.

Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians

and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017).

(39) No buildings within the Office Quarter, the Hybrid/Industrial Quarter or the Hotel, identified on drawing 089916_050_01 RevPL02 (proposed illustrative masterplan), are to be occupied until such time as the effects of traffic generated by such development and any identified relevant mitigation measures have been submitted to and approved in writing by the Local Planning Authority (in consultation with the Highways Authority and Highways England). The mitigation measures shall be carried out in accordance with the approved scheme.

REASON: To ensure the M1 Motorway continues to serve its purpose as part of a national system of routes for through traffic, to satisfy the reasonable requirements of road safety on the M1 Motorway and connecting roads in accordance with section 10 of the Highways Act 1980.

APPENDIX 2 - APPROVED PLANS AND DOCUMENTS

AGENDA ITEM

7

COMMITTEE: **DEVELOPMENT CONTROL**

DATE: **27 MARCH 2019**

NEW CENTURY PARK PLANNING APPLICATION

APPENDIX 2: APPROVED PLANS AND DOCUMENTS

PLANS

Century Park Access Road plans:

Car Parking Strategy Properties Demolished And Lost KQ30131H120 Rev9
Car Parking Strategy Properties Demolished And Lost KQ30131H120A Rev9
Car Parking Strategy Properties Demolished And Lost KQ30131H121 Rev8
Car Parking Strategy Areas Affected KQ30131H121A Rev8
Parking Strategy Reprovision (1 of 2) KQ30131H122 Rev9
Parking Strategy Reprovison (2 of 2) KQ30131H123 Rev8
CPAR Scheme Layout KQ30131H141 Rev6
New Airport Way Layout KQ30131H142 Rev2
CPAR Highway General Arrangement Sheet 0 - 350M KQ30131H148 Rev3
CPAR Highway General Arrangement Sheet 350 - 700M KQ30131H149 Rev2
CPAR Highway General Arrangement Sheet 700 - 1050M KQ30131H150 Rev4
CPAR Highway General Arrangement Sheet 1050 - 1400M Rev3
CPAR Highway General Arrangement Sheet 1400 - 1750M KQ30131H152 Rev2
CPAR Highway General Arrangement Sheet 1750 - 1950M KQ30131H153 Rev2
CPAR highway general arrangement (new century park) sheet 1 of 5 KQ30131H153A Rev3
CPAR highway general arrangement (new century park) sheet 2 of 5 KQ30131H154 Rev2 (outline only)
CPAR highway general arrangement (new century park) sheet 3 of 5 KQ30131H155 Rev2
CPAR highway general arrangement (new century park) sheet 4 of 5 KQ30131H155A Rev2 (outline only)
CPAR highway general arrangement (new century park) sheet 5 of 5 KQ30131H156 Rev3
Typical Kerb Details KQ30131H157 Rev0
Tactile Paving Details KQ30131H159 Rev0
Carriageway & Footway Construction KQ30131H160 Rev0
Typical Cross Sections Main Carriageway Sheet 1 Of 6 KQ30131H164 Rev2
Typical Cross Sections Main Carriageway Sheet 2 Of 6 KQ30131H164A Rev0
Typical Cross Sections Main Carriageway Sheet 3 Of 6 KQ30131H164B Rev0
Typical Cross Sections Main Carriageway Sheet 4 Of 6 KQ30131H164C Rev0
Typical Cross Sections Main Carriageway Sheet 5 Of 6 KQ30131H164D Rev0
Typical Cross Sections Main Carriageway Sheet 6 Of 6 KQ30131H164E Rev0
Frank Lester Way GA Plan KQ30131H166 Rev0
Airport Way Typical Cross Section KQ30131H167 Rev2

APPENDIX 2 - APPROVED PLANS AND DOCUMENTS

Eaton Green Road GA Plan KQ30131H168 Rev3
CPAR Construction Compound Locations And Site Access Points KQ30131H169 Rev3
Car Park Plots Standard details KQ30131H210 Rev0
Individual plot detail - Plot A KQ30131H211 Rev0
Individual plot detail - Plot B KQ30131H212 Rev0
Individual plot detail - Plot B -ext KQ30131H213 Rev0
Individual plot detail - Plot C KQ30131H214 Rev0
Individual plot detail - Plot D KQ30131H215 Rev0
Individual plot detail - Plot E KQ30131H216 Rev0
Individual plot detail - Plot F KQ30131H217 Rev0
Individual plot detail - Plot G KQ30131H218 Rev0
Individual plot detail - Plot H KQ30131H219 Rev0
Individual plot detail - Plot I KQ30131H220 Rev0
Individual plot detail - Plot J KQ30131H221 Rev0
Individual plot detail - Plot L KQ30131H223 Rev0
Individual plot detail - Plot M & N KQ30131H224 Rev0
Individual plot detail - Plot P KQ30131H226 Rev0
Temporary Parking - T1-T9 KQ30131H227 Rev0
Temporary Parking plot detail Plot H, J and P KQ30131H228 Rev0
Car Park Phasing - West Of Frank Lester Way - Existing KQ30131H229 Rev0
Car Park Phasing - West Of Frank Lester Way - Proposed KQ30131H230 Rev0
Car Park Phasing - East Of Frank Lester Way - Existing KQ30131H231 Rev0
Car Park Phasing - East Of Frank Lester Way - Proposed KQ30131H232 Rev0
Car Park Phasing - East Of Frank Lester Way - Temporary KQ30131H233 Rev0
Car Park Phasing - West Of Frank Lester Way - Temporary KQ30131H234 Rev0
Individual plot detail - Plot Q KQ30131H236 Rev0
Individual plot detail - Plot R KQ30131H237 Rev0
CPAR Bridge Structure General Layout D30131 H0101 Rev0
Retaining Structure 3 General Arrangement DQ30131 G019 Rev0
Retaining Structure 4 General Arrangement DQ30131 G020 Rev0
Retaining Structure 2 General Arrangement DQ30131s022 Rev0
Retaining Structure 1 General Arrangement DQ30131 G016 Rev0

Lighting plans:
Preliminary street lighting layout (1 of 11) DQ30131H01-1300-001 Rev8
Preliminary street lighting layout (2 of 11) DQ30131H01-1300-002 Rev8
Preliminary street lighting layout (3 of 11) DQ30131H01-1300-003 Rev8
Preliminary street lighting layout (4 of 11) DQ30131H01-1300-004 Rev8
Preliminary street lighting layout (5 of 11) DQ30131H01-1300-005 Rev8
Preliminary street lighting layout (6 of 11) DQ30131H01-1300-006 Rev8
Preliminary street lighting layout (7 of 11) DQ30131H01-1300-007 Rev8
Preliminary street lighting layout (8 of 11) DQ30131H01-1300-008 Rev8
Preliminary street lighting layout 9 of 11) DQ30131H01-1300-009 Rev8
Preliminary street lighting layout (10 of 11) DQ30131H01-1300-010 Rev8
Preliminary street lighting layout (11 of 11) DQ30131H01-1300-011 Rev8

Drainage plans:
Typical Drainage Details (1 of 3) KQ30131H161 Rev0
Typical Drainage Details (2 of 3) KQ30131H162 Rev0

APPENDIX 2 - APPROVED PLANS AND DOCUMENTS

Typical Drainage Details (3 of 3) KQ30131H163 O Rev0
Proposed CPAR Drainage Layout (sheet 1 of 2) KQ30131H146 Rev4
Proposed CPAR Drainage Layout (sheet 2 of 2) KQ30131H147 Rev4
Play and Skate Park Drainage Layout 083075-CA-0-GF-DR-CE-001-RevP02

New Century Park plans:
Proposed Illustrative Masterplan 089916_050_01 RevPL02
Indicative Phasing Plan 089916_050_40 RevPL02
Proposed Building Types 089916_050_10 RevPL2
Proposed Building Heights 089916_050_20 RevPL2
Proposed Land Take 089916_050_30 Rev PL2
Building Use Parameters Plan 089916_050_60 RevPL2
Building Heights Parameters Plan 089916_050_70 RevPL2
Relocated Car Hire Centre Option 2 Rev0

Technical Service Building plans:
Proposed Site Layout 089916-050-102 Rev0
Proposed Ground Floor Plan 089916-050-103 Rev0
Proposed First Floor Plan 089916-050-104 Rev0
Proposed Roof Plan 089916-050-105 Rev0
Proposed Sections 089916-050-106 Rev0
Proposed Elevations 089916-050-107 Rev0

Wigmore Valley Park plans:
Existing Pavilion Plan 02910-FA-00-00-DR-A-10P02 Rev0
Proposed Pavilion Plan 02910-FA-00-00-DR-A-10P03 Rev0
Proposed Contour Plan ACAD Export-KOMPAN 083075-CA-0-00-DSP-CE-401-P00 Rev0
Wigmore-Valley-Park-Surfacing-Groundworks PLAY_PARK_Scheme_G.W IN-SITU Rev0
Wigmore-Valley-Park-Finalised-Drawing-July18 PLAY_PARK_Scheme Isolated View Rev0
Wigmore-Valley-Park-Finalised-Drawing-July18-In-Situ PLAY_PARK_Scheme IN-SITU Rev0
Technical-Plan-Wigmore-Valley-Park PLAY_PARK_Scheme_T.D. Rev0
Mound Area - Sketches & Photos PLAY_PARK_Scheme M.A Rev0
Wigmore-Valley-Park-Toddler-Foundation-Plan-July18 PLAY_PARK_Scheme_T.F.P Rev0
Wigmore-Valley-Park-Junior-Foundation-Plan-July18 PLAY_PARK_Scheme_J.F.P. Rev0
Surface Drainage Plan WGMR-DLP01 RevA
Existing Site Conditions WGMR-ESC01 RevA
General Arrangement Plan WGMR-GAP01 RevA
Setting Out Plan WGMR-SOP01 RevA

Landscaping plans:
Detailed Landscaping Masterplan (1 of 9) WVP-CAP-DR-L-101 T5 Rev5
Detailed Landscaping Masterplan (2 of 9) WVP-CAP-DR-L-102 T3 Rev3
Detailed Landscaping Masterplan (3 of 9) WVP-CAP-DR-L-103 T4 Rev4
Detailed Landscaping Masterplan (4 of 9) WVP-CAP-DR-L-104 T3 Rev3

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Detailed Landscaping Masterplan (5 of 9) WVP-CAP-DR-L-105 T3 Rev3
Detailed Landscaping Masterplan (6 of 9) WVP-CAP-DR-L-106 T3 Rev3
Detailed Landscaping Masterplan (7 of 9) WVP-CAP-DR-L-107 T3 Rev3
Detailed Landscaping Masterplan (8 of 9) WVP-CAP-DR-L-108 T3 Rev3
Detailed Landscaping Masterplan (9 of 9) WVP-CAP-DR-L-109 T3 Rev3
Landscape Mitigation Plan CS/083075_L_020 RevD
Landscape Masterplan (1 of 5) CS/083075-L-21 RevC
Landscape Masterplan (2 of 5) CS/083075-L-22 RevC
Landscape Masterplan (3 of 5) CS/083075-L-23 RevC
Landscape Masterplan (4 of 5) CS/083075-L-24 RevD
Landscape Masterplan (5 of 5) CS/083075-L-25 RevD
Soft Landscape Plan Key Plan WVP-CAP-DT-L-200 Rev0
Soft Landscape Plan 1 of 9 WVP-CAP-DT-L-201 Rev0
Soft Landscape Plan 2 of 9 WVP-CAP-DT-L-202 Rev0
Soft Landscape Plan 3 of 9 WVP-CAP-DT-L-203 Rev0
Soft Landscape Plan 4 of 9 WVP-CAP-DT-L-204 Rev0
Soft Landscape Plan 5 of 9 WVP-CAP-DT-L-205 Rev0
Soft Landscape Plan 6 of 9 WVP-CAP-DT-L-206 Rev0
Soft Landscape Plan 7 of 9 WVP-CAP-DT-L-207 Rev0
Soft Landscape Plan 8 of 9 WVP-CAP-DT-L-208 Rev0
Soft Landscape Plan 9 of 9 WVP-CAP-DT-L-209 Rev0
Planting Schedule & Specification Notes WVP-CAP-DR-L-210 Rev0

DOCUMENTS

Arboricultural Survey (Perimeter Road) ref: RE3013V002B (dated May 2016);
Extended Arboricultural Survey (Enterprise Zone) ref: RE3013V003A (dated September 2016);
BREEAM (Hotel) Design Strategy and Pre-Assessment Report ref CS/089916-06 Rev01 (dated November 2017);
BREEAM (Industrial Units) Design Strategy and Pre-Assessment Report ref CS/089916-06 Rev01 (dated November 2017);
BREEAM (Offices) Design Strategy and Pre-Assessment Report ref CS/089916-06 Rev01 (dated November 2017);
BREEAM (Technical Services Building) Design Strategy- Pre-Assessment Report ref CS/089917-05CAP-Z1-XX-RP-ES-P2 (dated November 2017);
Consultation Statement (dated 13 December 2017)
Consultation Statement Addendum (received 15 August 2018)
Design and Access Statement ref: CS_089916 RevPL02 (dated July 2018)
Drainage Strategy (CPAR and NCP) RevP3 (dated December 2017)
Addendum to Drainage Strategy (CPAR and NCP) (dated August 2018)
Wigmore Valley Park Drainage Strategy ref: CS-08305 Rev R03 (dated 8 June 2018)
Flood Risk Assessment ref: RE30131/V006/P3 (dated December 2017)
Addendum to Flood Risk Assessment ref: RE30131/V006/P4A (dated July 2018)
Framework Travel Plan ref: Q30131/TP/R01 (dated December 2017)
Lighting Strategy ref: RQ30131H015-4 (dated June 2018)

APPENDIX 2 - APPROVED PLANS AND DOCUMENTS

Planning Statement (dated December 2017)
Planning Statement Addendum (dated August 2018)
Outline Site Waste Management Plan ref RQ30131/H050-3 (dated December 2017)
Car Parking Strategy ref: Rq30131H013-9 Rev 10 (dated July 2018)
Transport Assessment ref Q30131/TA/R02 (dated December 2017)
Supplementary Transport Assessment ref: Q30131/STA/R01B (dated June 2018)
Hard and Soft Landscape Material Palettes RevA (dated August 2018)
Landscape Mark-ups SK-002-180703 RevA (received 15 August 2018)
Landscape Management Plan ref: 083075-L-RP01 RevA (revised 18 July 2018)
Amenity Grass Maintenance Informal Soft Play Area ref TOHA/18/3101/TW (dated 31 January 2018)

Updated Environmental Statement Volume 1: Non-Technical Summary (dated August 2018)
Updated Environmental Statement Volume 2: Technical Chapters (dated August 2018)
Environmental Statement (Volume 3): Technical Appendices (dated December 2017) with additional technical chapters provided on 14 August 2018 as follows:

- **INT1 - LBC Scoping Opinion**
- **INT2 - LBC Letter, Advice Note and Regulation 22)**
- **INT3 – Reg 22 Responses**
- **INT4 – Stakeholder Comments & Responses**
- **ECO14 - Barn Owls**
- **ECO15 - Great Crested Newts**
- **AQT5 - Energy Plant Specification**
- **AQT6 - Construction Mitigation**
- **ARC1 – Revised Geophysical Report**
- **ARC3 - Correspondence**
- **GCC7 - Construction Effects Input**

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
1.	Yes 15.1.18	Thanks for your letter dated 9 Jan, sending me details of the above planning application. You said you would be grateful for any observations. Unlike LLAL, I assume that you are a public servant, and write to you in that spirit. I see that a notice was placed in the Herald which although dated Thu 11 Jan, is delivered to me on Fridays. It asks for comments by 12 February, a little longer than your letter, which gave the date of 8 February. Further I note that there is a related application of which you did not inform me, 17/02219/FUL. This is a huge project, with over 180 documents, some very lengthy. All the same, some crucial documents remain unavailable, such as a detailed report from the applicant to the Environment Agency. I noted in the scoping report their concern about the possibility of irreversible contamination of groundwater due to disturbance of what had been the main landfill site for the town at a time when environmental controls were fewer, and all grades of toxic material were dumped here. Methane is a dangerous gas which can be explosive and also make people ill if it accumulates in confined spaces such as offices. I made an earlier request to the Environment Agency for information. If they had this, they would have supplied it. However, the landfill predates the setting up of the EA, so Luton Council had responsibility for and supposedly, knowledge of the site. They have carried out testing for at least 2 years, and their findings and the figures and implications of this should be made available to the public. One of the fundamental principles of developing at all on Wigmore Park depends on this. If testing for safety is not complete, the application should not have been submitted. The precautionary principle should be applied. To say that this is an outline application, and such a crucial safety issue can be sorted out later, is unacceptable. Luton has already had a serious leak from the Guildford Street petrol station, which nearly contaminated the town's water supply - we should have learnt and applied lessons from this. Could you let me have documentation to confirm, as several longstanding residents have told me, that Wigmore Park was gifted to the people of Luton when the Wigmore estate was built. When the landfill was closed, the park was created, landscaped and planted with a great many trees for residents by council officers, and managed until now, like other parks, by the council on their behalf. If the council wished to allow building on the park to further airport interests, it should first have asked the people who have used it for three generations. I also assume, in view of the crash in insect populations, and its remarkable numbers of orchids (5 species) that the County

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Ref.	Objection	Comments
		Wildlife Site occupying the southern half of Wigmore Park would be treated as sacrosanct, meaning it would not be sacrificed for a car park, which could be sited in a great many other places, including ground-level car parks which could be changed to multi-storey. The proposal, which conflicts with the new Local Plan, to destroy a large number of trees, which help to provide a pollution and noise barrier, and to build a new road into Wigmore Park and a large roundabout near the current Tidy Tip entrance, as well as unnecessarily removing an attractive and convenient area of park nearest to where people live, appears full of flaws in traffic-flow assumptions. The present road network cannot cope, thanks to a 6 million passenger increase at the airport in the last 3 years having brought nearly the same number of extra vehicles. The new road and Eaton Green access, coupled with a continued increase in airport traffic, would combine to make the present degree of congestion and frequent gridlock much worse and unsustainable. The application is of such major status, with knock-on effects throughout, and far outside, the borough, that following deliberations by your department, it will have to be called in by the government. Various organisations and individuals who work full-time will need time to read and absorb this considerable documentation, to seek opinions within their own membership and also liaise with other organisations. I therefore ask that you extend the time that people have to consider the implications of this application from 4 weeks to at least 6 weeks. I will be in touch further when you have responded to this letter.
2.	Yes 1.1.18	This is acquisition of public space by stealth. How can Luton Airport apply for planning permission from itself? You must think Lutonians' heads zip up the back.
3.	Yes 18.1.18	Luton has become so overcrowded and what with more houses being built near Vauxhall motors it's a nightmare driving in and out of Luton and will get worse. The jobs that are highlighted as being made at the new century park will attract outsiders, who obviously will have to travel in and out of Luton. Has anyone on your planning committee ever tried getting on or off the M1 recently, it is virtually at a standstill most days. Also planned is passenger increase. There are so many holiday makers clogging up residential streets as they then get free parking, that now is making our once nice streets into nothing more than eyesores, along

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Ref.	Objection	Comments
		with being dangerous for anyone trying to cross roads etc. There also isn't any parking left at Wigmore Valley Park due to office workers parking there all day. This project of yours will cripple Luton completely.
4.	Yes 19.1.18	i feel that the very nature of the proposal is inappropriate and that the use of land/property should not change. - Local, strategic, regional and national planning policies. Remember this application is in breach of the Luton Local Plan which was only published in November 2017. The local plan is a major document that dictates future policy for 20 years and they have broken it by using Eaton Green Road as an access point. - Previous planning decisions (including appeal decisions) The original permission for Century Park banned access from Eaton Green Road. - Nature conservation - Overlooking - Visual amenity (but not loss of private view) - Adequacy of parking. ie The TUI car park will be much further away tempting more employees to park in the street - Highway safety - Traffic generation - Noise and disturbance resulting from use - Hazardous materials in that the site is a recognised unregulated toxic tip so should be left alone with its clay cap. - Smells through disturbance. - Loss of trees - Layout and density of building - Design, appearance and materials - Landscaping - Road access - Road Safety - The development may lead to a significant impact upon road safety due to more cars and lorries using local roads for access. - Proposals in the Development Plan
5.	Yes 21.1.18	I would like to object to this planning application. There are so many empty business sites in and around Luton how can you justify the need for this site. If there where not so many empty sites one could understand the need for it.

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Ref.	Objection	Comments
		Wigmore valley park and the surrounding area is such a valuable and loved green space, why must any of it be built on? The traffic on the route you have suggested is already heavy and I fail to see how this will be a benefit to the community. I hope you have learned from the mistakes made with capability green which has only one access road and one exit road. It feels like you will leave the bear minimum of skate park and childrens park, do we really need a cafe here? Energy recovery center sounds great and very eco friendly but what benefit is this to near by resident? Is this really what Luton needs? Should we not look to improve and use what we already have?
6.	Yes 21.1.18	I wish to lodge a planning objection to the following points: 1. The planning application is in breach of the newly adopted local plan, as the local plan states in policy LLP6 that there should be no vehicle access from Eaton Green Road to Century Park except for buses and taxis. The planning application has a new link road from Eaton Green Road by Kimble Close to Century Park and the airport so breaches this policy. 2. Document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF makes the following comments on two diagrams of the landfill. … REPEAT OF REP 11. … As the planning application has stated the dangers of building on this landfill, including further subsidence, deadly gases and odours that could affect the health of residents the application should be turned down for all of the above reasons
7.	Yes 21.1.18	I am writing to oppose the development of the Wigmore Park area for the following reasons: 1. The land you want to build in is contaminated full of methane gas which is inflammable. We already have a problem with smells and aviation fumes. 2. We also have a major traffic problem in this area already and the proposed development is likely to make this much worse. 3. Residents in this area already have problems with cars, such as workers from TUI First Fort who use our streets as a company car park. 4. My other worry is that my house is opposite the park entrance and I will be looking out on these buildings, whereas now I have a nice view of trees and parkland.

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
		5. The final concern is the noise from these buildings as the proposal is to build these close to the residential area. All in all, this land should not be built on but left as it is.
8.	Yes 21.1.18	Further to my previous objection, I would like to object more specifically on the grounds of the information contained in document DAS_Part2, section 5.8. Every point listed is alarming, but I would like to highlight the following in particular: "During construction waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas". This would be an unacceptable risk to public health. "Waste may contain volatile contaminants which produce vapours. Potential risk to future users of the site." This would also be an unacceptable public health risk. "As waste decomposes gases e.g. methane, which can build up to explosive levels in confined spaces." This is also clearly unacceptable, and a massive risk to local residents and anybody involved in construction. "Piling through landfill can potentially cause downward migration of contaminants. [...] As waste decomposes, it produces "leachate" which can contains elevated levels of contaminants which can get into groundwater" This is also a huge risk to public health, and one which may only come to light in decades to come. The potential risk to public health in Luton as a result of this development is clearly enormous.
9.	Yes 22.1.18	Clear breach of the local plan adopted in November 2017 in terms of Policy LLP6 which says the link between Percival Way and New Century Park shall be designed so as to ensure no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in the case of emergency. The plans show a link. This will put considerable strain on the local road network which is only designed to handle local traffic and will increase the dangers to

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Ref.	Objection	Comments
		children in the local schools and the general public.
10.	Yes 22.1.18	I wish to lodge an objection to the above planning application on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 - London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: *Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to* *provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency.* *Planning document KQ30131H168 shows a link with Eaton Green Road, which is also in breach of a planning condition when outline planning permission was granted to the original Century Park some 20 years ago.* *This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested.* *This will put considerable traffic on the local roads including Eaton Green Road, Wigmore Lane and Crawley Green Road that were only designed to handle local traffic. These named roads all have schools on them, namely Wigmore Infant and Primary School, Someries Infant and Junior School and Ashcroft Secondary School and the new proposals will increase the dangers of these roads to the general public including children.*[1]
11.	Yes 22.1.18	I wish to register my objection to planning application 17/02300/EIA on the following grounds. The application is a breach of the local plan as a route has been added from Eaton Green Road to the business park. I also wish to object to the principle of building on Wigmore Park, as the planning application includes the following text in document 17_02300_EIA DAS_Part 2-686521:

[1] Section used elsewhere in reps

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
		During construction waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas. *Waste may contain volatile contaminants which produce vapours. Potential risk to future users of the site.* *As waste decomposes gasses e.g. methane, which can build up to explosive levels in confined spaces.* *Piling through landfill can potentially cause downward migration of contaminants.* *In the 1970's dilute and disperse landfill was considered acceptable i.e no liner on bottom of landfill so contamination can seep out of the base of the landfill.* *Ground water in chalk is highly protected in the area as it is the main source of drinking water.* *Settlement waste is uncompacted and has a high potential for immediate and long term settlement.* *Settlement could impact upon the integrity and proper falls of drains and other services.* *Pilling over and against the landfill will cause it to settle.* *Stability of chalk- the top of the chalk may be weathered and weak. Therefor may not be suitable for founding in.* *Large obstacles in the landfill could prevent piling to full depth.* *Sulphates in the landfill may attack and degrade the concrete in the piles.* *Development of site could change gassing regime.*[2]
12.	Yes	I wish to register my objection to the above planning application on the grounds of the following

[2] Section picked up and used in Rep 19 and other reps

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Ref.	Objection	Comments
	22.1.18	Nature conservation - Wigmore Park is an area of natural beauty & offsets pollution from the airport . It offers facilities for a vast cross section of the local community and people from further afield, numerous different routes around the park and neighbouring fields and the opportunity to see the wild orchids in summer along with observing the local wildlife including deer, foxes, a large variety of birds and rabbits. I know the planned road and proposed business park will destroy a vast amount of this wildlife habitat. A promise of a replacement park will take years to develop and may never replicate the same precise environment that has attracted the current rich mix of nature and British wildlife at its best. I appreciate that airport development does have to happen but the current plan is totally inappropriate for the area. Adequacy of parking - The parking from workers in the TUI building is already completely inconsiderate and dangerous in places. The fact that the new TUI car park will be further away will only tempt more employees to park in neighbouring streets. Effects on local residents – I note in the planning application the following statements REPEAT OF ELEMENT FROM REP 10. The site is a recognised unregulated toxic tip so without any doubt should be left alone with its clay cap.
13.	Yes 22.1.18	I would like to submit my objection against this proposal as I believe the land should not be changed, as we will suffer the loss of the trees and nature around the area plus the side effects on this will create a toxic environment and also will generate an increased traffic flow for the residents. Noise levels will also increase whilst the parking will still remain an issue as it seems the numbers are not adequate. We will also suffer from noise and disturbance resulting from use!
14.	Yes 22.1.18	1. The proposed site is at present open space which is used by the people of the area for recreational purposes. (Luton has one of the lowest amount of green belt land in England, 2%). 2. The traffic in the area, especially at peak times, has the second largest congestion problem in the Anglia area. 3. It is the stated policy of Luton Council to double the throughput of London Luton Airport, which is adjacent to this site. This will obviously create more pollution in addition to the increase of traffic to this business park. 4. This being a business park, the traffic using it will be predominately diesel powered with resultant increase of harmful emissions. Diesel emissions are particularly harmful to children and the elderly.

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Ref.	Objection	Comments
		5. In addition to this proposal there is in the pipework more proposals to build additional 2000+ housing units in the area from Hertfordshire Council, which is adjacent to the site of this proposal. This will add to the congestion and pollution in the area. There is at the moment no proposal for extra roads to cope with is increase in housing. 6 There is extensive wildlife in this area including deer and in the last few years the red tailed kite has started to return to the area. These developments would see this wildlife wiped out. 7 The proposed re-vamp of Wigmore Park in no way compensates for the loss of the present recreational area. As can be seen from the above the increase in pollution and traffic density from all these additional inputs will have a very detrimental effect on the area. I have to ask, when, and if this all comes to be will we be, in a few years' time, introducing congestion and environmental charges because of the amount of congestion and pollution.
15.	Yes 22.1.18	This is Luton Council treating its residents with utter contempt.
16.	Yes 22.1.18	Wigmore Valley Park is a special park for me. I regularly walk there with my dogs and appreciate the wild, and varied routes, and the opportunities to see the many wild orchids in summer, the deer, foxes, birds, and the many rabbits in the early morning. I know the planned road and proposed business park will destroy a vast amount of this wildlife habitat. A promise of a replacement park will take years to develop and may never replicate the same precise environment that has attracted the current rich mix of wild life. I appreciate that airport development does have to happen but to plan a car park on top of a designated County Wildlife Area can only have been chosen by individuals with little understanding of the importance of preservation of nature.
17.	Yes 22.1.18	This application is in breach of the Luton Local Plan which was only published in November 2017. The local plan is a major document that dictates future policy for 20 years and they have broken it by using Eaton Green Road as an access point. Previous planning decisions. The original permission for Century Park banned access from Eaton Green Road. *Loss of Trees and Wildlife. * The TUI car park will be much further away tempting more employees to park in the street. The local roads will have a higher number of cars parking on them which has already been a issue in the past. * Much higher traffic generated the area.

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Ref.	Objection	Comments
		* More pollution in the area. * Smells through disturbance. * Road Safety – More cars, lorries, delivery vehicles using the local roads for access. *Buried in the planning application are the following statements which will be a horror story to the residents... … REPEAT OF REP 11. …
18.	Yes 22.1.18	I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 – London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency. I wish to object against any incursion of Wigmore Valley Park. The new road & development will mean the landfill will be disturbed during construction and waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas. I object also that the development will mean the destruction & loss of much of the current park, the destruction of many mature trees & much of the CWS that holds significant local value due to it's rich biodiversity. The destruction of much of this is unacceptable. It would mean the loss of habitat that had taken decades to mature & reach its current status, home to so many species of flora & fauna. There are no guarantees that current bio diversity numbers/conditions can be replicated by other prepared sites nearby as compensation. Local authorities have an obligation to respect & protect County Wildlife Sites & not to do the opposite by building on them!

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Ref.	Objection	Comments
		I look forward to your reply confirming my objections have been logged & registered. If I can any assist further please don't hesitate to contact me.
19.	Yes 22.1.18	… REPEAT OF REP 11. …
20.	Yes 22.1.18	I oppose planning ref: 17/02300/EIA on the grounds that building on a former landfill site is very dangerous to the public and surrounding areas. As it states on page 36 or page 16/24 of the PDF in the attached planning application document: … REPEAT OF REP 11. … This is a shocking revelation and only one reason why this land should be left untouched .To put peoples lives at risk is an unacceptable situation. If problems did occur and there was an environmental disaster ,what then ? Huge compensation for disaster victims as in the recent Grenfell fire ?
21.	Yes 22.1.18	I disagree with the principle of this proposal. I feel it is inappropriate and that the use of this land should not change.
22.	Yes 22.1.18	1. The Luton Local Plan, adopted and published in November 2017, is being broken by the above planning application by using Eaton Green Road as an access point. The Luton Local Plan stated that Eaton Green Road should NOT be used. 2 Additionally the original permission for Century Park banned access from Eaton Green Road. 3 Nature conservation: Wigmore park is an area of natural beauty & offsets the airport pollution. It is home to several species of wild orchid, bats and birds to name but a few. The development would also cause the loss of many trees - trees give us oxygen, store carbon, stabilise the soil and give life to the area's wildlife. 4 Hazardous materials - the site is set on top of a hazardous tip. …COPIED AND PASTED FROM REP 19… 5 Adequacy of parking: The TUI car park will be much further away tempting more employees to park in the streets. This is

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Ref.	Objection	Comments
		already a major problem. Additionally, there are also already problems with holiday makers using local roads to park and this would only likely become more of a problem. 6 Traffic generation - traffic is already extremely heavy along the routes from residential areas around the airport, leading to town and the M1. The increase in traffic to be generated would cause added air pollution and cause severe travel congestion 6a The increase in traffic will impact on the safety and health of the children using the local schools: Wigmore Infant and Primary School, Someries Infant and Junior School and Ashcroft Secondary School.
23.	Yes 22.1.18	I totally object to the said plans that LBC propose. It seems that this whole area is being heavily built but not for the community's benefit. I have walked my dog on Wigmore park for 12 years and love to go at weekends with my children to walk around, look at the wildlife and to watch the planes land and take off. Yes LBC are offering a new community centre and park as a token gesture but there is a major road going through the park and it totally unsure for children. Will you be providing traffic wardens 7 days a week during sunlight hours? Will there be speed bumps and traffic cameras set up? There was nothing wrong with our old community centre in the grounds of Wigmore Park until funding stopped and it is now in a state of disrepair. Wouldn't it be cheaper to invest in repairing the building?. Plus why have the council taken away our local library and now letting it turn into another restaurant. it seems the council are not listening to local residents, we are having everything taken away from us and we don't want the expansion of the airport, the new business park and the new houses. We want open landscape and fields and a safe area for our children to carry on enjoying and to play in rather than being cooped up at home, being unhealthy and unsociable. My biggest concern with all this expansion is the building on top of a landfill site. What health issues will our families suffer in the future? I have 2 small young children, I do not want them to be in their school playgroup or the park breathing in harmful gases which could be cancer inducing in later life. I do not want my husband and myself to get ill and leave behind two small children. Have the council carried out proper health and environmental studies? Have you considered the possible and likely consequences where hundreds of children could be taken into care because they no longer have their parents due to health risks of building on a landfill site? Why when LBC had a survey carried out at the park where the people wearing safety closing and had specialist showers to make sure they were not covered in anything untowards yet our families won't be protected? It's time LBC looked at other ways to regenerate the town rather than building on a health hazard. It seems LBC are only interested in bringing in new business and people moving out of London rather than looking after their residents who have lived here all their lives. I also ask about this incinerated mentioned in the documents. You haven't been specific to explain what this is for, being vague points to the fact you are hiding something from residents.

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Ref.	Objection	Comments
		I feel as though local residents are not having enough sessions with the council to ask questions and to be completely and honestly informed about the plans. Are LBC going through the correct channels and following guidelines for planning or is it already a done deal with lots of 'back handers'?? I've seen the unjustness of LBC who have granted planning permission against their guidelines because the property owners were friends with someone from the council. People put up and shut up but we're fed up with it. You need to start listening to people's opinion and look after your residents
24.	Yes 23.1.18	This application MUST BE DECLINED hidden in the depths of this application clearly demonstrates a danger to nearby residents and its community. Wigmore Park Buried in the planning application are the following statements which will be a horror story to the residents: COPY OF REP 10
25.	Yes 23.1.18	I wish to object to planning application 17/02300/EIA on the following grounds: Firstly, it is in breach of the Luton Local Plan by using Eaton Green Road as an access point to Century Park. Creating an access point here would turn Wigmore Lane into a major route into the park for people coming from, for example, the Hitchin direction. Wigmore Lane is already close to capacity at peak times, and would be unable to cope with the extra traffic. It is also regularly in a very poor state of repair - particularly near the Ashcroft Road junction, as is the section of Ashcroft Road leading to the Jansel House roundabout. This problem would be further exacerbated by the considerable increase in traffic. This will also have an impact on road safety. The increase in traffic on Ashcroft Road and Wigmore Lane in particular, which would undoubtedly be made up of taxis, minibuses and coaches to the airport, would turn these local roads into dangerous rat runs, especially considering the amount of school children which use them, such as those walking to Someries Infants and Primary Schools, Wigmore Primary, Putteridge Primary and Putteridge High. In addition, the unknown quantity of building on a former landfill site is of particular concern due to the risk of toxic emissions, and the instability of the land (which has already settled by quite a degree in some places). I realise some testing has been done in this area, but it is far from conclusive, and there are still too many unknowns, making it a dangerous undertaking not only for

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		local residents, but also for anybody involved in the construction. I also object due to the loss of accessible green space. The new areas being provided on former arable land will be much further away from inhabited areas, making them less accessible to a lot of people. The park was also originally designed as a buffer between the airport and local residences, but the Century Park development would bring the airport very much closer to local housing estates, potentially raising noise levels to unacceptable levels Furthermore, the lack of clarity on the "Energy [Recovery] Centre" in unacceptable. As far as we know, this could end up being an incinerator. The loss of TUI / First Port parking, forcing even more employees to park in local streets, blocking driveways and pavements (as they do presently) is another concern. In addition, the amount of parking being provided for a business park which is meant to be bringing over 3000 jobs, is simply inadequate. There is not room to provide enough parking for this many jobs, meaning local streets would once again be swamped with employees' cars. The loss of trees and plant species, including orchids, which have taken decades to be established, would be a travesty. It will take many years before any newly planted trees reach maturity, and much longer for any other species to return (if at all). In addition, I object to the loss of direct access to the Tidy Tip. This could lead to fly-tipping along the peripheries of Century Park, as people would be less inclined to find their way to the Tidy Tip itself.
26.	Yes 23.1.18	As a resident of the Wigmore and Stopsley area I object to the Century Park development for the following reasons: The roads in the area are already extremely congested and I believe the proposals would further add to the congestion on these roads. As a local resident I use Eaton Green Road, Wigmore Lane, Crawley Green Road, Ashcroft Road and Vauxhall Way and these roads are bad enough already. This proposal would only make things worse. We would lose a valuable area of green space that as a family we use for walking, running and taking the grandchildren out. The council would be better served making changes to what is there already at Wigmore Valley Park. The proposal for Century Park would involve digging up an old landfill site. This would not be a good idea for the environment as it would expose us to waste and toxic gases. Surely this would be a very dangerous environmental issue.

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		There is also road safety issues with the increase in traffic in the area we have to remember the local schools and school children walking to school as well as people walking to work and having to negotiate busy roads. The proposals for Century Park and the airport itself bring the added nuisance of even more noise than there is at present for local residents. Also even more pollutants in the air. Just looking at our window sills in the summer and the airborne dust and dirt from the aircraft and vehicles. Just think about what we are all breathing in on a daily basis. I ask Luton Borough Council to consider these proposals again. Better still let an independent body look at the plans. I feel there is a conflict of interest here!!!
27.	Yes 23.1.18	I am becoming increasingly concerned about the council's proposal of plans to build Century Park on what is now Wigmore Valley Park. The reasons are; * The depletion of valuable green space in an already cramped and industrialised town. The government is encouraging us to get fit and healthy by getting outdoors, but how is that possible when the council is eroding away all our green space by building on every available space we have. * The increase of traffic on already congested roads in the area. With the proposal to build thousands of new homes in the Cockernhoe area as well as Century park, how will the roads cope with all the extra traffic. This will also make it extremely hazardous for local children walking to and from the schools in the area. There is also already a problem with parking on roads around the airport and this will become worse with the proposals unless there is sufficient parking provided. * The most alarming point is the fact that Century Park is being built on a landfill site which is dangerous to the health of the local residents by releasing dangerous chemicals with the excavation of the site.
28.	Yes 23.1.18	I wish to object to a road and a business park development on Wigmore Valley Park. I will appreciate a cafe especially if it has a toilet with disabled facilities. I do have [redacted] years my needs are simple but I do enjoy sitting in the car in the car park watching the green area, the trees and the families and children enjoying the open space as I no longer have a garden. A business park and access road on the park will destroy the outlook for me and I understand there might be a possible danger

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		from toxins released from the old landfill, which could make the area polluted and damage both the wildlife, and more worrying visitors to the park. I do hope you will consider my objections seriously
29.	Yes 23.1.18	I wish to register my objection to planning application 17/02300/EIA My major concern, although by no means the only one, is the detail contained within 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF Building on a former tip will cause conditions dangerous to the population and hazardous materials in that site,as a recognised unregulated toxic tip, should be left alone with its clay cap. I appreciate that the path of progress cannot be halted and your wish is for the airport and Luton to grow, however, to built anything on this park will be a matter of concern and hazardous to anyone using any new facilities you build. In addition this application is in breach of the Luton Local Plan which was only published in November 2017. The local plan is a major document that dictates future policy for 20 years and you have broken it by using Eaton Green Road as an access point, the original permission for Century Park banned access from Eaton Green Road. Wigmore Valley Park is an area of natural beauty, a buffer between residents and the airport, a natural area to absorb pollution. The scale of proposed building in the whole area from Butterfield Green through to the housing development planned for Wigmore/ Cockenhoe, Napier park & the DART system is huge and open space in Wigmore Valley Park must be retained as an essential area of nature conservancy and recreation.
30.	Yes 23.1.18	We wish to lodge an objection to the planning application 17/02300/EIA. We as local residents, have serious concerns over the increased traffic this development will bring to the area and along with the congestion this will cause on routes that are already frequently congested heading towards the airport, we are concerned about the decline in local road safety as more vehicles use the route. These roads were only ever meant to cope with local traffic and we believe this will have a significant impact locally. We use Wigmore park regularly as do many of our neighbours and are disgusted that there is a plan to build on it and move our

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		only green space further away. Local residents already have major parking issues caused by employees from Wigmore Place parking on residential streets, as their car park will be moved even further away, this problem will increase significantly. We have concerns about buildings been on a former landfill site and the possible health hazards this could cause to local residents. … REPEAT OF REP 11. … The park is well established, home to wildlife and plants that has taken years to establish and you seem to think it's fine to destroy that. Well it's not. The majority of local residents are opposed to this planning application, our local council is supposed to work for the local people, not bulldoze over their opinions and park.
31.	Yes 23.1.18	I am writing to lodge my objections to this planning application. There are many and I will highlight them as bullet points below. • First is a point of principle. This is a greenfield space that benefits the community and is in constant use by the families and dog walkers in the local area. I simply do not understand how it can be that in a time of enhanced concern for nature conservation, that the council could be so indifferent to parkland and the local community that it serves. This is a much loved resource that provides a valuable buffer from the ever encroaching airport. I am unable to comprehend the thinking in regard to destroying such a valuable natural asset. It is my opinion that this land should not have its use changed at all. • I'm extremely concerned about the pressure this will apply to already overstretched car parks in the area. The employees of local business are already causing great parking nuisance by parking in side roads within Colwell Rise and surrounding areas. • We have ALREADY experienced noise nuisance from the pile driving works that were taking place at the Airport. This is where the construction company saw fit to perform extremely loud hammering during the late evening and early morning. This continued for days. The fact this was allowed to happen AT ALL ,while people were trying to sleep, only illustrates to me that the council could not be trusted to manage noise from the construction of such a large development situated on peoples doorsteps going forward. • I am concerned that this development is intended to take place over a capped landfill site that, being from a time when Health and Safety regulations were not as strict, could contain all manner of hazardous waste. I see no way that construction on top of this will not release either foul smells or worse toxic particles into the surrounding area. • I am surprised and dismayed by the projected changes to the road layout. I believe this will add pressure to Wigmore Lane.

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		This is a road which cannot cope with the amount of traffic at rush hour at the moment, let alone when this becomes effectively an A505 link road. Moreover ,it seems the planners have completely overlooked the amount of pressure that is currently applied to Eaton Green road, with traffic Jams at rush hour regularly stretching from Kimpton Road right the way to the roundabout between Eaton Green road and Wigmore Lane.This will only be exacerbated when the plethora of new traffic lights erected for the housing development on Kimpton Road become active. Naturally the addition of more vehicles and in particular heavy construction vehicles is a safety concern in close proximity to such a densely populated location. • I am also lead to understand that by using Eaton Green road as the access point for the development, it is in contravention of the November 2017 Luton Development Plan.
32.	Yes 23.1.18	I am writing to object to the plans for Century Park, Planning application number 17/02300/EIA, on the grounds of Hazardous materials. The site is recognised as an unregulated toxic tip and should therefore be left alone with its clay cap in place and not built on. Hundreds of families with young children will be at risk in the local area and it is not acceptable to build on this land at a detriment to their health. I refer to the diagrams in document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF and the following statements within the planning application. … REPEAT OF REP 11. …
33.	Yes 23.1.18	I strongly object this development - particularly to the disturbance of contaminated land (previously the tip as I remember it as a Lutonian of 63 years) in view of the dangers to drinking water and health.
34.	Yes 24.1.18	The proposed site was formerly used as landfill in an era with very little (if any regulation) on what was deposited. The presence of heavy metals, poisons, explosives and other potential risks are known, and currently protected by the existing landscaping. The development of this site will result in these substances polluting the atmosphere and water table, with potentially disastrous consequences. The location is inappropriate for the proposed development. Eaton Green Road is already overburdened, and the proposal to create an access to this is in contravention of the Local Plan. Furthermore, there is already inadequate parking for the existing business development, resulting in employees parking in residential streets, a problem which will only be exacerbated by the proposed development. An increase in road traffic gaining access to the proposed development will also increase pollution and have a detrimental effect upon road safety.

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		The proposal will destroy an established park that is a much used (and cherished) local amenity, and the home to local wildlife and flora, some of which is very rare.
35.	Yes 24.1.18	I believe that the park has fantastic wildlife and is a real benefit in the days of obese people and especially children. The chance to walk in an area that has a natural not manufactured habitat and let children imagine their adventures cannot be replaces. My son and I followed the red Indian trail and hunted the baddies and i was looking forward to doing this with my grandchildren.
36.	Yes 24.1.18	I am writing with regards to the recent planning application reference 17/02300/EIA for the new century park (Wigmore Park). I've lived here for 17 years and noticed the increase in traffic particularly when travelling in rush hour and have strong concerns on the 'U Turn' regarding access from Eaton Green Road for all traffic when the local plan you published back in November 2017 stated there would be no access except for buses and taxis. This will enormously generate more traffic in the area and further increase travel times for the local residents not mentioning the increased pollution we will endure. I also have strong objections to building on land fill sites to my health as this would emit harmful gases for adding to health concerns. Please, I urge you to ensure local residents are heard and review this application appropriately.
37.	Yes 24.1.18	I am writing to oppose your extremely disappointing plans and changed proposal concerning the above plan reference. I moved to this quiet location in 2015 to live on the outskirts of this village. I now find myself living in a road which will be directly in between this proposed business park with a dual carriage way, and 4000 houses the other side at Wandon. My road, Wigmore lane and Eaton Green road will become a major through way before you are done. This application is in breach of the local plan published in 2017 which states there should be no access except for buses and taxis from Eaton Green road. Why are the goal posts being changed all the time? I strongly object to the use of Eaton Green road as an access road, this would turn wigmore lane into a major route from Hertfordshire Hirtchin area.

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		Loss of green land, trees, shrubs including orchids. Loss of wildlife, foxes, deer, rabbits, rare birds. WHY BOTHER BUILDING THIS PARK AND GIVING IT TO THE NEIGHBOURHOOD IF YOU WERE GOING TO TAKE IT AWAY. Loss of access to the tip. Loss of accessible greenspace for everyone locally, especially those who older and with physical disabilities. They will not have an accessible area by foot. I guess this the future, the OLD do not matter. Building on an former landfill site, risk of gas emissions. As for some of the small print in the planning application " during construction waste and contamination may be exposed ...could cause health effects to people in neighbouring areas"
38.	Yes 24.1.18	I am writing to object strongly to the proposed development at Wigmore Park. The park is a valued asset to the surrounding area and is used by many people for enjoyment. I do believe that this application is in breach of the Luton local plan that was only published in November 2017. The local plan is a major document that dictates future policy for 20 years and they have broken it by using Eaton green road as an access point. Previous planning decisions (including appeal decisions) had banned access from Eaton green road. What's changed?? The area is already at a standstill in peak time. How will an increase in traffic help? Hazardous materials which have been identified should be left alone with its clay cap. How can this be allowed to go through by the council?? Another appalling decision about to be rail roadbed through
39.	Yes 24.1.18	I object to the proposal to alter wigmore park for the following reasons, • on Principle - I feel that the very nature of the proposal is inappropriate and that the use of land/property should not change. • because this application is in breach of the Luton Local Plan which was only published in November 2017. The local plan is a

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		major document that dictates future policy for 20 years and they have broken it by using Eaton Green Road as an access point. • Because The original permission for Century Park banned access from Eaton Green Road. • high buildings Overlooking private homes. • Visual amenity as will be an eye sore. • Adequacy of parking. ie the business park is meant to employ 1000's of people yet has just over 1500 parking places, meaning more nuisance parking for local residents. • Highway safety • Traffic generation • Noise and disturbance resulting from use • Hazardous materials in that the site is a recognised unregulated toxic tip so should be left alone with its clay cap. • Smells through disturbance and possible health effects. • Loss of trees and wild life • Road Safety - The development may lead to a significant impact upon road safety due to more cars and lorries using local roads for access. • The fact that unexploded ordnance has also been found after a bore hole was dug. This was found on page 289, Factual report on Ground Investigation.
40.	Yes 24.1.18	I object to the planned works in Qigmore valley park for various reasons, including loss of wildlife and habitats. Risk or water contamination and public health risks. I also object because of infrastructure and the lack there of before, during and after the works should they go ahead.
41.	Yes 24.1.18	I object to this plan, not only because it is in breach of the Luton Local Plan, which was only published in November 2017, but because the very nature of this proposal is inappropriate. This piece of land is very important for not only local wildlife but for the health and wellbeing of local people and children. The loss of trees and hazardous materials in this site, which is an unregulated toxic tip should be left well alone. Also the fact that an unexploded ordinance was found (pg 289 factual reported ground investigation) makes this an unsafe place to dig and build. There is also a lack of adequate parking (only 1500), road access and thoughts to road safety.
42.	Yes 24.1.18	I object to this due to the noise, traffic increase, loss of our wildlife.
43.	Yes	I oppose these plans due to the loss of natural established countryside and wildlife. Not to mention robbing my children of a safe and accessible park to go to. What happened to the government's bid to try and protect established woodlands and nature

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	25.1.18	reserves. Our roads will become congested and unsafe. In addition... At bore hole co-ordination E:512595.2 N:221451.1 they had to stop digging as they found unexploded ordnance 2.8m below the surface. On instructions from the the client they abandoned the bore hole. Seeing that hardly any bore holes were dug how many more bombs were dumped in the tip after the WW2?
44.	Yes 25.1.18	Wigmore Valley Park is unique green space for the people of luton. The area of the planned development covers a wild area that is unmatched by other Luton parks. It is the only place I have ever seen, wild orchids, green woodpeckers and weasels living in the wild since moving to Luton over 30 years ago. There are also bats, dragonflies and lots of other insects and wildflowers thriving in the area that is planned to be developed. These populations take decades to establish and cannot be moved to an empty field. A new building on the other hand can be placed in an empty field.
45.	Yes 25.1.18	I think it is ridiculous to purchase an empty field, with the intention of moving a public park onto it, so that you can then build on where the park was, and (promise to) rebuild the park further away from where people live. Moving established trees that are over 30 years old is going to be very expensive. Why not just put the new buildings in the empty field instead?
46.	Yes 25.1.18	I wholly object to the building of century park at Wigmore valley park. Not only will its creation cause more traffic in the Wigmore area ,as the new proposal seems to have added a junction on Eaton Green Road with access into century park. Along with extra traffic comes pollution ,noise and congestion. The area is already "log jammed " at certain times so surely this proposal will only make things worse. Also the stripping back of open green spaces for the local community has to be detrimental for all, and moving the new green space further away isn't going to help either. I'm sure an alternative site could be found to regenerate an existing area of unused concrete, or somewhere that wouldn't cause so much upheaval and destruction. Allowing the construction of century park really is not progress.!
47.	Yes	I object to this planning application

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	25.1.18	I am concerned about the loss of accessible green space. The new area being provided is much further away from the majority of housing making it less accessible to a lot of people. The park was also originally designed as a buffer between the airport and local residences, but the Century Park development would bring the airport very much closer to local housing estates making them more vunerable to noise and pollution. Creating an access point at Eaton Green Road would turn Wigmore Lane into a major route into the park for people coming from, for example, the Hitchin direction. Wigmore Lane is already close to capacity at peak times, and would be unable to cope with the extra traffic. I am also concerned about disturbing a landfill site during building works and the possible hazards this could bring.
48.	Yes 25.1.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. Not only does this business park mean extra traffic but it will add more noise /pollution and will make the area generally a less safe environment for my young family. I also wish to object to any development on Wigmore Valley Park, as this is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement. I also wish to object to the piling and disturbance of the former council tip as the planning application has provided the following statements in document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF I am concerned on the potential exposure of the waste and the possible contamination of the local area this may bring. Furthermore, I think turning this green belt land into a business park, whilst it will bring jobs to Luton, will impact a lovely bit of countryside and it would be a real shame to lose the land. (Why not build on areas around the M1?)
49.	Yes	I am writing to object to the proposed plan 17/02300/EIA

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	25.1.18	Firstly, the site is set on top of a tip and the disruption of the land has the potential of releasing unpleasant, and at worst dangerous, substances at a potential risk to future users of the site & local residents. Secondly, considering the emissions from the airport, the park serves to offset some of the polluting effects of the airport, while also being home to a great deal of wildlife. The construction proposed is likely to destroy much of this wildlife and to achieve this diversity of wildlife in a new location will take many years, with no guarantee of recreating the parks current beauty and diversity. Of course, residents accept that some concessions must be made for airport expansion, a great deal of the frustration that residents feel is rooted in the lack of consideration for the local area this plan displays. While the possibility of an access road from Eaton Green Road were initially denied by the council representatives at consultation meetings, the updated proposal shows plans for such a link road. This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested. The road infrastructure already struggles at peak times and the proposal shows a disregard for its potential effects on the road. Also, park is already an issue for the local area. The parking from the TUI building is already overflowing into residential streets to the detriment of residents. By moving the TUI carpark further away, it only increases the temptation to park on local roads. Finally, I do not want this change to the park but what is most frustrating is the feeling of voicelessness and impotence these plans gives to local people. The consultations begin only after the plans are in motion and the concessions and promises (e.g. no Eaton Green Road access) are broken. The suggestion that the park will be replaced before we are affected is disingenuous, as children's play facilities are slowly stripped away under our noses and tests and ground works wreck parts of the green space. I want a green space as an escape from the seemingly omnipresent airport, a place to walk my dog and appreciate the beauty of a town that people insist doesn't have any. But Luton Borough Council seem determined to strip away what is special about Wigmore as residents fail to be heard over the jangling pockets of the airport, though we still hope our objections don't fall on deaf ears again.
50.	Yes 25.1.18	I wish to lodge an objection to planning application 17/02300/EIA My reasons for objecting are as follows

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		I attended a consultation evening at Wigmore School where it was stated that there would be no access from Eaton Green Road however on the current plan a route has been added from Eaton Green Road to the business park. Furthermore, The Luton Local Plan, adopted and published in November 2017, is being broken by the above planning application by using Eaton Green Road as an access point. The Luton Local Plan stated that Eaton Green Road should NOT be used. This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested. This will lead to more traffic on the local roads in this area that are already congested at peak times. The new road & development will mean the landfill will be disturbed during construction and waste and contamination may be exposed which could cause odour nuisance and health effects to people in the area. Parking concerns - the TUI car park will be much further away which could mean more employees parking in residential streets, which is already an issue in the area. The development will mean the destruction & loss of much of the current park, the destruction of many mature trees and the loss of habitat that had taken decades to mature & reach its current status
51.	Yes 25.1.18	REPEAT OF REP 58 (AND REP 11)
52.	Yes 25.1.18	I write to object in the strongest possible terms about the proposed application cited above. I am frankly disgusted that Luton's elected representatives could imagine that building over well established parkland, of vital environmental importance to the local community, would be acceptable to those they represent. I object specifically on the following grounds: - it is not safe to build on toxic landfill. Doing so could pollute the air and water sources. - the green space is a buffer between the airport and the community. If it is built on, residents' air quality will go down and noise pollution will increase - the park is a significant amenity for local people to use for leisure. There is no comparable space within walking distance. The farmers' fields are not comparable, having rights of way issues, and in any case are under threat from development also. - the park was given to the people of Luton in the 1970s for the reasons above, and has been used as parkland ever since.

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		Therefore, under common usage laws, it should remain in public ownership of the people as a green space. I am privileged to work in a local high school. During a recent lesson about voting and who represents us in government, I informed the students about this planning application. Many touching anecdotes about the park ensued ('I learnt to ride my bike there!' 'but we walk our dog there every morning!') accompanied by disbelief that their own council could take such action. I have encouraged them to make their own objections to this ridiculous plan.
53.	Yes 25.1.18	I wish to object to any development on Wigmore Valley Park, as this is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement. Wigmore Park has become an established wildlife haven over the years, which has been recognised as the status of a County Wildlife Site has been awarded to the park. It is essential green space in what is becoming a rapidly developed area. Crucial for fresh air and freedom of space for the physical and mental well being of residents. REPEAT OF REP 58 (AND REP 11) Finally the road and park development will result in the loss of current car parking spaces for TUI office, First Port and airline workers. This will result in unacceptable parking in residential streets which is an inconvenience for local residents and may result in parking permits being issued at a cost to those residents.
54.	Yes 25.1.18	REPEAT OF REP 53 ABOVE
55.	Yes 25.1.18	I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 - London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percival Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to

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		provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency. Planning document KQ30131H168 shows a link with Eaton Green Road, which is also in breach of a planning condition when outline planning permission was granted to the original Century Park some 20 years ago. This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested. This will put considerable traffic on the local road network including Eaton Green Road, Wigmore Lane and Crawley Green Road that were only designed to handle local traffic. I strongly object to any incursion of Wigmore Park that includes destruction of mature parkland or any incursion into landfill which would result if the development goes ahead. Landfill disturbance risks hazardous & toxic materials being released & ground water being contaminated so I fully object to any road or development on Wigmore Valley Park for these reasons. Wigmore park was gifted to locals as compensation because of large scale housing development at the time & was intended as a natural buffer between Wigmore & the airport & containing the landfill as a result. I strongly object to any development or road in Wigmore Parks place for the reasons given. The park should stay as is other than improvements to just the skate, pavilion & play areas only.
56.	Yes 26.1.18	SAME AS REP 1 FROM PETITION SHEET
57.	Yes 26.1.18	REPEAT OF REP 32 AND REP 11
58.	Yes 26.1.18	I wish to strongly object to the planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads.

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Ref.	Objection	Comments
		I also wish to object to any development on Wigmore Valley Park, as this is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement. Wigmore Park has become an established wildlife haven over the years, which has been recognised as the status of a County Wildlife Site has been awarded to the park. During summer months at dusk Bats are very often sighted flying across the park! The alternate location proposed in the planning application for the new Wigmore Park is a ploughed farmer's field that is devoid of any wildlife value and is located too far from the homes of the majority of park users. I also wish to object to the piling and disturbance of the former council tip … REPEAT OF REP 11 …
59.	Yes 26.1.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads. Anyone living near Wigmore Lane/Eaton Green Road will know how difficult it is to drive around this area- especially in rush hour. A lot of the smaller roads are only able to be used for single lane traffic due to cars parked on every available kerb - yellow lines ignored. It has already been reported in national newspapers about vandalism caused to cars parked inconsiderately - something which could increase with the increase of traffic. … REPEAT OF REP 58 (AND REP 11)
60.	Yes 26.1.18	We wish to strongly object to the proposed use of part of Wigmore Park for the development of "Century Park". Wigmore Park was given to the people of Luton in 1982 when the Wigmore Estate was built, and it should not now be used for development. The park has matured over the last few decades, and we consider it to be one of the best wildlife sites in Bedfordshire.

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		There are now many wild-flowers including five species of orchid one of which is the county flower the Bee Orchid. There are also foxes, rabbits, deer, bats, plus many birds and insects. The park provides a welcome retreat from the urban environment for both adults and children. Replacing the publicly accessible park with a cultivated field, that will take many years to recover from the weed killers and chemical fertilizers that have been applied over the years, is not a recompense. The extra traffic to the business park both in construction and afterwards will cause more pollution, and inconvenience to the residents of this area. The road surface in Ashcroft Road is already in a poor state of repair, so it's unlikely to cope well with even more traffic thundering down it. Having read that ordinance was found in one test bore hole, it makes you wonder what else is lying unknown on that site.
61.	Yes 26.1.18	REPEAT OF REP 58 (AND REP 11)
62.	Yes 27.1.18	Following your letter of 9 Jan in which you asked for my comments, to which I sought clarification (below) on several matters, I am surprised not to have heard back yet from you or a colleague about these important matters. I understood that council policy was to respond to queries within 5 working days, and this is a major issue for the town. Time is crucial, particularly my request for an extension of the consultation period from 4 to 6 weeks. Further, I attach a response I sent on Wed 24 on behalf of Friends of Wigmore Park, who I am advising, to the notice placed in Luton News on 3 January. These comments are quite clearly directed to Luton Council (who still own the park land, and propose to continue with its management, although it may have been leased or licensed to LLAL) whose address appeared at the foot of the notice, not to the applicant, LLAL. Yet the planning officer seemed unable to decide who they should go to, and passed them to the applicant. As I believe you are the case officer scrutinising proposed developments on Wigmore Valley Park, could you please reply to these comments as well as those below? Friends of Wigmore Park has requested: 1) details of the date and the process by which a publicly owned park was passed to a private company without notifying its users, the public

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		2) assistance from the council to declare our park Local Green Space, and an Asset of Community Value 3) help in setting up a Neighbourhood Forum. It concerns me and others greatly that the council, which should impartially determine all planning applications, seems unable to separate itself from the applicant, which consists of Luton Council personnel. I should be grateful for clarification of your position on this, and how your role can be separated from the strong views of your superior officers, as I cannot now expect an impartial response from the council leader or CEO, who have been promoting all activities relating to airport expansion.
63.	Yes 29.1.18	I object to Century Park on the ground that Wigmore Valley Park was given to the people of Luton. It is also an old landfill site so there is a potential threat if this land is disturb. There would also be a considerable increase in traffic and it is already congested
64.	Yes 29.1.18	I object to the application due to the significant environmental impact and damage that would be caused. Disturbing a landfill site isn't going to be good for anyone. Site surveys conducted on behalf of the application clearly show nasties such as arsenic, asbestos, medical waste and unexploded ordnance. Piling through this two the bed rock will likely pollute the water table as stated within the application. Other reasons would be the significant traffic increase on already choked roads. Because of the significant charges in place at the airport the surrounding roads are becoming churned up and hazardous to pedestrians. Regularly walking home from work im forced into either the mud or road to get around the cars parked on airport way, completely blocking the pavement, surely any form of airport business expansion will make such issues worse.
65.	Yes 29.1.18	I wish to object to the proposal due to the following reasons; -The loss of wildlife space that the proposal will result in. Hundreds off trees will be lost as well as other well established shrublands. -The additional traffic flow that the plan will bring and additional dangers in terms of road safety. -The inevitable increase in parking issues in the surrounding areas. A parking consultation was recently conducted in the area. While the result of this consultation have not yet been published, it was conducted without the full facts of the planned development yet being available to the residents. The change to Frank Lester Way no longer being accessible to standard traffic will mean that even if TUI and other companies sharing the building by Wigmore Library obtain replacement parking spaces in the new development, it is unlikely the employees will opt to park there and instead flow out even more onto the surrounding roads.
66.	Yes 29.1.18	I am totally against the planned development of Wigmore Park, (new century park) It will totally destroy the habitat, I am vehemently against the destruction of tree's and wildlife purely for profit! The planned proposals will bring a massive amount of traffic and more noise pollution to the area. Along with the noise comes the fumes that

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		the traffic brings. Luton borough council keep harping on about air quality and in the next breath deem it acceptable to plan roads and dual carriageways through this area probably at the thought of generating money. There is plenty of derelict building land on the outskirts of the town centre that could be used. The park is extremely well used by residents of Luton and surrounding areas. I would like to remind Luton council that it's members are democratically elected and can be easily de elected! Listen to what your constituents are saying! I VOTE NO TO THE PLANNED DEVELOPEMENT!!!!!!!
67.	Yes 29.1.18	I strongly oppose these plans particularly the new road that will cause more congestion and pollution to an already busy area.
68.	Yes 30.1.18	REPEAT OF REP 58 (AND REP 11)
69.	Yes 30.1.18	I wish to object in the strongest possible terms to the planning application 17/02300/EIA. Despite repeated assurances to the local community in the past that access to the planned Century Park would not be via Eaton Green Rd, this is now what is planned! This is in total breach of the local plan policy LLP6. The local residents already have to suffer extremely congested roads at peak times mainly due to the totally unsuitable siting of Wigmore Place next to a large residential estate. The parking provision for this building is totally inadequate and moving one of the existing car parks as part of this development will naturally mean longer journeys for workers and simply mean local residents will find more inconsiderate parking occurring in estate roads in the area. Wigmore Park is a valuable asset enjoyed by many local residents. It is well established and the removal of such an important outdoor recreation area is an extremely concerning prospect. The proposed replacement "Park" is totally unsuitable both in its location and the fact that it will be nothing more than a farmers field! REPEAT OF REP 11
70.	Yes 30.1.18	I wish to strongly object to the planning application 17/02300/EIA and to any development of Wigmore Valley Park. The park was a gift the people of the area and is a valued asset to the community. It has flourished over the years and has trees,

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		that have taken decades to mature, and wildlife that will be completely destroyed by this development. The planned replacement park is far away and currently devoid of any life. The proposed development completely goes against the Luton Local Plan 2011 to 2031, strategic objective 10 - to improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the river lea corridor, the chilterns area of outstanding natural beauty (AONB) and areas of local landscape value (ALLV). Wigmore park is designated as an ALLV in the policies map that supports this local plan The proposed site also used to be a landfill containing heavy metals, poisons, explosives and other potential risks that are protected by the current landscaping but which, if disturbed by building work, risk polluting the atmosphere and water table. This could potentially be disastrous for the area and the residents The location is completely inappropriate for any planned development. Eaton Green Road is already heavily congested and the plan to build an access road into it will only add to the burden on the area, as will plans to close off Frank Lester Way to through traffic. Parking issues are already a concern, with people in the current office premises (used by TUI and First Port) already using local side roads and wigmore valley park to park. The plans will close their current parking at the tidy tip (more traffic wars on the side streets!) and do not provide sufficient provision for the new office premises being built on the park (1000's of jobs to be created, but not 1000's of parking spaces!) The extra cars and lorries/trucks required to use to roads to build the business park will add to the air pollution In summary, the development will ruin the local area, destroy wildlife and vital green space, cause traffic and parking chaos and have the potential to cause environment disaster!
71.	Yes 30.1.18	REPEAT OF REP 58 (AND REP 11) … I have lived in Wigmore in excess of 10 years and feel your plans will ruin the society that us homeowners live in.
72.	Yes 31.1.18	I oppose the proposal to build on the new century park due to the hazardous materials in the site which is a recognised unregulated toxic tip which fills me with worry if it is disturbed
73.	Yes 31.1.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton

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		Green Road, which are all already extremely busy local roads. In addition this would turn Wigmore Lane into a major route into the park for people coming from, for example, the Hitchin direction. Wigmore Lane is already close to capacity at peak times, and would be unable to cope with the extra traffic. It is also regularly in a very poor state of repair - particularly near the Ashcroft Road junction, as is the section of Ashcroft Road leading to the Jansel House roundabout. This problem would be further exacerbated by the increase in traffic. I also wish to object to any development on Wigmore Valley Park, as this is a superb community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement, also providing a 'green' buffer between residents and the Airport. Wigmore Park has become an established wildlife haven over the years, which has been recognised with the status of a County Wildlife Site being awarded to the park, including thriving Orchids which have taken years to get established. The alternate location proposed in the planning application for the new Wigmore Park is a ploughed farmer's field that is devoid of any wildlife value and is located too far from the homes of the majority of park users. REPEAT OF REP 11 The lack of clarity on the "Energy [Recovery] Centre". As far as we know, this could end up being an incinerator. The loss of TUI / First Port parking, forcing even more employees to park in local streets, blocking driveways and pavements (as they do presently). The loss of direct access to the Tidy Tip. This could lead to fly-tipping along the peripheries of Century Park, as people are less inclined to find their way to the Tidy Tip itself."
74.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
75.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) I walk my dogs in this park with my wife and granddaughter which we all enjoy very much. It would be a disaster to lose this. I would not be able to walk In the new proposed park as it would now be too far away from my house.
76.	Yes	REPEAT OF REP 58 (AND REP 11)

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	31.1.18	
77.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
78.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
79.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
80.	Yes 31.1.18	I strongly object planning ref: 17/02300/EIA, building on a former landfill site is very dangerous to the public and should be the main reason why this Century Park project should not go ahead. The effects from gases omitted and possible polluted drinking water could cause long term health effects and cancers to innocent Luton residents. This planning application is also in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads and very congested at times. Also worth noting, many quiet residential roads in this area have already become 24hr carparks for holiday makers, causing all sorts of problems and parking issues.
81.	Yes 31.1.18	1. The proposed development goes against the Luton Local Plan 2011 to 2031 - Strategic Objective 10: Improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity. 2. Wigmore Park is designated as a ALLV in the policies map that supports the Local Plan. REPEAT OF REP 58 (AND REP 11)
82.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) With all of the above included, I have the benefit of utilising Wigmore Valley Park every day of the week (sometimes twice a day) along with my husband and dogs.

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		On are walks we been fortunate to have seen badgers, deer, foxes and rabbit and are aware of the mole hills and even seen frogs along our route, what is to become of all of all of them! With great sadness, we have already seen some considerable changes over the last couple of years including the desolation of walking routes, shrubs, hedges and brambles which enabled our wildlife to flourish. In our opinion the bramble and hedges also helped dull some of the activity at the airport and since their removal along with the noise, we have even noticed an increase in the smell of aviation fuel even from our house!
83.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
84.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
85.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
86.	Yes 31.1.18	As a former Stopsley inhabitant I have been closely following the developments in the neighbourhood and am greatly worried, especially as I have many friends and relatives still living in close proximity to Wigmore Park. REPEAT OF REP 58
87.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) I no longer live in Luton after spending 40 years in Stopsley and Wigmore I still have a lot of family living in these areas.
88.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) The new access road opposite Keeble Close will also cause considerable traffic problems. Wigmore Lane is already having traffic issues due to Schools being located on this road so more traffic will only exacerbate the situation. Whilst noting about the traffic problem it will also cause more frustration with the local residents as already the Wigmore Place employees are parking around the residential areas and it will only get worse with a new business park.

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Ref.	Objection	Comments
89.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) I am informed that unexplored items were found during recent exploration of the proposed site I quote page 289 of Factual Report on Ground Investigations: At bore hole co-ordination E:512595.2 N:221451.1 they had to stop digging as they found unexploded ordnance 2.8m below the surface. On instructions from the the client they abandoned the bore hole. Seeing that hardly any bore holes were dug how many more bombs were dumped in the tip after the WW2? Am I right in thinking that this is unknown. Once again I cannot believe that the council is prepared to put its residents safety at risk.
90.	Yes 31.1.18	I object to this proposal due to the loss of green belt land, the issues this will cause with traffic congestion and also parking which we already have a problem with in the area.
91.	Yes 31.1.18	Loss of country side. added Pollution. Zero trust in LBC with regards to these plans
92.	No and Yes 31.1.18	Whilst I do not object to the plan as a whole I do object to the junction which has now appeared on Eaton Green Road, as I live in Keeble Close. If there really is a need for access from Eaton Green Road then why on earth can you not use the current roads already in place. You can use the junction for the tidy up, up the road being used for access for the Tui car park and join to the roundabout from there. Even a slip road could be added where the current footpath is, and use a small amount of the grassy hill rather dig a massive amount of it. This option would surely allow the traffic to flow more efficiently rather than installing traffic lights on an already congested, and during morning rush hour stand still road.
93.	Yes 31.1.18	My property backs on to Eaton Green Road, where I have lived for the past 30 years, and I am most definitely in full agreement with the objections listed below. If you had lived here you would have become aware of the ever increasing volume of traffic into this area. And now you want to develop Wigmore Park, and bring even more traffic here! We already have a severe problem with the number of people working in the local offices, parking itheir vehicles in our streets.

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Ref.	Objection	Comments
		"I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 - London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: REPEAT OF SECTION IN REP 10
94.	Yes 31.1.18	I wish to object to the plans to develop Century Park, application number above, on the grounds of Hazardous Materials. As the site was previously an unregulated toxic tip, the area should be left as it is and not built on. My children and grand children live in close proximity to the proposed development and you can not reassure me that this proposed development would not impact on their health and well being. According to your own documents and statements within the planning application, waste and contaminants may be exposed which may cause odour nuisance and/ or health effects to people in neighbouring areas. The build up of vapours by volatile contaminants could cause potential risk to future users of the site. You do not know what is under the clay cap that is keeping the area safe at the moment. How can we be reassured? An unexploded ordnance at a bore hole has caused digging to stop and to be abandoned in that area. I am sure the area in proximity to the airport was bombed during WW2. How much more ordnance is under the area? This site is too dangerous to be developed for many reasons.
95.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) I don't believe wrecking our beautiful country side will be the best option for my family. The disturbance this week alone has been awful I don't think I could bare it when it's a full scale building site.

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Ref.	Objection	Comments
96.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
97.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
98.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11)
99.	Yes 31.1.18	REPEAT OF REP 58 (AND REP 11) The danger to life due to the presence of unexploded items as detailed with various reports, couple this with the presence of dangerous gases, it would be reckless of the council to allow such a development, especially so close to the run-way of a major airport. How can the council condone agreeing to this, it will make them responsible should anyone get hurt, are they prepared to accept this responsibility. The construction of the relief road will also pass through areas which in the past were very close the clay pits used in the manufacture of bricks, building a main road on such land could put the public at risk of sink holes opening up. The traffic around the Wigmore area is already overloading roads and the pollution caused is growing, which will be made worse by this development and the resulting traffic. Junction 10 of the M1 already cannot cope the amount of traffic in the mornings and evenings, more traffic will lead to greater disruption impacting on the other businesses and individuals in the area. The need for a further business park has not been demonstrated to the local community, how can the council be sure that these building will be used and not turn into a white elephant. The impact on local residents will be huge, especially with regard to parking on residential roads, which the council has not taken any action on.

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Ref.	Objection	Comments
		In summary the need to concrete over a beautiful open space full of wildlife is something i am totally opposed to especially in view of the danger to the local community.
100.	Yes 31.1.18	I wish to object to planning application 17/02300/EIA as it will mean the destruction of Wigmore Park and Nature Reserve . The park is an essential asset to the area,used by hundreds of people for many activities ,including sports and exercise, families, picnics, dog walkers, plane enthusiasts,& nature lovers. It is the only green space in this part of Luton, serving a huge area as public space ,that actually belongs to the people of Luton. I also object the plans for a huge car park to be installed on the wildlife conservation site. I also object to the car park not being multi storey (minimising area destroyed) and the slaughter of hundreds of species of flora and fauna. Since its creation over 30 years ago the park has become established and nature flourishes, bringing joy and happiness to many, many people that use the park
101.	Yes 31.1.18	I wish to object to the planning application 17/02300/EIA. My objections are: Loss of the majority of Wigmore Park which is a place of immense beauty, enjoyed by a great many people from Luton and surrounding areas. It has also been a place for organised sports, for example Football and county running events. The park is an important buffer from the noxious fumes and noisy Airport and the local housing. Loss of habitat for wildlife which always gets ignored and overridden when planning applications are presented. Wigmore Park was gifted to the people of Luton in the 1980's so why can it just be taken away without proper consultation when a planning application is filed. Part of this area used to be a refuse tip so any disturbance of the land would be dangerous to the local residents, the local airport and any workers in these areas, despite some land surveys which have taken place. The planned new road would not solve any traffic problems we are already suffering at peak times daily in fact it would just move the majority of the traffic onto other local roads. It is already difficult to leave the Wigmore Estate at peak times on the Eaton Green Road and Crawley Green Road junctions. This panning application goes against the Luton Local plan 2011-2031 which states ‘Improve, protect & enhance biodiversity of natural areas with the town, including the quality, accessibility, health & recreational value of Green Space’.
102.	Yes	I would like to put forward my objection to the destruction of Century Park and Wigmore Park in Luton. The proposed

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Ref.	Objection	Comments
	1.2.18	Development on precious green spaces in the borough of Luton is wrong. Doing away with mature trees and green land is detrimental to our health and the health of the Planet. Trees and plants absorb and hold onto pollution such as Carbon making the air cleaner for us to breath. The proposal to increase Air traffic AND build on green field land makes a Complete Mockery of the Governments Environmental future targets. Please Do Not build on these Parks or Old Un safe land fill sights. We must protect established parks and green spaces. Wild life needs and must have somewhere to live. Without wild life We All Die! The South East of England has a huge amount of Aviation pollution, we do not need or want more. We must encourage people to fly Less not more.
103.	Yes 1.2.18	I am raising my concerns about this new road, business park, expansion of airport for trying to achieve capacity of 36m in future. I am a keen user of Wigmore park, which will be destroyed to make way for new business park. The local road network is absolutely busy during peak hours and still more traffic will be added because of this new proposed development. I would like to express my objection to planning application 17/02300/EIA as a local resident. I am raising my concerns about this new road, business park, expansion of airport for trying to achieve capacity of 36m in future. I am a keen user of Wigmore park, which will be destroyed to make way for new business park. The local road network is absolutely busy during peak hours and still more traffic will be added because of this new proposed development. I also wish to express my objection to any development on Wigmore Valley Park, as this is community asset that was gifted by Hitchin Hones to the people of Luton. I wish that Luton council will listen to people of Luton and stop this development.
104.	Yes 1.2.18	REPEAT OF REP 58 (AND REP 11)
105.	Yes	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
	1.2.18	
106.	Yes 1.2.18	REPEAT OF REP 58 (AND REP 11) Wigmore valley park has been a lovely green space for so many years so to disrupt this & all its wildlife this is something that will most certainly upset the community. And REPEAT OF REP 167
107.	Yes 1.2.18	REPEAT OF REP 58 (AND REP 11)
108.	Yes 1.2.18	REPEAT OF REP 58 (AND REP 11) The amount of traffic generated both during construction and once the road is in use as planned will bring Wigmore & the surrounding areas to a complete standstill. The resulting gridlock will blight every resident physically, mentally & emotionally. Business's in Wigmore and the surrounding areas will suffer as customers from the area and outside will stop coming to the area to use those businesses because of the gridlock. The pollution resulting form the gridlock will affect everyone's health and well-being. As an [redacted] I am dreading the impact that will have on me and other [redacted].
109.		
110.	Yes 3.2.18	We have lived in the Wigmore area for thirty five years and have seen the area develop and it has been a very good area to live unfortunately over recent years it has deteriorated. These are some of the reasons why this has happened: 1. Traffic has reached maximum levels thus lowering the quality of life in the area 2. Speeding traffic in Wigmore Lane 3. HGV vehicles using Wigmore Lane en route to the airport 4. Litter strewn around the grass verges 5. The brick planters towards Eaton Green Road are crumbling into the road 6. Fallen tree branches blocking the footpaths 7. High level of noise pollution from the airport 8. Air pollution some days you can smell aviation fuel in the atmosphere

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		9. Cars parked outside residents houses whilst the owners go on holiday from the airport 10. Cars parked on the footpath restricting its use 11. Cars double parked on the entrance to Wigmore Hall estate restricting the entrance and exit No more development in the Wigmore area. No more houses. Leave Wigmore Park alone it is for the residents of the Wigmore area.
111.	Yes 6.2.18	I wish to strongly object to the proposal to add a new access road to the Century Park development from Eaton Green Road on the grounds that this will further add to the traffic using the Ashcroft Road and Wigmore Lane which is effectively becoming the Luton East Ring Road. Given that there are already proposals to build hundreds of new homes on the East Luton border then a genuine Link road connecting the A505 Hitchin road to the housing development then onto Century Park and ultimately the M1 needs to form part of a joined together proposition by both Luton and Hertfordshire Authorities in order to avoid the already substantial amount of traffic which is using these roads as short cuts due to the fact that that many of the existing routes are already gridlocked at certain times of the day. I should point out that I am not against either of these plans in principal only against the fact that development is, as is often the case, once again preceding the provision of suitable and sufficient infrastructure.
112.	Yes 6.2.18	REPEAT OF REP 58 (AND REP 11) I'm strongly object to any part of the park & landfill being compromised for the reasons stated above & the potential dangers associated with it.
113.	Yes 7.2.18	REPEAT OF REP 58 (AND REP 11)
114.	Yes 7.2.18	The proposals do not take the opportunity to improve connection to and through the new park for walkers, cyclists and horseriders. A linked footpath and bridleway runs south from Eaton Green road, across the new park, becoming a bridleway where it swings East. Shortly after swinging South again, it leaves the park and runs along the airport perimeter, ultimately joining a minor road near Netherfield Spring. The Luton Definitive Map shows this stretch as FP38, FP29, BW28 and BW37. As the park is being redeveloped, Luton should take the opportunity to upgrade access along the whole length to Bridleway and the development should cover the cost of improving the whole route. This section of Bridleway will provide a valuable link through the park to the countryside south of Luton, avoiding the dangerous narrow, twisting section of lane around Winch Hill.

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Ref.	Objection	Comments
		The information provided to support the application is misleading in that plans do not show footpaths and bridleways through the application accurately. Most of the plans exclude footpaths/bridleways altogether, even though they are public highways with strict procedures attached to modification. For example "17_02300_EIA-089916_050_02_Proposed_Masterplan_ Rev_PL01-686446" does not show public ROW even though it includes planned new pedestrian and cycling routes. In "17_02300_EIA-DAS_Part2-686521", page 40, the existing footpath/bridleway is shown partly as a proposed pedestrian route. In "17_02300_EIA-DAS_Part2-686521" Figure TVI8, public rights of way, the route south from Eaton Valley road to near Netherfield Spring is shown as a footpath. More than half of it is a bridleway. Providing consistent, quality information for the public to respond to is an important part of the democratic process. At the very least the masterplans should be updated to show the existing Rights of Way through the development.
115.	Yes 9.2.18	The consultation plans show that where the buildings for Century Park are to be sited is to be on the old refuse tip, this will entail digging/excavating down into the rubbish deposited there. No one knows exactly what all the substances are there. It is known that asbestos and chemical trade waste was dumped, but there are no records of all the contaminants on site. Disturbing these substances would release these carcinagous materials into the air, to the detriment of residents health. This would result in London-Luton airport, Luton BC, and the Developers in Legal action for years. Would the committee like to be held personally responsible for cancer causing chemicals released into the air affecting thousands of people. The consultation plan also shows an entrance to Century Park from Eaton Green Rd, near Keeble Close. This was not on the original submission. If this was allowed it would make Wigmore Lane a rat fun for traffic from the A505, Hitchin/Stevenage and villages, travelling to Jct 10A of the M1. This would make the air quality even worse than it is now. Jet fuel fumes from aircraft on the runway, taxiways and engine test/run up area that are blown by winds from the southerly quadrants that push the fumes into the Wigmore Housing estates. The air quality monitors are shown as all on the airport site, the monitor no LLA13 is shown as on Eaton Green Rd, near to the Raynham Way community centre, not that anyone I know of has yet found the monitor, and a lot of people have looked for it. I believe that the airport authority and Luton BC are failing in their Duty of Care, as the air quality is well below the standards set by the EU.

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		I thought that when the Luton Local Plan 2011/31 was with the Government Inspector he had expressly forbidden access to Century Park fron Eaton Green Rd. I know Capita, the management company involved in this Development is in financial trouble, but if it is correct that this access is forbidden, they should know this. They seem incompetent as well. To me the Logical alternative would be to site the Century Park buildings on the proposed green area shown on the development map CS-089916, on the eastern side of the development. The proposed dual carriage what from the airport approach road from Jct 10A could be directed straight over to this area. This would negate the problems of disturbing the soil of the old refuse tip, and leave the flora and fauna of the site relatively undisturbed. Local residents would welcome this alternative as it would bring employment to the area and leave our Green Space alone. It may cost the Developers more in the short term, but the Long term benefits would be for all, and stop the Developers and Local and Airport Authorities being involved in costly Legal Cases. I am strongly against this Development, unless this alternative site is used.
116.	Yes 12.2.18	1 Breach of the Luton Local Plan The access from Eaton Green road is in clear breach of the new Luton Local Plan, which was only approved in November 2017, Particularly Policy LLP6 which prohibits access via Eaton Green Road to New Century Park except for bicycles, buses & taxis. 2 Traffic and pollution Local roads were designed for local anticipated traffic conditions only. The proposed access via Eaton Grenn Road would encourage traffic away from teh A505 and on to Wigmore Lane, Crawley Green Road, Ashcroft Road & Lalleford Road. The access from Eaton Green Road would generate a considerable amount of extra traffic on these already congested roads making them far less safe and adding to the air pollution, affecting peoples's health.
117.	Yes 12.2.18	I write to object to the above planning application on the following grounds 1. Traffic from the site ending up on Eaton Green Road. The local road structure is insufficient to cope with the volume of traffic that will be created by the extra volume created by the direct route planned opposite Keeble Close. Wigmore Lane and Eaton Green Road are congested at the present and will simply come to a standstill by the implementation of these plans. 2. The loss of mature trees caused by the construction of a slip road from Eaton Green Road but also around the park where commercial development is planned. There appears to be little addition of semi mature trees to compensate for the loss planned. Given that the landscaping was provided for the benefit of close residents and also users of Wigmore Valley Park it seems that this planning application is totally contrary to past agreements reached between your department and local housing developers.

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		3. The loss of wildlife habitation on the park with the planned construction of a long stay carpark. It seems that the loss of this habitation will not be replaced given the "additional" park land that has previously been farmland that is unsuitable for wildlife habitation. 4. The loss of business properties in the building of a dual carriageway through the north and west side of the airport will result in an initial loss of employment and if the development on the park is aimed at compensation for business premises loss in the airport it does not mean that there will be the gain to overall employment suggested by these proposals. 5. The car parking issues already common to most of the south and east side of Wigmore will be exacerbated by these developments. The business and commercial properties both existing and planned will mean vehicles far in excess of the 1647 car parking spaces planned. This will result in even more local street parking by non-residents and be a greater detriment to those residing in the local area. 6. The planned roads, buildings and parking are mainly on land that was once a waste tip and contains materials that may well be toxic. Disturbance in laying foundations, making roads and cuttings into rises will probably disturb what was originally dumped there and create a hazard to residents and to those subsequently employed in the new business properties. For the above reasons I believe this development is unlikely to be of benefit to those that live in the area or who use the local roads in the East of Luton. I would request that you bring these reasons and this objection to the attention of the Development Control Committee
118.	Yes 12.2.18	REPEAT OF REP 58 (AND REP 11) This is a precious open space, and Luton is already well below the national average, our council should hold on , and even increase, such amenities.
119.	Yes 14.2.18	Concerns regarding the destruction and development of Wigmore Valley Park. Place was a former rubbish dump but has recovered and become a wild and natural space enjoyed by many. Outdoor natural places offer benefits to physical health as well as mental health and provide social interaction, quiet contemplation, exercise and enjoyment. The park is use by people of all ages, dog walkers, photographers, children nature lovers and plane spotters as well as many others. Until recently it was used as a sports field. Wigmore Valley Park is the only wild and natural place in Luton and offers respite from the already congested roads, airport noise and pollution. The perimeters of the park have been planted and now provide habitat for birds, butterflies, rabbits, bats, newts, frogs and toads as well as wild flowers such as orchids. To me it is crucial that this wild space is protected from further

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		development. Human beings need access to open space and with further housing planned in the surrounding area it is of utmost importance that this space is protected. There must be a balance between the needs of the local people and further development. This area is already congested with traffic, causing respiratory illness and premature death. We must first and foremost consider the health and well being of the local community, We must really take into account the impact on the wildlife in the park. Whilst I understand the need for jobs in the area, I don't believe the benefits of development twill outweigh the needs of local people. Wignore Valley Park is a unique place, it is a place that should be protected, studied and nurtured. I would like to see studies carried out to ascertain the impact of the former rubbish dump in the long term effects on nature. Also the high water table in the area will be affected and no research has been carried out. I also want to see a study of the loss of the habitat will have on the wildlife.
120.	Yes 16.2.18	I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. Luton is already a nightmare for traffic jams. Also more people working in the area means when car parks are full people park on our roads. That site also has hazardous materials which should not be disturbed due to health and safety of people in the vicinity. Keep Wigmore green.
121.	Yes 17.2.18	REPEAT OF REP 58 (AND REP 11) Wigmore Valley Park is a well used asset by the local community and by people from surrounding areas (as I did 30 years ago before I moved to the area). Luton has very little green space sadly therefore this park should be left alone . REPEAT OF REP 167
122.	Yes 17.2.18	I object to the outline planning application for New Century business park and full planning application for an access road, both of which are proposed on Wigmore Valley Park, for the following reasons: The loss of this valued open space which has taken 35 years to mature, this area was given to the people of the East of Luton as part of the planning application for the development of further housing in Wigmore in 1982.

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		The traffic increase, traffic in the East of Luton is already over capacity in some locations and will be greatly increased if this proposed development on Wigmore Park and the proposed development on the Luton/ Hertfordshire border were to go ahead. Journey times at the moment are greatly increased during the morning rush hour, a 5 minute can take half an hour during busier periods. The contravening proposed link road, the proposed road from Eaton Green Road cannot be created as it contravenes LLP6 in the Luton Local Plan 2011 -20314Di page 32 which states "such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport". This local plan was agreed through consultation between the council and local people and has only recently been published, November 2017. The landfill, the proposed development would take place on the currently capped landfill site, which was used to take much of Luton's waste from 1937 until its closure in 1978. The tip would have been used to take waste from the airport, Vauxhall plant and from places such as LaPorte Chemicals. This unlined site (at the base) sits above the chalk aquifer, which provides drinking water for the local area. Any drilling or pilling and building (compressing) on this landfill layer could cause dangerous liquids to permeate into the vital source of drinking water below. One of the landfill soil sample reports in the planning application stated that the sampling borehole LF-BHG was stopped at 2.8m due to a high UXO reading. Luton was involved in manufacturing of munitions and tanks during WW2 and the airport was an airbase at the time. There are reports that hundreds of WW2 ordinance were dropped on Luton during air raids and many of these devices can lay dormant until disturbed for building works. The contravening of the local plan to build on an Area of Local Land Value. As well as being a well-used park for people, Wigmore Valley Park has also gone from being the local dump, to being an Area of Local Land Value (ALLV) as detailed in the Luton Local Plan 2011 - 2031 proposal map. The planning application goes against the 2011- 2031 local plan (November 2017) page 78 "Strategic Objective 10. This proposed development would do the opposite to strategic objective 10, it would not protect and enhance biodiversity it will reduce the size and quality of this much needed ALLV site. Accessibility, the development would reduce the accessibility to open space for people, the proposed park area is not as accessible for those like me who have walking difficulties, as the gradient of the land proposed for the new park is much steeper than the current park area. I have real concerns that I will be unable to use much of the proposed park as the land is too steep for me to walk up. The park would be more remote so people would need to travel further to access the open area of parkland. CWS The Wigmore park area contains a valued County Wildlife Site with many species of birds and five different species of wild

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		orchid (numbering in their hundreds). The proposed development would reduce this CWS habitat which goes against the local plans aims to improve and enhance biodiversity (strategic objective 10). The creation of a business park to provide jobs, The Guardian Newspaper 13th December 2017 "The jobless rate remained at 4.3%, its lowest since 1975." which gives me great concern as this is one of LLAL's main reasons for building the business park "New Century Park is the latest exciting development in the continuing delivery of the Luton Investment Framework which is attracting much-needed new jobs" quote from Councillor Andy Malcolm, chair of LLAL, it would seem at this time a business development to create jobs would be misguided. Air Quality, the reduction of trees and grass and the increase of traffic and aircraft, which this development would, cause all go against the health and welfare of the local population. Parking, residents near the airport were recently asked to complete a survey on parking. The impact on the area with the current airport site and lack of parking near Wigmore Place have been high profile, in recent months Luton made the national news due to angry residents not being able to park in their street, because of the number of parked cars associated with the airport. Users of Wigmore Park had to fight for access to the facility due to staff from Wigmore Place taking all of the spaces. Wigmore Place has nowhere near the capacity of parking needed for staff and they have had to lease land on two sites in the park and one at Parkway station to meet the need. The Century Park development details in its plans the number of jobs provided and the number of parking spaces to be created, the two don't match, unless people's habits change then we will see more parking on the surrounding residential streets. This will again cause friction and ill feeling with local residents and the employers and could cause safety issues in the area. This proposal will have a huge impact on environment and the health and wellbeing of local residents, something which was recognised in the early 1980's but may now have been forgotten. There are so many strong examples given by residents and experts that show this land should remain untouched for the people of Luton to benefit from for future generations.
123.	Yes 17.2.18	REPEAT OF REF 108
124.	Yes 18.2.18	REPEAT OF REP 58 (AND REP 11)

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125.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11) As a result, I feel that it is clear that the immediate and longer-term dangers of development on this site are acute. Development here will run roughshod over the health and well-being of local residents, wildlife and ecosystems, and frankly contravenes the Council's role as a representative body entrusted with protecting local residents, those who vote to determine its makeup and who pay council tax to provide for its funding. The other fundamental danger of development here is in relation to the proposed new access road. Clearly, in beginning to make changes to local roads, this development is undeniably linked holistically to proposed developments on land to the east of Luton. If airport development here is linked with the proposed Century Park development, then the required road network would facilitate the construction of a new housing development on the lands of Wigmore and Cockernhoe. Whilst a separate application, the issues of such development are blindingly clear: further destruction of local wildlife, their habitats and ecosystems, further increased traffic on the already choking roads of this area, increased strain on Luton's failing social service provisions, and the permission of an unacceptable sprawl of Luton beyond its borders into Green Belt land, precisely the land designed to prevent such sprawl. As a result, it is clear that on many levels this proposed development of Wigmore Park is unacceptable. It poses immediate environmental and health dangers, but also would provide a fatal precedent for the further development and destruction of the land to the east of Luton and around Luton Airport.
126.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11) The park is beautiful and so diverse, please accept this email as my objection of the proposed development to Wigmore Valley Park.
127.	Yes 19.2.18	The proposed buildings will cause a loss of public space, wildlife and natural light. Instead, this green space will be replaced with noise and disturbance to the local community, which already suffers due to the noise and pollution created by London Luton airport.
128.	Yes 19.2.18	The proposed buildings will cause a loss of public space,wildlife and natural light. Instead, this green space will be replaced with noise and disturbance to the local community, which already suffers due to the noise and pollution created by London luton airport. I strongly object to this development application on many grounds. I agree with the arguments put forward in more detail within ANONYMOUS REPRESENTATION 3. 1-THE ADOPTED LUTON LOCAL PLAN EXPRESSIVELY FORBIDS THE ACCESS TO NEW CENTURY PARK FROM EATON GREEN ROAD IN

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		POLICY D1. Luton adopted their Local Plan 2011-2031 on 4 Nov 2017. On p.32 section d.1 it says no access road from Eaton Green Rd very clearly: "such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport" 2- THE COUNCIL IS LOANING 300 MILLION POUNDS TO THE COMPANY FOR THIS PROJECT - WHEN THERE IS ZERO GUARANTEE IT WILL EVER BE REPAID AND THE COMPANY ALREADY OWES MORE THAN IT'S SHAREHOLDING VALUE. 3- PRESENCE OF DANGEROUS, HAZARDOUS AND EXPLOSIVE MATERIALS THE EXECUTIVES AT THE COUNCIL ARE WELL AWARE THERE IS LIKELIHOOD OF UNEXPLODED ORDNANCE BENEATH THEIR UNTESTED LANDFILL, AND INSTEAD OF TESTING THIS AS THEY WERE ADVICED TO DO, THEY ARE IGNORING IT HOPING NOTHING WILL SLOW DOWN THEIR CONSTRUCTION, LEST THEY SHOULD LOOSE THEIR SEMLEP GRANT. THIS IS UNACCEPTABLE AND DANGEROUS. THEY HAVE ALREADY BEEN WARNED ABOUT THE POSSIBLITY OF SUBTERRANEAN FIRES BREAKING OUT. THE SITE ALREADY LEAKS METHANES AND IT'S GATES RUN UNDER HOUSES! OBVIOUSLY ALONG WITH LARGE AMOUNTS OF METHANE, AND SITTING DIRECTLY NEXT TO AN AIRPORT. THEY HAVE BEEN ADVISED NOT TO DIG THIS UP WITHOUT PROPER SPECIALIST INVESTIGATIONS OR THERE COULD BE SERIOUS CONSEQUENCES SUCH AS EXPLOSIONS, AND FIRES THAT RUN UNDERGROUND AND ARE IMPOSSIBLE TO PUT OUT. ALSO IT COULD RESULT IN DEATHS. THERE ARE ALSO DANGERS OF AQUIFER CONTAMINATION, SINCE THIS LANDFILL HAS ALREADY CONTAMINATED A NORTH HERTS BOREHOLE WHICH IS NOW UNUSUABLE! 4- DANGEROUS AIR POLLUTION HAS NOT BEEN MONITORED AT ALL IN EAST OF LUTON RESIDENTIAL AREAS, INCLUDING STOPSLEY, WIGMORE, CRAWLEY AND ROUND GREEN. 5-TRANSPORT STUDIES ARE INADEQUATE AND MADE FICTITIOUS MODELS ASSUMING ROADS THAT DO NOT CURRENTLY EXIST.

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		5-LONDON LUTON AIPORT FREEHOLD LIMITED PARK FIRST SCHEME IS INVOLVED. Last June 2017, a petition for the closure of Toby Whittaker's company Store First Limited, a nationwide firm was presented to the High Court by The Secretary of State for Business, Energy and Industrial Strategy. Although a spokesman for the Serious Fraud Office said the winding up petition was not connected with a separate investigation into pension schemes which had invested in pods from Store First. However as this petition, that was presented for the closure of Toby Whittaker's company back in June 2017, why would London Luton Airport Ltd suddenly have agreed to a new business arrangement and association with their precious brand only several months later in the form of London Luton Airport Freedhold Limited and a Park First investment scheme? 6-THE WIGMORE VALLEY PARK LAND HAS NOT BEEN DISPOSED OF LAWFULLY. 7-THE LOCAL PLAN SPECIFIES THAT THIS PARK IS AN AREA OF GREAT COMMUNITY VALUE. IT IS ALSO A PLAYING FIELD. 8-THE SITE IS A WILDLIFE CONSERVATION ZONE 9-THE ROAD NETWORK IS ALREADY CONGESTED AND CAN NOT COPE WITH 14,000 EXTRA VEHICLE MOVEMENTS DAILY.
129.	Yes 19.2.18	REPEAT OF REP 58 In summary I wish to log my objections to the planning application because I the impact this will have on the environment and the local area.
130.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11)
131.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11)
132.	Yes 19.2.18	Keep it green!!
133.	Yes 19.2.18	I object to the New Century Park, because the loss of green space, it's a beautiful park to walk around, so many people dog walk, and we do not want to lose this to large concrete buildings, too much traffic all around Wigmore and the Airport, which is already nearly at grid lock at peak times, the supermarket and surrounding shops will not cope with all the extra cars and staff. Parking is

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		already causing major problems around the Park using roads in housing estates. If the New homes get planning at Cockernhoe, it will be even worse for Stopsley and Wigmore to cope with.
134.	Yes 19.2.18	There is enough pollution in the wigmore area by the airport without the added pollution more industry and less green land will make
135.	Yes 19.2.18	EXTRACTS FROM REP 48 AND 58 Do not proceed with this development.
136.	Yes 19.2.18	REPEAT OF REP 135
137.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11)
138.	Yes 19.2.18	Wigmore Valley Park is enjoyed by all who use it and should be left in tact for future generations. I joined a large gathering of mixed ages for a 'Picnic in Wigmore Valley Park' in August 2017. The park is accessible for residents of local houses and within walking distance. Also visited by nearby residents of North Herts. The Picnic was televised on the local news and all agreed it was a special place that must be kept as it is for families now and future generations. Local Plan map LLP14 shows no development on Wigmore Valley Park. The park helps act as a barrier to protect the local residents from the Airport traffic noise and pollution. Pollution shortens lives. Hundreds of established trees in Wigmore Valley Park act as green lungs. As well as providing space for children to play, elderly residents to walk around it, the park also provides important wildlife habitat- note local plan LLP6E also it is a County Wildlife Site - the quality of open space and landscaping to be maintained. Luton Council has a responsibility for the health and welfare of people in such an overdeveloped town, more importantly this park acts as a barrier to pollution and noise. Richard Attenborough and many Scientists have proved that aviation is the fastest growing cause of climate change, Luton Airport is the fastest growing UK source - How can you justify the proposed plan? Is there a conflict of interest with Luton Airport and Luton Council? Luton Airport appears greedy. Please think again - you have the capability to improve air quality in Luton.

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		LLAL Vision 2020-2050: "Although climate change is beyond our direct control, we recognize that Luton Airport has a significant influence over factors that contribute to it, such as: emissions from aircraft; vehicle trips; and the activities of other companies operating at the airport. Ahead of any future expansion work, we will develop a comprehensive strategy to reduce where possible carbon emissions." It is the policy in the 20 year plan that Eaton Road access should not be allowed. It would bring more traffic, noise and danger from new rat runs on Wigmore Lane, Eaton Green Road. Disturbing and building on a landfill site anyway would be high risk with much testing still to do, not confident that development is safe anyway. Please think carefully - life is precious.
139.	Yes 19.2.18	I wish to lodge an objection to planning application 17/02300/EIA on the grounds that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 – London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency. REPEAT OF REP 11 RE LINK ROAD Also we need to keep the green spaces in Wigmore for the trees and wildlife. I'm a dog walker and frequently use the park and the bridle path. It seems like the area will be turned into a concrete jungle with the business park and thousands of new houses. Please listen to the opinion of local residents.

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140.	Yes 19.2.18	Mainly worried that the proposed development will put even more pressure on the already dire traffic situation in and around the wigmore area and the airport. Also, considering the land has been tested for such a long time now, I don't think that they found anything positive, so god knows what they will dig up if the development goes ahead. Why would they need to keep coming back, time and time and again? Surely this has to be a worry... Maybe better to leave it untouched, and keep the green space.
141.	Yes 19.2.18	I object to this application on the grounds that it is contrary to Section 10 of the 1906 Open Spaces Act, where the common land is held on trust for the use and enjoyment of all local inhabitants as an open space and no other purpose.
142.	Yes 20.2.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads. Large ground level car parks should not be built on a County Wildlife Site and Area of Local Landscape Value. The CWS has become a diverse habitat with 5 species of orchid and over 60 bird species. The offices, road and roundabout would all have unacceptable, adverse impacts on this landscape. Car parks can go anywhere and should be multi-storey due to lack of space. The 'replacement park' is much further away on agricultural fields and in no way equates to what we have now. It would be further from homes, less convenient, has no trees to absorb pollution, and would mean a net loss of green space. Described as "intensively farmed arable fields with little habitat value and relatively low ecological importance", it would take many years to become as good a site for wildlife, which is in sharp decline and needs help now. REPEAT OF REP 11 Luton is encroaching ever faster onto the green land that surrounds it. The quality of life for residents in these areas bordering countryside needs to be preserved
143.	Yes 20.2.18	X (Note the electronic submission indicated that the objection was made on the grounds of 'Design', 'noise and disturbance', 'parking' and 'visual intrusion'
144.	Yes	REPEAT OF REP 58 (AND REP 11)

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	20.2.18	
145.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11)
146.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11)
147.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11) I grew up in the Wigmore area and have used the park since it opened and even though I'm no longer local I still enjoy spending time there on a regular basis and would be extremely upset to see Luton lose one of its best parks.
148.	Yes 20.2.18	Loss of community green space and destruction of wildlife habitats.
149.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11)
150.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11)
151.	Yes 20.2.18	I am concerned about the effect on Wigmore Valley Park. I am concerned about the loss of recreational area and green space and the effect on wildlife in the park. I also object to the access road to Eaton Green Road as traffic would be using local roads to access Century Park making Wigmore area more congested with traffic. This also causes more noise and disturbance due to traffic flow.
152.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11) In summary I wish to log my objections to the planning application because of the impact this will have on the environment and the local area.
153.	Yes	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
	20.2.18	
154.	Yes 20.2.18	Green space and parkland is very important to me and my family. We have 2 children who enjoy their days and walks in Wigmore Park. It is the only open space near where we live. We strongly object to this proposal.
155.	Yes 20.2.18	REPEAT OF REP 167
156.	Yes 20.2.18	REPEAT OF REP 167
157.	Yes 20.2.18	Please keep our green space its so vital for flora and fauna and a wonderful place to walk. There will be nothing of luton left soon just a concrete jungle. It is a proven fact that mental health is improved by open spaces surely to god thats more important .
158.	Yes 20.2.18	REPEAT OF REP 167
159.	Yes 20.2.18	This is a beautiful area used by many residents locally to walk dogs play with their children and enjoy the wonderful nature in the area. This would result in already saturated roads becoming increasingly busy and the nearby villages would foot a lot of this traffic causing damage to road surfaces and increased danger to children walking to schools.
160.	Yes 20.2.18	REPEAT OF REP 58 (AND REP 11) Luton is encroaching ever faster onto the green land that surrounds it. The quality of life for residents in these areas bordering countryside needs to be preserved.
161.	Yes 20.2.18	I have been using Wigmore Park to walk our dogs for years. It is a place of natural beauty and great for spotting wildlife. I understand the need for expansion but wildlife habitats, green space for dogs to play and explore & people's wellbeing outweighs that for me. I am totally against ploughing up more beautiful green areas & destroying natural wildlife homes.
162.	Yes 20.2.18	Loss of a green space and wildlife
163.	Yes	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
	20.2.18	
164.	Yes 20.2.18	I wish to strongly object to planning application 17/02300/EIA, which is in total breach of the local plan policy LLP6, as an access route has been provided from Eaton Green Road to the proposed business park. This proposed new link road will act as a relief road for the A505 taking traffic away from the A505 at Ashcroft Road and then feeding traffic along Wigmore Lane to Eaton Green Road, which are all local roads. The proposed development would encourage and lead to further congestion on already congested roads. At peak times the roads around Wigmore struggle to deal with the amount of traffic in the area and the proposed development would draw more traffic from the airport into the residential areas surrounding it. Along with the increased traffic also comes the very real increase in pollution that will impact local residents and the many schools in the area. The proposal also doesn't give proper consideration to other road users. I further object to this development as it is my understanding that Wigmore Valley Park is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's, as part of a previous planning permission requirement. I understand no formal consultation has taken place with residents of Luton regarding the transfer of this community asset to LLAL. Wigmore is becoming increasingly hemmed in with planned housing just outside the Luton border, coupled with the trend in Luton for high rise residential developments, the need for open, useable green space is becoming a premium and it is deeply concerning that consideration is being given to development that would remove such a space. Wigmore Valley Park is also an established wildlife area and would be severely impacted should this proposal go ahead. The alternate location proposed in the planning application for the new Wigmore Park is a ploughed farmer' s field that is devoid of any wildlife value and is located too far from the homes of the majority of park users. I also wish to object to the disturbance caused by the development of the former council tip. There is a real threat that disturbance of this former tip would have a very real impact on the local environment and waterways.
165.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11)
166.	Yes	I wish to object to this planning application for redesign the Wigmore park area to accommodate Century park. As has been

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Ref.	Objection	Comments
	21.2.18	stated the park was a gift to the community and as such should not be time limited. The disturbance of the old landfill site is a concern as there was little environmental control on the substances that were deposited over the years and their release could cause great harm to the environment which will be additionally polluted further by airport expansion. Although progress is inevitable I cannot understand why the original placement of Century Park, which I think was in the field where Wigmore park is now proposed to be moved, cannot be kept as it was therefore leaving Wigmore park undisturbed. The proposed entrance to the site from Eaton Green Road is also a concern with a substantial roundabout and large access road leading from an already very congested area. The original plan suggests that traffic from Hitchin would access the site from Vauxhall Way, therefore freeing traffic from the Wigmore area, however this entrance surely means traffic would use the inadequate Wigmore lane. To my mind this entrance suggests that an access route would be made along Eaton Green Road towards Tea Green to accommodate the proposed North Herts. Development which is a concern. Luton has substantial housing shortage at the moment, hence the other proposals for creating homes in the area, so the creating of 4000 jobs suggests that the majority of new employees will have to come from outside Luton. This will increase traffic congestion even more than the gridlock we have at peak times now. If the plan goes ahead then there must be provision for parking provided for these employees as surrounding roads are already littered with parked cars during the day creating a major hazard to safety especially for children crossing, restricted use of pavements and also access for emergency services in some roads.
167.	Yes 21.2.18	There should be no development on Wigmore Park. It was provided for the people of Wigmore close to homes because it was needed, and thoughtfully landscaped with hundreds of trees planted. It is a vital Community Asset, highly valued and crucial to our well being. It has been enjoyed by parents, families and visitors to the town since the 1980s and must be left for future generations to enjoy. Local Plan map LLP14 shows no development on the park – only a possible road to Century Park fields Luton is extremely overdeveloped and we have already lost too much green space for the town's needs. Wigmore residents have suffered disproportionately. It is not reasonable to expect residents and those who enjoy the park to tolerate a greater loss, when health and exercise are more important than ever

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		Over two hectares of trees would be lost in this scheme, part of those planted for us in the 1980s. The trees in Wigmore Valley Park provide an important wildlife habitat for many species and also act as a barrier to air and noise pollution. This pollution barrier and biodiversity cannot be lost. This would be against the LLAL Vision 2020-2050 which states: *"As part of any expansion proposals, we will develop landscape and ecology strategies which seek to conserve, and where possible, enhance the landscape and biodiversity within Luton Airport and on nearby sites."* *We don't want development in this area, but if any were to be allowed it should be on Century Park Fields which have had planning permission for 20 years. The fields could be reached via a road which also stays within the airport boundary to join the point where the tunnel was planned. No development should take place on a public park which would ruin a well loved, peaceful green area and subject people to danger, noise and air pollution.* *The new 20-year Luton Local Plan is clear that there should be no access road to Wigmore Park from Eaton Green Road. A new access road by the Tidy Tip, one of two proposed roads on to the park from Eaton Green Road should not be allowed. It would generate more traffic, increase noise and create dangerous new rat runs on Wigmore Lane, Eaton Green Road and already congested surrounding roads. Frank Lester Way should not be closed to cars.* *My other concern is the rapid airport expansion which has made Luton the 5th most congested UK town, with huge traffic problems. No significant mitigation has been proposed, but expansion continues. A dual carriageway would make it worse and bring traffic gridlock . This cannot be permitted.* *The rapid increase in flights brings millions more vehicles and more pollution, which at several places in the airport is at illegal levels. A major road will make this worse. Rising levels of toxins will have a significant negative impact on health. Pollution from diesels and planes kills 40,000 people every year. It stunts children's lung growth, causes asthma, strokes and heart attacks, and shortens lives. A housing development was recently refused because no mitigation for pollution was provided. There is no mitigation here.* *Large ground level car parks should not be built on a County Wildlife Site and Area of Local Landscape Value. The CWS has become a diverse habitat with 5 species of orchid and over 60 bird species. The offices, road and roundabout would all have unacceptable, adverse impacts on this landscape. Car parks can go anywhere and should be multi-storey due to lack of space.* *The 'replacement park' is much further away on agricultural fields and in no way equates to what we have now. It would be*

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		further from homes, less convenient, has no trees to absorb pollution, and would mean a net loss of green space. Described as "intensively farmed arable fields with little habitat value and relatively low ecological importance", it would take many years to become as good a site for wildlife, which is in sharp decline and needs help now. *Local Plan policy LLP6E on Wigmore Park says "the quality of open space and landscaping will be maintained". LLP29: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas." The secret selling off of this public park is immoral and shows a cynical intention to disregard and spoil the landscape, and NOT to maintain the quality of open space and landscaping for the community of Wigmore. The offices, road and roundabout would have unacceptable impact on this ALLV landscape.* *I are extremely concerned about the possible irreversible contamination of groundwater and the drinking supply, and dangerous gases from disturbing and building on a landfill site where hazardous waste was dumped. With much testing still to do, until it can be said with confidence that development is safe, outline permission should not be granted.* *Building offices and roads on a landfill site which is unstable below ground is high risk, and can lead to costly subsidence, where buildings and roads can crack and sink. This happened to B & Q at Dallow Road, which had to be closed for a year and rebuilt. Also sulphates and acids in the landfill may attack the concrete in the pilings.* *The proposed dual carriageway through the airport, taking traffic into a public park, seems far bigger than is needed for the offices proposed. This appears to be for a bigger development, yet we are only asked to comment on what is shown. The reason for this road should be fully explained and justified in the application. If not, permission should not be granted.* *This major road would have been very close to the children's playground until many people objected. The road corridor remains. Because this is an outline application, a threat would be hanging over us that the big road could be brought back at any time.* *Aviation is the fastest growing source of climate change and Luton is the fastest growing UK airport. Therefore, Luton is the fastest growing source of climate change in the UK. The rapid fuelling of climate change will be disastrous for humanity's future, as we are often reminded by Attenborough and many scientists. The LLAL Vision 2020-2050 states "Although climate change is beyond our direct control, we recognise that Luton Airport has a significant influence over factors that contribute to it, such as: emissions from aircraft; vehicle trips; and the activities of other companies operating at the airport. Ahead of any future expansion work, we will develop a comprehensive strategy to reduce where possible carbon emissions."*

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		The Wigmore application is for airport-related development, moving car parks on to a public park to make room for aprons and terminals, displacing businesses to build a major road to carry far more traffic. There is no strategy whatever to reduce climate change, contrary to the 2012 National Planning Policy Framework Section 10 (Meeting the Challenge of Climate Change) so this development should not be permitted. *I ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a Community Asset which does not comply with key relevant Local Plan policies.*
168.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11)
169.	Yes 21.2.18	Do not build on the public park. Too much traffic in an already congested part of town
170.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11) I'm strongly object to any part of the park & landfill being compromised for the reasons stated above & the potential dangers associated with it. I look forward to your acknowledgement upon receiving my objection.
171.	Yes 21.2.18	I object to the outline planning application for New Century business park and full planning. The loss of a highly valued open space environment, established trees and wildlife. The open space in Wigmore Calley Park has taken 35 years to mature. This area was given to the people of the East of Luton as part of the planning application for the development of further housing in Wigmore in the 1980's. The Wigmore Planning Brief December 1982 states "Provision of public open space in the Wigmore Area is close to the minimum necessary. The development of the Wigmore area will generate a need for an additional provision of public open space and allotments". It goes on to say "The former Airport Refuse Tip at Wigmore Hall Farm might also be used to accommodate some of the open space required by the Wigmore area, so releasing more land for housing". If anything this area has seen even more

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		development and reduction of open space since 1982. For example the 70 properties at Someries Hill on the former allotments adjoining Crawley Green Park, which took a well-used area of space away from the community. Accessibility The development would reduce the accessibility to open space for people, the proposed new area is not as accessible for those with walking difficulties as the gradient of the land proposed for the new park is much steeper than the current park area (from map contours shown on the planning maps) the park would be more remote, people would need to travel further to access the open area of parkland. The playing fields of which Luton already has less than required should not be built on as there have been no proposed alternatives, a requirement of Sport England. A Local park Wigmore Valley Park is a local park. The development and proposed relocation of recreational areas and open space would negate this thus creating an inconvenient and inaccessible space to those with difficulties who wish to access local open space. My Local park Wigmore Valley Park is my local park, easily accessible from where I live, one of the reasons I chose to live in this part of Luton and where I walk my dogs. The proposed new park would be further away and less accessible for me. County Wildlife Site (CWS) The Wigmore Valley Park area contains a valued County Wildlife Site (CWS) with many species of birds and five different species of wild orchid (numbering in their hundreds). The proposed development would reduce and diminish this CWS habitat which goes against the local plans aims to improve and enhance biodiversity (strategic objective 10). Air Quality The reduction of trees and grass and the increase of traffic and aircraft, which this development would cause all go against the

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		health and welfare of the local population. Quoted from Luton Borough Councils 2016 Air Quality Annual Status Report "The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion". "Luton is currently seeing an increased number of planning applications, including a number of substantial developments which have potential to impact upon air quality". Reference URL: [https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Environmental%20and%20Consumer%20Services/Pollution/2016%20Air%20Quality%20Annual%20Status%20Report%20(ASR).pdf] The Landfill The proposed development would take place on the currently capped landfill site, which was used to take much of Luton's waste from 1937 until its closure in 1978. According to the Environment Agency's listing for the tip on their website it contains industrial waste from factory or industrial processes, commercial waste and liquids/sludge which include chemicals, industrial wastewater, sewage sludge and chemical wastes mixed with municipal solid waste Reference URL: [http://maps.environment-agency.gov.uk/wiyby/queryController?topic=waste&ep=2ndtierquery'=_e&layerGroups=2&x=512492.833&y=221758.7525&extraClause=HLD_REFERENCE~%27EAHLD00782%27&textonly=off'stValue='stField] The tip would have been used to take waste from the airport, Vauxhall plant and from places such as LaPorte Chemicals. This unlined site (at the base) sits above the chalk aquifer, which provides drinking water for the local area. Any drilling or pilling and building (compressing) on this landfill layer could cause dangerous liquids to permeate into the vital source of drinking water below. One of the landfill soil sample reports in the planning application stated that the sampling borehole LF-BHG was stopped at 2.8m due to a high UXO reading. Luton was involved in manufacturing of munitions and tanks during WW2 and the airport was

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		targeted at the time. There are reports that hundreds of WW2 ordinance were dropped on Luton during air raids and many of these devices can lay dormant until disturbed by building works. The Traffic Increase Traffic in the East of Luton is already over capacity in some locations and will be greatly increased if this proposed development on Wigmore Park and the proposed development on the Luton/ Hertfordshire border were to go ahead. The Transport Assessment Part 4 (pg. 29) in the planning application for New Century Park shows that in 2016 (the base year) three of the assessed junctions were already over capacity and three were close to capacity. The assessment shows that over the period of time from the business park opening to design year this will increase to a total of six junctions being over capacity and a five more being close to capacity. The assessment states that it does not factor in the proposed housing development on the Luton/Hertfordshire border in part 2 pg. 47 table 5-7, but Hertfordshire's development report on traffic from the new site shows it would also cause an even greater increase in traffic. In addition, recent bus stop installations which cause traffic obstructions, potholes, inferior surfacing, poor markings and lack of cycleways are examples, individual and combined, that contribute to traffic delays in addition to sudden volume increases from incidents on the M1 motorway, delays on the Stockingstone Road / Old Bedford Road intersection A6 trunk route, A505 trunk route or adverse weather conditions which cause major delays to the entire area. Highway Infrastructure I'm concerned that the development of New Century Park has not properly acknowledged the wider infrastructure issues that commuters face in the East of Luton now and in the future and that the general state of highways will worsen given the capacity increases from the proposed New Century Park and housing developments on the Luton/Hertfordshire border, which have also not been considered. The proposed closure of Frank Lester Way The proposed closure of Frank Lester Way to vehicles will have a huge impact on traffic in the local area causing disruption further into residential areas. It will not reduce traffic as indicated in modelling, it will cause many other issues in the local area around major trunk routes to the M1 and LLA served by the A6 and A505 and will only worsen as volume increases. Frank Lester

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		Way (itself once the only entry point for LLA) provides traffic relief to and from Vauxhall Way for vehicles travelling to Capability Green and the M1 motorway using Percival Way and is an important route for traffic in the local area. Frank Lester Way also serves a multitude of existing business with large numbers of employees with personal vehicles (who may also not know about the proposal) in and around LLA, President Way units, airport car hire companies and the LLA car parks. Secondly, I object on principle to the proposed closure of a road named after Frank Stanley Lester OBE, a man who served as Mayor of Luton four times, with forty years of public service to Luton as well as the history and contribution to the town and airport. The contravening proposed link road The proposed road from Eaton Green Road cannot be created as it contravenes LLP6 in the Luton Local Plan 2011 -20314Di page 32 which states “such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport”. This local plan was agreed through consultation between the council and local people and has only recently been published, November 2017. The contravening of the local plan to build on an Area of Local Land Value As well as being a well-used park for people, Wigmore Valley Park has also gone from being the local dump, to being an Area of Local Land Value (ALLV) as detailed in the Luton Local Plan 2011 – 2031 proposal map. The New Century Park planning application goes against the 2011- 2031 local plan (November 2017) which states on page 78 “Strategic Objective 10: Improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity”. This proposed development would do the opposite, it would not protect and enhance biodiversity it will reduce the size and quality of this much-needed ALLV site. The creation of a business park to provide jobs The Guardian Newspaper 13th December 2017 “The jobless rate remained at 4.3%, its lowest since 1975.” Which gives me great concern as this is one of LLAL’s main reasons for building the business park “New Century Park is the latest exciting development in the continuing delivery of the Luton Investment Framework which is attracting much-needed new jobs” quote from Councillor

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		Andy Malcolm, chair of LLAL, it would seem at this time a business development to create jobs would be surplus to requirements. There is no evidence to support that the proposed jobs will be for local people and there is no evidence to say which businesses will take residency in New Century Park. It is likely that much of the workforce will commute into Luton therefore the notion that this will benefit Luton by providing jobs for the town is unsubstantial. The creation of a business park in a residential area next to an International Airport The proposed development would increase capacity on the local highways and rail of non-London Luton Airport (LLA) passengers especially at peak times. With its passenger numbers increasing by the month and with future plans for growth and development, LLA operations will undoubtedly be affected by the proposal. The effect is twofold, one being operationally for LLA and secondly the LLA customer experience, where passengers could be unnecessarily affected, an affect not only on LLA but potentially airline operators themselves. The continued success of LLA is vital to the town. Parking Residents near the airport were recently asked to complete a survey on parking. The impact on the area with the current airport site and lack of parking near Wigmore Place have been high profile, in recent months Luton made the national news due to angry residents not being able to park in their street because of the number of parked cars associated with the airport. Recently users of Wigmore Park had to fight for access to the facility due to staff from Wigmore Place taking all the spaces. Wigmore Place has nowhere near the suitable capacity of parking needed for staff and they have had to lease land on two sites in the park and one at Parkway station to meet the need. The Century Park development details in its plans the number of jobs provided and the number of parking spaces to be created, the two don't match, unless people's habits change (based on an assumption of taking public transport over private vehicles) then we will see more parking in and around the surrounding residential streets. This will again cause further friction and ill feeling with local residents and could cause safety issues in the area. Summary This proposal will have a huge impact on the environment and the health and wellbeing of local residents, something which was recognised in the early 1980's but may now have been forgotten. There are so many strong examples given by residents and

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		experts that show this land should remain untouched for the people of Luton to benefit from for future generations.
172.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11)
173.	Yes 21.2.18	REPEAT OF REP 58 (AND REP 11) I strongly object to any part of the park and landfill being compromised for the reasons stated above and the potential dangers associated with it
174.	Yes 21.2.18	I object to planning application 17/02300/EIA for the following reasons: I feel especially strongly about the: 1. development would obliterate an important area for recreation and for wildlife, and the proposed "replacement area" would be almost useless. It would be much further from people's homes, and its wildlife value would be negligible for many years, whereas the current park includes a County Wildlife Site and an Area of Local Landscape Value. 2. The proposed road access to Eaton Green Road would add seriously to an already congested area and hence to the air pollution suffered by everyone living in or passing through it. In more detail: REPEAT OF REP 167
175.	Yes 22.2.28	REPEAT OF REP 58 (AND REP 11) As a resident of Luton I would like my town to remain safe and uncontaminated. I would like my children to grow up seeing and appreciating nature on their door stop. Destroying natural habitats is a disgrace and will affect generations to come. Luton is fast becoming over populated I myself would like it to remain the way is it with its huge sense of community and high values. We do not need this development.
176.	Yes	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
	22.2.18	
177.	Yes 22.2.18	Loss of light aka loss of the light of children playing…
178.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11)
179.	Yes 22.2.18	Please leave the park alone
180.	Yes 22.2.18	REPEAT OF REP 167
181.	Yes 22.2.18	I strongly object to the above planning application for the following reasons: REPEAT OF EXTRACTS FROM REP 168
182.		
183.	Yes 22.2.18	Although I do not live that close to Wigmore Park, as a Lutonian and athlete for Luton AC I have ran many times there in Chiltern League and National Events, this is a wonderful public space and a tragedy to lose it. REPEAT OF REP 58 (AND REP 11)
184.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11) I strongly object to any part of the park and landfill being compromised for the reasons stated above and the potential dangers associated with it.
185.	Yes 22.2.18	I am writing to object against the plans to build on wigmore Park. I have used this park all my life, to take the dogs for a walk and meet up with friends after school and during half terms. The park has encouraged children to become individuals and to learn so much about nature and the environment in their local surroundings and for everyone to meet new people.

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Ref.	Objection	Comments
		You will be taking away everyone's freedom to escape to the park after a day of work, school and nursery. You will be taking away the people of Wigmore's, Park and greenery. This is a selfish act that Luton borough council have decided and once it's gone – it's gone. Maybe think about what your plans are doing and going to do to the people who live nearby and have lived there their whole lives, instead of just money making for yourselves.
186.	Yes 22.2.18	I object to the above planning application for the following reasons: There should be no development on Wigmore Valley Park. It was provided for people in Wigmore close to homes because it was needed, landscaped and planted with hundreds of trees. It has been enjoyed by parents, families and visitors since the 1980s, so is highly valued and crucial to our wellbeing. It must be left for future generations to enjoy. Luton is overdeveloped and green space is well below the town's needs, so people come from other parts of the town to walk here and see wildlife. This park should not be taken away. With more people sitting down all day, health and exercise are more important than ever. …. REPEAT OF REP 167
187.	Yes 22.2.18	REPEAT OF REP 167
188.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11)
189.	Yes 22.2.18	REPEAT OF REP 167
190.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11)
191.	Yes	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
	22.2.18	
192.	Yes 22.2.18	REPEAT OF REP 58 (AND REP 11) I also don't feel that Luton needs any more of this kind of development, the one at Butterfield was only half built and still has empty premises.
193.	Yes 22.2.18	REPEAT OF REP 167
194.	Yes 22.2.18	REPEAT OF REP 167
195.	Yes 22.2.18	REPEAT OF REP 58 (NOT REP 19)
196.	23.2.18	REPEAT OF REP 167
197.	Yes 23.2.18	REPEAT OF REP 167
198.	Yes 23.2.18	I VERY STRONGLY object to the above planning application on the following grounds: … REPEAT OF REP 11. … I strongly object to the above planning application on the following grounds:- Local, strategic, regional and national planning policies:- This application is in breach of the Luton Local Plan (published in November 2017.) The local plan is a major document that dictates future policy for 20 years and it is being broken by using Eaton Green Road as an access point.

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Ref.	Objection	Comments
		Previous planning decisions (including appeal decisions):- The original permission for Century Park banned access from Eaton Green Road. Nature conservation:- Wigmore park is an area of natural beauty & offsets the airport pollution. Adequacy of parking:- The TUI car park will be much further away tempting more employees to park in the streets. This is already a major problem. Traffic generation Noise and disturbance resulting from use Hazardous materials in that the site is a recognised unregulated toxic tip so should be left alone with its clay cap. Smells through disturbance. Loss of trees Road Safety – The development may lead to a significant impact upon road safety due to more cars and lorries using local roads for access.
199.	Yes 23.2.18	REPEAT OF REP 167
200.	Yes 23.2.18	REPEAT OF REP 58 (AND REP 11) There is so much wildlife that will suffer, we regularly have deer visit this area, along with all the beautiful rare flowers, its just awful to think this lovely peaceful park area will be destroyed.
201.	Yes 23.2.18	REPEAT OF REP 58 (AND REP 11) ALSO EXTRACTS FROM REP 45 Nature makes us healthier and happier people and a growing number of studies show evidence that a connection with nature

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Ref.	Objection	Comments
		can have sustained increases in health and happiness. One study in particular – 30 Days Wild, which was conducted by Dr Miles Richardson, head of psychology at the University of Derby showed that those who took part improved their general health by 30%.
202.		
203.		
204.		
205.		
206.		
207.		
208.		
209.		
210.	Yes 23.2.18	I am writing to strongly object to planning application 17/02300/EIA, which is in breach of the local plan policy LLP6, as an access route has been provided from Easton green Road to the proposed business park. I feel that in building this road it will cause more traffic and pollution to the area, causing problems for local people. This will have a major effect on local people travelling to and from work and also create a massive parking issue in the area. The fumes from sitting traffic may also have an effect on local people's health. I also wish to object to any disturbance of the former council tip . I refer to the planning application statement in document 17_02300_EIA DAS_Part2-686521 page36 or page 16/24 of the PDF. As you are aware that as waste decomposes, gasses such as methane can build up to explosive levels. If you are to start

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		disrupting this land you will be responsible for releasing these gasses into the area and therefore putting peoples health and safety at risk. I cannot understand how you thought by trying to disguise the small print and ultimately lying to local people and telling them this area is safe to build on, would be a good idea . Do you really understand the damage to health disrupting this former tip could cause ? I can only imagine the health risks you would be creating and also the millions of pounds the you (the council) will end up paying out in compensation . I object to any development on Wigmore valley park, as this is a community asset that was gifted by Hitchin Homes to the people of Luton in the 1980's .Speaking as a person with 4 children born and bred in Luton we wish this park to remain untouched with the wildlife living there happily as they have for many years .
211.	Yes 23.2.18	Comments against proposals for development of New Century Park and its impact on the surrounding area Firstly I am surprised that the long held official view that New Century Industrial Park would be accessed by a tunnel under the Luton Airport to alleviate any traffic impact on the roads in surrounding area has now been abandoned with it seems no mitigating explanation. I recall some years ago there was a traffic study on the impact in roads such as Eaton Green Road Crawley, Green Road, Wigmore Lane and so on, which came out against any further mayor traffic increase using the roads without causing serious traffic congestion. The very reason why the tunnel option was the most viable. The development of the established Wigmore Park itself is surely equally controversial. Already some land from the Wigmore Park was taken some years ago to accommodate parking requirements for a local company with the proviso that this was not going to set a precedent. Well time has shown how hollow that promise was. In the new plan, the relocated Wigmore Park is reported to have some upgrade. However the new proposed site is further away from access, causing increased distance for car travel but more worringly is the loss of playing field area is retained in any new proposal. These new plans while yes giving new job opportunities, in their present form do not give Luton inhabitants a better quality of life either because of increased 73ondon73 pollution and road congestion and at least the same area of land for leisure and sporting recreation.

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Ref.	Objection	Comments
212.	Yes 23.2.18	REPEAT OF REP 167
213.	Yes 23.2.18	REPEAT OF REP 167
214.		
215.	Yes 24.2.18	REPEAT OF REP 58 (AND REP 11)
216.	Yes 24.2.18	Stop destroying our parkland
217.	Yes 24.2.18	REPEAT OF REP 167
218.	Yes 24.2.18	REPEAT OF REP 128
219.	Yes 24.2.18	REPEAT OF REP 167
220.	Yes 24.2.18	REPEAT OF REP 167
221.	Yes 24.2.18	REPEAT OF REP 167

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Ref.	Objection	Comments
222.	Yes 24.2.18	REPEAT OF REP 167
223.	Yes 24.2.18	REPEAT OF ANONYMOUS REP 3 (SERIES OF 7 EMAILS)
224.	Yes (undated)	Quotes the documents put forward in REP 220, namely: 1. unlawful disposal of public land (quoting Muir v Wandsworth BC 2017 2. bias as Luton Borough Council as local planning authority will be determining a planning application being submitted by a private company wholly within the ownership of the Council (LLAL) 3. no air quality monitoring is being carried out in the Wigmore area 4. likelihood of unexploded ordnance beneath the landfill site and concerns about contamination and hazard REPEAT OF REP 128
225.	Yes 24.2.18	REPEAT OF REP 167 (AND 59)
226.	Yes 24.2.18	REPEAT OF REP 167 (AND 59)
227.	Yes 24.2.18	Due to the new documents which have been added to the planning application, it is necessary for me to lodge another objection. Page 884 of document GCC3 states that location LF-BH10G produced high readings in relation to Unexploded Ordnance. Given the explosive gases which will be released from the old landfill site, the risk posed to life by disturbing unexploded ordnance is clearly enormous. It is clear that no further exploration should be done on this site, and that no building of any sort should ever be considered within the boundaries of the park, due to the risk of loss of life and the risk of damage to surrounding buildings from an explosion.

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228.	Yes 24.2.18	REPEAT OF REP 167 24.01.2018 Added: I wish to add to my objection that after reading a late report submitted into the planning application. A report called "GCC3 Ground Investigation Landfill" states on page 289 that: Borehole abandoned due to UXO at 2.80m depth on client's instruction. Borehole abandoned at 2.80m in concrete with a high UXO reading. Only a very few bore holes were dug on a relatively large site yet unexploded ordnance was found that hasn't been removed. This is clearly a safety concern, as the site is a former landfill site opened during the war that was located next to a Second World War airfield. The fact that a high reading was found in concrete suggests that this was a bomb dump that was capped in concrete. No one knows the complete picture of what was placed in this tip as it was unregulated. For that very reason this planning application should be refused on the grounds of safety.
229.	Yes 25.2.18	And I oppose the proposal to build on the new century park due to the hazardous materials in the site which is a recognised unregulated toxic tip which fills me with worry if it is disturbed. I disagree with the principle of this proposal. I feel it inappropriate and that the use of this land should not change.
230.	Yes 25.2.18	REPEAT OF REP 58 (AND REP 11)
231.	Yes 25.2.18	REPEAT OF REP 11 AND REP 236 10 The slaughter of 1000s of indigenous species of flora and fauna. 11 Increase in health issues due to extra pollution and loss of oxygen producing trees. The loss of another green space in East Luton will increase physical and mental health issues to people living under the stress of

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		such an ill thought out plan, even the childen's play area promotes pollution and nothing to do with anything natural or eco-friendly to compensiate for the decimation of Wigmore Park. Digging up a former landfill site will only bring disaster and most likely huge compensation claims if touched, as in previous attempts to build on contaminated land such as this. Please think of this in your assessment.
232.	Yes 25.2.18	REPEAT OF REP 58 (AND REP 11)
233.	Yes 25.2.18	Wigmore park belongs to the people of luton, once you have destroyed it there is nothing left for us !!! All we are going to gain from this is more traffic more noise ……. Stop ruining luton with the constant building everywhere !!!
234.	Yes 25.2.18	I strongly object to the planning application for the following reasons: There should be no development on Wigmore Park. It is a vital Community asset, well used, highly valued and crucial to our well being. We have walked our dogs at this park for over fifteen years and are horrified at the thought of it being destroyed to make way for an industrial park. The trees in Wigmore Valley Park provide an important wildlife habitat for many species and also act as a barrier to air and noise pollution. This pollution barrier and biodiversity canot be lost. The proposed new access road by the Tidy Tip should not be allowed, It would generate more traffic, increase noise and create dangerous new rat runs on Wigmore Lane, Eaton Green Road and already congested surrounding roads. Frank Lester Way should not be closed to cars. The 'replacement park' is much further away on agricultural fields and in no way equates to what we have now. It would be further from homes, less convenient, has no trees to absorb pollution, and would mean a net loss of green space. It will take many years to become as good a site for wildlife, whish is in sharp decline and needs help now. The proposed dual carriageway through the airport, taking traffic into a public park, seems far bigger than is needed for the offices proposed. This also runs within a couple of hundred metres of my house and I am extremely concerned about how much extra noise and pollution it is going to create near my home.

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		I ask that for all the reasons above the application be refused as the proposal is an inappropriate development on a community asset.
235.	Yes 25.2.18	Wigmore Park is of great community value for family and sports activities. It is an established wildlife and conservation site. Moving it to the new site proposed would wipe out those assets. Access from Eaton Green Road contradicts the established Luton Local Plan. Damage and contamination to aquifers serving Herts would be inevitable. The proposed road and expected 24hour access needed to the site would impose an unacceptable traffic burden on surrounding roads and lanes, many in Hertfordshire.
236.	Yes 25.2.18	Wigmore is already a VERY VERY busy area I work in St.Albans and most days leaving my house it will take 15-25 minutes to get from Wigmore to the lower Luton Road at 7:00am because of all the airport traffic adding more cars and lorries is just plan stupid. REPEAT OF REP 128 (with amplification) Luton adopted their Local Plan 2011-2031 on 4 Nov 2017. On p.32 section d.1 it says no access road from Eaton Green Rd very clearly: (addition to [1]) Repeatedly residents have been assured that these developments will not have a significant negative impact on their quality of life, and these reassurances (such as separate road access) continue to be rescinded in later stages. The council also seem to neglect the fact that current traffic levels between the motorway and the airport are awful, and that the additional traffic generated from further developments in this area, and the area near Luton Airport Parkway Station are going to bring traffic to a complete standstill. (addition after [10]) The Council's current strategy of pursuing relentless development in every area of the town seems to neglect the town's limitations. We all accept that growth is good, but there is a saturation point which should be paid regard to. Luton is now at that point, and we should value and embrace what we are, rather than trying to be something else.

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		And I strongly object to this development application on many grounds. I agree with the arguments put forward in more detail within ANONYMOUS REPRESENTATION 3.
237.	Yes 25.2.18	REPEAT OF REP 128
238.	Yes 25.2.18	REPEAT OF ANONYMOUS REP 3(EXTRACT FROM SERIES OF 7 EMAILS BUT ONLY IN RELATION TO RSS AND LAW)
239.	Yes 25.2.18	REPEAT OF REP 128
240.	Yes 25.2.18	I disagree with the principles of this proposal. I feel it is inappropriate and that the use of this land should not change
241.	Yes 25.2.18	I disagree with the principles of this proposal. I feel it is inappropriate and that the use of this land should not change
242.	Yes 25.2.18	I disagree with the principles of this proposal. I feel it is inappropriate and that the use of this land should not change
243.	Yes 25.2.18	I disagree with the principles of this proposal. I feel it is inappropriate and that the use of this land should not change
244.	Yes 25.2.18	REPEAT OF REP 128
245.	Yes 25.2.18	[1] Outdated BREEAM Standard: The Capita BREEAM Design Strategy & Pre-assessment report Nov 2017 ref CS/089916-06 Rev1 is highly suspect by achieving only 56.4% rating which is just 1.4% above the target level. A normal margin of error would suggest the BREEAM report does not meet the project target. In addition, the Capita report is using the BREEEAM methodology which is now out-of-date with the introduction of BREEAM New Construction 2018 [see https://www.breeam.com/engage/research-and-

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		development/consultation-engagement/80ondo-uk-new-construction-2018-consultation] so the report should now be re-worked using the 2018 BREEAM standard as the project planning application cannot be evaluated using out-of-date principles. [2] Significant Traffic Growth: According to Capita at the consultation meeting 31Jan2018 Raynham Way Community Centre, the New Century Development will generate c3,000 new jobs which equates to 2,000+ additional vehicles, excluding additional road traffic & aircraft movements generated by the New Century Park businesses, all of which further pollutes the local environment. This will cause greater congestion in Luton & the surrounding area which is already the Uks 5th most congested town [see Inrix report]. The Inrix report highlighted "motorists in Luton spent approximately 29 hours in gridlock last year, costing each of them £1,143. They also wasted 11% of their total drive time stuck in congestion". In the Luton Airport area the congestion is worse with significant traffic queues during morning & evening periods despite the road developments as Luton Airport growth has already outstripped the new infrastructure capacity. The forecast for increased congestion from the development must be professionally identified using the Inrix report as the foundation to understand the additional costs to motorists & similarly affected local residents which we believe will be unacceptable to the community. [3] Premature Luton Deaths From Pollution: According to the Luton Borough Council [LBC] website report on Air Quality "A recent report by Public Health England estimated that in Luton, 86 deaths were 80ondon80ructu to particulate air pollution per annum with 1,004 associated life – years lost. Luton has a higher percentage of adult deaths (5.8%) related to long term exposure to air pollution than England (5.1%). The main source of air pollution in Luton is from road traffic particularly the M1 motorway and congested town centre streets". The LBC Air Quality Report stated "Ensure all major developments, and any significant developments in areas of elevated air pollution, are required to produce an air quality assessment". An Air Quality Assessment report in conjunction with this development application must be made available to the public based upon the inevitable increase in Luton area road vehicle & airtraffic pollution, which we believe will show the local community an unacceptable level of risk. [4] Environmental Impact Upon Luton Children & Elderly: The Luton residential area surrounding the development has a high demographic for children & the elderly & the development project includes a "childrens play area". However the LBC Air Quality Report states "Children are particularly susceptible to the effects of pollution, as their lungs are not yet fully developed, and pollution may have an effect on lung growth and lung function. Older people are also more vulnerable to the detrimental health effects of pollution, and those with pre-existing health conditions and diseases are also more at risk". It seems absolutely clear the development will risk worsening the impact upon vulnerable Luton residential groups including children & the elderly, adding further stress to the local Luton NHS costs & resources which is a further reason to reject the application. We believe these points totally justify rejection of the planning application.

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246.	Yes 25.2.18	REPEAT OF REP 128
247.	Yes 25.2.18	REPEAT OF REP 128
248.	Yes 25.2.18	REPEAT OF REP 128
249.	Yes 26.1.18	I am writing to object to the above planning application. I am opposing the plans due to the loss of the natural wildlife and the impact that the plans on the habitat to this area. In addition, I am opposing the application because it is in breach of the local plan that was published in November 2017, as the local plan states that there should be no access except for buses and taxis from Eaton Green Road to the business park. Finally, I am against the application due to the noise level, increased pollution and traffic because of the plans.
250.	Yes 26.1.18	PART 1 OBJECTION TO APPLICATION ON PLANNING GROUNDS Why two parts to our objection? Our concerns relate not only to the impact on local people and wildlife from the possible loss of most of Wigmore Valley Park, but it was quickly obvious that this development is part of a much bigger picture, and could be the start of a chain of events that could have a major impact on people across Luton in Herts, and across the UK. We attach our response to the consultations from 10 May last year, which forms part of our response now. A few features were changed by the applicant in late 2017, such as the road across the north of the park, buildings being removed from Century Park fields, the number of buildings halved, and an access point proposed at Eaton Green Road, but most of our concerns still apply. We attach also some photos to indicate the importance of the park. Members of Friends of the Earth have been deeply concerned about the proposal to build on Wigmore Park since the two stakeholder workshops in February 2017. Following the 3 consultations in Mar 2017, we were proactive in discussing the issue with local residents and helped to set up Friends of Wigmore Park, who we have supported continually since, including help with organising the Big Picnic in the Park in August 2017 which attracted nearly 200 people, and joining the FoWP committee at a Town Hall meeting with LLAL and LBC. Although we have not posted on it, we are delighted that the FoWP facebook site now has nearly 1400 members.

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		Wigmore residents have lost their library, seen increased airport parking in residential roads, great inconvenience from traffic congestion, and health problems from pollution. But they have seen no benefits from airport expansion, and now the proposal is for them to lose most of a vital park. 1 WIGMORE VALLEY PARK KNOWN TO BE ESSENTIAL IN 1980S "The 'urban-fringe', the areas of the borough at which there is a link between the countryside and the urban area, is of particular importance." – Borough of Luton Planning Handbook, 1989. From Environmental Statement for Century Park 2009: Importance of Wigmore Park: New Local Plan policies included nothing about development on Wigmore Park – the proposals map has an arrow indicating only a possible road across the park. Council documents show that a road to the Century Park development proposed for 20 years on the fields beyond need not touch the park (see 15). Wigmore Valley Park should not be developed. It was planned and provided for the people of Wigmore when the estate was built, to be as close to homes as psossible, based on recognised recreation need per 1000 population, by responsible council officers. They thoughtfully landscaped the park, with banks, ridges, and planted hundreds of trees. It is a vital Community Asset, highly valued and crucial to well being. It has been enjoyed by parents, children, dog walkers and visitors to the town since the 1980s and must be left for future generations to enjoy . 2 LUTON IS OVERDEVELOPED Luton is one of the most overdeveloped towns in the UK, and green space provision is well below people's needs, so many people come from other parts of the town to walk here and see wildlife, as it is the nearest area of semi-wilderness they can encounter. Some visit from outside Luton, and a great many who have left the town return to enjoy the park when visiting friends and relatives. With more people sitting down all day, health and exercise are more important than ever, and there is a need for health sector and parks to work more closely together to encourage this, so the park should not be taken away. 3 WHAT THE PARK PROVIDES: OPEN SPACE AND LANDSCAPE Local Plan policy LLP6E on Wigmore Park says "the quality of open space and landscaping will be maintained". LLP29: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas." The secret sell-off of this public park shows a cynical intention to disregard and spoil the landscape, and NOT to maintain quality of open space and landscaping for the community. Offices, road and roundabout would totally change the area, and have unacceptable impact on the ALLV landscape. 4 WHAT THE PARK PROVIDES: DESIGNATED WILDLIFE & LANDSCAPE FEATURES The whole of the southern area of Wigmore Valley Park, stretching diagonally to the north-west, is a County Wildlife Site, which links with an ancient woodland corridor to the east. The CWS has developed into an important mosaic of habitat, with a surprising variety of wildflowers. This is exceptionally rich in orchids (photos), of which there are,

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		unusually, 5 species. These flourish amongst an impressive diversity of other species, to a large extent due to the local conditions. This is likely to be because the clay layer over the landfill, which allows the ground to become waterlogged over winter months (see photo of the seasonal pond) is overlaid with chalky soil. Trying to reproduce such conditions elsewhere would be risky and unlikely to succeed. Wigmore Valley Park is also an Area of Local Landscape Value (see Local Plan policies map). Strategic Objective 10: the Local Plan aims to "improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity". LLP29 A: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas." This includes ALLVs. This planning application does not meet either of the above objectives. The large office buildings proposed would take away most of Wigmore Park, and ruin views currently enjoyed. It would not create a relaxing environment for park users. It would not protect, enhance or conserve the character of the area. It would change the area completely and would take away the ALLV. This cannot be permitted. A board at the Raynham Way exhibition stated: "The development has been designed to reduce potential ecological impacts and minimise loss of habitat." By building ground-level car parks (which LLAOL oppose) over a County Wildlife Site? The proposal is simply appalling, and unnecessary. The offices are speculative, shown by being reduced from 20 to 10 in late 2017. We view it as criminal not only to build on a park, but also to waste land with huge and pointless car parks, roads and roundabouts. Given the shortage of both green and commercial space in Luton, developments like this should go on brownfield sites, where car parks can be multi-storey. It appears to us that there is still plenty of space on the airport complex itself, and for offices, the Monarch, Halycon and many other buildings are vacant. 5 WHAT THE PARK PROVIDES: ESSENTIAL FUNCTION OF TREES Over two hectares of trees would be lost in this scheme, part of those planted for us in the 1980s. The trees and CWS in the park provide an important wildlife habitat for many species and also act as a barrier to air and noise pollution which must not be lost. This would be against the LLAL Vision 2020-2050 which states: "As part of any expansion proposals, we will develop landscape and ecology strategies which seek to conserve, and where possible, enhance the landscape and biodiversity within Luton Airport and on nearby sites." The loss of mature trees would take place around the park where commercial development is planned, which is unnecessary as offices and roads could be sited to avoid this. It seems that most would be destroyed to create access for construction of a major new access road from Eaton Green Road. This is against the new Local Plan (see 8 below). The trees here are on a bank, forming an attractive sloping access point to the park which partially masks the road to the Tidy Tip. The loss of these trees would create a

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		stark open area focused upon the new road, which would rapidly become congested as it would meet a big roundabout within the park, joining the proposed new major road through the airport. This would ruin the feeling of well-being as one enters the park which encourages people to go there, and is totally unacceptable. There appears to be little addition of semi-mature trees to compensate for the loss planned. Parks Dept say: "The loss of areas of County Wildlife Site is of concern and as the mosaic of habitats is unlikely to be replicated in the short term on the replacement area of open space proposed in the agricultural area – it would seem reasonable that some form of mitigation should be sought for loss of habitat." FoE applauds this request for funding for tree planting elsewhere in the borough, which should not have been withdrawn. The i-Tree survey in Wardown, which may be replicated elsewhere in the town, showed that apart from all the well-known benefits of trees which bring wellbeing, trees have financial value in terms of absorbing pollutants and carbon, reducing climate impacts. With increasing traffic due largely to the airport, we should be planting a great many more trees across Luton, including street trees, and creating pocket parks whenever the opportunity arises. But the mosaic of habitats at Wigmore Park should not be lost. The CWS and other areas of the park include thousands of trees planted for the community and for wildlife by previous council officers. These trees provide the vital function of absorbing noise and pollution from planes. It is suggested by Parks Dept that because of the risk of bird strike, substitute planting should take place at other sites. The Blake Morgan document for LLAOL states: "35 species of birds would suffer adverse effect due to removal of vegetation". So don't remove it. The CWS provides a diverse habitat for our beleaguered wildlife, with continued loss of habitat and crashing populations, and is important not only for birds. Removing trees is flawed thinking, as modern methods have much reduced the risk of bird strike. Mitigation measures suggested to compensate for removing trees include creating open grassland – this could attract geese. Bird strikes http://www.telegraph.co.uk/travel/travel-truths/how-dangerous-is-a-bird-strike/ "Aircraft are designed and built to withstand bird strikes and pilots undergo rigorous training to enable them to deal with such eventualities," said BALPA flight safety specialist, Stephen Landells (5 Sep 2017) Very few bird strikes cause damage to planes. Despite massive increase in flights, no accidents were reported at Luton in the last 5 years due to bird strikes. There is no open water at Wigmore Park or near the airport. Canada geese need suitable grassland, and do not roost in trees are not present at Wigmore. Very few seagulls visit, and starlings are rarely seen there. Crows and pigeons would do no damage to a plane on takeoff or landing. Heathrow monitors bird activity and keeps records. Scaring measures, such as playing distress calls, firing flares, and even controlled use of birds of prey have been successfully employed at various airports, says BALPA. Vehicles used by Heathrow are fitted with an electronic system called Digiscare. Two external loud speakers are fitted. It is pre-programmed with the distress

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		calls for a variety of birds based on knowledge of how different species will react in different ways. At Luton, two vehicle mounted bio-acoustic Scarecrow B.I.R.D. Tabs? Are used daily as part of LTN's persistent wildlife management system to disperse birds from the airfield and surrounding areas. Described as 'faultless' by the bird controllers. Since using this system the airport has seen an 80% reduction in airfield bird sightings in the last year which has minimised the risk of bird strike. https://www.scarecrow.eu/luton-airport/ Given that the landscaping and planting was provided for the benefit of nearby residents and other users of Wigmore Valley Park this planning application is totally contrary to past agreements reached between Luton Council and local housing developers. The park's trees, planted by council officers for residents 30 or more years ago, form an important noise and pollution barrier, also absorbing carbon and reducing climate emissions, the park's trees must not be lost. 6 'REPLACEMENT PARK' While Wigmore Valley Park is the nearest park for most people in the large Wigmore estate, and much-used, many already live further away than the national recommended standards. The 'replacement park' on agricultural fields would be still further away from their homes, and would in no way equate to what they have now. People have ever less free time to visit parks, and need them more than ever for fresh air, tranquillity, recreation and connection with nature. These fields would be less convenient, have no trees to absorb pollution, and there is a question mark over whether new trees would be planted because of worries about bird strike. Offices, roads and a hotel on Wigmore Park would mean a net loss of green space within reach of people's homes, and their view of and from the park would be spoilt. There is no disguising the stark 4 or 5 storey blocks seen in brochures. The new far-away park would be less used because of the time factor and limited interest there. Described as "intensively farmed arable fields with little habitat value and relatively low ecological importance", it would take many years to become as good a site for wildlife, which is in sharp decline and needs help now. 7 NO EATON GREEN ROAD ACCESS The new 20-year Luton Local Plan is clear that there should be no access road to Wigmore Park from Eaton Green Road. LLP6 p38 London Luton Airport Strategic Allocation inc Century Park: "Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percival Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency." This policy was created for very good reasons. With rapid airport expansion, roads in east Luton and across the town have become far more congested, already causing greater inconvenience. A new access road from Eaton Green Road by the Tidy Tip, one of two proposed roads on to the park, should not be allowed. It would generate more traffic, increase noise and create danger. This access would mean vehicles would pour into Wigmore, seriously affecting already congested Eaton Green Road, Wigmore

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		Lane, Ashcroft Road, Lalleford Road, and surrounding roads, creating new rat runs. Three nearby schools would see more danger and pollution on school routes. The Raynham Way exhibition boards said that junctions on Eaton Green Road and Vauxhall Way are already over-capacity; and that it would not be appropriate to encourage significant levels of traffic on to the new dual carriageway via Eaton Green Rd/Wigmore Lane/Lalleford Rd, as it would be contrary to the Local Plan and LTP3 policies. That is exactly what the new access point and large roundabout would achieve! The Blake Morgan document shows LLAOL are clearly concerned about people getting to their planes on time. It has the useful statement that "after the development, many of the junctions will be operating over their capacity? The proposal will lead to increased journey time and increased traffic flow." It is also concerned about closing Percival Way as a through route, which will "cause major operational disruption." And the lack of evidence that Dart would reduce traffic. It concludes: "The proposal will have a serious impact on the surrounding infrastructure." We agree with LLAOL that Frank Lester Way should not be closed to cars: LLAOL says it would cause major disruption to the airport. LLAOL also says that moving the staff car park and part of the long-stay car park into Wigmore Park would cause major problems for the airport and staff; that splitting the car hire centre into 3 areas including Wigmore Park is ill-conceived; that the road modelling for access to the business park was useless; and there is no evidence that Dart would make a significant difference to car numbers. Travel plans have been mentioned in the last 3 Local Plans but have achieved very little. In this case their aims is to reduce the car journeys to and from Wigmore Park. It would be best to ensure there are no journeys at all. 8 CONGESTION OUT OF CONTROL – URGENT ACTION NEEDED Rapid airport expansion has made Luton the 5th most congested UK town, with huge traffic problems. No significant mitigation has been proposed, but expansion continues. One report lists all the junctions where congestion is already bad, and proposes much costly remedial work. A dual carriageway would make it worse and bring traffic gridlock . This cannot be permitted. 9 AIR POLLUTION – URGENT ACTION NEEDED Air pollution is a serious and much neglected problem. It costs lives and billions of pounds, and like the government, Luton Council is seriously failing in its duties to act to reduce it, and this development would make the impacts worse. People are encouraged to spend time in parks as part of a healthy lifestyle. However, due to a major road through the airport, vehicles going to new offices on the park, and increased flights, the proposed reshaped park, and the Eaton Green Road area, would receive higher levels of noise and air pollution. People in East Luton, including Eaton Green Road and parts of Wigmore Lane, already suffer fairly high pollution levels, and extra traffic would be likely to bring these near illegal levels. It is not all right to be just below legal levels – that is far too high. The government has lost in the High Court for a third time on its lack of action on air pollution. With a plan for continued airport

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		expansion, it is vital that the whole area around the airport, including access roads, be made an Air Quality Management Area, wqith a range of strategies to reduce pollution. The rapid increase in flights at Luton has brought 5 million more vehicles in 4 years, and greater pollution, which at several places in the airport is at illegal levels. A major road would bring far more traffic, increase toxins in the air, and have a significant negative impact on health. Pollution from diesels and planes kills 40,000 people every year – more than obesity and alcohol – shortening lives and causing misery. Vehicles contribute about 80% of NO2 pollution at the roadside (pushchair level). Diesel fumes are Grade 1 Carcinogens. They are the biggest killer: the tiny particles they emit are the most dangerous. They stunt children's lung growth, fuel asthma, lung cancer, strokes, dementia and heart attacks, and shorten lives. This is reflected in the terrible statistics for Luton, shown in the Joint Strategic Needs Assessment. Pollution puts an extra burden on stretched health services and businesses. The cost of illness and working days lost is estimated at £20bn a year. Children in polluted areas are 4 times as likely to have stunted lung growth. The UK has the highest asthma levels in the world: 1.1m children have asthma. Dramatic effects are seen in children who live or go to schools near busy roads. Particulates are a key reason for the decline of insects & mammals such as hedgehogs – numbers have crashed in proportion to the increase in diesel cars since the 1990s. Luton has a special problem to deal with Luton sits in a valley, and on windless days, pollution is especially bad for its citizens' health. The airport has not only increased pollution from plane exhausts, but the increase in flights from 9 to 15.7m passengers in less than 5 years has increased the number of cars on Luton's roads by 5 million in the same period. Luton has far above average car use. People needed a sub-regional east-west rail service but they got a local busway, which did nothing to help half the people in Luton who leave the town to work, or half Luton's employees who come to Luton to work. A housing development in Kent was refused in Nov because no mitigation for air pollution was provided. There is no mitigation here. NO2 is a lung irritant, and a key symptom of other air pollution. LBC/LLAL is behaving dishonestly and irresponsibly in averaging NO2 levels measured across all monitoring points around the airport, when the 6 busiest points there, where most people pass through, are constantly at illegal levels. This poses special dangers for people who work at the airport. No2 levels are not far from reaching illegal levels on Eaton Green Road, which with rapid airport expansion has become far more congested. If a new access point to Wigmore Park, to join the dual carriageway through the airport, was created near the Tidy Tip, Eaton Green Road would soon reach illegal levels too. It is good news that in February 2018 Client Earth has beaten the government in court for the third time, and there will have to be far more Air Quality Management Areas. These require serious preventative measures to cut pollution. One is certainly needed around Luton Airport and its approaches, as with such rapid expansion we've become 5th most congested town! Ten Luton GPs in 2014 signed a petition to stop Luton Airport expansion, concerned about the health of their patients. Continued expansion to 18m passengers should now be seriously and transparently reviewed in the light of failure to provide legal air

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		quality. Plans to cut Pollution at the airport and across Luton - Phase out diesels, with scrappage schemes - Catalytic converters & clean diesel filters must be the only replacement for a car's first exhaust - Higher charges for diesels to park - When buying a vehicle, people should look for the highest (80+MPG), hybrid or electric - Borough-wide measures to reduce traffic use, including car pool and car sharing schemes - Public education programme, including the dangers of sitting in a vehicle with its engine idling - Training on how to drive better, such as accelerating slowly, not leaping away at traffic lights - Teach people that their health is more at risk in their car than on the pavement or a bike - Assess Luton schools for pollution risks – at least 3 have found poor air quality. Action on this should be a priority, such as cutting car journeys to school, and walking bus schemes - All mature trees in Luton should be protected: they have great value in absorbing pollution, fixing climate gases, providing shade and reducing the 'heat island' effect of a densely populated town. Many more trees should be planted, mainly native species - Frequent flying should be discouraged, like the higher charge for using more gas or electricity - Council to stop promoting unsustainable development using the excuse of 'more jobs' when it means more income for the council The benefits of cleaner air would be shared by all – reduced congestion, more liveable towns, better health 10 GROUND LEVEL CAR PARKS SHOULD BE ELSEWHERE & MULTI-STOREY Large ground level car parks should not be built on a County Wildlife Site and Area of Local Landscape Value. The CWS has become a diverse habitat with 5 species of orchid and over 60 bird species. The offices, road and roundabout would all have unacceptable, adverse impacts on this landscape. Car parks can go anywhere and should be multi-storey due to lack of space in Luton. Document GCC5 – PRA Landfill states (at the time the landfill was closed in Jan 1978): "There will have to be a move towards provision of multi-storey airport parking." 11 DANGERS OF LANDFILL We are extremely concerned about : - possible irreversible contamination of groundwater, river quality and drinking supply over a wide catchment - inflammable, explosive methane and threats from a combination of other gases from disturbing and building on a landfill site containing hazardous waste. With much testing still to do, it cannot be said with certainty that proposals are safe, so outline

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		permission should not be granted. Building offices and roads on a landfill site which is unstable below ground is more complex, costly, and a high risk strategy. It can lead to subsidence, where buildings and roads can crack and sink. This happened to B & Q at Dallow Road, which had to be closed for a year and rebuilt. Also sulphates and acids in the landfill may attack the concrete in the pilings. The large amount of surface water is a concern – the whole site is soggy in winter. With heavy rain, pilings would open pathways for toxic contaminants in landfill to seep down to groundwater, leading to the pure River Mimram, where watercress has been grown for 200 years at Whitwell. Arup's Contamination Preliminary Risk Assessment gives a long list of likely dangerous contaminants from landfill – and many of these were found when testing. The risk assessment states: Migration of ground gases from former landfill eg methane into future buildings and build-up of gases – Risk very high Waste in former landfill – risk to users of future development / public / workers – Risk high Driving of contaminants downward to the prinicipal chalk aquifer – Risk high Leachate in former landfill – downward migration to the prinicipal chalk aquifer – Risk high Driving of contaminants downward during piling to the prinicipal chalk aquifer – Risk high Inhalation of airborne contaminants and microorganisms by adjacent site users (eg residents and other buildings on the airport) – Risk high Inhalation of vapours from contaminants in capping material by users of future development / public / workers – Risk high Yet the plan shows 4-5 storey office blocks and a hotel on the high ridge – the most polluted, dangerous part of the site – near borehole LF-BH07, where methane readings are in 6 figures, and high across this area – see interactive gas map Fig 14 (doc GCC6). Engineers who drilled at the former landfill site below Wigmore Valley Park have told us: "You would have to be mad to try to build there." Methane gas escaping from landfill is highly likely to make people ill (Radio 4, June 21 2017). A 2006 study showed that groundwater in the bedrock was already being contaminated by the landfill. The combination of these risks in our view makes the proposed development too dangerous, and the proposal to build offices, a hotel and roads on Wigmore Park should be withdrawn. 12 CLIMATE CHANGE – URGENT ACTION NEEDED Aviation is the fastest growing source of climate change and Luton is the fastest growing UK airport. Therefore, Luton is the fastest growing source of climate change in the UK. The rapid fuelling of climate change will be disastrous for humanity's future, as we are often reminded by Attenborough and many scientists. The airport is a huge energy consumer and major polluter, unfairly affecting people's future when compared with other towns. The LLAL Vision 2020-2050 states "Although climate change

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		is beyond our direct control, we recognise that Luton Airport has a significant influence over factors that contribute to it, such as: emissions from aircraft; vehicle trips; and the activities of other companies operating at the airport. Ahead of any future expansion work, we will develop a comprehensive strategy to reduce where possible carbon emissions." The Wigmore application is for airport-related development, moving car parks on to a public park to make room for aprons and terminals, displacing businesses to build a major road to carry far more traffic. As planes and traffic are such a big source of climate emissions, the council should also have a robust policy to keep this to an absolute minimum. But there is no strategy to reduce climate change, contrary to the 2012 National Planning Policy Framework Section 10 (Meeting the Challenge of Climate Change) so this development should not be permitted. 13 THE MAJOR ROAD (See Part 2) The proposed dual carriageway through the airport, taking traffic into a public park, seems far bigger than is needed for the offices proposed. This appears to be for a bigger development, yet we are only asked to comment on what is shown. The reason for this road should be fully explained and justified in the application. If not, permission should not be granted. This major road would have been close to the children's playground in Wigmore Park until many people objected. The road corridor remains. Because this is an outline application, a threat would be hanging over us that the big road could be brought back at any time. 14 NEW CAFÉ, TOILETS, PLAYGROUND & SKATEPARK WELCOME Residents would be pleased to receive long-needed toilets, and the other facilities would attract more people to the park. We also welcome the ongoing funding commitment for maintenance of the whole park. However, we believe the council should make this commitment anyway, using funds from the airport whose activities have caused so much inconvenience for residents who live in the same ward. 15 NO DEVELOPMENT VERY STRONGLY PREFERRED- LAST RESORT CENTURY PARK People don't want development in this area, but if any were to be allowed it should be on Century Park Fields which have had planning permission for 20 years. It would be partly screened from Wigmore Valley Park by the strip of ancient woodland and trees along the eastern avenue. The fields could be reached via a road which also stays within the airport boundary across existing car parks to join the point where the tunnel was planned. A public transport route was planned along this corridor in 2008 to serve proposed development on Century Park fields. This would be easier and cheaper to build. It would be safer for the public and occupants of new buildings than a high-risk complex, costly attempt to build a business park on a landfill site, subject to dangers of methane escape, subsidence and irreversible contamination of groundwater below the landfill which via surface water and heavy rain could affect a wide catchment area (see 12). Ultimately the public might have to pay for problems caused out of airport money that could be more

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		beneficially used elsewhere. No development should take place on a public park which would ruin a well loved, peaceful green area and subject people to danger, noise and air pollution. 16 SUMMARY We ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a valuable Community Asset which does not comply with key relevant Local Plan policies. We reserve the right to speak at any committee assigned to determine this application. Yours sincerely David Oakley-Hill and Julie Furnivall Luton Friends of the Earth PART 2 OBJECTION TO APPLICATION ON OTHER GROUNDS This Part will follow when we have received a reply to our Freedom of Information request. REASONS FOR THE ROAD AND SECRET INTENTIONS Ever since the stakeholder workshops, secrecy has been employed by Luton Council / LLAL, and the presentation of what is intended has been highly selective. This is not how a council should behave – it should perform the role of a caring public servant, and be open and transparent. Instead this project has been presented in a way you might expect from the worst, greedy corporate, out for itself. Why Wigmore Valley Park? Local Plan map LLP14 shows no development on the park – only a possible road to Century Park fields. Nowhere in the application is the reason stated why Century Park Fields, with planning permission and a 20-year aspiration for building on, was dropped in 2014 (Arup aerial photo) or earlier in preference for Wigmore Valley Park. Yet a road could easily follow the proposed public transport route of 2008 north-south within the airport boundary to reach the point near the emergency training area where the previous tunnel under the airport would have emerged, to reach Century Park fields only a short distance away, obviating the need for costly remediation work to build on an ex-landfill, and the destruction of a public park and County Wildlife Site. Further, the reason is not stated why a dual carriageway should be built through the airport at great expense to reach a few offices which were proved speculative when their number was halved from 20 to 10 post-consultation with Friends of Wigmore Park. The large road across the north of the site was removed at the same time. But as it is an outline application, there is a fear that the road could be brought back at any time. It is obvious that it points in the direction of new housing across the Herts border. Luton Council's aspiration for an east and north circular 'M25' is longstanding. Yet the public was told to treat this application as 'standalone', and that it was not related to proposed airport expansion. This does not instil trust in our council,

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		which is supposed to act as a public servant, not a land-grabbing corporate intent on getting as much income as possible from the airport and housebuilding, however unsustainable, and whatever loss of countryside or adverse health and environmental impacts this might cause. 'New Century Park' 10 May 2017 Luton Friends of the Earth response to stakeholder workshop and exhibition about plans to build offices on Wigmore Valley Park, also commercial development on Century Park fields. Copy to national committee following up Parliamentary Inquiry on Deficit in Parks & Green Spaces We object in the strongest possible terms to any development on Wigmore Valley Park. We are also unhappy about development on Century Park fields. Members of Luton Friends of the Earth attended the stakeholder workshops, and all three exhibitions. We have visited Wigmore Park several times this year, spoken with park users and attended two meetings organised by residents, so we are well aware of public opinion on this proposal. People who use the park are the key people who matter, as many have been visiting and enjoying the park for years – some all their lives – because it is a park with its own character and much variety. Some who only use the park occasionally, who live not only in Wigmore but elsewhere, nevertheless value it greatly, and are universally outraged by the threat of its loss. Most people say that Luton is over-developed, and there are not enough parks and green spaces. Their view is that this is a public park which they own, and the council are their public servants, who are supposed to manage it for them. Nobody who uses and enjoys it wants to see any development at all on Wigmore Valley Park. Consultation literature states that Wigmore Valley Park is a well-used amenity. A Friends of Wigmore Park group has been formed. One resident has produced a slideshow of wildlife and other scenes in the park that has already attracted 900 views. REASONS FOR OBJECTION 19) A public park belongs to the public Wigmore Valley park is a large, diverse public park with interesting areas of wilderness, which many users have been visiting for a great part of their lives, and it means a lot to them. Many come to it from across Luton and from further afield. The park was given to residents of Luton as compensation for loss of open space when building the large Wigmore estate and Finefare (now Asda) on fields. 2) Wigmore Park was designed by council officers When the landfill was closed in the 1970s, the council chose the best possible option for its future, and spent time and public money on the project. A team of council officers thoughtfully designed the area as a public park to make it interesting for people to use, with banks, ditches, and paths. They planted a great many trees of widely varying species, planning the landscape to

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		attract and support increasing amounts of wildlife as the site matured, with the advantage that it was alongside an existing valley with a substantial strip of ancient woodland, a wildlife corridor providing diverse habitat that would spread on to the site. Parkland is widely thought to be the best, and safest, use of an ex-landfill site: there are numerous examples of this good practice around the UK. This was an extremely successful project, and it must not be undone. 3) An important wildlife site The successful layout of the park by officers led to its designation as a County Wildlife Site, which is particularly diverse and important. It has the advantage of size, lies at the edge of countryside, and has considerably more value being adjacent to a footpath and bridleway through a strip of ancient woodland and hedgerows with bluebells, providing a corridor for wildlife into Hertfordshire. It has a mosaic of habitat including grasslands, many trees, self-seeded shrubs and wildflowers, a seasonal pond, marshy areas, and wilderness areas not found in most of the town. The park has the advantage for wildlife of providing plenty of dense, undisturbed habitat, and supports a rich variety of plant species including 4 orchids; 60 or more bird species; many mammals including stoats; slow worms, lizards and newts; and a great variety of pollinators and other invertebrates that cannot survive in more urban parks. Luton is overdeveloped and there is too much pressure on most of its parks for leisure activities to provide this kind of habitat. The CWS is recognised as important in the Local Plan, and requires Biodiversity Action Plans for conservation which public authorities must carry out. Benefits of development proposals must clearly outweigh the intrinsic nature conservation interest, which cannot be the case with this development, which is speculative and not needed. The habitats at Wigmore Park have taken several decades to develop, and it would not be feasible to move or 'replace' them. There is always something new and different in this park to discover through the seasons. It is a special place to escape the dense urban housing and enjoy nature, trees, birdsong, areas of wilderness and, except for the planes, peace and quiet. For their council to plan to lease it to the airport to build offices is totally unacceptable. Development would wipe out species and degrade its value as a habitat of wild places that are increasingly under threat and cannot be found within the town. All wildlife areas in Wigmore Valley Park must remain. Along the west side of the park is a natural area with many trees along the boundary, a pond and marshy areas. To even suggest building a long-stay car park here, covering over a large area of wildlife habitat in tarmac, shows crass insensitivity to the value of the park. The wildlife here has been enjoyed for years by many visitors, and should be enjoyed by future generations. Everyone acknowledges that Luton has too few parks and green spaces, and hardly any with wildlife areas. We cannot lose this park. 4) Century Park fields is not a replacement! There is not much in these agricultural fields for people to enjoy. There is no wildlife, bushes or trees which take years to mature. It is too far for many people to walk. The attractive landscape would be ruined anyway by offices and sheds. If residents' wishes

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		are ignored, and anything at all is to be built on Wigmore Valley Park, then people should be offered part of the fields, but this is the poorest possible substitute for the removal of most of a large, popular park with an unusual degree of wildlife enjoyed at the edge of an urban area. 5) Brownfield first This is a fundamental development principle. Century Park Fields is a very large area – 94ondon94 40 hectares, that was given outline planning permission for commercial development in 1996. We and others strongly objected to this, as the whole site is an attractive landscape of rolling green fields, where crops are grown. Before any fields are considered for development, planning guidance states that brownfield sites should be prioritised (on existing airport land or elsewhere in Luton). Wigmore Valley Park, adjacent to Century Park fields, is not part of those fields, does not have planning permission and should in no circumstances attract development. There is no need for offices – this is speculative development. There is still empty space at Butterfield Green, opened 20 years ago, was to be a 'science park'. Huge development areas are still to be built on at Kimpton Road and Power Court. Although users of Wigmore Park don't want to see the scenic green rolling Century Park Fields covered in offices or sheds, as a last resort, if the airport has now bought the land, they say build there, not on our park. A footpath and separate cycle track could be provided around the perimeter of Century Park fields, to encourage more people to this area and provide healthy exercise. 6) Landfill dangers Luton Airport Landfill Site, the largest landfill site within Luton's boundaries, was operated by Luton Council between 1937 and 1978. All types of waste were dumped here, including liquids, sludge and other organic matter. The landfill is bigger than Wigmore Valley Park, and almost entirely encloses it. Potential development on a landfill site is an important public issue and there should be no secrecy about it, so as contractors have been regularly testing on the site, we would expect to see results in a clear and understandable form, and to know if the proposed buildings and roads on the landfill meets the National Quality Mark Scheme for Land Contamination Management (NQMS) launched in January. In winter, and after heavy rain, a huge amount of water collects in the park, leaving the site soaked with puddles and small lakes. This only dried up in April, so building would be difficult and costly. Office car parks in open areas under buildings would flood, and on this exposed hill, biting winter winds would howl through them. If water were pumped away, where would it go, and what would be the implications of this, and of disturbing the site for building, for contamination of groundwater, streams and rivers such as the Lea (already contaminated at Luton Hoo) and nearby Mimram, one of the cleanest rivers in the area? Would pumping have to continue regularly? Would this amount of water cause problems for creating stable foundations for offices and roads?

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		Regarding building on landfill, we would mainly be concerned about 3 issues: contamination of groundwater flowing beneath the chalk under the landfill – and this could not be avoided should the normal pilings for construction be driven through the clay landfill cap; the dangers of methane, which as wellas being a potent greenhouse gas, has when buildings have been constructed on landfill sites elsewhere caused leaks into buildings, fires, explosions and adverse health effects; the extra cost and likely problems with building on landfill – 4-storey buildings are planned! Deep pilings would puncture the clay cap and lead to contamination of groundwater. It is extremely likely that things could go wrong, including subsidence, and this could lead to ongoing and long-term remediation at the site, or even fines, with potentially huge costs. These would fall not only on the airport, but to its major shareholder the council, who owns the land, and hence the taxpayer, who did not want the development in the first place. The Environment Agency "encourages sustainable practices that prevent harm or pollution. We can set and enforce conditions requiring this". Given that none of the 4 conditions below appear to apply to this site, do you consider that building offices and roads on the landfill is feasible and justifiable, and would the EA be likely to object to planning permission to build offices and roads across Wigmore Valley Park? Emberton and Parker (1987) proposed the following set of criteria that should be met before considering a landfill site for redevelopment purposes: o the waste should be shallow with a depth of less than 10 m; o the site should have a stable low water table; o the landfill should not contain toxic or hazardous materials, particularly liquid wastes; o the development should be appropriate for the site conditions. We have spoken to several engineers. All of them told us that building on here could be dangerous, costly and expose people working on construction and in the buildings to unacceptable risk. One used the term 'reckless'. We can envisage that if an attempt was made to support buildings on concrete rafts on this unstable footing, sudden ground subsidence could throw construction workers to the ground, or people in the buildings later could experience a damaging 'earthquake'. When this landfill was in operation, there were no separate sites to take hazardous waste. Large amounts of toxic liquid sludge were dumped here. One engineer we spoke to had drilled on this site in 2016, and explained that there are big pockets (hot spots) of highly toxic material and methane, particularly under the ridge between the airport fence and children's playground. Below, the site is highly unstable, and "you would be mad to try and build on this site." Underground there are slurry pools of toxic water. Water flows under the chalk beneath the landfill and this would become contaminated if buildings were erected on the site. The Environment Agency has strict rules about contamination of water, and in its response to the shoddy Environmental Scoping Request (which did not refer to the County Wildlife Site), the EA appeared in

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		diplomatic language to express scepticism about the wisdom of building here. We have put in a Freedom of information request to the Environment Agency to obtain a better picture of the site's history and condition. We advise in the strongest terms NOT to attempt building offices or roads here. The best way to reach Century Park fields would be to take a road along the inside of the airport perimeter to the point where the tunnel was shown in the previous Local Plan, near the aircraft fuselage used for fire drill . It should not encroach on to Wigmore Valley Park. It would need a bridge over the public footpath / bridleway. This would mean moving the Recycling Centre, but it is a safer choice. Building a road or roads across the park would not only be high-risk and costly, but would sever connections for walkers and prevent access to the wilderness areas across the south of the site. The large B&Q store at Dallow Road, Luton, was unwisely built on the old Laporte site, where toxic heavy metals such as mercury, lead, arsenic and cadmium had been dumped early last century, before any controls. The site was technically referred to as a 'lagoon', which still contained liquid sludge. The building split in two, and had to be closed for a year to be detoxified and rebuilt, with a mass of new material below to stabilise it. At Nottingham Sixfields, where a road was built across an ex-landfill site, this quickly became uneven and 'lumpy' and has required frequent repair to make it usable. 7) Air pollution, health, noise, congestion Councils have a remit to provide open areas for healthy leisure activities. Green areas are deeply important for clean air, exercise and well being. This enriches lives. The Plans are contrary to planning guidance and enlightened modern practice. LLAL's Corporate Social Responsibility Statement says "We improve the health and wellbeing of children and young people". Everyone, particularly children, needs to connect with nature and spend time in wild spaces. Wigmore Valley Park is a healthy place to be. The statement also says "The quality of Luton's built and natural environment is an important benefit to local residents, community groups and businesses. The environment theme has a broad agenda to protect and enhance Luton's environment including parks and open spaces." You don't do this by building over them. Air pollution ruins lives. The council/airport shouldn't pay public money to developers and consultants to build on parks and shorten people's lives with pollution, putting a huge strain on the NHS. They should demand more cash from the airport they own to be spent on public services like health. The airport has grown from 9m to 14m passengers in 5 years, bringing 5 million more polluting vehicles to jam our roads, affecting our health. Residents complain of soot on their washing and in their houses, and wonder what this is doing to their health. Luton is UK's 7th most congested town, yet passenger numbers will grow to 18m. It must STOP. People are often late for work, affecting the local economy. The increase is self-defeating: people are frequently missing flights,

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		having their holidays ruined. There has been a relentless build-up of local parking problems, blocking roads to regular traffic and bus services. Pollution from UK traffic & planes kills 50,000 people each year. Children and older people are most vulnerable – many children already use inhalers. This affects the whole town: most of Luton sits in a valley where pollution collects on windless days. Luton's health figures are very poor. The Health Authority must work harder on prevention to reduce the problem. The Airport and council must reduce pollution. This park should remain good for health. The airport must work harder to cut pollution from planes. We must prevent tiny particles entering our lungs, so the airport should rapidly phase out diesel vehicles that visit the polluted airport, to protect vulnerable employees, and people in nearby areas, who breathe the fumes. A main focus should be to switch to electric / hybridvehicles. As in London, they should charge more for passengers or drop-offs who bring diesel vehicles to the airport. The council should do the same across the town. More reward for residents via Luton Council. The council is allowing unsustainable development of the airport, increasing pollution, congestion and reducing public green space. It can't keep growing. Every flight fuels climate change. For every extra million passengers, the airport should provide at least 2 million pounds to the council. £2 for each passenger is a tiny amount. A big proportion of this should be used to reduce climate gases and pollution, and support better health. 8) Security The southern part of Century Park fields is very close to the runway. This is bad not only for health, but also for SECURITY. Irresponsible people with drones and lasers and worse could be a threat to pilots. 9) Exhibition and consultation inadequate, flawed and 'controlled' This is a major development which should have been put before the whole town, but was grossly and deliberately under-publicised. It is claimed that invitations to the exhibition were delivered to 14,000 homes. Luton's population is 220,000. The tent at St George's Square didn't even have a nameboard to draw people in. Many people using the park, some of whom visit from other parts of the town, are still unaware of the proposals. The many who didn't hear about the exhibition, particularly users of the park, are angry that they weren't consulted. Stakeholder workshops – an intimidating and closely controlled experience The name 'New Century Park' is, unbelievably, being used to include not only this large area of fields, but also a large public park, Wigmore Valley Park, which does NOT have planning permission for any development, and is an important County Wildlife Site. This was not stated in the invitation to the stakeholder workshops in February. It was known that a tunnel beneath the airport was unaffordable. The invitation letter suggested a road across Wigmore Park to a new development at Century Park fields, which we were told at the workshops had recently been bought by the airport. Some attendees were left shocked and came away very angry at the scale, the manner of presentation, effrontery and injustice of the development proposal, which was presented as a fait accompli that had been agreed by 'those in power', and almost impossible to object to. Luton Council, the architect of this plan, had removed itself to a place where its officers and councillors have the

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		nom-de-plume of London Luton Airport Limited. At the exhibitions, both council officers and their consultants acted like bouncers or minders providing enough 'experts' to effectively dissuade public visitors from getting together and discussing the plans amongst themselves. FoE members were the soul of discretion, approaching visitors to hear their views, but attempts were made to discourage this by council officers and consultants – hardly democratic, open behaviour. An open council with open plans, acting as it should on behalf of residents, should have nothing to hide. Throughout the exhibitions it was obvious that the council did have something to hide, and wanted the emphasis presented by officials and by the exhibition boards to prevail. 10) The need for trees Luton is already one of the most densely populated urban environments in England, and is the 7th most congested. It needs all the mature trees and green spaces it can get, yet has destroyed many thousands in recent years, and any further loss must not be allowed to take place. Luton Council carried out an i-Tree survey in Wardown Park, which gave financial value to its trees, for their ability to absorb air pollution and capture carbon emissions. Because of its airport and extremely high volumes of traffic, causing peak-hour gridlock, Luton needs more trees than most towns, but has fewer. Yet the council has had the lack of foresight to remove completely the budget for tree-planting. This is a recipe for poorer health, putting greater strain on our health service, which is struggling to cope. And it is abjugating its responsibility for countering its extremely high greenhouse gas emissions. 11) Conflict of interests The vital role of the Director of Public Health appears to have been overruled by 'the development wing' of the council, which clearly has been given (or taken) far too much power, and overridden the role of council as public servant, now acting instead like a private corporation given to hiding facts from the public and using consultants to cover its intentions.
251.	Yes 26.2.18	I object to the above application on the grounds as follows: 1. The Luton Local Plan, adopted by LBC on 04/11/17, page 32 sect, d1, Access shall be designed to ensure that no use is made of Eaton Green Road to provide access to Century Park or Luton Airport. You can not vote to accept a Local Plan and then ignore any part you do not like. 2. Luton Borough Council own 99.99% of the shares of London Luton Airport. This application was proposed by LLA (owned by LBC), it is being presented to LBC (the owner of LLA) as the planning authority and will be judged by LBC (owner of the applicant). Do Luton BC think they will be judged as impartial in this matter. 3. Luton BC is loaning London Luton Airport (who they own) £300M. LLA already owe LBC more than their shares are worth. Have they even paid Luton BC the interest on any of the previous loans. This money is Luton ratepayers money, the council is

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		treating our money as Monopoly money, and treating the ratepayers with contempt. They should not forget it is us ratepayers who employ them, and they are not giving value for money. 4. Digging up parts of the old Eaton Green Road rubbish tip to site this development is a bad idea, it contains explosive materials from WW2, from all the various manufacturers in this area, who were involved in armaments, as well as unknown pollutants that were deposited there over the years, some of which are carcinagenants [sic], A company drilling test bore holes stopped working because of the dangers they found and advised Luton BC not to allow work on this site until full site testing has been undertaken. Luton BC has ignored this advice. 5. Air pollution in this area is already well known, you only need walk in the area and jet propellant fumes envelop you, drifting over from the airport. Century Park would only increase air pollution and with NHDC proposed housing development sites to the East of Luton, the pollutants from vehicles would increase air pollution. Neither LBC, London Luton Airport or NHDC are running monitoring of pollutants in the area. There is especially no monitoring of Lead, Benzene, Carbon Monoxide, Non-Methane Volatile Organic Compounds (NMVOC), Ammonia, Methane, Sulphur Dioxide and Nitrogen Dioxides, this is from the Councils own annual air status reports. I strongly believe if this development had been proposed to be sited further over to the East on the fields near the runway end, where there would be no need to disturb the tip, and the flora and fauna on this site would not be affected, they would have less arguments against the development. As it stands I am strongly opposed to the development and because of the above reasons believe this Council to be guilty of maladministration. I will be sending a copy of this email to the relevant Secretaries of State, for further investigation.
252.	Neutral 26.2.18	On behalf of TUI Group, please find representations attached in relation to recent applications made for the New Century Business Park (NCBP) and New Century Park Access Road (CPAR) located to the east of Luton Airport.
253.	Yes 26.2.18	REPEAT OF REP 167
254.	Yes	REPEAT OF ANONYMOUS REP 3 (SERIES OF 7 EMAILS, BUT ONLY SECTIONS ON AQ AND LAW)

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	26.2.18	
255.	YES 26.2.18	REPEAT OF REP 167
256.	Yes 26.2.18	Having attended exhibitions on this subject, and read as much as I can about it I would make you aware of some objections I have to this scheme. 1. Having made it clear in the Luton Local Plan last year that no access would be permitted for Century Park onto Wigmore Lane or Eaton Green Road I see that the junction area of these two roads has become a focus for access into the site. This surely cannot be possible as you have an adopted Local Plan. Also the junction now proposed is extremely busy with traffic by-passing the town and accessing Asda and the local shopping hub nearby. Especially at times before and after school the next mini-roundabout on Wigmore Lane beyond Asdas, (that with Twyford Drive), becomes clogged with vehicles, sometimes as far back as Someries Primary School. To add to this present congestion all the proposed extra traffic accessing the 7,000 or so workplaces on Century Park and also the proposed extra traffic from the new housing development to the east of Luton on North Herts land agreed to by your Council, will put a considerable extra burden on the area, and attract people to seek new rat runs towards the airport, Century Park and ultimately the M.1.. The extra pollution added by queuing traffic added to the extra flights already proposed for the airport will add to journey times for all and to the health and safety dangers of local residents. 2. The development of Century Park removes the present play facilities for young people in Wigmore Park and relocates them further from the houses from which the youngsters come, perhaps for some beyond reasonable walking distances and puts the Business Park between Wigmore and the play area. There is no suggestion that there will be toilet facilities accessible at all times for families visiting the park, as presumably as with all pavilions this will be securely locked when organised sport is not being played, if this facility is restored after the redevelopment. The disturbing of the remnants of the old town tip and ordnance dump may well have further health concerns for which I see no risk analysis or assessment. How are the potential problems from the methane produced by rotting going to be dealt with with housing and businesses and sporting activities all in the nearby area. Is this not endangering peoples health or even lives? How might this disturbance affect the seepage of chemicals into the local aquifers? 3. I am not clear on whether the Council and Airport Management have full powers to change the Local Plan without a full public review procedure, to redistribute land use, commit large amounts of Public money before schemes have been agreed, to make

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		loans and agreements with organisations where serious fraud investigations are already under way, and to possibly pay off Sport England in order to remove the need to provide sporting facilities in this area. This all seems to be against what members of the public would be expected to do in their own lives and financial dealings.
257.	Yes 26.2.18	I would like to draw your attention to the case of Muir v Wandsworth Borough Council [2017] EWHC 1947 (Admin) (28 July 2017) – which provided guidance to local authorities on the scope of the restrictions that apply to disposals of open spaces. The ruling has implications for local authorities considering the disposal of land owned by them in order to generate income. They need to ensure that their actions are compliant with legislation that seeks to ensure that open spaces are kept available for public use and local authorities should be aware that disposals of such land may be held unlawful if the effect is to exclude the public from those areas. In January 2015, the Wandsworth Borough Council ("the Council") decided to invite expressions of interest for a lease of 10 or 15 years in respect of premises situated on Wandsworth Common. This could equally be changed to "In January 2018, the Luton Borough Council decided to grant a lease to London Luton Airport Limited in respect of premises situated on Wigmore Valley Park, which was an area of common land given to the public 40 years ago." Three pieces of legislation were relevant to the Wandsworth Council's decision: 1. Section 10 of the Open Spaces Act 1906 (the 1906 Act) – this provides that a local authority that has acquired control over any open space to which the 1906 Act applies shall, subject to certain conditions, hold and administer the open space in trust to allow the enjoyment of it by the public as an open space and for no other purpose. 2. Section 123 of the Local Government Act 1972 (the 1972 Act) – this provides that a council may dispose of land held by it in any manner it wishes subject to certain conditions including that it should not be disposed of for less than the best price that can reasonably be obtained in the market and that the council must advertise its intention in a local newspaper. 3. The Greater London Parks and Open Spaces Order 1967 (the 1967 Order) – Article 7 empowers local authorities to provide facilities for public recreation in any open space in greater London. Article 11 sets out provisions in relation to the exercise of those powers, including that the powers cannot be exercised in such a way that members of the public are by reason only of the

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		exercise of those powers, unable to obtain access without charge to some part of the open space. Wandsworth Council was aware that the grant of a lease in these circumstances would amount to a disposal of open space and so complied with the requirement to advertise under section 123 of the 1972 Act. The Council received various expressions of interest, one of which was from the claimant, who proposed an educational and recreational facility for use by local maintained schools. The claimant's application was rejected on the grounds that it did not provide sufficiently detailed information. The Council's principal valuer recommended that the lease be granted to a limited company (the Company), who intended to operate a private nursery at the premises for up to 62 school children aged two to five years. The claimant applied for judicial review against the Council's decision, on the grounds that the Council did not have the power to grant the lease to the Company for the provision of childcare at a nursery which had exclusive use of the premises and could therefore restrict entry to members of the public (Ground 1) and that the Council's principal valuer had acted unlawfully in deciding to grant the lease to the Company because he did not have authority to do so under the Council's constitution (Ground 2). Likewise, the argument would apply equally that Luton Council do not have the power to grant the lease to London Luton Airport Limited for the provision of industrial units within an industrial enterprise zone which will have exclusive use of the premises which would restrict entry to members of the public (Ground1) and that the Council's principal valuer has acted unlawfully in deciding to grant the lease to the Company because he does not have authority to do so under the Council's constitution (Ground2). The Descision for the Wandsworth Case: The Court rejected Ground 2 but upheld Ground 1, holding that the disposal was contrary to the statutory trust arising under section 10 of the 1906 Act pursuant to which the common is held on trust for the use and enjoyment of all local inhabitants and it was not a lawful exercise of the council's power under the 1967 Order. It was held that the obligation under section 10 of the 1906 Act applies equally to buildings in the open space. Local authorities will therefore need to ensure that care is taken not to prevent public use of such buildings for a significant period of time. The decision to let the premises to a private company to operate a fee paying nursery would deny members of the public a right

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		of access to the premises and would not provide them with any facilities. Facilities would only be provided for the cohort of children enrolled in the nursery and not for children generally. If local authorities are considering letting any such premises to private companies, then they will need to consider whether the services provided by any such company can be said to be for the benefit of the public as a whole, rather than just a specific group of people. This decision does not prevent local authorities from allowing private companies to step into its shoes and provide facilities for the use of clubs, services or organisations and make a charge for those services. However, this must be distinguished from the circumstances of the present case in which the Council was allowing the Company to make an entirely different use of the premises and create a new charge for its use. Grounds for Objection to the Plans for New Century Park and development of new roads upon Wigmore Valley Public Park are supported by the ruling of this case. I therefore object to this application on the grounds that the local authority, Luton in this case, is considering disposing of open space land and that the disposal is contrary to the statutory trust arising under section 10 of the 1906 Act pursuant to which the common is held on trust for the use and enjoyment of all local inhabitants and it was not a lawful exercise of the council's power under the 1967 Order – since the name of the Airport is LONDON Luton Airport. Also Section 10 of the Open Spaces Act 1906 (the 1906 Act) – provides that a local authority that has acquired control over any open space to which the 1906 Act applies shall, subject to certain conditions, hold and administer the open space in trust to allow the enjoyment of it by the public as an open space and for no other purpose. Section 123 of the Local Government Act 1972 (the 1972 Act) – this provides that a council may dispose of land held by it in any manner it wishes subject to certain conditions including that it should not be disposed of for less than the best price that can reasonably be obtained in the market and that the council must advertise its intention in a local newspaper. Wigmore Valley Park land has not been disposed of and it is only being leased to the London Luton Airport Company Limited. Under Case Law as upheld, the obligation under section 10 of the 1906 Act applies equally to buildings in this open space. The local authority will therefore need to ensure that care is taken not to prevent public use of such buildings for a significant period of time, however since this is not possible for an Airport Enterprise Zone and Private Industrial Units for rent, we believe this

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		disposal to be unlawful. https://www.hughjames.com/news/comment/2017/09/councils-decision-lease-open-space-land-limited-company-private-use-held-unlawful/#.Wn8jI3ynzIU Council's decision to lease open space land to a limited company for private use was held to be unlawful 5 Sep 2017 | Comment In times of increasing cuts to public funding, alternative methods of raising funds to provide services to local inhabitants are being considered by local authorities. Some local authorities may be considering disposing of land or premises owned by them in order to generate income. However, local authorities considering taking such steps need to ensure that their actions are compliant with legislation that seeks to ensure that open spaces are kept available for public use and local authorities should be aware that disposals of such land may be held unlawful if the effect is to exclude the public from those areas. The case of Muir v Wandsworth Borough Council [2017] EWHC 1947 (Admin) (28 July 2017) provided guidance to local authorities on the scope of the restrictions that apply to disposals of open spaces. The background In January 2015, the Wandsworth Borough Council ("the Council") decided to invite expressions of interest for a lease of 10 or 15 years in respect of premises situated on Wandsworth Common. Three pieces of legislation were relevant to the Council's decision: 1. Section 10 of the Open Spaces Act 1906 (the 1906 Act) – this provides that a local authority that has acquired control over any open space to which the 1906 Act applies shall, subject to certain conditions, hold and administer the open space in trust to allow the enjoyment of it by the public as an open space and for no other purpose. 2. Section 123 of the Local Government Act 1972 (the 1972 Act) – this provides that a council may dispose of land held by it in any manner it wishes subject to certain conditions including that it should not be disposed of for less than the best price that can reasonably be obtained in the market and that the council must advertise its intention in a local newspaper.

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		3. The Greater London Parks and Open Spaces Order 1967 (the 1967 Order) – Article 7 empowers local authorities to provide facilities for public recreation in any open space in greater London. Article 11 sets out provisions in relation to the exercise of those powers, including that the powers cannot be exercised in such a way that members of the public are by reason only of the exercise of those powers, unable to obtain access without charge to some part of the open space. The Council was aware that the grant of a lease in these circumstances would amount to a disposal of open space and so complied with the requirement to advertise under section 123 of the 1972 Act. The Council received various expressions of interest, one of which was from the claimant, who proposed an educational and recreational facility for use by local maintained schools. The claimant's application was rejected on the grounds that it did not provide sufficiently detailed information. The Council's principal valuer recommended that the lease be granted to a limited company (the Company), who intended to operate a private nursery at the premises for up to 62 school children aged two to five years. The claimant applied for judicial review against the Council's decision, on the grounds that the Council did not have the power to grant the lease to the Company for the provision of childcare at a nursery which had exclusive use of the premises and could therefore restrict entry to members of the public (Ground 1) and that the Council's principal valuer had acted unlawfully in deciding to grant the lease to the Company because he did not have authority to do so under the Council's constitution (Ground 2). The decision The Court rejected Ground 2 but upheld Ground 1, holding that the disposal was contrary to the statutory trust arising under section 10 of the 1906 Act pursuant to which the common is held on trust for the use and enjoyment of all local inhabitants and it was not a lawful exercise of the council's power under the 1967 Order. It was held that the obligation under section 10 of the 1906 Act applies equally to buildings in the open space. Local authorities will therefore need to ensure that care is taken not to prevent public use of such buildings for a significant period of time. The decision to let the premises to a private company to operate a fee paying nursery would deny members of the public a right of access to the premises and would not provide them with any facilities. Facilities would only be provided for the cohort of children enrolled in the nursery and not for children generally. If local authorities are considering letting any such premises to private companies, then they will need to consider whether the services provided by any such company can be said to be for the

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		benefit of the public as a whole, rather than just a specific group of people. This decision does not prevent local authorities from allowing private companies to step into its shoes and provide facilities for the use of clubs, services or organisations and make a charge for those services. However, this must be distinguished from the circumstances of the present case in which the Council was allowing the Company to make an entirely different use of the premises and create a new charge for its use. Local authorities who are considering disposing of open space land may wish to seek advice on the impact of this decision on their proposed plans. If you would like to discuss this, please contact a member of the Property Dispute Resolution team who will be happy to give you advice on your specific circumstances.
258.	Yes 26.2.18	REPEAT OF REP 128 … 11-There is also the archaeological aspect regarding the Roman settlement site, Second World War commandment post and Someries Castle which this development would have a great impact on.
259.	Yes 26.2.18	I totally disagree with the plans for development on Wigmore Valley Park!... 1: Building on county wildlife area 2: Closure of Frank Leicester Way 3: Shortage of green space in Luton 4: Possible contamination of ground water from landfill site 5: Increase in pollution 6: New park area too far away for many people to walk 7: Look horrendous!
260.	Yes 26.2.18	REPEAT OF ANONYMOUS REP 3(SERIES OF 7 EMAILS, BUT ONLY AQ)
261.	Yes 26.2.18	REPEAT OF ANONYMOUS REP 3(SERIES OF 7 EMAILS, BUT ONLY AQ)
262.	Yes 26.2.18	REPEAT OF ANONYMOUS REP 3(SERIES OF 7 EMAILS)

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263.	Yes 26.2.18	REPEAT OF REP 128 … 9-DRAINAGE IN THE WHOLE OF THE STOPSLEY/WIGMORE AREA IS POOR, THE SEWERS CANNOT COPE WITH HIGH LOAD PERIODS AS IT IS, THEY WILL NOT COPE WITH ANY EXTRA LOAD AND THERE WILL BE MORE FREQUENT OCCURENCES OF FLASH FLOODING.
264.	Yes 26.2.18	We object to the application as the roads cant handle the extra traffic the development will create the air pollution in the wigmore area is bad now with out adding to it you often smell 107ondon107r fule in the air the park will be a big loss to the community no more pollution please
265.	Yes 26.2.18	There are limited amounts of open space and parks already in the area. Children need this park and outdoor space! Traffic around the area is already very congested. The airport already cannot cope with the traffic and current 107ondon107ructure. A business park will only add to this pressure.
266.	Yes 26.2.18	After careful consideration and speaking with representatives at the public exhibition evening 31st January 2018. I wish to strongly object to planning application 17/02300/EIA, REPEAT OF REP 58 (AND REP 11)
267.	Yes 26.2.18	I would like to object to the above plans for development.
268.	Yes 26.2.18	REPEAT OF REP 167
269.	Yes 26.2.18	REPEAT OF REP 167
270.	Yes 26.2.18	REPEAT OF REP 167
271.	Yes 26.2.18	REPEAT OF REP 167

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Ref.	Objection	Comments
272.	Yes 26.2.18	REPEAT OF REP 167
273.	Yes 26.2.18	The Wigmore Valley park was provided to the people for recreational values and it has flourished and developed into a beautiful and valued landscaped area providing much space needed for the local people and visitors to enjoy since the 1980's, it will only be replaced with an access area to Century Park Fields, so why cant it be left so families and visitors can come and enjoy the wildlife and maybe use the area to exercise and bring mental balance to some. The trees provide much needed barrier to noise pollution and provide better air quality, which will only be lost if you remove the trees. Bringing in more roads to the area, will only provide more gridlock and the expansion of the airport will expand on the gridlock effects brought around the Luton area with more buildings and developments expanding all the time it will increase noise and pollution and cause the surrounding roads to be rat runs away from the traffic congestion. I believe a housing development was refused planning permission as it didn't have mitigation for pollution, well taking away WVP (Wigmore Valley Park) will only add to the pollution in the area. The area that has been ear marked to replace WVP will not be as convenient to use as it's further away and taking agricultural land away to provide the new park will be a net loss of green space, and the said land is of over worked quality and to bring it up to a quality of what we have now might take years and we will loose the wildlife and even the wildlife is in decline, so shouldn't we be trying to improve the quality and try improve the wildlife habitat to increase wildlife in the area. I am seriously concerned about the irreversible contamination of the groundwater and drinking supply because of the disturbance of the landfill site, explosive gases could be released and the hazardous waste that has been dumped there could also has a serious effect on the area. Have all the tests performed on the previous landfill site come back to a satisfactory level of safety? Is that something the Government is willing to admit without any uncertainty that is safe? Will building on landfill sites cause subsidence where buildings and roads can crack and sink & require even more government funds to fix them at a later date? I would like you to consider my points and refuse the future planning and development of the Wigmore Valley Park area
274.	Yes	I emailed some time ago to put my objections in regrading Wigmore Park's development into Century Park. You emailed back to say you would not accept the objections without an address so I am emailing them again.

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	26.2.18	I am extremely concerned about the fact that you will be building on an old landfill. When I rose this objection at the open event you held I felt the answer was very lame. This land fill site had very little toxic waste in it. I do not believe this to be so as everything and anything was thrown into old landfill sites. As a resident I am very worried about what toxins will be released into the environment. Also as a resident I am concerned about the traffic this development will generate. Some mornings the traffic is backed up to the roundabout at Wigmore Lane where the TUI building is. More traffic will make the journey down Eaton Green Road even worse than it is now. I do not see how the new access road will make much difference as the traffic will still have to enter Eaton Green Road at some point.
275.	Yes 26.2.18	REPEAT OF REP 128 Note corruption elements left out and the additional drainage issue re Stopsley/Wigmore raised as per OBJ 217
276.	Yes 26.2.18	We write to strongly oppose the above planning application for the following reasons. Wigmore Valley Park We opposed to any development on the park. Morally it belongs to the public and is an essential Community Asset enjoyed equally by local residents and visitors to the area. It is a public open space and should remain so. The Consultation Statement Part 1 para 2-8 – 2.10 refers to the pre-application announcement to media and interested parties in early 2017 and that the applicant acquired the site in 2015 (para 1.10). It leads us to conclude that Luton Borough Council (LBC) being the major stakeholder and owning 100% of LLAL had full knowledge of the intention to develop on the park and would knowingly breach it's own Luton Local Plan making a mockery of local democracy. The Transport Assessment Part 1 prepared for LBC illustrates the location and scale of the New Century Park site. The figures 1.1, 3.1 & 3.2 show what little regard LBC give to Wigmore Valley Park. It appears that the whole area including the old and proposed new park is incorporated into Century Park. We have no confidence that this application will be dealt with objectively and seek assurances that any replacement green areas and park do not form part of ~~P~~Phase 4 or beyond this proposed

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		development. The LLAL Vision for Sustainable Growth 2020-2050 states that We will work tirelessly to keep you informed. We will share proposals as they develop, and will make sure everyone has an opportunity to feed into the process. We believe that the community has not been treated as equally or fairly and that the opportunity to identify Wigmore Valley Park as an area of great importance and afford it some protection has been purposely denied to us. At the very least It should have been a matter for public debate prior to any plans to build on it. Wigmore Valley Park provides an important wildlife habitat for a variety of species and is rightly recognised as a Country Wildlife Site (CWS). The park in its entirety caters for the leisure and educational interests of both children and adults both residents and visitors. It was sympathetically planned and reflective of the communities needs both then and now. It serves as a barrier area to help reduce air and noise pollution from the Airport, helps to improve air quality as well as a good example of what can be achieved with former landfill sites. The proposal is too close to the CWS and this development will result in the loss of wildlife, wildlife corridors and important biodiversity. There will be a substantial loss of mature trees which cannot be replaced because of the siting of the new park in such close proximity to the runway and the danger of bird strike as mentioned in several consultation documents. Wigmore Valley Park is a much valued landscape and has great amenity value. The development does not conserve, protect or enhance the natural and local environment nor does it minimise pollution and other adverse effects in accordance with the National Planning Policy Framework 2012 (NPPF) Chapter 11. Building on the park will also increase the noise levels and pollutants locally and this important buffer zone to the airports negative aspects will be lost and given the determination to increase airport numbers in addition to this development the park is crucial to our health and well being and should remain untouched. The proposed development is entirely contrary to the recently adopted Luton Local Plan 2011 – 2031 November 2017 (LLP) and the local plan policies map which clearly shows no development on the park. Replacement Park The National Planning Policy Framework (NPPF) 2012 Section 8 para 73-77 emphasizes the importance of high quality open

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		spaces for the health and well being of communities and that assessments should identify specific needs for the local area and that any resulting loss will be the equivalent or better in terms of quantity and quality in a suitable location. The suggested siting of the park is to close to the runway increasing the serious health risks associated with noise and air pollution. It will not be a nice or pleasant place to visit and experience. The proposed replacement New Country Park (17/00405/EIASCP Scoping Letter 19.4.17) is vastly inferior and doesn't meet the essential criteria listed by Natural England for a Country Park. It does not make provision for all members of the community, it is situated to far away from residents, is not central to the community and it will be inaccessible to some members of society who will not reasonably be able to access it on foot. The likelihood is that it will encourage people to use cars to reach the area or to not to use it at all and contrary to LLP31 part B (Sustainable Travel). There is no provision of a sporting nature for instance and there would have been an opportunity for reconciliation of the football pitches but instead the area will be lost. We can only presume that this is due to the size of the new proposed park and that the green space is therefore smaller than the existing park. The replacement new park will be devoid of wildlife and the biodiversity that currently exists will be lost. Treated farmland will not support similar biodiversity and an old field of little wildlife value and devoid of interest is not a substitution and most definitely not an improvement on vibrant fully fledged parkland. It will effectively leave large parts of the community with little or no interest in the area. It will be subject to pesticides being used on neighbouring agricultural land, will be unappealing visually and will take another forty years to reach maturity. The needs of the community have not been assessed accurately nor the specific needs identified. The proposed new park does not comply with the open space policy LLP27 B (I). Eaton Green Road and Traffic We note that the plan includes access to the proposed development via Eaton Green Road which is contrary to the LLP4 Section D (ii) (Spacial Strategy) which quite clearly states that no use of Eaton Green Road is to be made of with the exception of public transport, cyclists, pedestrians and emergency services. We do not consider the massive generation of construction traffic including huge articulated vehicles to fit this criteria. To propose access here is extremely ill conceived. It will place an overwhelming strain on an already congested area and will create dangerous new rat runs as local traffic tries to avoid a grid locked area. It is already a busy civic centre and employment area and this scheme will also draw traffic towards residential areas creating a substantial danger to health and safety increasing toxic pollutants, noise levels and causing significant adverse impacts on the quality of life. We are very concerned that the

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		proposed route through to the development will effectively make the whole area unsafe and unusable for pedestrians and will result in the community being unable to reach essential amenities. To propose closure of Percival Way to through traffic and Frank Lester Way is, in addition also ill conceived and will further compound the problem. The Traffic Assessment is inadequate and does not give enough weight to the cumulative negative effects of other major developments in the area on a similar timescale nor that of the substantial growth in passenger numbers at the airport. Development Why does the application require a dual carriageway for simply access to offices as this is most certainly over development and we believe that the truthful reason for a major road of this size should be properly revealed before giving any outline planning consent. It is also our concern that the road originally sited to close to a children's playground will also resurface were consent to be given. The Consultation Statement states that it will deliver 7,200 jobs to the enterprise zone with over 4,000 jobs for local people this is in addition to the increase in passenger numbers. Where will all these people live and where will they all park their cars? There is woefully insufficient parking allocated within the application. There should be provision for a multi-storey car park sited away from the CWS not one level areas eating up valuable green space. The Landfill Tip We are extremely worried about the dangers of disturbing and building on top of the landfill site for both the risk of contaminating the groundwater and leaching chemicals into the local drinking supply and releasing dangerous ground gases. There does not seem to be any accurate records existing that show precisely what materials and hazardous waste was dumped on this site. The Contamination Quantitative Risk Assessment para 7.2 acknowledges that data for the landfill is currently limited and does not meet the requirements of guidance. And para 7.4.1 (Ground Gas Risk Assessment Methodology) The current monitoring does not meet the requirements within CIRIA C665 so is not sufficient to inform the design of the ground gas protection measures. Further long term monitoring is proposed at the site which will provide the required detailed gas data.

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		The assessment has identified that the tip contains a significant component of industrial waste, a number of alarming potential leakages and the possibility to inhale dangerous vapours causing both the residents and anyone working on the development to be exposed to airborne chemicals. This is an unacceptable risk in a residential area and to anyone working on site. The entire content of the landfill should be identified before any excavation, movement or disturbance takes place. The dangers and hazardous materials have not been accurately measured and established and the potential harm cannot therefore be predicted. The application cannot comply with the NPPF para 109. Climate and Pollution LLAL is major contributor to climate change and pollution and it has a responsibility to mitigate these effects both to it's neighbours and the wider population. The local community suffers on a daily basis with the negative health effects of both traffic and airport pollution. The airport is ahead of schedule in increasing airport capacity and drawing yet more traffic, building lorry parks and encouraging more HGV's to travel to the area at all times of the day and night will further pollute the environment and contrary to LLP33 (Freight). This proposal is wholly airport related and does not include a strategy to reduce these adverse effects and is contrary to NPPF Chapter 10 (Meeting the Challenge of Climate Change). The LLAL Vision for Sustainable Growth 2020-2050 states: Ahead of any future expansion work, we will develop a comprehensive strategy to reduce where possible carbon emissions associated with additional construction and operation of LTN. Demolishing existing buildings and building an unwarranted dual carriageway through a park is not meeting this challenge and the application shows no attempt to mitigate any of the negative impacts on heath. Perversely it is actively contributing. Conclusion This application is an inappropriate development in an inappropriate place on an area identified as a County Wildlife Site and Area of Local Landscape Value. Wigmore Valley Park is a Community and Visual Asset that should remain so. The proposal is

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		contrary to LLP29 and LLP6 part E and does not protect, conserve or enhance the character, setting and natural beauty of a local landscape nor maintain the quality of open space and landscape and so this development should not be supported. The NPPF Chapter 1 para 22 states that Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. To retain a site for over twenty years with no prospect of the development being realised unless you turn a residential area upside down is not inline with this policy. We do not believe that there is a need for further development of this nature with both office and commercial space still available elsewhere in the town and that brownfield sites should be more frequently utilised. The surrounding infrastructure will not be adequate to support the proposal and it is therefore not sustainable. We therefore respectfully request the application be refused.
277.	Yes 27.2.18	REPEAT OF REP 128
278.	Yes 27.2.18	27 page objection. These can be summarised as follows: 1. Raises issue of link with LLAFreehold Ltd Park First and disqualified director 2. Involvement of Capita, then equating it with another separate company. 3. Issue on Local Plan compliance (LLP6) and the RSS. 4. Issue on LBC lending £300M to LLAL with no guarantee of return. 5. Issues of UXOs and the unknown contents of the tip 6. Lack of monitoring of AQ and issues of pollutants 7. Rigged and biased planning application due to ownership of LLAOL (judge and jury) 8. Issue of sale of public land
279.	Yes 27.2.18	REPEAT OF REP 58 (AND REP 11)

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Ref.	Objection	Comments
280.	Yes 27.2.18	I wish to object to planning 17/02300/EIA. We need our park as a protection from all the air pollution that is caused by the aircraft , our air quality is bad and the removing of any green space trees will have a very bad effect on us who live very near the airport , Also the traffic around our roads is at a standstill at rush hour and at the weekends going into Asda the traffic is queing . We cannot tolerate any additional traffic on these roads
281.	Yes 27.2.18	REPEAT OF REP 167
282.	Yes 27.2.18	REPEAT OF REP 128
283.	Yes 27.2.18	I wish to place my strong objections to the proposed development of Wigmore Valley Park. Although, not a Luton resident, having moved for work purposes, I spent much time there with my family visiting the park and I see the great benefits for families, children and single people. I wish to object for the following reasons:- 1. This excellent green space was provided for the large area of housing nearby and its use is of essential benefit to the physical and mental health of those living in the great number of closely-developed houses nearby and it is in walking distance for a great number of people. 2. Luton is very heavily developed with closely packed buildings and certainly lacks the green spaces which provide for the government's much- promoted need for healthy exercising for all ages as well as Wigmore Valley Park providing a much-needed environment for the development of children's awareness of nature. As a teacher, I have seen how the use of such an environment affects the children's understanding of issues of climate change. Its loss will affect future generations and the attitude which they have to caring for the earth. 3. The park is in an area of much pollution, being near the airport and the replacement of the bushes and trees by concreting over this most valuable of ecological areas would be a total scandal in the light of the effect on people's health, well-being and the important variety/benefits of the wild life of the area. It is also against the LLAL vision 2020-2050 mandate of "developing the landscape and ecology strategies which seek to conserve?.enhance the landscape and biodiversity within Luton Airport and on nearby sites" The LLAL Vision 2020-50 acknowledges that .." we recognise that Luton Airport has a significant influence over factors that contribute to it" (climate change) so such a massive reduction of pollution- absorbents in the immediate area would

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		be totally again the LLAL vision which would become merely words on a page with no impact. 4. By the nature of its position, the area near the airport is already subjected to the heaviest of traffic and every effort should be made to maintain any existing environment which helps to absorb the pollution and to minimize the use of cars in the area. 5. The main attraction of Wigmore is that it is in walking distance of a densely populated area and the suggested replacement park would be at a greater distance, likely adding to increased use of cars and consequent pollution. As it would take extensive time to develop into biodiverse area of Wigmore Valley Park, there would be a great gap with no protection from the pollution of noise and air with the consequence that local inhabitants and those working in the area would be deprived of the advantages of this most valuable site. 6. The history of the site is one of landfill with its concomitant problems of likely contamination once the ground is disturbed by the mechanics of development. Any contamination would have a devastating effect on residents over a great distance. 7. Because this is an outline planning application, there is always the possibility of extended development and further destruction of the environment in future. For the reasons cited above, I feel that under no circumstances should this most valuable of ecological and leisure sites be destroyed and urge that this is preserved for present and future generations; thus planning application be refused.
284.	Yes 27.2.18	REPEAT OF ANONYMOUS REP 3(EXTRACT FROM SERIES OF 7 EMAILS BUT ONLY IN RELATION TO RSS AND LAW [LLP6 EATON GREEN ROAD])
285.	Yes 27.2.18	REPEAT OF REP 58 (AND REP 11)
286.	Yes 27.2.18	REPEAT OF REP 58
287.	Yes 27.2.18	REPEAT OF REP 167

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Ref.	Objection	Comments
288.	Yes 27.2.18	REPEAT OF REP 167
289.	Yes 27.2.18	REPEAT OF REP 167
290.	Yes 27.2.18	It is with great regret that I have write to you as Councillor for the Wigmore Ward regarding the proposed new access road to Century Park opposite Keeble Close. This will mean that there will be 2 junctions very close to each other causing an already very busy road to have even more traffic jams. Thus, making the journey from the A505 and surrounding areas a good 30 minutes to the M1 and that is on a good day. Any incidents on the M! doesn't bear thinking about. Residents and Councillors alike are already very concerned about the traffic having to be endured along Wigmore Lane, Eaton Green Road and Crawley Green Road. We have 5 Schools in close proximity to these roads which are already creating traffic jams, pollution and concerns for children and adults with heart and lung conditions are being raised constantly. With the Airports massive expansion, I feel that Wigmore residents are getting a very rough deal, that also includes massive parking issues caused by inconsiderate development and lack of parking spaces, on the Expansion Plans, for employees of Century Park as with other businesses in the immediate area.
291.	Yes 27.2.18	REPEAT OF ANONYMOUS REP 3 (SERIES OF 7 EMAILS)
292.	Yes 27.2.18	I object to the above planning application for the following reasons: No considered consultation with residents has been made. No explanation as t why we have no choice in the decision has been given. No explanation as to how we can possibly travel anywhere including how we get to work whilst this extensive work continues. How we are supposed to cope with the vastly increased noise, pollution and traffic. Where we are all supposed to walk our dogs now, the proposal offers a totally inadequate and insensitive solution. No consideration has been given to the loss in equity for hardworking homeowners who will not now be able to sell their homes at market rates.

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Ref.	Objection	Comments
		REPEAT OF REP 167 I ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a valuable Community Asset which does not comply with key relevant Local Plan policies. I am utterly devastated at the council's lack of communication and consideration for this community and the severe stress this will cause for residents.
293.	Yes 27.2.18	I object to Wigmore park being built on, the area as it is provides a balance between adjoining industrial areas and open spaces, any less than there is is now will ruin the area in so many ways! The park serves a huge area of homes where people can walk their dogs and let their children enjoy the open space. If anything I think the park needs more social areas ie basketball courts and such things that will encourage social interaction between people who would otherwise never interact. The wildlife that has established in the park is amazing and should be preserved not destroyed. The park serves as an excellent defence against the pollution of the airport and landfill, building will only bring the pollution closer to people's homes. I am very concerned about the old landfill site near the tidy tip being disturbed and what poison might be released when this happens. The roads around the park cannot cope with any more traffic than it does now, building will mean more traffic on the surrounding roads.
294.	Yes 27.2.18	I am objecting because of my concerns about the loss of a valuable green space and wildlife habitat, and about the wider environmental impacts of the proposed development, which are set out in detail in many of the comments submitted by local people. In particular, the climate change impacts of the development have not been properly considered.
295.	Yes 27.2.18	REPEAT OF REP 167
296.	Yes	I have moved back into this area after being in Ireland for 15years, I love Luton and consider us all as being lucky to have such beautiful areas to walk, with friends family and /or our dogs. As most of us lead high stressful jobs or live with difficult personal

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Ref.	Objection	Comments
	27.2.18	issues or [redacted] it is essential we have the local countryside areas to walk. As a regular walker I. The Wigmore Park area, I have great pride in the place as a local resident. I see regular people walking in the park whom I have exchanged conversations with, I am moved by the amount of people who rely on their walks for many reasons, coping with illness/disability, emotional strains and recovery of various types or just distressing!, please can we consider and keep this area as the precious place it is and an essential area for so many people in so many ways.
297.	Yes 27.2.18	REPEAT OF REP 58 (AND REP 11)
298.	Yes 27.2.18	REPEAT OF REP 167
299.	Yes 27.2.18	REPEAT OF REP 167
300.	Yes 27.2.18	REPEAT OF REP 167
301.	Yes 27.2.18	REPEAT OF REP 167
302.	Yes 27.2.18	REPEAT OF REP 167
303.	Yes 27.2.18	I strongly object to this development application on many grounds. I fully agree with the arguments put forward in more detail within ANONYMOUS REPRESENTATION 3. In addition even this far away from the Airport, we often have the strong smell of Kerosene, as if we were on the tarmac with the planes. As well as the exhaust dirt on our window ledges and fruit growing in the garden. Downwind pollution measurements should be carried out before any further expansion, Then add to this the opening up of an old rubbish tip, with the release of chemicals into the air, blowing from the south west across the Wigmore housing estate, you have a recipe not only for lung disease but also other linked health ailments for the existing local population, Could prove expensive if not handled responsibly,

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Ref.	Objection	Comments
		and the appropriate Health and Safety risk assessments are not evidenced. Total disregard for the local voting constituents, whom you should be representing. REPEAT OF REP 128
304.	Yes 27.2.18	I would like to oppose the development of Wigmore Park. I feel that more buildings will cause more traffic and more people illegally parking on residential areas. The environment will be at risk to more pollution which is not good for us. Wildlife will be scares. Lighting from roads and buildings will effect our sleep, The development of the site is potentially hazardous to local residents with building on ex landfill sites and releasing of hazardous gases could cause discomfort to some of us and unexploded WW2 bombs potentially exploding. The park at the moment is a welcome sight to our bleary eyes from al the airport buildings and lighting. This would get much worse if you go ahead with development plans. I wholeheartedly oppose this development due to damage to the environment and pollution risks.
305.	Yes 27.2.18	REPEAT OF REP 167
306.	Yes 28.2.18	REPEAT OF REP 167 (bullet points reorganised)
307.	Yes 28.2.18	REPEAT OF REP 58 (AND REP 11) I'm strongly object to any part of the park & landfill being compromised for the reasons stated above & the potential dangers associated with it. I look forward to your acknowledgement upon receiving my objection.
308.	Yes 28.2.18	REPEAT OF REP 167

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Ref.	Objection	Comments
309.	Yes 28.2.18	REPEAT OF REP 167
310.	Yes 28.2.18	REPEAT OF REP 167
311.	Yes 28.2.18	REPEAT OF REP 167
312.	Yes 28.2.18	REPEAT OF REP 167
313.	Yes 28.2.18	REPEAT OF REP 167
314.	Yes 28.2.18	1. The application should be refused since it does not accord with Local Plan policy LLP6E on Wigmore Park which states "the quality of open space and landscaping will be maintained". LLP29: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas." Transfer to a private company without strict planning restrictions which prohibit development of the kind proposed is not in accordance with policy and therefore should not be granted. Offices, road and roundabout development is not going to conserve or enhance the character and landscape and therefore should be refused. 2. Wigmore Valley Park clearly has a valuable role to play for the local community, and was provided for the local residents as part of residential amenity. Providing and maintaining green space adjacent to urban areas is a key resource in the balance of local planning decisions, as well as promoting health and wellbeing as people walk and take exercise. Removing such an amenity is likely to have a negative impact on health and produce more burden on already overstretched health care provision. Its trees help to offset local pollution caused by surface traffic and aircraft, and it forms part of the natural heritage of the local area and should be undeveloped in accordance with the Local Plan. As a green area planted with trees it is an important wildlife habitat, and a buffer against pollution as well as being an important part of the landscape. The planning application is therefore contrary to LLP29 and should be refused. 3. Nearby Century Park Fields has had planning permission for 20 years and could be reached via a road within the airport boundary to join the point where the tunnel was planned. This would be a more sensible planning approach and avoid

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Ref.	Objection	Comments
		destruction of a green space valued by local people and visitors alike. This application should be refused since it is not in accordance with the new 20-year Luton Local Plan that there should be no access road to Wigmore Park from Eaton Green Road, so. There is a danger of creating new rat-runs with associated traffic, noise and nuisance in already congested roads. 4. A new dual carriageway could make traffic congestion in the entire south Luton area much worse, and so should be refused on transport planning grounds. 5. It is not clear why such a significant road would be required in any case and planning should not be granted in the face of a clearly part-complete picture. It is entirely possible, for example that this application is related to proposals for future airport-related development, and may involve swapping a park for car parks to make additional room on the airport site for aprons and terminals. This is not in accordance with the 2012 National Planning Policy Framework Section 10 (Meeting the Challenge of Climate Change) so this development should not be permitted. 6. The site has become a County Wildlife Site and Area of Local Landscape Value, with new diversity in plants and birds and hence is unsuitable as a location for large ground level car parks, offices, roads and roundabouts and so the application should be refused. 7. Mitigation by way of a replacement park further away from the communities which need and use Wigmore Park is unacceptable and inadequate, and would not provide equivalent amenity since it is currently simply fields. 8. Building on a landfill site could well result in pollution to the local water supplies and is not in any case appropriate where hazardous substances or unstable ground conditions may exist, therefore outline planning permission should not be granted. For all the reasons above, the application should be refused in order to safeguard a valuable community asset.
315.	Yes 28.2.18	In my opinion there is not enough open space in Luton, and especially not enough that is 'wild'. So there should be no development on Wigmore Valley Park. From the Local Plan map I got the impression that there would be no development of the park. Surely the four lane road could go round the perimeter of the park instead of straight across it. My mother, her dog, and I have visited the park hundreds of times. Please do not destroy it.
316.	Yes 28.2.18	The affects of such a new business park will be hugely detrimental to the well being of local residents and nature – not worth the money the companies overseeing this will make given what you would destroy. The council should be looking after its people and their needs. When the council should be making every effort to make Luton a better place to live, such a construction here will only add to the depressing state of the town. It is completely unnecessary and irresponsible to take this valuable green land. Use existing concreted / office areas – Luton has plenty empty of this but not enough of the green.

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Ref.	Objection	Comments
		Please leave this beautiful and special green space alone.
317.	Yes 28.2.18	REPEAT OF REP 167
318.		
319.	Yes 7.3.18	REPEAT OF REP 167
320.	Yes 7.3.18	1 The land was granted for the pleasure and benefit of the people not to facilitate a commercial enterprise 2 The blight inflicted on the area by excessive airport growths in this way is unacceptable 3 The lost green lung amenity is an environmental outrage
321.	Yes 7.3.18	I object to the development for the following reasons: 1. The Luton Playing field strategy 2014-2021 identifies deficiencies in every outdoor sport including 11 cricket pitches. At one time there was at least 6 pitches on the park. They have existed for at least 25 years and some did have drainage problems. The present one where the posts remain has no problem whatsoever. 2. The condition of the playing surfaces are irrelevant – it is the quality of the pitches which could be created on the new park which matters. 3. A discussion on this matter would have taken place at the consultation stage but a SERIOUS error. I attended the stakeholders meeting on the 21st February at Wigmore school. Maps of the new site were distributed. There were THREE FOOTBALL PITCHES CLEARLY SHOWN which later were designated as dog walking areas (I have copies) 4. The park was also a designated cross country site hosting National competitions. These cannot now take place because changing facilities will not exist. 5. The Local plan states that the new park should have facilities of at least equal quality. The loss of sports facilities suggest otherwise. While the Airport plans more major development in the future it is encumbent that Local residents who mainly suffer from the adverse effects should benefit most. This clearly is not happening. Upgrading existing facilities that were allowed to degenerate is a poor response. I have unsuccessfully championed the cause of replacing the Spectators building creating an Education and employment centre.

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Ref.	Objection	Comments
		All measures which would have benefitted all Lutonians.
322.	Yes 7.3.18	REPEAT OF REP 167
323.	Yes 7.3.18	REPEAT OF REP 167
324.	Yes 7.3.18	REPEAT OF REP 167
325.	Yes 7.3.18	There should be no development on Wigmore Valley Park. It was provided for people in Wigmore close to homes because it was needed, landscaped and planted with hundreds of trees. It has been enjoyed by parents, families and visitors since the 1980s, so is highly valued and crucial to our wellbeing. It must be left for future generations to enjoy. The area is a County Wildlife Site (CWS) and should be protected by your own planning policies. Luton is overdeveloped and green space is well below the town's needs, so people come from other parts of the town to walk here and see wildlife. This park should not be taken away. With more people sitting down all day, health and exercise are more important than ever Over two hectares of trees would be lost to roads and car parks. The trees and CWS in the park provide an important wildlife habitat, and act as a barrier to air and noise pollution. No development should take place on a public park which would ruin a well loved, peaceful green area and subject people to danger, noise and air pollution. The CWS has become a diverse habitat with 5 species of orchid and over 60 bird species. The offices, roads and roundabout would all have unacceptable, adverse impacts on the biodiversity and landscape. The 'replacement park' is much further away on agricultural fields and in no way equates to what we have now. It would be further from homes, less convenient, has no trees to absorb pollution, and would mean a net loss of green space. Described as "intensively farmed arable fields with little habitat value and relatively low ecological importance", it would take many years to become as good a site for wildlife, which is in sharp decline and needs help now. Local Plan policy LLP6E on Wigmore Park says "the quality of open space and landscaping will be maintained". LLP29: "Development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas."

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Ref.	Objection	Comments
		I ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a valuable Community Asset which does not comply with key relevant Local Plan policies.
326.	Yes 7.3.18	Friends of Wigmore Park comments on application 17/02300EIA. We have a number of major concerns about the application that would have a significant impact on Wigmore Valley Park and the local area, if the development were to receive planning permission. Our concerns relate to the impact on local people and wildlife. 1. The loss of mature trees caused by the construction of a slip road from Eaton Green Road, but also around the park where commercial development is planned. There appears to be little addition of semi mature trees to compensate for the loss planned. Given that the landscaping was provided for the benefit of close residents and also users of Wigmore Valley Park it seems that this planning application is totally contrary to past agreements reached between your department and local housing developers, this important noise and pollution barrier that offers residents some protection from the airport should not be lost. 2. The southern area of Wigmore Park next to the runway is designated as a County Wildlife Site (CWS), this signifies that it is an area of local wildlife value. The CWS has grown and become established during the course of the last thirty years, it has five different species of wild orchid and sixty bird species. A portion of this CWS has been detailed on the plan as a long stay car park, the loss of this area and the creation of a car park and office development so close to the remaining land would have a negative impact on both the wildlife and the people who go to visit. This view and seasonal pond would disappear under a car park. 3. Wigmore Valley Park has been identified in the Luton Local Plan and on the policies map as an ALLV. Strategic Objective 10 of the Luton Local Plan states that the local plan aims to “improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity”. This planning application doesn’t meet strategic objective 10, it would take away most of Wigmore Park a designated ALLV. LLP29 A states that “development proposals will be supported where they protect, conserve or enhance the character, setting and natural beauty of national and local landscape areas”, which includes ALLV’s. This proposal will not protect, enhance or conserve the character of this area. It will change the area completely and would take away the ALLV, displace the wildlife, set

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Ref.	Objection	Comments
		plant growth back thirty years and take away many trees which would not be replaced. The current ALLV view, this view would be lost, it would have large industrial buildings on the right behind the swings, which would not create a relaxing environment for park users. The current ALLV view, which would be replaced with buildings, these trees would be hidden from view. 4. Luton Local Plan LLP29 B states "developments giving access for all users, where feasible, to the countryside and green space". This development would reduce access to green space for many local residents as the proposed new area of open space will be a greater distance from their homes. The new area of open space would not be as accessible for those with walking difficulties as the gradient of the land is much steeper than that of the current area of open space. Under the Equalities Act 2010 organisations have a duty to create accessible places, this proposed new area of open space would go against that. This planning proposal does not safeguard and enhance the district park, it encroaches onto most of the current area of parkland It forces local residents to go further to enjoy an area of open space and limits access for those who have difficulty walking on steep inclines. In a recently published report, highlighted by the BBC U.K residents were able to look up their town and see how much was built on, how much was farmland and how much was open space. Luton's stats were 70% built on, which is higher than some London boroughs and unfortunately Luton only has 20% open space, which would be reduced ever further by this proposal. The drawing, "Detailed Landscape Master Key Plan" in the planning application documents shows the contours of the land in the proposed new park area and the existing Wigmore Valley Park. The contours are much closer together in the new area, which means the gradient is much steeper than the current park making it less accessible. https://planning.luton.gov.uk/online-applications/files/A5596EE2A0A2D6AD36ECBADE2ED6B021/pdf/17_02300_EIA-CS083075-L-100B_Detailed_Landscape_Masterplan_Key_Plan-686508.pdf 5. The Playing Pitch Strategy (PPS 2014) sets out key aims and supporting objectives for sport provision in the Borough. "The PPS recognises Luton's constrained supply of land for facilities, growing demand in some sporting sectors as the population is set to grow with a consequent increasing pressure to develop sites for alternative uses. Essentially the key aims seek to protect and enhance levels of outdoor sports facilities and better manage the resources including maximising shared access (e.g. to educational sports facilities) and investment". This proposal will see the loss of playing pitches that have been used within the last five years and the loss of a vast area of open level ground used by families and friends for recreational activities. Mitigation by moving to other sites in the ward is highly unlikely and Luton already has a lack of high quality pitches and open space.

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Ref.	Objection	Comments
		6. Development planning document KQ30131H168 shows a link with Eaton Green Road, this is a clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 – London Luton Airport Strategic Allocation, including Century Park where on page 38 the policy states the following regarding access: "Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency". 7. Document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF makes the following comments on two diagrams of the landfill. "During construction waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas. Waste may contain volatile contaminants which produce vapours. Potential risk to future users of the site. As waste decomposes gasses e.g. methane, which can build up to explosive levels in confined spaces. Piling through landfill can potentially cause downward migration of contaminants. In the 1970's dilute and disperse landfill was considered acceptable i.e no liner on bottom of landfill so contamination can seep out of the base of the landfill. Ground water in chalk is highly protected in the area as it is the main source of drinking water. Settlement waste is uncompacted and has a high potential for immediate and long term settlement. Settlement could impact upon the integrity and proper falls of drains and other services. Pilling over and against the landfill will cause it to settle. Stability of chalk- the top of the chalk may be weathered and weak. Therefor may not be suitable for founding in. Large obstacles in the landfill could prevent piling to full depth. Sulphates in the landfill may attack and degrade the concrete in the piles. Development of site could change gassing regime". As the planning application has stated there are considerable dangers in attempting to build on this landfill, including further subsidence, deadly inflammable gases and odours that could affect the health of residents, the irreversible contamination of groundwater the application should be turned down for all of the above reasons. 8. Pollution from noise and aviation fuel could potentially be at higher levels in the proposed new park area. The noise contours

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		map on the Luton Airport website clearly shows that the noise levels in the proposed park area would be higher than the current park https://www.london-luton.co.uk/corporate/community/noise/noise-monitoring. People are encouraged to visit parks as part of a healthy lifestyle, this would not be possible, as the proposed park area is closer to the runway and would potentially expose them to higher levels of noise and air pollution. 9. This area was given to the people of the East of Luton as part of the planning application for the development of further housing in Wigmore in the 1980's. The Borough of Luton Wigmore Area Planning Brief December 1982 states "Provision of public open space in the Wigmore Area is close to the minimum necessary. The development of the Wigmore area will generate a need for an additional provision of public open space and allotments". It goes on to say "The former Airport Refuse Tip at Wigmore Hall Farm might also be used to accommodate some of the open space required by the Wigmore area, so releasing more land for housing". This planning policy recognised the need to provide accessible open space and this need has grown with more housing infill across Luton. The people of Wigmore and the neighbouring boroughs have used this park to benefit their health and wellbeing over the last 30 years and should continue to do so. Conclusion Our committee group requests that the application be refused on the above points. If the application should go to development control committee we request that we should be given notice of the date and be given the opportunity to have a representative of our group speak against the planning application. Should the planning application proceed to the next stage, we ask to be consulted with at the appropriate time. However, please know that the loss of any part of the park will be greatly felt by local residents.
327.	Yes 7.3.18	There will be significant impact on the local area which will affect people who live and work in the local area. There will be a loss of numerous mature trees in the current Wigmore Park to build access roads and the Century Park itself. Luton has a reputation of being a concrete industrial town that no one wants to visit and the current trees help the environment and the beauty of the local area. They will also act as a noise barrier between the airport and its associated noise and the local housing estate having a detrimental impact to people living there. The current Wigmore Park (which is a proper park in the true sense rather than an office estate called Century Park incidentally) has a County Wildlife Site (CWS) which has established over the last 30 years with five different species of Orchids and sixty bird species. The creation of an office car park on this site and close to this site will have a negative effect on the wildlife here.

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Ref.	Objection	Comments
		The infrastructure in terms of the roads will not be able to cope with the additional office buildings as there is significant traffic and congestion in this area currently and not enough sufficient parking for the existing office buildings at Wigmore Park which is having a detrimental impact on the local community and environment. At times there is already significant polluition in the local area from aviation fuel and this will increase. [redacted] and other people who suffer with respiratory conditions will have worsening symptoms due to the impact on the air around this area. People are encouraged to go to parks for their health but how can I take my daughter there so close to the noise and air pollution as it's closer to the runway? Wigmore Park was given to the local residents of the Wigmore area by the council as part of the planning application for further development of housing in Wigmore in the 1980's. This was then taken back by the Council without communication and/or consultation. I also understand that before Wigmore Park it was a ground used for industrial waste and therefore I am concerned if this was disturbed to build Century Park that it will cause environmental damage to the local area and also cause potential health issues. Please can you confirm acceptance of this objection and ensure it is logged on the website?
328.	Yes 7.3.18	REPEAT OF ANONYMOUS REP 3(SERIES OF 7 EMAILS, BUT ONLY SECTION ON RIGGED AND BIASED PROCESS)
329.	Yes 7.3.18	I do not understand why the park needs to be moved as surely if more units are required for the airport then they could be built on the area nearest the runway which is currently being proposed for the re-instatement of the park area. This would surely be much more cost effective as the current park would remain. The existing park could then be re-vamped but there would be no need for all the moving of plants etc. The above would also ensure that the local people using this parkland would not be subjected to higher pollution levels from being nearer the runway. I understand that Century Park Fields were given planning permission some years ago for building on so why not do this? The new 20-year Luton Local Plan states there should be no access road to Wigmore Park from Eaton Green Road, so this application should be refused. A new road by the Tidy Tip, one of two proposed roads on to the park from Eaton Green Road would bring more traffic, increase noise and create dangerous new rat runs on Wigmore Lane, Eaton Green Road and already congested surrounding roads. Frank Lester Way should not be closed to cars. As for the proposed duel carridge way. This is not

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Ref.	Objection	Comments
		necessary for the Century Park development and is obviously only there to serve the proposed housing development in North Herts. This has recently been admitted after months of denying it. So many lies and half truths that the local residents have now lost all trust in the local council. As if all this isn't enough what about the possible contamination of groundwater and drinking supply. There needs to be a lot more investigation into this before any decisions are made. For these reasons please do not pass the proposed plan. It is totally inadequate and does not make any sense when better, cheaper alternative plans could be used. The only reason for passing this application is that there are other (hidden) reasons for this plan which have not been bought to light in the consultation which would mean laws are being broken here. Please be honest and let people know what is really going on and then a proper plan can be put forward.
330.	Yes 7.3.18	REPEAT OF REP 326 (FoWP)
331.	Yes 7.3.18	There should be no developement on Wigmore Valley Park. It was provided for people in wigmore because it was needed and is probably needed more than ever for the wellbeing of the many people who use the park. The park has grown into a beautiful place and we really dont want to see more buildings which will inevitably bring more traffic and pollution. The replacement park is much further away with no green space and has no trees to absorb noise and pollution. I am extremely concerned about disturbing and building on a landfill site where hazardous waste was dumped. Wigmore Valley Park has been enjoyed by so many generations and is highly valued no development should take place on a public park which would ruin a well loved, peaceful area that acts as a buffer to the airport Luton is already overdeveloped and green space is well below the towns needs, people come from other parts of the town to walk and see wildlife and enjoy all this great park has to offer. I ask that, for all the reasons above,the application be refused as the proposal is an inappropriate development on a valuable community asset which does not comply with key relevant local plan policies.
332.	Yes 7.3.18	I am writing to object to the Airport expansion at Wigmore Valley Park. All the natural land that absorbs harmful chemicals/gases from the airport will be taken away, which will result in polluting local residence. There could be un-detonated WW Bombs within the land. That will be disturbed. Also, we do not have the infrastructure to cope with all the extra traffic.
333.	Yes	Loss of green space/environment: Wigmore Valley Park is a beautiful area well used by local residents (it's a park I enjoy running around). It is well established, thanks to the landscaping and tree planting of 30+ years ago and, therefore, is an important haven

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	7.3.18	for wildlife. The replacement part envisaged would destroy all this, and is also further away from the residents the current park serves. This area of Luton has precious little public green space and these plans would cut that even more. Traffic/infrastructure: Traffic in this area is already a huge issue, particular in the morning and evening rush hours. The new access road from Eaton Green Road as proposed, plus all the extra motorists who would be coming into the area to work in the new Century Park development would only further exacerbate this problem, leading to yet more gridlock. Safety: I understand that initial testing has flagged up possible dangers of building on a landfill site. Until these risks have been fully investigated and safety guaranteed, no development should be given permission to proceed.
334.	Yes 7.3.18	REPEAT OF REP 167
335.	Yes 7.3.18	REPEAT OF REP 167
336.	Yes 7.3.18	REPEAT OF REP 167
337.	Yes 7.3.18	REPEAT OF REP 167
338.	Yes 7.3.18	REPEAT OF REP 167
339.	Yes 7.3.18	REPEAT OF REP 167
340.	Yes 7.3.18	I object to the lack of community space and the destruction of an established parkland. The damage to the local wildlife and established woodland is unforgiveable. Luton already is lacking in green spaces and destroying a large established area is not good for local residents. The land was originally given to the residents as compensation for building the Wigmore Estate , and the proposed spaces to

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		replace the park is not a suitable substitute for the current park. The Local Plan does not show development of the Wigmore Park site. The site was a former landfill site, and has been used to dump all manner of waste over the years. It has been safely capped off and is currently contained; turning an ugly, disused landfill into a beautiful natural natural amenity. By disturbing this site, the environmental contamination risk is really high. There are several local ancient chalk aquifers which sustain an important local ecosystem, and the damage that could result from groundwater penetration is vast and far reaching. The increase in local traffic will be large. Not all the traffic to the proposed site will access from the M1. Any traffic coming from the A1 or elsewhere will be using local roads to cut through. Many of the local roads are barely more than single track lanes. Through the hamlet where we live, the road is very narrow, and is often congested at rush hour times, if lorries and van, or cars, are trying to get through the same time as the local public bus – a valuable link to Hitchin and Luton for the residents of the rural villages. On the above grounds I object to the development.
341.	Yes 7.3.18	REPEAT OF REP 128
342.	Yes 7.3.19	REPEAT OF REP 167
343.	Yes 7.3.18	REPEAT OF REP 167
344.	Yes 7.3.18	I strongly object to this development application on many grounds. I agree with the arguments put forward in more detail within ANONYMOUS REPRESENTATION 3. THE ADOPTED LUTON LOCAL PLAN EXPRESSIVELY FORBIDS THE ACCESS TO NEW CENTURY PARK FROM EATON GREEN ROAD IN POLICY D1. Luton adopted their Local Plan 2011-2031 on 4 Nov 2017. On p.32 section d.1 it says no access road from Eaton Green Rd very clearly: “such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the

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		Airport" THE COUNCIL IS LOANING 300 MILLION POUNDS TO THE COMPANY FOR THIS PROJECT – WHEN THERE IS ZERO GUARANTEE IT WILL EVER BE REPAID AND THE COMPANY ALREADY OWES MORE THAN IT'S SHAREHOLDING VALUE.
345.	Yes 7.3.18	REPEAT OF REP 58 (AND REP 11)
346.	Yes 7.3.18	REPEAT OF REP 167 … With Luton Council the majority shareholder in Luton Airport, I think it is a serious conflict of interest that Luton Planning Department is involved in deciding whether or not to grant this planning application. At the meeting, the New Century Park developers had a board posting the anticipated timescales for the project should permission be granted. According to that, after spending a year destroying our existing park and wildlife and causing major disruption for local residents whilst building the new access road via the tip access on Eaton Green Road, there is every chance the proposed new buildings will not be erected since their timeline states – and I quote – "Early 2020: Early start for commercial development (subject to market conditions)". So after ruining our park and creating chaos on our roads, they may not even go ahead with building the complex if they deem it non-viable financially! I ask that, for all the reasons above, the application be refused, as the proposal is an inappropriate development on a valuable Community Asset which does not comply with key relevant Local Plan policies.
347.	Yes 8.3.18	REPRESENTATIONS SUBMITTED ON BEHALF OF TUI GROUP IN RESPONSE TO THE PROPOSED NEW CENTURY PARK ACCESS ROAD (REF: 17/02300/EIA) We write on behalf of our client, TUI Group, to submit representations in relation to recent applications made for the New Century Business Park (NCBP) and New Century Park Access Road (CPAR) located to the east of Luton Airport. These representations primarily relate to the impact of the proposed CPAR on the various assets and operations of TUI Group. TUI Group is a multinational leisure, travel and tourism company and a principal airline operator at Luton Airport. The head office for TUI UK & Ireland is based at Wigmore House to the immediate north of the proposed new CPAR. TUI Group employs over 1,800 people at its head office and as part of its maintenance operations based at Luton airport which serve the UK fleet of 63 airliners and also part of the European fleet. As discussed in this letter, the primary concern regarding the CPAR proposals relates to the loss of significant areas of car parking which is essential for the continued operation of all TUI Group operations in the area. The proposed CPAR dissects a number of TUI Group buildings and car parks. Whilst the principle of the New Century Business Park proposals are supported by TUI Group, without proper and full consideration and mitigation, the proposed CPAR will

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		severely compromise TUI Group operations. We encourage London Luton Airport Limited (the Applicant) to engage further with TUI Group to ensure its New Century Business Park proposals do not compromise TUI Group assets and operations. We also ask that the Council carefully consider the proposals in terms of the impact on TUI Group's car parking. At present TUI Group does not consider that the mitigation measures contained within the proposals are adequate and that these fall short of what is required to prevent significant disruption to its operations. Background A Car Parking Strategy and associated plans has been submitted in support of the application (Ref: 17/02300/EIA) and has been reviewed by GVA on behalf of TUI Group. The following comments and references are made with regards to this Car Parking Strategy. Car Park CP4 is located between Prospect Way and Percival Way and currently comprises approximately 166 spaces used exclusively by TUI Group staff in relation to its flight training centre and aircraft maintenance facility. As a result of the alignment of the proposed CPAR, all 166 spaces are expected to be lost. The proposals include replacement car parking in Plots B (extension) and L, providing 54 and 75 spaces respectively. It isn't clear whether these spaces will be reserved for exclusive use by TUI Group to partly mitigate the loss of existing car parking spaces. As set out in the Representations section below, further explanation of the permanent replacement of TUI Group car parking is sought from the Applicant. Car Park CP9 is located to the south of Eaton Green Road and currently comprises approximately 492 spaces used exclusively by TUI Group staff in relation to its head office at Wigmore House. CP9 is also used as the fire assembly point in the event of the evacuations of staff of located at Wigmore House. As a result of the alignment of the proposed CPAR and the construction of a replacement of Building B16 in the southern area of the existing car park, approximately 377 spaces will be lost. Approximately 115 spaces are expected to be retained in the northern part of the car park (Plot F). To help mitigate the loss of car parking spaces during construction, a temporary car park at the southern end of the long stay car park is proposed to be provided, comprising approximately 300 spaces (Plot P). Building B16 is expected to provide 51 car parking spaces when complete but it understood that these spaces will serve the B16 building and not be made available to staff of TUI Group. Car Park CP10 is also located to the south of Eaton Green Road and currently comprises approximately 315 spaces, of which 194 spaces are used exclusively by TUI Group staff in relation to its head office at Wigmore House. As a result of the alignment of the proposed CPAR and major reconfiguration of the plots, all 315 spaces are expected to be lost. It is expected that 145 car parking spaces will be provided on a temporary basis during construction in the remaining area of CP10 to help with the displaced car parking spaces. On the northern element of CP10, it is expected that 227 permanent spaces will be provided (Plot I). The Planning Statement submitted in support of the application acknowledges that the proposed route of the CPAR dissects the existing TUI staff car park. As a result, it is proposed that "the most appropriate long term solution for this area of the site is to redesign the existing TUI car parks and car hire centre in order to create one large TUI car park located as near to their existing

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		office development as possible". However, that this redesign to the north of the CPAR would require "the relocation of the existing car hire centre, with the most appropriate location being adjacent to the Central Terminal Area". As set out in the Representation section below, confirmation is sought from the Applicant of a contingency plan should the relocation of the existing car hire centre be delayed or not be forthcoming. Representations The following representations are made on behalf of TUI Group in response to the car parking strategy of the proposed CPAR: Temporary car parking to mitigate the loss of CP4 Car Park CP4 is currently used by TUI Group in relation to its aircraft maintenance operation in Hanger 61, which is located within close proximity to the car park. The proposed CPAR will result in the loss of all 166 spaces. Provisions must be made and secured to ensure suitable temporary car parking is provided to re-provide all 166 spaces in close proximity to Hanger 61 to ensure the continued operation of the TUI Group's UK aircraft maintenance operation. Without proper mitigation, the loss of this car park will result in significant and preventable disruption to TUI Group operations and could result in staff being required to park elsewhere within the vicinity, including in the Wigmore Valley Park car park and surrounding residential estates. A temporary car park for the exclusive use of TUI Group should be provided and provisions secured as part of a S106 Agreement to ensure this is complete and operational prior to any of the existing 166 parking spaces being lost. We ask that the Applicant engages further with TUI Group to ensure that adequate mitigation is considered and that the Council secure appropriate mitigation to ensure the application can be considered acceptable. Permanent car parking to mitigate the loss of CP4 It is not clear within the submitted Car Parking Strategy whether the existing car parking spaces in CP4 are proposed to be replaced permanently. Whilst the proposals show that 129 car parking spaces will be provided in new Plots B (extension) and L, it isn't clear whether these spaces will be reserved for exclusive use by TUI Group to mitigate the loss of existing car parking spaces. In any case, the permanent replacement of car parking spaces within the existing CP4 must be secured to ensure that existing TUI Group operations are not severely compromised and to avoid any harmful impact on local car parking. We ask that the Applicant engages further with TUI Group to ensure that all 166 car spaces are replaced in close proximity to Hanger 61. Temporary car parking to mitigate the loss of CP9 and CP10 Car Parks CP9 and CP10 comprise of 807 spaces, of which 686 spaces are currently used by TUI Group in relation to its head office at nearby Wigmore House. The proposed CPAR will result in the loss of a majority of spaces. To mitigate the loss, it is proposed to provide 300 temporary car parking spaces to the south of the existing long stay car park. The car parking within CP9 and CP10 is used predominantly for staff of the head office at Wigmore House (located to the north of Eaton Green Road). The proposed temporary spaces to the south of the existing long stay car park are a significant distance from Wigmore House and are not within reasonable and practical walking distance. CP9 is also used as the fire assembly point in the event of the evacuations of

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		staff of located at Wigmore House and the temporary car park proposed some distance from Wigmore House and an alternative fire emergency strategy would therefore need to be accommodated. Therefore, we consider that the temporary car parking spaces would not effectively mitigate the loss of car parking in CP9 and CP10 during construction works. This proposed arrangement will likely further exacerbate the existing issue of parking within the Wigmore Valley Park car park and surrounding residential estates. We ask that the Applicant engages further with TUI Group to ensure that a solution can be identified that is acceptable to TUI Group and that the Council secure appropriate mitigation to ensure the application can be considered acceptable. Permanent car parking to mitigate the loss of CP9 and CP10 Approximately 115 spaces are expected to be retained in the northern part of CP9 (Plot F) and 277 spaces retained in the northern part of CP10 (Plot I). The proposed arrangement will result in the loss of 415 car parking spaces in CP9 and CP10 and without suitable agreements in place, a significant number of TUI Group car parking spaces will be lost. Whilst not confirmed specifically within the Car Parking Plan, the Planning Statement confirms that the existing TUI car parks and hire centre will be redesigned to "create one large TUI car park" located as near to the TUI Group head office building as possible. Referring to Plots G, F and I on the Car Parking Strategy 'Potential Areas for Reprovision' plans, 1,015 permanent car parking spaces will be delivered in these areas. Whilst the overall quantum of car parking spaces is welcomed, allocation of spaces for the exclusive use of the TUI Group will be necessary to ensure the loss of existing car parking spaces is properly mitigated. We ask that the ApplicanSummary TUI Group is supportive of the principle of the proposed New Century Park and the New Century Park Access Road. However, as set out in this letter, adequate provisions should be made to ensure there is no net loss of car parking spaces used by TUI Group at any stage during construction and at the time of completion of the proposed development. We look forward to further engagement with the Applicant to ensure that: A minimum of 166 permanent car parking spaces be reprovided for the exclusive use of TUI Group in relation to the loss of CP4, where reprovided spaces are located within walking distance of Hanger 61. Assurances must also be made that adequate temporary car parking spaces are provided whilst the CPAR is being constructed and the existing car park is not operational. A minimum of 686 permanent parking car parking spaces to be reprovided for the exclusive use of TUI Group in relation to the loss of CP9 and CP10, where the reprovided spaces are located within the proposed car park in Plots F, G and I (within walking distance of TUI Group head office). Whilst the provision of temporary car parking spaces is welcomed to mitigate the loss of the existing car parking spaces in CP9 during the construction of the new B16 building, considering that these space will be used by TUI Group staff located in the head office at Wigmore House, a more appropriate temporary location needs to be explored to ensure this proposed mitigation is effective. We look forward to further discussions to agree an appropriate location.

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		The provision of replacement parking in Plots F, G and I rely on the relocation of the existing car hire facility. It should be ensured that no relevant works should commence until the relocation of the car hire facility has been secured to ensure that there is at no time, any loss of car parking used by TUI Group. We look forward to receiving confirmation that these representations have been received and will be considered in the Council's determination of the planning application. We also look forward to further engagement with the Applicant to agree provisions and mitigation related to the temporary and permanent loss of TUI Group car parking.
348.	Yes 8.6.18	The planning application for a business park and associated roads should be refused on the following grounds: *Wigmore Valley Park is a much loved community asset containing playing fields and a County Wildlife Site. The planning application fails to take this into consideration nor does it intend to replicate these existing features at its proposed new location for the new Wigmore Park. It should be noted that the applicant has already identified the location of the New Wigmore Park as a site for a long term car park in its consultation for airport expansion so there has to be doubt if the park will actually open and if it does for how long.* *The proposed business park already has outline planning permission on land that has a boundary with Luton Airport. A physical connection to the airport was given as a reason for using Wigmore Valley Park. A tunnel could be avoided if the new dual carriageway were to be diverted around the outside of Wigmore Park.* *The applicant has submitted plans for a business park yet it is committed to using Wigmore Park for a primary role in its aims to expand the airport from 18 million passengers to 38 million passengers per year. The planning application fails to mention this at all.* *The planning application seeks full planning permission only for a dual carriageway, a link road from Eaton Green Road and the construction of airport related parking. The sole purpose of this application is to build infrastructure to support a later planning application for the expansion of Luton Airport and has little to do with the construction of a business park; thus the application is misleading.* *One of the justifications for the planning application is that a new Wigmore Park will be created. The application goes into great detail about a park that will be created next to the existing Wigmore Park in a featureless farmer's field, yet the applicant has made it clear in a consultation document for the expansion of the airport that they want to use this land for a car park and not a replacement park.* *The link road from Eaton Green Road is contrary to policy LLP6 which was only adopted late in 2017 and remains in the latest amended applications.* *Further, the application should be refused on the grounds that a link road from Eaton Green Road would congest local roads and would send airport and business park related traffic directly past three schools on roads that were designed for local traffic conditions only.*

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		Ashcroft Road, Wigmore Lane and Eaton Green Road would act as feeder routes for traffic from the A505 and A1 for not only a business park, but also for a terminal 2 and even the existing terminal. Even if the routes were not signposted Sat Navs would direct traffic to use local roads. This is a clear intention as without it traffic would have to use Vauxhall Way and Airport Way to the Ibis Hotel roundabout and then traffic would have to head down New Airport Way, as though it was heading for the M1. Cars and lorries would then use a right turn onto the new dual carriageway causing a tailback to the Ibis Hotel roundabout. *Road junctions associated with access via Eaton Green Road will be over capacity and that doesn't take into account the applicant's plans to put a terminal for up to 22 million passengers opposite this entrance. Once this link road was built it would be too late to do anything about it, if and when Terminal 2 was built.* *The construction of the dual carriageway will result in the loss of many company car park spaces that will be replaced by car parks on Wigmore Park and is contrary to policy LLP6.* *The revised planning application still involves the loss of most of the County Wildlife Site and the admittance that it cannot be replicated at a new site. The application also admits there will be no replacement grass wetlands to discourage birds. Nothing in the revised application satisfies policy LLP29.* *The replacement trees are shown in locations that the applicant wishes to expand the airport and its associated infrastructure into, so if they were planted they would be removed if LLAL were successful in their desire to expand the airport using its preferred options.* *The application still supports the loss of playing fields with no alternative proposed. The replacement Wigmore Park has no provision for playing fields, as the land is not flat. Again the replacement Wigmore Park was part of a consultation to build a car park at its proposed location so the applicant has no desire to follow its own planning application if approved. This could mean the plan for a replacement park could be dropped if this application were to be granted approval.* *The application still does not address policies LLP6(D) and LLP27 for the provision of open space and sports pitches and that the influx of new workers would not have any sports facilities that they could use.* *The application is harmful to local residents on the following grounds that haven't been addressed in the revised application:* *A link road from Eaton Green Road.* *Loss of trees and hedgerows.* *Loss of a valued park.* *Loss of sports pitches.* *Potential contamination impacts.* *Loss of ecological areas (CWS and District Wildlife Site [DWS])* *Impact on the openness of the surrounding area.*

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		There is no safeguarding of the nature conservation of the area or the County Wildlife Site. The statement that "the largest and most significant part of this site will be kept and incorporated in the proposed scheme" is false, as the majority of the CWS will become a car park. This is despite the applicant reducing the number of parking spaces. All of the CWS will in fact disappear, as the applicant has published consultation documents that show a terminal 2 located on the remainder of the CWS. The fact that this hasn't been mentioned in this planning application should not be dismissed as there is a clear intention in their preferred option for airport expansion to build on the remainder of the CWS. *During construction of hangars on the edge of the existing council tip around the year 2000 large amounts of unregulated waste were exposed. There are no guarantees this would not happen again which could put the public in danger; and there are no guarantees that additional contamination would not occur. It was noted by a member of the public who published photographs that during the bore hole and test pit dig samples of waste were discovered outside the cordoned off areas.* *The planning application update still shows vast areas of car parks that will destroy large areas of landscape-value park and the CWS.* *The application has not dealt with the fact that the existing park sits higher than many residential roads that front the existing park so any new buildings will dominate the landscape. This will be in part due the removal of a wood of mature trees bordering Eaton Green Road that would be cut down to facilitate the construction of the Eaton Green Link Road.* *The Transport Assessment makes no mention of a second terminal or the plan to add up to 22 million passengers to that second terminal. This is despite the applicant promoting a second terminal in their own consultation for airport expansion. Also it does not take into account additional traffic generated by the airport or from the Bloor Homes and Crown Estates developments making the application untenable.* *Traffic modelling has ignored existing traffic congestion or the impact from a second terminal. This should be included as the applicant is also the sponsor for airport expansion and has made reference to the new road as a gateway to terminal 2. It should be noted that the proposed dual carriageway/Eaton Green Link Road is already one of the reasons LLAL is justifying a terminal on Wigmore Park. LLAL cannot promote a route in a consultation while at the same time ignoring its own consultation when it seeks planning permission. This is just another example of the applicant withholding key information that will give false traffic forecasts if it is not included.*

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		The application makes reference to the DART rail link but has not laid out how it will be seamless using a single ticket solution. At the moment travel times can be extended by the need to queue and buy a second ticket for travel to the terminal. LLAL was looking to the new franchise rail agreement for East Midland trains to run a nonstop train every 15 minutes. The actual franchise agreement announced an ending of nonstop trains that call at Luton Airport Parkway at peak periods and still only 1 nonstop train an hour off peak thus reducing demand for the DART. *The revised application is still in breach of the local plan, as it still contains a link road from Eaton Green Road, which is in breach of policy LLP6D(i)* *Highways England have not been approached for comment about the new dual carriageway potentially serving terminal 2, which is the clear intention of the applicant.* *There will be major disruption to the airport operator, local businesses and residents during the dual carriageways construction phase.* *One of the justifications for the business park is to create jobs yet much of the existing land LLAL owns behind Percival Way has been derelict for years with no attempt made to create jobs within it. The dual carriageway will cut through much of this derelict land that could have been redeveloped.* *The application does not benefit local residents, whose views have been ignored; residents are strongly opposed to the loss of their park, traffic congestion and pollution. Friends of Wigmore Park, whose mandate is to save the park, has in excess of 2000 members. The planning application makes limited reference to the concerns or opposition of residents.* *The transport assessment also claims that the development contributes to health and wellbeing and protects and enhances biodiversity. This is a total fantasy when the park is under threat. In fact the House of Commons Communities and Local Government Committee published a paper on the value and threats to local parks. It included the following statement.* *"Parks and green spaces are treasured assets and are often central to the lives of their communities. They provide opportunities for leisure, relaxation and exercise, but are also fundamental to community cohesion, physical and mental health and wellbeing, biodiversity, climate change mitigation, and local economic growth"* *"Parks and green spaces matter. They make a vital contribution to many of our most important strategic objectives, such as climate change mitigation, public health and community integration. However parks are at a tipping point, and failure to match*

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		their value and the contribution they make with the resources they need to be sustained could have severe consequences. We believe that our recommendations will help to ensure that parks receive the priority they deserve, and to prevent a period of decline" *The above statement in its own right should be considered as justification for refusing planning permission as no viable alternate has been offered that is comparable with what local residents already have.* Jeff Morgan Comment submitted date: Tue 23 Jan 2018 Dated 23.01.18 I wish to lodge an objection to the following points. 1/ The planning application is in breach of the newly adopted local plan, as the local plan states in policy LLP6 that there should be no vehicle access from Eaton Green Road to Century Park except for buses and taxis. The planning application has a new link road from Eaton Green Road by Kimble Close to Century Park and the airport so breaches this policy. 2/ Document 17_02300_EIA DAS_Part 2-686521 page 36 or page 16/24 of the PDF makes the following comments on two diagrams of the landfill. During construction waste and contamination may be exposed which could cause odour nuisance / and or health effects to people in neighbouring areas. Waste may contain volatile contaminants which produce vapours. Potential risk to future users of the site. As waste decomposes gasses e.g. methane, which can build up to explosive levels in confined spaces. Piling through landfill can potentially cause downward migration of contaminants.

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		In the 1970's dilute and disperse landfill was considered acceptable i.e no liner on bottom of landfill so contamination can seep out of the base of the landfill. Ground water in chalk is highly protected in the area as it is the main source of drinking water. Settlement waste is uncompacted and has a high potential for immediate and long term settlement. Settlement could impact upon the integrity and proper falls of drains and other services. Pilling over and against the landfill will cause it to settle. Stability of chalk- the top of the chalk may be weathered and weak. Therefor may not be suitable for founding in. Large obstacles in the landfill could prevent piling to full depth. Sulphates in the landfill may attack and degrade the concrete in the piles. Development of site could change gassing regime. As the planning application has stated the dangers of building on this landfill, including further subsidence, deadly gases and odours that could affect the health of residents the application should be turned down for all of the above reasons Jeff I wish to lodge an objection to planning application 17/02300/EIA on the ground that it is in clear breach of the local plan that Luton Borough Council adopted on 7th November 2017. The strategic document quotes Policy LLP6 - London Luton Airport Strategic Allocation including Century Park where on page 38 the policy states the following regarding access: Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and

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		shall link Percieval Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency. Planning document KQ30131H168 shows a link with Eaton Green Road, which is also in breach of a planning condition when outline planning permission was granted to the original Century Park some 20 years ago. This link road will be used by cars and lorries trying to avoid parts of the A505 and the main access via New Airport Way, as this route is often congested. This will put considerable traffic on the local road network including Eaton Green Road, Wigmore Lane and Crawley Green Road that were only designed to handle local traffic. Also these three roads have three schools on them called Wigmore Infant and Primary School, Someries Infant and Junior School and Ashcroft Secondary School that will enhance the dangers of these roads to the general public including children. 24.01.2018 Added I wish to add to my objection that after reading a late report submitted into the planning application. A report called "GCC3 Ground Investigation Landfill" states on page 289 that: Borehole abandoned due to UXO at 2.80m depth on client's instruction. Borehole abandoned at 2.80m in concrete with a high UXO reading. Only a very few bore holes were dug on a relatively large site yet unexploded ordnance was found that hasn't been removed. This is clearly a safety concern, as the site is a former landfill site opened during the war that was located next to a Second World War airfield. The fact that a high reading was found in concrete suggests that this was a bomb dump that was capped in concrete. No one knows the complete picture of what was placed in this tip as it was unregulated. For that very reason this planning application should be refused on the grounds of safety.

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		Dated 04.10.18 Dear Mr Gurtler, I wish to further object to planning application 17_02300_EIA for a business park on Wigmore Park due to the answers provided in document 17_02300_EIA-Consultation_Statement_Addendum-769080 Eaton Green Road Access Paragraph 19 mentions estimated traffic conditions in 2031 when the business park would be fully operational but mentions nothing about the applicants own proposal to expand Luton Airport and the effects of a second terminal on traffic conditions in Eaton Green Road. Paragraph 22 "Despite a link road being a departure from Local Plan policy, the easing effect that it would have future traffic patterns is a justification for its inclusion within the application, and prevents severe impacts on the local traffic network". This statement is nonsense as it does not take into account new traffic that would use the link road from the A505 and A1 via Ashcroft Road and Wigmore Lane to access the business park and the existing and expanded airport. Car Parking 25. "The Century Park Access Road (CPAR) will provide easy access to the site from the A1081 and motorway" There is no mention about the more difficult access from the A505 and A1 using CPAR as this would involve joining the queue of traffic heading for the existing terminal along the original Airport Way, then taking the third exit at the Holiday Inn roundabout, which is the route to the M1 and then turning right across the dual carriageway. As this proposed new junction is very close to the existing roundabout traffic would back up and block this roundabout, which is no doubt one of the reasons why a new access point at Eaton Green Road is proposed. 26. "By adhering to the maximum standards set by the Council, this encourages a 'modal shift' across the business park, as visitors and staff members change the mode of transport for getting to and from the business park to a car alternative" This is Déjà vu, as the same logic and reasoning was applied to the TUI building at the junction of Eaton Green Road and Wigmore Lane when that was given planning permission. The result was a later planning application for an additional car park on Wigmore Park to serve this building, a further overflow car park on the top floor of the multistory car park at Luton Airport Parking and street parking around local roads. Loss of Parkland 33. "Policy LLP6E (i) states that "provision will be made to ensure that the scale and quality of open space and landscaping in the area is maintained, and if feasible, ensure that there is a net increase in open space provision". Whilst LLP6E (iii) requires that

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		"new open space to replace Wigmore Valley Park offers facilities of at least equal value". The Policy therefore recognises that land at Wigmore Valley Park will be lost in order to deliver employment within the Strategic Allocation which will contribute to the Strategic Objectives of the Local Plan" The old Centrury Park location already has outline planning permission. Using Wigmore Park will not create any more jobs than the original site would have. 35. "The total (existing) public open space allocation at Wigmore Valley Park measures 38.6ha, whilst the newly created open space, when added to the area of WVP which will be retained and enhanced, will measure 40.6ha. The proposed development will therefore create a net increase of 2 ha of public open space. This is illustrated in the 'Existing and Proposed Open Space' plan (Ref:)" LLAL have already announced their intension to build a car park on the new Wigmore Park as per their airport expansion consultation document making the above statement nonsense. Ecology and Trees 39. "The creation of New Century Park will result in the significant loss of ecologically valuable habitats within two non-statutory designated sites which will have a significant impact on protected species such as birds, great crested newts and invertebrates. Construction works will most likely temporarily disturb fauna due to light, noise and dust protected species. There may also be damage to habitats caused by accessing the site, the movement of movement of machinery and the creation of areas for temporary construction offices, machinery and storage" This statement alone is justification for refusing planning permission as Wigmore Park is a major established town park and County Wildlife Site. Opportunities for Enhancing Bridleways/Pavements 50. "A few comments queried if the proposal has fully taken advantage of the opportunities for new bridleways and pavements. The site is fully accessible to pedestrians, and wide pavements have been incorporated on all the roads within the Business Park. Furthermore, additional footpaths have been created to promote walking within the natural landscaping maintained within the Business Park but also linking up with the numerous footpaths created within the existing Wigmore Valley Park but also the extended replacement parkland, which will connect to the BW6 bridleway" The consultation documents, which supersede this planning application, show a business park on the fringes of an expanded

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		airport. Paths would lead only to airside boundary fences. 65. "A number of measures have been incorporated into the design in order to reduce impacts on views when the business park is constructed" LLAL are proposing a second terminal on Wigmore Park which would have a major impact on any business park that would be built around the edges. Disruption to Local Business 74. "For those buildings that are not proposed to be replaced, the jobs losses are minimal. This is on account of the buildings comprising of disused storage sheds which have been remained vacant for many years. The loss of 15 jobs is significantly offset by the creation of up to 3,724 Full Time Equivalent (FTE) jobs within the borough once fully operational" There is no guarantee that 3,724 jobs will be created or any more jobs that could have been created on the original Century Park site which the applicant has refused to build. Queries Regarding Prior Permission 75. "Queries have been raised as to why the Applicant is not implementing a previous consent on the site, which proposed a business park primarily storage and distribution units, accessed via a tunnel under the airport" 76. "The scheme proposed was in an isolated 'land locked' location which makes its viability fully reliant on a standalone transportation link like the highways tunnel link proposed. This link would start at the roundabout on Airport Way, take the form of a tunnel going under the Airport and resurface to the West of Century Park" 77. "Notwithstanding the complexity of implementing the tunnel, the proposed 'island' location of Century Park hugely limited its commercial viability and its detachment from the airport itself reduced the possibility of aviation linked businesses associated with the expanding airport taking residence there" LLAL proposal for the 2.1km dual carriageway actually made the tunnel solution redundant as the road crosses the airport. Instead of entering Wigmore Park the road could have followed the airport boundary to the old Century Park location. As the old Century Park location had a land border with the airport it would be no different than the new Century Park except it would not be suitable for a second terminal, which is really what this planning application is all about.
349.	Yes 9.8.18	Letter sent on behalf of our client London Luton Hotel BPRA Property Fund LLP, who are the owners of the Holiday Inn Hotel located on Airport Way, Luton.

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350.	Yes 9.8.18	SUBMITTED REP 2 IN PETITION SHEET
351.	Yes 23.9.18	I was disappointed that the revised plan for airport expansion has failed to take account of important elements pertinent to Wigmore residents. I have listed objections below: 19. Ecology: Luton Borough Council's own publications seek to promote parks. It has recently adopted the national 'parkscharter.org.uk' charter which states "embed effective protection from inappropriate development or use, or loss of any part of our parks." Translocation of wildlife habitats – whilst LBC claim to be able to undertake this, during the summer an attempt was made to translocate orchids in Wigmore Park but the "translocation of wildlife habitats guide for civil engineers" was not followed in that tubers were not placed end to end, were too small, and not watered in when we were in the midst of a heat wave. Personnel appeared unaware of up to date guidelines. I refer to the Luton Local Plan 2011-31 pages 76-88 whereby development ton open spaces should only be where it is surplus to requirements and only if equivalent type quality and quantity is given. You cannot build a car park on a country wildlife site and replace it with a former wheat field. The LLP also states that existing habitats and ecological networks are afforded protection from harm. The LLP recognises there is limited and deficient green space and yet state they need to promote biodiversity. They have a statutory duty to protect wildlife – see 40 Natural Environment and Rural Communities Act 2006 and Town and Country Planning Environmental Impact Assessment 1999. The replacement of open space mentioned in Antony Aldridge's letter, namely 'new public open space' is not by any means 'new'. This is an area I have walked with my family and my dogs for over 30 years – it has always been there. 19. Traffic: The newly created access from Eaton Green Road this is again contrary to the LLP. It is recognised by all who live in the Wigmore, Stopsley and outlying Beds and Herts villages that this will be a pull on traffic from the A505 Hitchin onto the surrounding residential roads which are already gridlocked at rush hour time. 19. Pollution: WVP has always been described as the bugger for pollution from Luton airport, however, as all local residents know you can often taste airport fuel in your mouth. Increase in traffic to access the Eaton Green Access would further add to the current ambient pollution that lingers in the air we are breathing.

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		Over the past few weeks there have been national reports regarding pollution links to diabetes and dementia, in addition to the well documents heart and lung conditions associated with poor air quality. 19. Need for business park: Since Monarch Airlines along with a number of other businesses have moved out of the airport land is there really a need to create a business park outside the current footprint? 5. Jobs: Top of Antony Aldridge's list for losing WVP was the creation of jobs, Luton is not a town without employment opportunities many vacancies have been unfilled for some time. Where will people come from, and where will they live, in a town that has under capacity for accommodation? 6. Sport England misrepresentation: The information regarding the loss of playing fields at WVP. Officially football has not been played for a number of years as Council didn't flatten out sunken areas of pitch but in reality informal cricket, rounders and multi-exercise and running groups are regulars. I understand the Council provided Sport England with a plan for mini football but that plan puts those pitches in the area for the business park. 7. Concurrent proposal for Termianl 2: I recognise that this isn't the remit but what is the purpose of spending huge sums of money with this plan when the ultimate plan is for a Terminal 2 to be built on the area. This is taxpayers money and I feel the Council are either hoping to confuse the local council taxpayers or have some devious planning strategy that requires outwitting the local community. I enclose for your information a booklet produced by our local orchid expert (the wild orchids of Wigmore Park).
ANONYMOUS RESPONSES		
1.	Yes 30.1.18	I have lived in the Wigmore area for ten years now , and have just found out about the possible development of Wigmore Park. I think we need to keep our park for the established trees and wildlife. I would like to register my vote against these proposed works .
2.	Yes 31.1.18	REPEAT OF REP 53

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3.	Yes 10.2.18	The email contained a series of lengthy objections (29 pages), which were then copied by others. These can be summarised as follows: 1. Alleges that London Luton Airport Freehold Limited was part of the application and LBC had allowed the Director of that company to use the name. 2. Quotes law in relation to the Regional Spatial Strategy, but also pointed out the development was in conflict with LLP6D. 3. Objects to the Council lending £300M to LLAL for the development. 4. Objects to the fact that no air quality monitoring is being carried out in the Wigmore area. 5. Objects to the application on the basis of the likelihood of unexploded ordnance beneath the landfill site and concerns about contamination and hazard. 6. Objects to the fact that Luton Borough Council as local planning authority will be determining a planning application being submitted by a private company wholly within the ownership of the Council (LLAL). 7. Objects to the unlawful disposal of public land (quoting Muir v Wandsworth BC 2017.
4.	Yes 10.2.18	I do not believe this New Century Park will bring any benefits to Luton due to the council's record on half baked schemes of the past. The ghost town of Butterfield Park stands testament to this and the once thriving community of one man/woman businesses in Power Court were compulsory purchased overnight and has been left as a decaying eyesore for 20 + years….I am not sure how much council tax money it cost to demolish the very prominent and dynamic looking 'Measurement Technology' building but this building was less than 30 years old.. Traffic too is a problem as those accessing a new park from the West will have to climb the clogged up Stockingstone Road., but more of a major concern is what is under the site, this was once the site of the original landfill tip as well as legend has it…secret experiments for the Blue Streak rocket of the 1950s.So heaven knows what is buried up there. There must a limit to what expansion can take place or is Luton and Hitchin going to be linked by concrete?
5.	Yes 12.2.18	REPEATS ANONYMOUS REP3 – unlawful disposal of public land
6.	Yes 12.2.18	REPEATS ANONYMOUS REP3 – unlawful disposal of public land
7.	Yes	REPEATS ANONYMOUS REP3 – unlawful disposal of public land

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	12.2.18	
8.	Yes 19.2.18	REPEAT OF REP 58 (AND REP 11)
9.	Yes 20.2.18	I would like to object to this development
10.	Yes 21.2.18	I am writing to strongly object to the planning application 17/02300/EIA for the following reasons: The building of new roads will, I feel, create more congestion and pollution in an already overdeveloped area of Luton. The piling and drilling of the old tidy tip and other areas has been identified as causing dangerous hazards to health for local residents. Development of the airport will increase air and noise pollution which is detrimental to residents health and wellbeing. Most important of all to myself as a parent is the development and destruction of Wigmore Valley Park which is a wonderful local green space for residents that was gifted to the people of Luton. It is an area of natural beauty and home to an abundant variety of wildlife. I have visited this park all my life and have many happy memories of time spent there. As a parent, I am concerned about my daughter growing up in an area where there is a paucity of open green park space for her to run around and play in. I do not believe that the alternative suggested by planners will be sufficient for the volume of residents in the local area. The next nearest wide open green space would necessitate travelling in a car or using public transport which is worse for the environment.
11.	Yes 22.2.18	I object to the planning application under this reference to significantly alter and increase the vehicle movements. To further aggravate the already heavy pollution that is being produced by Luton Airport activities and to assist enabling even further expansion of these activities. Commercial interests are again being put ahead of the quality of life for those living and working in and around the area. There appears to be little, if any, regard for the environment with Luton already heavily congested . The further expansion of the airport and surrounding area are simply not supportable when the basic site is entirely unsuitable for an airport as large as Luton has become.

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12.	Yes 22.2.18	Please note and acknowledge my objection to application 17/02300/EIA
13.	Yes 25.2.18	I disagree with the principle of this proposal. I feel it is inappropriate and that the use of this land should not change
14.	Yes 24.2.18	REPEAT OF REP 168
15.	Yes 27.2.18	I hereby object to the proposed development of Wigmore Valley Park into Century Park My reasons being: Loss of green recreational space for locals of all ages. Remove this and what is left? Hardly anything. Loss of habitat for bird life. Once destroyed the birds will have no nesting sites and will be lost for ever. Loss of habitat for mammals- from small to large including badgers and foxes. Loss of trees that clean up the environment so close to the airport where pollution is high. Loss of habitats for butterflies that come for the diverse flora. Congestion on already busy roads which combined with the proposed new houses will be gridlock. You may not be bothered about a few trees, birds, wildlife but they are our grandchildren's heritage and we are destroying it for people who will come from outside the area contribute nothing to our local economy but take our green space.
16.	Yes 18.3.18	I formally wish to reject the parking plans for Wigmore and I formally object to the access road for the new Industrial Estate leading onto Eaton Green Road.
SECOND CONSULTATION FOLLOWING RECEIPT OF FURTHER INFORMATION		
1.	Yes 28.8.19	1) Traffic in Wigmore is bad enough as it is, especially in the commuting hours. A further expansion of the airport and/or business area on Wigmore valley park will further add to those problems. I understand a traffic survey was done but during the period of holidays and Asda being burnt down, so not a true reflection on the heavy traffic. 2) The destruction of park land, with well established wood land and wild life should not be done, full stop... I believe this area is listed in the wildlife conversation zones. 3) The concerns of toxic contamination due to any works being done on a land fill site.

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		4) The concern of methane being released from the landfill once work starts. 5) The concerns you will find unexploded WII bombs 6) Increased noise during the works, and indeed after completion 7) Increased pollution during the work and after completion. This is a great concern to the surrounding community and local schools with small children. 8) Concern of more people parking their vehicles in the surrounding housing estates for the LLA and/or business area.
2.	Yes 30.8.18	1. ACCESS ROADS. There is proposed access from Eaton Green Road. Access from this road is specifically prohibited in the Luton Local Plan, a plan which has only just been adopted. The access to the Century Park must be through a separate and adequate new road. 2. COMBINED EFFECT ON WIGMORE Century Park is also linked to proposals for a major expansion to the airport. North Herts is still considering a massive housing development on greenbelt land to the east of Luton. There are also proposals to build a giant incinerator on Lower Luton Road. The overall combination of these developments is simply too much pressure on traffic, environment and public services in Wigmore.
3.	Yes 13.9.18	As a group recognised in the planning application and formally consulted with on two occasions by LLAL and members of Luton Borough Council we wish to put in a consultation letter. Unfortunately we were not written to as part of the planning application consultation but we request that our letter be acknowledged as consultees for the planning process. We act as a representative committee for the Friends of Wigmore Park a group that has over 1300 members. REPEAT OF REP 326 (FoWP)
4.	Yes 13.9.18	I wish to lodge a serious rejection of all plans as described on the planning application web site 17/02300/EIA. I am attaching a press release describing the dire state of air pollution in Luton today. Luton needs more green spaces and mature trees to help clean the air that is being constantly polluted by aviation activities on the ground and in the air.

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		Century park is now an established green space with mature trees, grassland and habitat for wildlife, thus creating a mini lung for the immediate area. Trees take 25-30 years to mature enough to convert unclean air to clean air. Removing the present trees and dislodging the soil will release all the carbon they have been storing for our protecting, thereby increasing the already high CO2 levels produced by fossil fuels in Luton. Kerosene from planes now becoming the largest producer of CO2 which is warming the planet at an alarming rate. DO NOT REMOVE ANY TREES! The roads around Luton which already suffer a high density of traffic can not take any more. The local population do not want to, or should have to, live on rat runs. We have been living near Luton for 28 years, and over the last 5 years traffic and planes have increased beyond a reasonable amount, blighting our lives with noise and fumes. Luton is one of the most congested towns in the UK, more building is a very dangerous plan for the health of the local community and the planet at large. Economic growth is now not the priority, the health of our planet is, Future generations will not be able to exist in the SE of England because of severe over building creating flood risks, poisoned under ground water, over crowding, no green areas to enjoy and breath. I could go on, but I'd like you please to read the enclosed press releases instead. Thank you.
5.	Yes 4.10.18	I wish to further object to planning application 17_02300_EIA for a business park on Wigmore Park due to the answers provided in document 17_02300_EIA-Consultation_Statement_Addendum-769080 Paragraph 19 mentions estimated traffic conditions in 2031 when the business park would be fully operational but mentions nothing about the applicants own proposal to expand Luton Airport and the effects of a second terminal on traffic conditions in Eaton Green Road. Paragraph 22 "Despite a link road being a departure from Local Plan policy, the easing effect that it would have future traffic patterns is a justification for its inclusion within the application, and prevents severe impacts on the local traffic network". This statement is nonsense as it does not take into account new traffic that would use the link road from the A505 and A1 via Ashcroft Road and Wigmore Lane to access the business park and the existing and expanded airport. Car Parking

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		75. "Queries have been raised as to why the Applicant is not implementing a previous consent on the site, which proposed a business park primarily storage and distribution units, accessed via a tunnel under the airport" 76. "The scheme proposed was in an isolated 'land locked' location which makes its viability fully reliant on a standalone transportation link like the highways tunnel link proposed. This link would start at the roundabout on Airport Way, take the form of a tunnel going under the Airport and resurface to the West of Century Park" 77. "Notwithstanding the complexity of implementing the tunnel, the proposed 'island' location of Century Park hugely limited its commercial viability and its detachment from the airport itself reduced the possibility of aviation linked businesses associated with the expanding airport taking residence there" LLAL proposal for the 2.1km dual carriageway actually made the tunnel solution redundant as the road crosses the airport. Instead of entering Wigmore Park the road could have followed the airport boundary to the old Century Park location. As the old Century Park location had a land border with the airport it would be no different than the new Century Park except it would not be suitable for a second terminal, which is really what this planning application is all about.
6.	Yes 14.9.18	The excess vehicles on the road will further increase pollution around the area along with possible airport expansions and new homes therefore making heavy vehicles a regular occurrence and the noise created will be detrimental
7.	Yes 19.9.18	The building of the industrial park with the intended roadwork's goes against all the evidence that is now coming into the public domain. The evidence that pollution from vehicular traffic is causing unnecessary deaths from inhalation of nitrogen dioxide and sooty deposits from diesel vehicles would seem to be proven. New studies point to this pollution being the cause of 60,000 cases of dementia within the U.K. The very make-up of the proposed industrial park would point to the majority of the vehicular traffic being of the diesel type. This proposal with the intended building of some two thousand homes in the next county, which will inevitably use the easiest route to the M1, via the proposed new road, will mean a large increase in the pollution in the area. In addition it is the intention of the airport to double the throughput of passengers in the next few years. This means a vast increase in exhaust pollution from this source. When all over the country councils are seeking to mitigate pollution I cannot understand why this council seeks to introduce a new industrial park, increase throughput of the airport and apparently does not take into consideration other building that will add to the pollution problem. This does not even go into the fact that the land to be used for this project is one of the last pieces of wild land in the Luton area and is enjoyed by the local people. I believe that Luton has the least amount of green space in the whole country. To use this land for the proposed purpose is surely wrong. In five or ten years when people look back they will ask how this could even have been considered.
8.	Yes	1. The site description in application is incorrect. The site described is not Century Park, this is a small part of this current application, to East of Wigmore Valley Park.

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	1.10.18	All documentation for this application by Luton Borough Council, and London Luton Airport Ltd, gives name of site as New Century Park, encompassing Wigmore Valley Park, new site, and the actual Century Park site. As this is not specified in this application still using Century Park name, the application is incorrect in wording. 2. The listing of areas for development is incorrect, and does not specifically name areas shown for development. President Way will form the Eastern part of the Century Park Access Road. At no point in either description 1 or 2 of this application, is this road specifically mentioned for development. Application should be denied as it does not contain specific mentioned to developments of President Way. 3. The Century Park Access Road must be denied planning permission on environmental and health and well being grounds. The applicants own findings show that this road will not be fit for purpose before it is even built, as it will have congestion bottlenecks, and will produce pollution levels of the worst loadings. The applicants answer to this is to build an access point onto Eaton Green Road.This link has already been refused on original plans as against Luton Borough Councils Local Plan. This and other local roads are already subject to congestion and dangerously high pollution levels from airport related traffic congestion, and any new routes will obviously increase this to unacceptable levels. New Airport Way was built to take airport traffic out of neighbouring residential areas, these roads will bring that traffic back, so approval must be denied 4. This application should be refused as it involves the development of mature community green space, contrary to Luton Borough Councils Green Space Policy. They quote in numerous documents and surveys, that the town does not have enough community green space for it's population density, and that the retention of all green space is a priority, for the health of it's residents. On the grounds that this application consumes a huge area of such space, it must be denied in line with local government policies. 5. This application should be denied as it makes knowingly fraudulent claims on replacement green space provision. The detailed replacement green space, is already shown in London Luton Airport Ltd development consultation literature, to be consumed by future airport expansion. Any new grassland/woodland will be consumed long before it reaches the diversity and maturity of the current Wigmore Valley Park.

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		6. The application should be denied, as in light of the latest resident letter from Mr Aldridge on behalf of London Luton Airport Ltd re their application, the project has moved from local employment creation, to road and car park creation for current airport use and future expansion. The letter clearly states that the commercial development will only be commenced in 2020 "subject to market conditions". So the prime driver, employment for local residents, is now the last objective behind new road access to car parking for airport use. The application should therefore be denied under a change of use which is not specified in this application notice. 7. the application should be denied as it takes place on a site that the disturbance of, could be seriously damaging to local health. The site is on the old municipal refuse tip, in use for 40 years, taking all manner of domestic and industrial waste. Construction on such sites is advised against by governmental and industrial bodies worldwide, as the gases and pollution released can have extremely hazardous to health. Developments on the edge of the site, have had to include noxious gas monitoring as standard, to ensure the well being of staff. 8. The application should be denied as all could be achieved on existing brownfield sites, within the current airport footprint. The are large areas of derelict land and disused buildings along Percival Way, to enable an expansion of business use within that existing corridor. Saving valuable green space, and keeping traffic levels within the airport footprint.
9.	Yes 28.9.18	I have read the proposals for Luton Airport expansion and wish to register my concerns. Currently, aircraft arrivals to Luton Airport are designated on low noise routes and a holding "stack" clear of residential areas to the East of the airport. Unfortunately, aircraft are usually "radar vectored" over towns in Hertfordshire notably Letchworth, to avoid putting them in the designated holding pattern and provide a short cut to final approach. This results in additional and unnecessary noise over built up residential areas. Air travel will inevitably grow and it is vital to consider the impact of disregarding the approved arrival routes. I ask that stricter guidance be adopted by air traffic control to revert to the published arrival routes for Luton Airport to avoid the adverse effects of any approved planning application.
10.	Yes 28.9.18	I am writing to register my objections to this planning application and is in addition to my earlier objections sent to you by mail on 25.2.18. Firstly, I was somewhat surprised to receive your notification dated 24.8.18 of this application after the disclosure by LLAL in the summer of their plans to use this location for the proposed site of Terminal 2 and a range of ancillary works, etc. A development

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		that had been kept secret by various parties from local residents, including the Council. So is this application just a ploy to deflect the amount of criticism expressed by residents and others, to cause confusion regarding the proposed expansion of the airport, or are these proposals for Century Park an opportunity for LLAL to use this application to commence works for Terminal 2 under the guise of a Business Park? If the Park was approved and built it would surely only need to be demolished again. So what is really going on? The height of stupidity for one, I would have thought. This application should be refused on the following grounds: REPEAT OF REP 348 Many of these points will be reiterated in other objection letters you will no doubt receive. In conclusion, residents do not want the loss of Wigmore Park when I'm sure there are other more suitable alternatives for a few industrial units, without the loss of a much needed natural amenity and green space, which with a little imagination from Luton Council could be made into a rich habitat for wildlife. This space is a vital buffer between where people live and an aiport which has become more obtrusive in recent years.
11.	Yes 1.10.18	I wish to object to the planning application on the grounds that there will be increased environmental, noise and air pollution. In addition I object to the destruction of Wigmore Valley Park. I have lived in St Albans since 1975 and over the last 5 years the increase level of aircraft noise has been unacceptable. Any increase in capacity at Luton Airport will have a detrimental effect on the existing level of aircraft noise and pollution. Further development of the airport will in turn place additional burden on the local network of roads which currently struggle to cope with the volume of traffic generated by the Airport.
12.	Yes 3.10.18	I wish to lodge a strong objection on behalf of my wife and myself to any further expansion/development of Luton airport. The objection is on environment, noise and air pollution grounds.
13.	Yes 4.10.18	As your website to object to planning permissions is not working properly I have had to resort to sending you an email as I wish to raise 2 objections to the planning reference 17/02300/EIA on the grounds of design and self interest. 1 A major study published by Kings College London (Senior author Frank Kelly) on the 19th October 2018 suggests that air pollution could be responsible for 60000 cases of dementia in the UK. It further states that scientists found that people living in areas polluted by traffic and industry were 40% more likely to develop dementia. It also stated that it is increasing appreciated that the impacts of air pollution on health are seen far beyond the lungs. As in the short to medium term you intend to destroy trees and shrubs around the Wigmore area and only replace them with inmature plants this will have an increasingly detrimental effect on all the people living near to the proposed development. The propasals need to include a considerable increase in the

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		planting plans. 2 The second objection is relating to the council voting on its own plans. For any of these plans to go ahead the proposals should be overseen by a higher authority not the people who want the changes. You can dress it up as much as you want it's still the council's plans. As you will almost certainly be going ahead with these plans as per your planning application, you will be subjecting the people of Wigmore to a life of pollution, bad health, and grime from the bad air quality you will bring down on the area
14.	Yes 4.10.18	In respect of the massive purchase of land surrounding Luton Airport ... for more expansion eventually of the airport ... NO NO NO ! The local districts just do not have the capacity or the infrastructure to substantiate such expansion - a (planned) dual carriageway would not be sufficient for the added traffic. No room for more trunk roads. And, our local roads already struggle. Think carefully Luton ....
15.	Yes 3.10.18	I refer to the letter in this week's Stevenage Comet by Chris Haden saying that Luton Airport and Luton Borough Council are planning to build a dual carriageway through the airport, which will destroy Wigmore Valley Park and allow Luton Airport to expand even more by building a second terminal. I assume you have read the same letter. Mr Haden is rightly very worried that this whole thing will have a really bad effect on the environment by ever increasing pollution levels in the area. We know that already 40,000 people die every year because of pollution, and the more we carry on expanding airports and building motorways etc, the more diseases such as diabetes and cancer, and the more people will die every year. The Health Secretary, Matt Hancock is quoted as saying "I'll go round the world looking for the best technology to save lives." Poor Matt Hancock! It's not going to be technology that saves lives with airport developers rampaging around! Why is it that such developers and big business generally are so disinterested in the environment, climate change, and the welfare of people generally? If Brexit goes ahead it might turn out to be a great big white elephant. There won't be so many people coming or going via Luton Airport. And if Ryan Air is already struggling, you might find that WizzAir pulls out of Luton altogether. So PLEASE, for the Planet's sake, for all our sakes, STOP NOW! DON'T DO IT!

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16.	Yes 4.10.18	I am lodging my objections to the Century Park Development in Luton on the grounds of the impact of noise, air pollution, lost sleep and possible health implications to the almost one million people living in the towns and countryside near Luton airport. The constant drone of aircraft starting at 5:30am, continuing all day and going on past midnight is just awful. Add to that the cargo planes flying in and out of the airport in the early hours, this is making our lives pretty miserable. I urge you to abandon these plans.
17.	Yes 11.10.18	Firstly, the back of my apartment faces the A505 which is heavy with traffic throughout the day and night. Creating more offices and jobs at the airport would pull in more traffic along the Hitching road, more noise, more pollution. As it is we are opposite the crematorium. Secondly, across the road to me is Butterfield Green with lots of unoccupied fairly newly built offices, These should be occupied first of all. People working there from the Hitchin side of town would not have to pass my end of the A505. My appartment block is occupied by elderly retired people and we are all very vulnerable to the pollution when we open our windows in this area. The views of current residents must be taken into account and not exacerbate our failing health.
18.	Yes 11.10.18	Having read and studied numerous documents I believe this planning application should be refused on the following grounds: REPEAT OF REP 348 The transport assessment also claims that the development contributes to health and wellbeing whilst protecting and enhancing biodiversity. This take on the proposed benefits of the development are repeated through many of the the council's publicised documents and yet the council is not taking serious the dangerous high levels of pollution already occurring in the area of Luton. We are told they are to measure pollution with most sophisticated equipment made available to them at great cost and yet to date this exercise has not commenced. This is not a council that can be taken serious on its promises to look after health and well-being for the community and residents of Luton. From a personal perspective I can say my health has been compromised by pollution in Luton. At a local community meeting on Monday 8/10/2018 members of LLAL and the council attended. The expansion of the airport was rightly discussed amongst other issues and in particular the new DART transport system. On the current figures available around 16.5 million passengers now use the airport. Of this total total just 15.7% (2,590,500) use the train and the shuttle service from Luton Parkway. This leaves 13.9 million people arriving by road. It is a known fact that motor vehicles are probably the single biggest polluter and yet expansion will encourage more vehicles.

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		If ultimately the airport builds a second terminal these numbers are set to become massively significant and in a bad way. Assuming the number of people that use rail does not alter significantly and based on the projected 38 million passengers using the airport that would leave over 24 million people attending the area by car.This is an increase of 75% and yet the council wants to build more car parking spaces rather than discourage drivers. This is for one reason only. MONEY. It cannot be right that the monetary gain is valued more than the health of of the community. The resultant impact will be to have an adverse effect on the health of the community, not forgetting the many thousands of visitors and workers at the airport. Recently the House of Commons Communities and Local Government Committee published a paper on the value and threats to local parks. It included the following statement. "Parks and green spaces are treasured assets and are often central to the lives of their communities. They provide opportunities for leisure, relaxation and exercise, but are also fundamental to community cohesion, physical and mental health and wellbeing, biodiversity, climate change mitigation, and local economic growth. "Parks and green spaces matter. They make a vital contribution to many of our most important strategic objectives, such as climate change mitigation, public health and community integration. However parks are at a tipping point, and failure to match their value and the contribution they make with the resources they need to be sustained could have severe consequences. We believe that our recommendations will help to ensure that parks receive the priority they deserve, and to prevent a period of decline". The above statement in its own right should be considered as justification for refusing planning permission as no viable alternate has been offered that is comparable with what local residents already have. Lastly having registered my objection to this application I feel that this matter should be referred to the Secretary of State for Transport. It cannot be right that Luton Borough Council intends to deliver a decision on what is essentially its own planning application which if granted without being challenged will have enormous ramifications on this part of Luton which accounts for 20% of the town as a whole. Cc Secretary of State for Transport - James Brockenshaw Cc The Planning Inspectorate
19.	Yes 11.10.18	Wigmore Valley Park is a vital and much used community asset. The park not only provides important social and recreational facilities for many people in Luton and local surrounding areas. It also contains a County Wildlife Site with important varieties of fauna and flora that should be protected (many of these are rare.). Finally, and very importantly, the park provides a buffer regarding sound and chemical pollution between the built-up areas and the airport; the park therefore provides a incredibly

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		important element of protection from the worst excesses of these. From what I understand of the planning details that I have had access to, the planning application fails to take all the above into consideration. A replacement park should be like for like in terms of what I've described above. That includes fully the recreational and social function, ecology role and facilities. I've seen no evidence that any replacement park will provide that. For example, the application still supports the loss of playing fields with no alternative proposed. The replacement Wigmore Park has no provision for playing fields, as the land is not flat. Most importantly, the role in terms of the noise and pollution buffer would be gone. The same with the protected species of fauna and flora (I was really very disturbed by the relocation of the orchids; the way it was done was really not right at all; it was illegal). A key factor of the planning application is the new Wigmore Park being created. The application's detail is of a park created next to the existing Wigmore Park. However, this will not have the trees and scrubland; the fauna and flora will have nothing at all of the same environment in which to thrive as they do now. The revised planning application still involves the loss of most of the County Wildlife Site and the admittance that it cannot be replicated at a new site. The application also admits there will be no replacement grass wetlands. Nothing in the revised application satisfies policy LLP29. The application still does not address policies LLP6(D) and LLP27 for the provision of open space and sports pitches and that the influx of new workers would not have any sports facilities that they could use. The replacement trees are shown in locations that the applicant wishes to expand the airport and its associated infrastructure into, so if they were planted they would be removed if LLAL were successful in their desire to expand the airport using its preferred options. The new park is planned as a featureless farmer's field. Yes, not ideal for a replacement Wigmore Valley Park but perfectly ideal as a car park; which I believe is the real purpose of that planned replacement park. Yet more duplicity. The applicant has no desire to follow its own planning application if approved So, as I've said, it has come to notice in the 'consultation' (I use that word euphemistically here) that the applicant is intending to use the location of the New Wigmore Park as a site for a long term car park for airport expansion. Trust is vital here. There is no evidence we will have a park in the end. The park must be protected for all the reasons I've mentioned. Another example is that the country wildlife site will be destroyed for redevelopment: the applicant has published consultation documents that show a Terminal 2 located on the remainder of the country wildlife site. The fact that this hasn't been mentioned in this planning application should vitally be taken into consideration. It is transparent to me the underlying (but not expressed in this application) plan is for airport expansion which includes building on the country wildlife site. I am very clear in my mind that the statement that "the largest and most significant part of this site will be kept and incorporated in the proposed scheme" is deliberately deceptive, as the majority of the country wildlife site will become a car park.

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		The convoluted and contradictory plans set out in the 'consultation' had very limited meaning in substance. Everything was 'proposed this or that ?.' and similar expressions. There's nothing solid to grasp on. What we were shown then would most likely be completely different in reality a few years down the line. For example, I asked a man who had 'Planning' on his I.D. label if he could show me on the blown-up photograph of the airport and surrounding areas where the proposed business park (Centenary Park, if I remember correctly) was going to be and he said he didn't know. I believe the reason for him saying that was because he didn't want to tell me it was planned to be on Wigmore Park i.e. that they were trying to keep the fact that Wigmore Valley Park was going to be developed away from what they thought were naïve public. However, it's my belief that actually building Terminal 2 is what this is really about. This is not mentioned in the planning application. Why the duplicity? This will be the real reason why Wigmore Valley Park is being taken from the people of Luton and local areas' usage. The proposed business park already has outline planning permission on land that has a boundary with Luton Airport. A physical connection to the airport was given as a reason for using Wigmore Valley Park. Similarly intentionally duplicitous for the same reason is the fact that the planning application seeks full planning permission only for a dual carriageway, a link road from Eaton Green Road and the construction of airport related parking. The only reason for this application is to build infrastructure to support a later planning application for the expansion of Luton Airport. It is not about the construction of a business park. The application sets out to deceive. The link road from Eaton Green Road is contrary to policy LLP6 which was only adopted late in 2017 and remains in the latest amended applications. Anyone who lives in the area local to the airport knows full well how congested the roads get, leading right from the M1, from the Bedford Road side (and even through the countryside it can be challenging). These areas would be further congested and that is a very core reason why the application should be refused if the planned link road from Eaton Green Road remains. Everywhere around the local areas and more widespread would become seriously congested rat-runs. I already have to zigzag at times, during the mornings and evenings especially, just to get to the M1, Harpenden, Bedford Road area, etc. There are schools that already lead to very congested passageways for traffic and public even trying to walk past these. The area was not designed for such massive amounts of traffic to be using it. Everything is too compacted and impacted. Ashcroft Road, Wigmore Lane and Eaton Green Road are already rat-runs for traffic from the A505 and A1 but would be considerably more so for not only a business park, but also for a Terminal 2 and even the existing terminal. Road junctions associated with access via Eaton Green Road will be over capacity and that doesn't take into account the applicant's plans to put a terminal for up to 22 million passengers opposite this entrance. Once this link road is built there will be a point of no return with the predictable traffic impact when they build Terminal 2 (the real reason for the link-road, as if we don't know). The construction of the dual carriageway will result in the loss of many company car park spaces that will be replaced by car

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		parks on Wigmore Park and is contrary to policy LLP6. On top of the congestion we have the further problem of added noise and chemical pollution. Luton is seriously polluted already (to illegal levels in some parts) and this along with the airport industrial and airplane noise and chemical pollutions will create a massive problem for the people in these areas that will cause health problems to be very much worse than they are now. I don't claim to be an expert on the toxic waste that's buried underneath parts of the airport and park domain. However, digging has already begun in some parts (without the planning permission having been granted yet?), causing serious concern. The waste is unregulated and risks being exposed, as it was when past works were undertaken. This could put the public in danger; and there are no guarantees that additional contamination would not occur. It has also been noted that (recent work undertaken) bore hole and test pit dig samples of waste were discovered outside cordoned off areas. The application has not dealt with the fact that the existing park sits higher than many residential roads that front the existing park so any new buildings will dominate the landscape. This will be in part due the removal of a wood of mature trees bordering Eaton Green Road that would be cut down to facilitate the construction of the Eaton Green Link Road. The Transport Assessment makes no mention of a second terminal or the plan to add up to 22 million passengers to that second terminal. This is despite the applicant promoting a second terminal in their own consultation for airport expansion. Also it does not take into account additional traffic generated by the airport or from the Bloor Homes and Crown Estates developments making the application untenable. Traffic modelling has ignored existing traffic congestion or the impact from a second terminal. This should be included as the applicant is also the sponsor for airport expansion and has made reference to the new road as a gateway to terminal 2. It should be noted that the proposed dual carriageway/Eaton Green Link Road is already one of the reasons LLAL is justifying a terminal on Wigmore Park. LLAL cannot promote a route in a consultation while at the same time ignoring its own consultation when it seeks planning permission. This is just another example of the applicant withholding key information that will give false traffic forecasts if it is not included. So, the revised application is still in breach of the local plan, as it still contains a link road from Eaton Green Road, which is in breach of policy LLP6D(i). Highways England have not been approached for comment about the new dual carriageway potentially serving terminal 2, which is the clear intention of the applicant. This omission need to be urgently addressed.

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		There will be major disruption to the airport operator, local businesses and residents if the dual carriageway receives approval. One of the justifications for the business park is to create jobs yet much of the existing land LLAL owns behind Percival Way has been derelict for years with no attempt made to create jobs within it. The dual carriageway will cut through much of this derelict land that could have been redeveloped. The above statement in its own right should be considered as justification for refusing planning permission as no viable alternate has been offered that is comparable with what local residents already have. In summary, I am very much against the application as it stands. I believe that much of what is proposed is unnecessary and alternatives can be achieved. The 'consultation'; and other engagements with those involved have been a dishonest process with real intentions clear to me but unexpressed by those presenting. In that sense I do not feel properly consulted with. The planning application itself is deceptive. What is really planned is not in these plans. It is my firm belief that these plans will do immense unnecessary harm to the local area; including Wigmore Valley Park and the areas around it. All of this is part of a large but not well joined-up or communicated complex of developments planned in Luton and the surrounding areas that will cause significant increases in chemical and noise pollution, traffic jams and journey times, and further stress the areas around the airport and further afield including routes into Luton from various directions. The airport itself is very close to built-up areas and those areas are too compacted for such expansion. The risks of the works in terms of disturbing the toxic waste buried in the airport area and the park area are considerable and seem to be being done in a way that would not meet my expectation in terms of protecting the public or even the workers around there. There are alternative routes that could be developed for the road building project, if that did have to be done. The destruction of Wigmore Valley Park though for me is the biggest concern. There are clear alternatives to this but people are not being listened to. The park for me has the most vital function of providing a noise and chemical pollution buffer and that is crucial. On top of that we have the wildlife site and the recreational purposes which are fully utilised by people, animals and flora. Under no circumstance can I support this application as it stands. I wish to make it crystal clear that I am not against development or the promotion of Luton as a prosperous and energetic domain. What I am against is the plans that are false. Two things to ask in the most earnest way; 1: ask the planners to go back to the drawing board and come up with an acceptable and honest upfront alternative; 2: Save Wigmore Valley Park for the people of Luton and surrounding areas.
20.	Yes 12.10.18	REPEAT OF REP 257
21.	Yes 12.10.18	REPEAT OF REP 257

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22.	Yes 29.10.18	The access road and Century Park has once again raised its ugly head and I have to comment as a resident of Stopsley and on behalf of the residents of Wigmore as their Councillor. 1 OUTLINE PLANNING PERMISSION FOR MIXED EMPLOYMENT. I ask that you explain why this vast additional space is required when, looking around Luton, many existing office spaces etc are left empty. As an example, Butterfield Green was designated for offices and small industrial units many years ago and only part of that acreage has been used whilst existing offices lie empty. The plans for Century Park have insufficient parking spaces for employees. Wigmore residential streets are already congested because office workers and holiday makers leave their cars on our roads and get taxis to the airport. Please explain how you propose to mitigate the increased risk to residents. Equally important is the loss of the valuable community space at Wigmore Valley Park. It is home to a wide variety of wild life, plants, and trees and provides a recreational space important for health and well being. It will take at least 30 years to recreate to a similar habitat not only for wild life but for residents alike. This area acts as barrier to the fumes that are produced by an increasing number of aircraft taking off 24 hours a day. At this point I would also like to mention that the Orchids, some very rare, were removed during the heat of a hot summer and placed elsewhere, without water or care. This demonstrated a clear disregard to the environmental impact of the proposal. Residents are extremely concerned about this lack of care and any future planning of the park. If Terminal 2 and and a smaller mixed employment area were planned in a different position it would be possible to avoid Wigmore Valley Park. 2 ACCESS ROAD TO CENTURY PARK This road was not on the original plans and is causing great concern to the people that use the road to get to Luton, M1 and Airport. The roads leading on to Eaton Green Road are already congested at peak times. There are 5 schools in the area and I, along with residents, have great concern for the welfare of our children who are vulnerable at an early age to the pollution already being caused.. The traffic comes from Hertfordshire, Ashcroft Road, Wigmore Lane, Lalleford Road and the A505. Ideally the road should come off the A505 along Airport Way. This road was originally designed

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		to be a dual carriageway. Wigmore and Stopsley Wards have not had appropriate Air Quality monitoring completed for all the particles of concern to health and now with the Airport expansion it is even more critical. On behalf of residents and the users of Eaton Green I ask that you rethink the present plans proposed.. I will make every effort to encourage the residents to write to the Secretary of State for Transport stating their concerns.
23.	Yes 9.10.18	This planning application should be refused on the following grounds: Protecting our environment. Wigmore Valley Park is a much loved community asset containing playing fields and a County Wildlife Site. By building an unnecessary road and buildings, this planning application contributes to the health, noise, and environment issues that currently exist in Luton and surrounding areas. It will also contribute to the global warming issues that the world faces which has been widely reported this week. If you know someone who has suffered from a lifestyle change, such as obesity, diabetes, diseases of the cardiovascular and nervous systems, cancer, reproductive and mental health problems, asthma and allergies, then stop and prove that this development won't contribute towards that. This week there has been lots in the paper about the IPCC research into Global warming. Stop this planning application. How would you feel if in 40 years time your children or grand children ask you why you supported this planning application, when they could be suffering as a result? Perhaps your justification would be that it is so small a planning application that it would have made no impact to the greater picture, however we all know that's not the case, as the planned airport expansion would take full advantage of what is agreed now. Increased jobs, revenues and economic growth don't compare with the misery to be faced by the health and environmental issues that could result as a result of this planning application. Think of tomorrow and the ordinary person in the street, not those who would financially gain.
24.	Yes 10.10.18	I would like to oppose this application for these reasons: 1. The roads cannot cope presently with the traffic situation. The road system is a bottle neck in this area and will only get worse with the increase in airport passenger numbers. More passengers, more cars, more car park space required! As Luton lacks land for development, surely multi-storey construction is much more sensible than huge areas of open parking taking up so much space? Also park and rides could be used at areas at which the traffic enters Luton from the motorway and other main road connections.

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		2. Wigmore Park is a much needed green area for Luton containing many species of wildlife now under threat as the British countryside is being destroyed and ruined by development at a rapid rate. Luton is already one of the most developed towns in the country and one of the worst in the country for natural green areas, which is not good for the people living here. 3. The land on which Wigmore Park is situated is a former landfill site and recent borehole drill tests that were completed in the summer, have left the park with numerous pipes protruding from the ground. These pipes are open to abuse from the public and also a threat to the public. There has already been one pipe knocked from its fixing, leaving internal tubes and pipes exposed. I refer to pipe WS218 (reported to police and council) Also keys left bby pipes and lid open. (Pipe WS217B) Unreported. I myself locked this lid and removed keys from site. As WS218 was damaged I only reported this case. But a worrying lack of security being observed regarding these structures that are placed all over the park as it seems they can easily be knocked over and unsecured. 4. With recent findings by Climate Change Scientists that we have to stop polluting the atmosphere or risk Global Warming and face terrible consequences in the future for our planet, there needs to be a decrease in carbon emissions, not an increase, which this development will bring with increased flights and added traffic. 5. Health problems will increase and more costs for NHS. We need Green solutions to these problems to improve the lives of people, not create worse ones.
25.	Yes 11.10.18	Photographs provided re WS218 damage
26.	12.10.18	Breach of NPPF guidance in terms of air, noise, water integrity and ground stability. Within the UK is the National Planning Policy Framework states Government Policies to govern planning and development decisions, including yours'. It was recently updated and the latest version as of July 2018, was issued by the Ministry of Housing, Communities and Local Government. These are rules to be followed by both Local Authorities and the Planning Inspectorate. What does the National Planning Framework say about air pollution, noise pollution, water pollution and ground stability? These are all concerns due to the fact your chosen site is on top of a massive unlined toxic landfill, above a vast groundwater

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		conservation zone, providing Thames Valley much of its potable water for distribution hundreds of kilometres around. NPPF - p.49 "15. Conserving and enhancing the natural environment 170. Planning policies and decisions should contribute to and enhance the natural and local environment by: e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans…." The Planning Application for New Century Park, AKA Terminal Two via the Backdoor, definitely flouts this workable advice because it swivels the policy to the absolute polar reverse. Instead of "preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability." ….this development application would enthusiastically bound towards catastrophe, it would "ensure new and existing development contributes to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution and land instability." This application has all the negatives, meant to be avoided, completely covered in its goals! The digging up of a toxic landfill, on top of an unlined chalk-base aquifer, will ensure that potable water in a ground water conservation zone is placed at risk. Slowly it can leach quantities of poison into the environment and into peoples' bodies. The extra traffic congestion from both vehicles and millions of extra passengers and those additional, 7000 claimed new jobs, will guaranteed air pollution can worsen and worsen on already awful roads.

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		As the Road Assessment Document dated 31 Jan 2018 reveals - by its many glaring red designations, indicating "above maximum capacity already reached". Followed by the orange – "very soon to be above maximum capacity". The noise pollution that disturbs all surrounding areas already as far as Stevenage, Harpenden and St Albans can become even more intolerable. The instability of the landfill can be wonderfully maximized when you place large heavy structures on top of it – just like when B&Q collapsed under its own weight on the other side of Luton a few years ago. And none of these have any mitigating solutions whatsoever!!!
27.	12.10.18	NO ANNUAL AIR STATUS REPORTING THIS APPLICATION BREACHES NATIONAL PLANNING POLICY FRAMEWORK GUIDANCE BY ITS COMPLETE FAILURE TO PRODUCE ANY AIR POLLUTION MONITORING WHATSOEVER, IN THE RESIDENTIAL AREAS SURROUNDING THE PROPOSED DEVELOPMENT. The most recent Annual Air Status Report produced by Luton Borough Council is from 2016. It revealed that no air pollution monitoring AT ALL was taking place in the wards of Wigmore, Stopsley, Round Green and High Town. These are the wards containing and surrounding the Airport. NPPF - p.52 181. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan. NPPF - p.30 103. The planning system should actively manage patterns of growth in support of these objectives. Significant development

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Ref.	Objection	Comments
		should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making. Furthermore is was discovered that there has been no Annual Air Status Report produced by the Council AKA Planning Application Applicant for the last TWO YEARS!! Keith Dove confirmed today that there is not one even published – and possibly not even written, for both 2017 and 2018!
28.	Yes 12.10.18	I strongly object to PA 17/02300/EIA for the following reasons. NO PUBLIC SUPPORT OR ECONOMIC IMPACT REPORT Full details of this objection are ATTACHED. 3 documents attached: PowerPoint presentation, survey results from LLAL consultation, email response (below) THIS APPLICATION IS BEING PLACED FROM A COMPANY IN TO ITSELF. THE OWNERS OF THE APPLICANT COMPANY ARE THE SAME AS THAT OF THE APPROVING LOCAL AUTHORITY. THERE IS NO GETTING AWAY FROM THAT FACT. FURTHERMORE BOTH APPLICANT AND THAT SAME LOCAL AUTHORITY ARE DESPERATELY TRYING TO PERSUADE THE PUBLIC TO BELIEVE A LOAD OF RUBBISH IN PLACE OF SOLID DATA, AND ACCEPT A COMPLETELY INFERIOR SET OF PLANS. THEY ARE ALSO FINANCIALLY QUESTIONABLE AT BEST, BUT WOULD ULTIMATELY RUIN THE WHOLE TOWN AT WORST. Further proof that the Council fully intends to pass its own planning application to itself, was Robin Porter's presentation at the "Let's Talk/ Have Your Say Meeting" at Ramridge School on Monday 8th October 2018. Newspaper articles covering this: Robin Porter, the Director of LLAL, Hazel Simmons (Council Leader) and Trevor Holden (Council CEO) were invited by me, in order to answer directly residents' concerns about these planning applications. Robin proceeded to make a presentation (presentation is attached) where he claimed that the survey data they had gathered

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Ref.	Objection	Comments
		from the summertime consultations, proved that there was public support for the developments. However nobody has ever been allowed to see the results of the surveys to date, as they will never be published. He presented certain figures in order to attempt to show public support. However besides proving without doubt, that the Council is entirely biased towards itself and its own applicant company – naturally….conflict of interests as stated before….there were some gaping great holes in his figures. Firstly the figures were presented as though they were final. But Robin later admitted in writing the following day, when I requested a copy of the report where he got these figures; that they were not final figures and the report would not be ready until December sometime… We can presume then that Robin Porter plucked only the best most favourable statistics available to him. In which case they were not very favourable…clearly indicating the unpopularity of the development, in spite of his desperate attempts to claim otherwise. We re-framed his statistics and came up with entirely different conclusions from the same data. In spite of him claiming overwhelming support…the survey sample of 1,716, is just 0.4% of the populations of Luton, Hitchin, Stevenage, Beachwood Green, Harpenden, Dunstable and Caddington; since the total population of those areas is 435,951. If we break down their preferred options:- 4A - 858 are against/ don't know/ don't care 4B - 789-927 are against/ don't know/ don't care 4C - 617-1,099 are against/ don't know/ don't care YET STILL THEY THROW MILLIONS AT IT! All the comments about jobs/ income etc. have no source allocated, so they are just of their own making – fictitious and not rooted in anything solid. We ask how can you have chronic deprivation, and yet fastest growing jobs and wages? Why do all the figures state regional and national growth/ economy, and yet nothing about money into Council budgets for us all? LLAL's income in ratio to LBC income since 2010, needs careful examination. They expect £113 million cuts from Central Government, which should be about £14.125 million a year. So how can they afford to risk this precious Council nest egg, of 300 million? Where are the economic impact reports for the application detailing all of this? [PW121018] Furthermore, we have re-framed their survey results; graphs are attached.

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Ref.	Objection	Comments
		We looked at the number of attendees based on the potential Luton South population which we took as our denominator, which comes out at 2%, as shown in a pie chart. So hardly an overwhelming mandate, however you look at it! Highways Department should always factor in the 'economic cost of congestion' when dealing with road planning. Have LBC done this? If so is the report available? We don't think so – because we have looked and can't find it. By some estimates, the economic cost of congestion to the UK economy is estimated at £4.3bn a year and as much as £307bn by 2030. The economic argument for LLA expansion with Heathrow about to gobble up entire villages and with Gatwick serving the south and Stansted a few miles away is weak to say the least. Factor in BREXIT, the global economic slowdown and next recession which is not too far away and the country's still parlous finances, and LBC's plans seem at best short-sighted - at worst environmental, economic and financial madness.
29.	Yes 22.10.18	The proposed new access road via Eaton Green Road will worsen congestion in the local ara, causing breaches of air pollution limits in this highly populated area. Access must remain via M1/A1081 only.
30.	Yes 12.10.18	This planning application should be refused on the following grounds: REPEAT OF REP 348 The noise of the piling works will be unbearable and this already affected xxxxxxxxxxxxxxxxxxx. xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx is xxxxxxxxxxxxxxxxxxxx

APPENDIX 3: REPRESENTATIONS – ONLINE, EMAIL AND LETTERS

Ref.	Objection	Comments
31.	Yes 10.10.18	This is to register my objection to the planning application for the following reasons: Wigmore Valley Park is a much-loved community asset containing playing fields and a County Wildlife Site. The planning application fails to take this into consideration nor does it intend to replicate these existing features at its proposed new location for the new Wigmore Park. This is a facility which has been well used by us as a growing family over the used - and also still now for walks, foraging and well-being including fresh air and exercise. It should be noted that the applicant has already identified the location of the New Wigmore Park as a site for a long term car park in its consultation for airport expansion so there has to be doubt if the park will actually open and if it does for how long. REPEAT OF REP 348

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
1.	Petition by Friends of Wigmore Valley Park and Friends of the Earth Petition 26 signatures 24.1.18	In response to the above notice in Luton News 3 Jan 2018, asking if any owner or tenant of the land wishes to make representations about the above application: We assert that Wigmore Valley Park was given to residents in 1982 when the Wigmore estate was built. Residents were told this open space was the minimum necessary per 1000 population. The land was landscaped, planted, then managed for us by Luton Council, elected to represent us. Three generations have enjoyed the park, the trees have matured splendidly, and a big part has become an important County Wildlife Site, with many birds and orchids, a wonderful place for children and adults to connect with nature, and see countryside only a short distance from their homes — it is also designated an Area of Local Landscape Value. We were therefore hugely shocked to find that, without telling residents, our 'public servant', Luton Council has in 2015 either leased or licensed the land to a company, LLAL, which wants to build large 'units' and car parks on it, and has now submitted plans. As a large group of residents (over 1200 facebook members who live across the east of Luton), Friends of Wigmore Park own the park, as it has been in constant use and a right of way for residents for 35 years. A piece of land needs only to be used for 12 years to be assumed to be owned by the user, and can then be registered with the Land Registry. We would like to declare our park Local Green Space, and an Asset of Community Value, and wish to set up a Neighbourhood Forum to oversee the wider area. We therefore strongly object to losing our land for development. We believe we have a legal right to continue to use it, and that we have a contract of understanding with Luton Council for the park to be used in perpetuity, that has been broken. Luton is overdeveloped and our roads are heavily and increasingly congested due partly to the applicant — we cannot afford to lose our parks and be subjected to further health risks. The agricultural fields offered as a substitute for the loss of our park do not compare. They're further away, less convenient and of no wildlife value. People greatly value the park's wildlife, and are aghast that part of the County Wildlife Site would be built on. The smaller area that would be left would have less wildlife next to vehicles, roads and buildings. The view from the park would no longer be attractive near big buildings, and traffic would be noisy and pollute our park. The park was created over a landfill site, and building on it could be dangerous.

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
2.	Petition by Friends of Wigmore Valley Park and Friends of the Earth Petition 85 (64+21) signatures 9.8.18	I object to any airport development on Wigmore Valley Park (This was in fact an objection in response to LLAL's press notice informing anyone with an interest in the land that an application had been submitted)
Proforma Letter		
1.	Proforma letter 31.5.18	I object to any development on Wigmore ValleyPark. Residents were given this important green park when the Wigmore estate was built. Council officers thoughtfully landscaper it. They planted many trees for us, to act as a green buffer and as a country park between the airport and residential properties. This great work should not be undone. People have grown up with this park and have childhood memories. Over the last 35 years it has become a County Wildlife Site and 60 bird species and a wide range of plands including hundreds of orchids of 4 different species. These qualities could not be replaced by a new park located next to a runway where land is noisy and polluted by aircraft. Due to the proximity of the runway, for safety reasons bird life would be discouraged. Trees would be removed. The proposed new park would also be too far from where people live. We have lost too much green space. Rapid airport expansion has caused huge congestion and pollution affecting people's health. It is also fuelling climate change, harming people now and in the future. This cannot continue. The park and its hundreds of trees help to reduce pollution and noise. The trees must be protected. Build – only if you must – on Century Park fields, which has had planning permission for 20 yearsm not on our beautiful park.

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		An access road should go from the proposed route at President Way and follow the airport boundary, running inside it. It must not go across the park, which would sandwich our children's playground between two busy roads, stunting growth of our children's lungs and causing asthma and other health issues to our children. Pollution is also killing our grandparents! The Council must protect our health and our green spaces. *Once green space goes it never reappears.*
2.	Proforma letter	REPEAT OF REP 1 *Our green spaces should never be built on, only use brown fill land*
3.	Proforma letter	REPEAT OF REP 1 *Luton town has at least 20% too little greenery for the size of town. Enough is enough LBC. Too much stick and not enough carrot.*
4.	Proforma letter	REPEAT OF REP 1 *I have lived in my house for 28 years and have used it for my children and now my grandchildren and daily dog walks. Vital area to not only us local residents but people visit from all over Luton!!!*
5.	Proforma letter	REPEAT OF REP 1 *A wonderful place for dog walking, family picnics and only decent skate board.*
6.	Proforma letter	REPEAT OF REP 1 *We have enough noise from airport we do not need any more.*
7.	Proforma letter	REPEAT OF REP 1 *It will take years for the trees to reach the size they are now. I won't see it.*

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		The landfill is still an unknown quantity, test sites may not have uncovered it all. *We need the lungs of Luton to stay. Enjoyed this for 28 years – 3 generations – it has to stay. The pollution that will affect Wigmore residents is unthinkable. As well as affect quality of life.*
8.	Proforma letter	REPEAT OF REP 1 *We have brought our grandchildren over this beautiful park for years and they love to run in the wide, safe environment.*
9.	Proforma letter	REPEAT OF REP 1 *As a grandparent my wife and I have spent many hours with our dog and children walking and playing in this park.*
10.	Proforma letter	REPEAT OF REP 1 *For this generation and future ones to enjoy outdoor spaces*
11.	Proforma letter	REPEAT OF REP 1 *To enable us to enjoy fresh air and for future generations*
12.	Proforma letter	REPEAT OF REP 1 *The increased loss of green spaces will turn this country into a concrete jungle*
13.	Proforma letter	REPEAT OF REP 1
14.	Proforma letter	REPEAT OF REP 1 *The pollution and noise from the runway is terrible and dangerous for the new proposed site*
15.	Proforma letter	REPEAT OF REP 1 *I love my park*
16.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*Please don't take our children playground*
17.	Proforma letter	REPEAT OF REP 1
18.	Proforma letter	REPEAT OF REP 1 *Unfair and ludicrous plans. Loss of green space and pollution are my issues. Planners seem to plan for now and not the future.*
19.	Proforma letter	REPEAT OF REP 1 *I pick blackberries every year. Grandchildren love it. Walk my GSD who loves her freedom. Not many places left.*
20.	Proforma letter	REPEAT OF REP 1 *Love spending time here with my children in our play area and blackberry picking*
21.	Proforma letter	REPEAT OF REP 1 *Blackberry picking and spending time with the family*
22.	Proforma letter	REPEAT OF REP 1
23.	Proforma letter	REPEAT OF REP 1
24.	Proforma letter	REPEAT OF REP 1
25.	Proforma letter	REPEAT OF REP 1
26.	Proforma letter	REPEAT OF REP 1 *Why can't the buildings be put on the farm land. Keep Wigmore Park as it is!*
27.	Proforma letter	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		It will be extremely dangerous to build on landfill. The proposed dual carriageway does not have the necessary local road infrastructure and the resultant increase in road traffic will be detrimental to the area
28.	Proforma letter	REPEAT OF REP 1 *Wigmore Valley Park is the only park I feel safe and comfortable with my child and dog. Don't ruin it for our next generation*
29.	Proforma letter	REPEAT OF REP 1 *Think of the well being of all residents*
30.	Proforma letter	REPEAT OF REP 1
31.	Proforma letter	REPEAT OF REP 1 *I use the park everyday and would be very upset if we lose it*
32.	Proforma letter	REPEAT OF REP 1 *And put the interests of residents before profit*
33.	Proforma letter	REPEAT OF REP 1 *Don't take away a park that is so close to the hearts of the community. There are other alternatives nearby that would be more suitable.*
34.	Proforma letter	REPEAT OF REP 1 *I have been walking here for 20+ years. I understand the need for development, however I think the important stakeholders i.e. us views need to be taken on board and acted upon!*
35.	Proforma letter	REPEAT OF REP 1 *My family have been using this park for decades. We are passionately about the wildlife and will fight development tooth and nail*
36.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*Keep our park for avoid over crowding and not to very trafficy*
37.	Proforma letter	REPEAT OF REP 1 *Keep our parks for future generations*
38.	Proforma letter	REPEAT OF REP 1 *We all need open spaces for our children to play on*
39.	Proforma letter	REPEAT OF REP 1
40.	Proforma letter	REPEAT OF REP 1
41.	Proforma letter	REPEAT OF REP 1 *To build on this beautiful park – so full of wildlife, amazing nature and enjoyed by so many – would be an absolute tragedy*
42.	Proforma letter	REPEAT OF REP 1 *No development on the park as the community enjoy it please*
43.	Proforma letter	REPEAT OF REP 1 *Our children need spaces to play*
44.	Proforma letter	REPEAT OF REP 1
45.	Proforma letter	REPEAT OF REP 1 *I believe the ground under the park resides on an infill site and is therefore not safe to build on*
46.	Proforma letter	REPEAT OF REP 1 *Please think again*
47.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*We need this park to have out children to have green spaces to grow up and walk their dogs*
48.	Proforma letter	REPEAT OF REP 1 *All Luton Council is concerned about is greed, the local residents are seen as a hssle. Wigmore was a beautiful place and the Council has let it go the way the rest of Luton. Leave something for the children to enjoy and for once stop greed letting decisions get made*
49.	Proforma letter	REPEAT OF REP 1 *With the proposed housing estate to the back of Wigmore the community are losing their green space. We will have very little left onec these developments go ahead. Luton's 'progress' is at a massive cost to local people.*
50.	Proforma letter	REPEAT OF REP 1 *It is a joke that corporate profit is thought of as more important than health and nature*
51.	Proforma letter	REPEAT OF REP 1 I have lived here all my life and use the park regularly to walk my dog and take my child to the only park (within walking distance0
52.	Proforma letter	REPEAT OF REP 1 *This is a much needed green space for the community. Do not build on it!*
53.	Proforma letter	REPEAT OF REP 1 *This proposal is to the complete detriment of residents of Luton. We need our beautiful Wigmore Park left as it is.*
54.	Proforma letter	REPEAT OF REP 1 *We need the park for bees, butterflys, dogs and wilflife etc. Hands off.*
55.	Proforma letter	REPEAT OF REP 1
56.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*Many parks nationwide are long established, centuries or more. This is a fledgling park, leave it alone.*
57.	Proforma letter	REPEAT OF REP 1 *Put our children before big business*
58.	Proforma letter	REPEAT OF REP 1 *Feel very strongly re above. We have enjoyed this wonderful open space for years*
59.	Proforma letter	REPEAT OF REP 1 *I want to keep my park, clean air, plants, wildlife. Please leave our park and no pollution*
60.	Proforma letter	REPEAT OF REP 1 *Protect our green space, think of people and their health rather than profit. Once it's gone it's gone forever*
61.	Proforma letter	REPEAT OF REP 1 *Disgusting how the Council want to put our health at risk, disrupt the environment and a space which allows people to join together as a community*
62.	Proforma letter	REPEAT OF REP 1 *Having used the park for over 25 years I do not want to see it changed*
63.	Proforma letter	REPEAT OF REP 1 *I'm one of the grandparents and I can personally state that the air pollution has a detrimental effect on my chest condition*
64.	Proforma letter	REPEAT OF REP 1 *For the sake of our children and their children keep Wigmore green*
65.	Proforma letter	REPEAT OF REP 1 *Yes keep it green. Please*

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
66.	Proforma letter	REPEAT OF REP 1 *We don't need a new business park. Existing ones are not fully used. This is one of the best wildlife sites in the town and has taken many years to develop*
67.	Proforma letter	REPEAT OF REP 1 *We do not think the proposed 'benefits' are of any benefit. There are so many unused brownfield sites that could be made use of instead*
68.	Proforma letter	REPEAT OF REP 1 *Why strip out what has been established beautifully at Council taxpayers expense – this wonderful established park – only to start again with land too far removed for the locals with asthma and breathing problems (no doubt airport related) to walk to.*
69.	Proforma letter	REPEAT OF REP 1
70.	Proforma letter	REPEAT OF REP 1 *Absolutely critical to maintain wildlife habitat corridors. This area has evolved over many years to sustain numerous species. If built on landfill, would release toxic chemicals into watercourses*
71.	Proforma letter	REPEAT OF REP 1 *Totally opposed to the loss of this open space*
72.	Proforma letter	REPEAT OF REP 1 *We cannot lose so much of our open spaces in so small an area when other options are available. People should come before convenience for cars (see point above)*
73.	Proforma letter	REPEAT OF REP 1
74.	Proforma letter	REPEAT OF REP 1 *To redevelop this area will be a criminal act and should never be allowed*

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
75.	Proforma letter	REPEAT OF REP 1 *The park and wildlife area is precious. We must not lose anymore of it*
76.	Proforma letter	REPEAT OF REP 1
77.	Proforma letter	REPEAT OF REP 1 *We love this park for our grandchildren and dogs. Not much open space left in Luton now.*
78.	Proforma letter	REPEAT OF REP 1
79.	Proforma letter	REPEAT OF REP 1
80.	Proforma letter	REPEAT OF REP 1 *Building on this site will be a nightmare for the park. We Wigmore residents put up with the noise and pollution from the airport, yet we benefit from nothing in our area, and now you want to take away our beautiful park*
81.	Proforma letter	REPEAT OF REP 1 *Please leave our green space alone for families to use and not increase the noise and pollution for the residents of Stopsley*
82.	Proforma letter	REPEAT OF REP 1 *Why alter present green space for business which there is plent of land at J10.*
83.	Proforma letter	REPEAT OF REP 1 *Our children have grown up using the park and surrounding area*
84.	Proforma letter	REPEAT OF REP 1 *Because it is home to yummy blackberries and many adorable animals such as rabbits and foxes*
85.	Proforma letter	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		This is a beautiful place that my son loves to play in. His children will wonder where it went
86.	Proforma letter	REPEAT OF REP 1
87.	Proforma letter	REPEAT OF REP 1 *Keep a healthy area*
88.	Proforma letter	REPEAT OF REP 1 *Please do not build on our park. We enjoy all the health benefits it offers*
89.	Proforma letter	REPEAT OF REP 1 *Wildlife is real life*
90.	Proforma letter	REPEAT OF REP 1 *Keep our parks for future generations*
91.	Proforma letter	REPEAT OF REP 1 *Parks are precious keep ours*
92.	Proforma letter	REPEAT OF REP 1
Officially Anonymous		
1.	Proforma letter	REPEAT OF REP 1 *We use this area on a regular basis and it makes a great difference to our lives.*
2.	Proforma letter	REPEAT OF REP 1 *Space to think. Keep Wigmore wild and keep our happy spaces. "When the last tree has been cut down, the last fish caught, the last river poisoned, only then will we realise that one cannot eat money"*
3.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	letter	*Support #clean air for a clean conscience*
4.	Proforma letter	REPEAT OF REP 1 *It would be a shame to lose a wonderful well used green space in Luton. There are far too few green spaces in Luton already. Luton should set an example to the rest of UK airports.*
5.	Proforma letter	REPEAT OF REP 1 *I grew up in Stopsley so remember the environment over many years, particularly experiencing my connection with nature. I do not oppose technology and appreciate change, however, we must above all maintain a balance for our future children! This commercial proposal has no balance, no or zero balance, like life, creates disharmony. Fundamentally we are first nation people, intrinsically part of nature and our mother earth. It is no exaggeration that we are heading to a catastrophic conclusion. By abusing the earth we abuse our and all other life.* *Wigmore Park is a small but relative example of how we can literally save ourselves. Act now.*
Proforma Bullet Points		
1.	Proforma bullet list	Objection to application 17/02300/EIA for the following reasons indicated by crosses: **Viewpoint/Principle.** Wigmore Park is an asset given by Hitchin Homes to the people of Luton as a condition of their 1982 planning permission and as such belongs to the people. **Breach of the Luton Local Plan.** The Council produced Policy LLP6 that prohibits access via Eaton Green Road, except for bicycles, buses and taxis. **Traffic generation/Traffic and pollution.** Local roads were designed for local anticipated traffic conditions only. The application with access via Eaton Green Road will encourage traffic away from the A05 and to use Wigmore Lane, Crawley Green Road and Ashcroft Road. **Loss of Trees.** The application includes the destruction of many groups of mature trees within the existing Wigmore Park.

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Destruction of a county wildlife site. The majority of Wigmore Park's county wildlife designated site will be turned into car parks with the loss of special habits that won't and can't be replaced. **Location (and landscape).** The proposed New Wigmore Park is too remote for many existing users who walk to the park. A green corridor leading to the new park cannot be classed as parkland. **Toxic Tip.** The proposed development is on the town's former unregulated tip. It has been identified in document 17_02300_EIA DAS Part 2-68521 page 16/24 that piling and disturbing the clay cap could cause safety, odour, pollution and drainage issues through later settlement. **Density of development is too great.** The proposal claims that it will create 1000s of new jobs but only 1674 car park spaces have been created to serve the buildings. **Many existing businesses** located in numerous modern premises will have to relocate due to the route of the proposed dual carriageway causing uncertainty to the businesses and workers. **Other.**
2.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
3.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
4.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Toxic tip'. 'breach of LLP', 'traffic generation', 'loss of trees', 'location' and 'density of development'
5.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Destruction of CWS', 'location' and 'toxic tip'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Other. *Strongly disagree with building on Wigmore Park.*
6.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic generation', 'loss of trees', 'destruction of CWS', 'location', 'toxic tip' and 'density'
7.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
8.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density' or 'existing businesses'
9.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Location', 'density' or 'existing businesses' **Other.** *Increase in street planting following new plans.*
10.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
11.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
12.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development' **Other.** *Health and safety issues due to traffic increase, air pollution, children's safety, etc.*
13.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Loss of trees', 'location', 'toxic tip' or 'existing businesses'
14.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	bullet list	Did not tick 'Location', 'toxic tip', 'density' or 'existing business'
15.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Toxic tip'
16.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Loss of trees' and 'toxic tip'
17.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
18.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
19.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
20.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
21.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Access to Eaton Green Road, traffic is bad enough now.*
22.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Viewpoint', 'location' or 'existing businesses' **Other.** *Access from Eaton Green Road, traffic is far busy enough now.*

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
23.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
24.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
25.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
26.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
27.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Location', 'density of development' and 'existing businesses' **Other.** *I often walk my dog on Wigmore Park*
28.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development' and 'existing businesses'
29.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Principle', 'location and landscape', 'density of development' and 'existing businesses'
30.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'Location', 'density of development' and 'existing businesses'
31.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'Location', 'density of development' and 'existing businesses'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Other. *Used by many locals and children who would be affected by closing the park*
32.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic generation' **Other.** *Parking in local residential roads*
33.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Loss of trees', 'location' or 'density of development
34.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Destruction of CWS', 'location' or 'density of development'
35.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *This land was given to the people of Wigmore and now the Council have given the land to LLA. There is too much congestion as it is now. Infrastructure cannot cope with this development and the double passenger numbers that the airport is proposing.*
36.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *The area cannot already deal with the traffic there is at the moment. Getting out/in the estate at rush hour is a nightmare. All the green space in Wigmore is slowly being taken away. It is so sad that the park is being destroyed and the surrounding area.*
37.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'loss of trees', 'desnisty of development' or 'existing businesses'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Other. *Wigmore park was a landfill site*
38.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Toxic tip', 'destruction of CWS' and 'traffic generation' **Other.** *Concern over excess traffic*
39.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
40.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
41.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development' or 'existing businesses'
42.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Breach of LLP', 'traffic and pollution', 'loss of trees' and 'destruction of CWS'
43.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Existing businesses'
44.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
45.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
46.	Proforma bullet list	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Ticked all boxes
47.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Traffic generation', 'location' or 'existing businesses'
48.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
49.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
50.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *There are cycleways in the proposal. Nobody will cycle to the airport. More disruption on existing roads during construction.*
51.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *There has already been a land grab at Wigmore Park when an area was given over to a car park with the then assurance from the Council that no further incursion would take place.*
52.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *1. Only area for recreation. 2. Rare plants will be destroyed.*
53.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Other. *Fumes from Luton airport will be a threat to health*
54.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Very concerned about car parking – lack of*
55.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Parking in residential areas*
56.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'destruction of CWS' and 'location and landscape'
57.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'principle', 'destruction of CWS' or 'location and landscape' **Other.** *The new development twould increase inconsiderate parking on local roads outside residents houses.*
58.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
59.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
60.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
61.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	bullet list	Only ticked 'Traffic and pollution', 'loss of trees' and 'destruction of CWS' **Other.** *I live in Keeble Close but actually on Eaton Green Road and am concerned about disruption caused by new road and traffic lights*
62.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Loss of trees', 'destruction of CWS' and 'location and landscape'
63.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development'
64.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'loss of trees', 'destruction of CWS' and 'location and landscape'
65.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Density of development'
66.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
67.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP' or 'location and landscape'
68.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
69.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP' or 'existing businesses'
70.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	bullet list	Only ticked 'Principle', 'traffic and pollution', 'loss of trees' and 'destruction of CWS'
71.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
72.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
73.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *All above*
74.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Breach of LLP', 'principle' and 'traffic and pollution'
75.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Breach of LLP', 'traffic and pollution', 'destruction of CWS' and 'toxic tip'
76.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Viewpoint', 'traffic generation' and 'loss of trees'
77.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
78.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Toxic tip', 'traffic generation' and 'density of development' **Other.** *Density/transit of traffic generated by development*

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
79.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Traffic generation', 'loss of trees', 'destruction of CWS', 'location' and 'toxic tip' **Other.** *Great opposition to building on natural park on a tip – toxic waste*
80.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
81.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
82.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
83.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
84.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
85.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Existing businesses' or 'density of development' **Other.** *The new proposed park is no substitute for an established park and it is too far to get to. Also by disturbing the landfill site would be like opening 'Pandora's Box'*
86.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
87.	Proforma	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
	bullet list	Did not tick 'Breach of LLP' or 'density of development'
88.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'existing businesses', 'loss of trees' or 'location'
89.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Location'. 'density of development' or 'existing businesses'
90.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Viewpoint', 'breach of LLP', 'density of development' or 'existing businesses' **Other.** *Access for disabled people*
91.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
92.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
93.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Principle', 'traffic and pollution', and 'existing businesses' **Other.** *Impact on traffic near Gypsy Lane*
94.	Proforma bullet list	REPEAT OF REP 1 **Other.** *I can never trust this Labour run Council*
95.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
96.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
97.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *More traffic*
98.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
99.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Increased aircraft noise pollution*
100.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
101.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
102.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Traffic tailbacks causing chaos! Bad enough on Stockingstone Road as it is!*
103.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP', 'location and landscape' and 'existing businesses'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
104.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
105.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
106.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Existing businesses'
107.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Breach of LLP'
108.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
109.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
110.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Street parking will increase*
111.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
112.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Viewpoint', 'traffic generation', 'loss of trees' and 'toxic tip'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

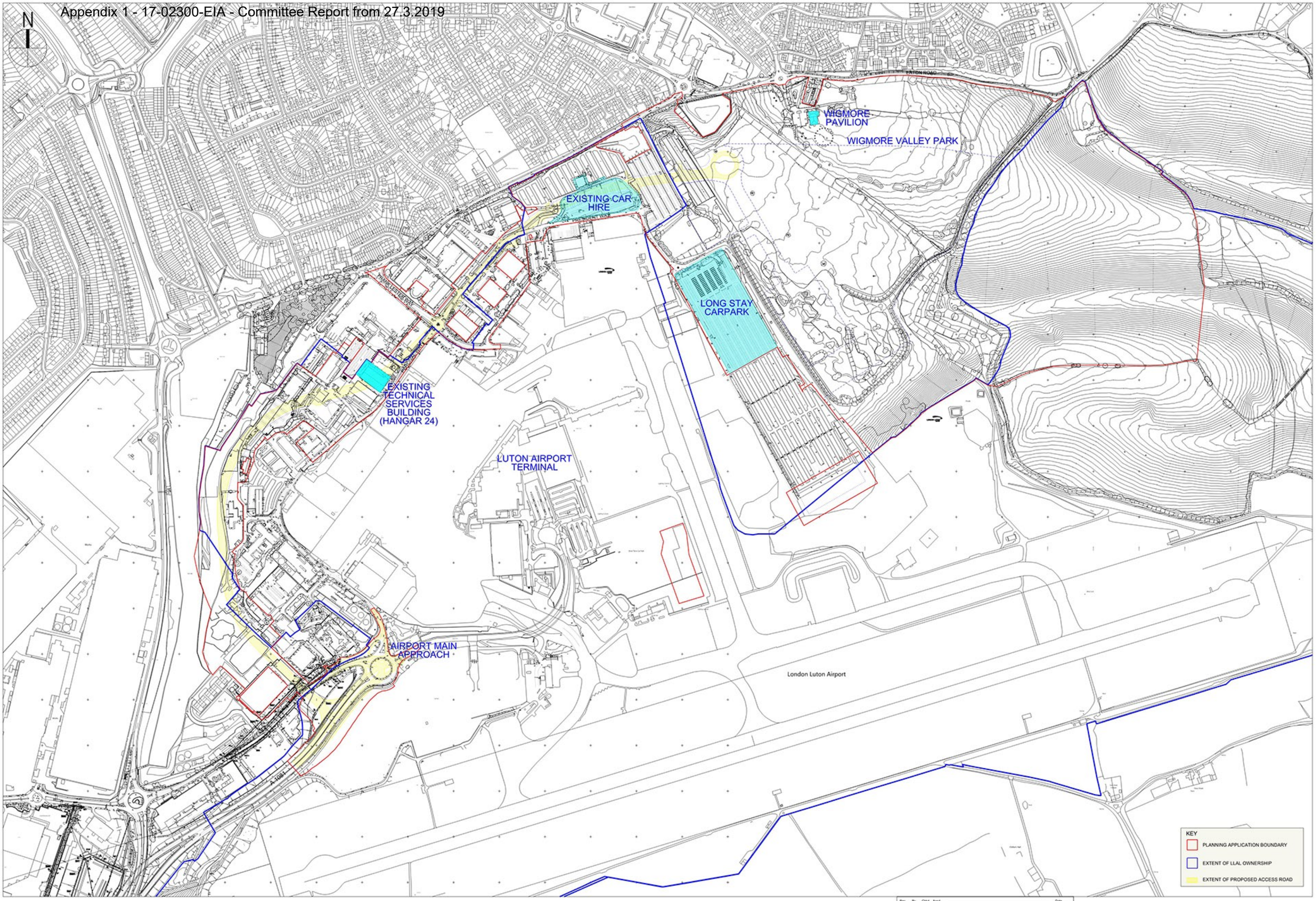
Ref.	Objection	Comments
		Other. *I take my children to the park there and they enjoy going there*
113.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** *Concern about development of traffic and distance as people will find quickest route using local routes*
114.	Proforma bullet list	REPEAT OF REP 1 Ticked only 'Traffic generation' and 'toxic tip' **Other.** *Insufficient infrastructure consideration on the access roads from M1 Junction 10 – already identified as over capacity*
115.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Viewpoint', 'breach of LLP', 'toxic tip' or 'existing businesses' **Other.** *Building on green land when you've allowed other office blocks to be changed to hotels.*
116.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'loss of trees' and 'destruction of CWS'
117.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Destruction of CWS'. 'loss of trees' and 'existing businesses'
118.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes **Other.** No matter how much work is done on modifying junctions the fact remains that Wigmore Lane cannot take any more traffic.
119.	Proforma bullet list	REPEAT OF REP 1

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
		Ticked all boxes **Other.** This area already suffers from air pollution generated by increased traffic on the roads and in the airport area as well as from the planes.
120.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Viewpoint' and 'density of development' **Other.** Major concern is parking. We currently have people parking on our roads now so they evade parking charges. Airport parking losing revenue but we are having to subsidise these people. If new development (which I support) goes ahead then residnts should have support from the Council in ensuring measures are put in place to ensure our roads are policed by: 1. Residents parking only 2. Time limit for any parking People who leave cards and go abroad for 6-8 weeks should be penalised not residents.
121.	Proforma bullet list	REPEAT OF REP 1 Ticked all boxes
122.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'Existing businesses' **Other.** The car parking issue is doubly concerning for me as the Council has been unable to fix the issue of businesses parking on the Raynham Way estate as it is.
123.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'loss of trees', 'destruction of CWS', 'toxic tip' and 'density of development'
Officially Anonymous		
1.	Proforma bullet list	REPEAT OF REP 1 Did not tick 'density' or 'existing businesses'

APPENDIX 4: REPRESENTATIONS – PETITIONS AND PROFORMA RESPONSES

Ref.	Objection	Comments
2.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Traffic and pollution', 'location and landscape' and 'toxic tip'
3.	Proforma bullet list	REPEAT OF REP 1 Did not tick any boxes **Other.** *Leave well alone, otherwise this will be an eyesore and there will be no green space left.*
4.	Proforma bullet list	REPEAT OF REP 1 Only ticked 'Principle', 'destruction of CWS' and 'toxic tip'. **Other.** *Destruction of green belt land. Business park should be built on brown field sites.*



Rev	By	Chkd	Appd		Date
PL 01	JL	LS	GU	PLANNING ISSUE	13 Dec 2017
PL 02	JR	LS	GU	Outline planning area revised. Existing site plan updated to show changes within the airport area. Existing Car Hire location indicated	04 Jul 2018

Client London Luton Airport Ltd
Date May 2017
Dwg No. 050_00

Project Luton - New Century Park Masterplan
Title Luton - Existing Site
Scale 1:2500@A0

75 Wells Street London W1T 3QH. Telephone. 020 7580 5886. www.esa-ltd.com

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CS_073849

AGENDA ITEM

2.1

DEVELOPMENT CONTROL COMMITTEE

27TH MARCH 2019 at 14.00

PRESENT: Councillors D. Taylor (Chair), Lewis (Vice-Chair), M. Ayub, Agbley, Campbell, Chowdhury, MJ Dolling, Franks, Hussain and Rivers.

23. APOLOGY FOR ABSENCE (REF: 1)

An apology for the meeting was received on behalf of Councillor Dr Saleem.

24. MINUTES (REF: 2.1)

Resolved: That subject to apologies for absence from Councillor MJ Dolling in respect of the meeting held on 11th March 2019, being noted, that the Minutes of the meeting of the Committee held on 11th March 2019 be taken as read, approved as a correct record and signed by the Chair.

25. NEW CENTURY PARK PLANNING APPLICATION, LUTON (REF: 7)

The Planning Consultant reported on Application No. 17/02300/EIA submitted by London Luton Airport Ltd for planning permission in relation to (1) outline permission for a new business park comprising office space (class B1), warehouse and industrial space (class B2 and B8), mixed employment space (class B1/B2/B8), a hotel (class C1), cafe space (class A3); energy centre (sui generis), internal access roads; car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection; and relocation of the airport car hire centre; (2) full permission for the construction of a 2km Century Park Access Road incorporating a new junction on the A1081, alterations to the existing airport way roundabout, alterations to Frank Lester Way, a newly created access from Eaton Green Road, a new roundabout providing access into the business park, demolition of buildings, provision of replacement car parking (temporary and permanent), associated earthworks, landscaping, surface water drainage and utilities diversions; the creation of new public open space including footpaths, landscaping and ecological mitigation; extension and alterations to Wigmore pavilion building to provide cafe (class A3) and additional community space; construction of a new skate park and children's play area; and construction of a replacement airport technical services building and associated parking at Luton Airport, Luton.

The Planning Consultant further reported that 975 neighbours had been notified and consulted on the application, and site notices were displayed in 12 locations in the area. The application was also advertised in the local newspaper, when it was first received and in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011; the application was again advertised when the further information was submitted. Furthermore, the application was advertised again prior to the meeting taking place. Whilst the initial advertisement mentioned the requirement under the Town and Country Planning (Development Management Procedure) Order 2015, it was not explicit that the application was being advertised as a major application or a departure from the development plan.

In accordance with the right to speak procedure the Applicants addressed the Committee, 2 objection letters were read out by the Joint Interim Development Management Service Managers and several Objectors addressed the Committee.

Councillors MJ Dolling and Chapman also addressed the Committee as ward councillors.

Resolved: (a) That Application No. 17/02300/EIA be **GRANTED** subject to: 1) Referral to Secretary of State as set out in 2(c) below, 2) the satisfactory completion of a S106 Agreement as set out in 2(b)(i) (3) the final date for any further comments from departure consultation (10.04.19) and review thereof as set out in 2(b)(ii); and 4) subject to the following conditions, (Appendix 1) some of which were amended pursuant to delegated authority being given to the Development Control Manager to amend the wording of conditions to ensure their effectiveness, delete any repetitive conditions and add any missing conditions

(01) The requirements of Part II of Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (as amended) are satisfied by reason of the Environmental Statement, and the Addendum, attached thereto including at least the following information:

(i) a description of development comprising information on the site, design and size of the development;
(ii) a description of the measures required in order to avoid, reduce and, remedy significant adverse effects;
(iii) the data required to identify and assess the main effects which the development is likely to have on the environment;
(iv) an outline of the main alternatives studied by the applicants and an indication of the main reasons for their choice, taking into account the environmental effects;
(v) a non-technical summary of the information under (i) to (iv) above.

(02) It be recorded that, in making the decision on the application, the Committee has taken into account the environmental information comprising the Environmental Statement and the Addendum and that this information meets the minimum requirements of Part II of Schedule

4 to the Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 2011 (as amended).

(b) The Committee further resolved to grant planning permission subject to (as set out below):

(i) The satisfactory completion of an agreement under Section 106 of the Town and Country Planning Act 1990 to contain the following:

1. Public art contribution (£ 250,000) to provide public art in the main office plaza;
2. County Wildlife Site contribution (£ 250,000) to compensate for the loss of 5ha of County Wildlife Site with management of 7.5ha of Dallow Downs County Wildlife Site;
3. Biodiversity contribution (£ 30,000) to provide for the creation and management of new habitats within the site;
4. Replacement trees contribution (£ 35,000) to compensate for loss of trees with replacement planting across the borough;
5. Raynham Way Neighbourhood Park Play contribution (£ 35,000);
6. Roads and highway improvements contribution (£ 3,455,917) to secure highway improvements at a number of junctions in the vicinity to improve capacity, safety and reliability and a requirement to ensure that the junction improvements are completed before the New Century Park access road is brought into use;
7. Sports pitch and changing room re-provision contribution (£1,196,737) to offset the loss of playing fields and ancillary facilities with the contribution being used towards implementing one or more of the following projects:
   i. Provision of a Step 5 Football Facility (an artificial grass pitch suitable for non-league senior football up to step 5 of the football pyramid and associated facilities (including parking provision and changing rooms) at Stopsley / Lothair Recreational Ground; Ely Way or Lewsey Park; and/or;
   ii. The replacement of or improvements to existing adult football facilities (playing pitches and supporting facilities such as changing and parking) at either one or more than one of the following locations:
      - Stopsley/Lothair Recreation Ground, Luton, Bedfordshire; and / or
      - Lewsey Park Recreation Ground, Luton Bedfordshire
8. Measures to ensure the new open space for Wigmore Valley Park is provided in advance of any development taking place on the existing park and the provision of a maintenance specification to ensure the long term maintenance and management of the park;

9. Construction, employment, training and skills initiatives; and

10. An administration and monitoring fee of £6,000 associated with the provision of the enhanced Wigmore Valley Park and its maintenance/management specification).

(ii) Subject to the delegated authority regarding conditions referred to above, grant planning permission subject to the imposition of the conditions as set out belowand that the grant of planning permission should be delegated to the

Development Control Manager upon the expiry of the consultation period and subject to no new material planning considerations being raised.

(c) The Committee further resolved that the resolution to grant would be subject to its referral to the Secretary of State (following the expiry of the further consultation period), as required by the Town and Country Planning (Consultation) (England) Direction 2009.

General conditions

(01) The development hereby permitted shall be begun not later than the expiration of three years beginning with the date of this permission. (Reason: To limit the duration of the permission in accordance with the provisions of Sections 91-96 of the Town and Country Planning Act, 1990).

(02) Applications for approval of the access, appearance, landscaping, layout and scale (herein after called the "reserved matters") for the first phase of the outline development hereby permitted shall be made to the Local Planning Authority before the expiration of three years from the date of this permission. Thereafter, applications for approval of all reserved matters relating to subsequent phases of the development shall be made to the Local Planning Authority before the expiration of two years from the date of approval of the last of the reserved matters of the preceding phase. (Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).

(03) Full details and particulars of the reserved matters referred to in condition 02 above shall be submitted to and approved in writing by the Local Planning Authority before any development of the outline element of the scheme is commenced (phases 2, 3 or 4). (Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(04) The development hereby permitted shall not be carried out other than in complete accordance with the approved plans and documents listed in Appendix 2, or as shall have been otherwise approved in writing by the Local Planning Authority. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP2, LLP6, LLP13, LLP14, LLP31, LLP32, LLP36, LLP37 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the aims and objectives of the NPPF).

(05) The development hereby permitted shall be limited to the following:

- 29,400sqm B1(a) office floorspace;
- 13,000sqm flexible office/industrial floorspace;
- 11,700sqm B2 general industrial and B8 storage;
- 2,950sqm Technical Services Building;
- 685sqm sui generis use comprising two buildings, one an energy centre and the other a recycling centre;
- 7,200sqm (145 bedroom) hotel;

- 225sqm ancillary retail;
- Between 3,200 and 3,500 car parking spaces within New Century Park, the extended long stay car park and the relocated car hire facility in the Central Terminal Area;
- New and enhanced park (including refurbished Pavilion Building, children's play areas, skate park, parkland, footpaths, ancillary park furniture, orchard, woodland and shrub planting, and habitats); and
- Associated access, highways, structures (including bridge, retaining walls and embankments), public realm, landscaping and ancillary works.

(Reason: To ensure the development is carried out in accordance with the planning permission and to ensure that any development that is carried out is that which has been assessed. To accord with the objectives of Policies LLP1, LLP25 and LLP31 of the Luton Local Plan 2011-2031 (November 2017)).

Archaeology condition

(06) No development shall take place until a written scheme of heritage asset resource management (SHARM) has been submitted to and approved in writing by the Local Planning Authority. The SHARM shall include provision for preservation and management in situ (where possible); archaeological investigation and recording and an outline strategy for post excavation analysis and publication. The development hereby approved shall only be implemented in full accordance with the approved archaeological scheme. (Reason: This condition is pre-commencement as a failure to secure appropriate archaeological investigation in advance of development would be contrary to paragraph 141 of the National Planning Policy Framework (NPPF) that requires developers to record and advance of understanding of the significance of any heritage assets affected by development before they are lost (wholly or in part) and Policy LLP30 of the Luton Local Plan 2011-2031 (November 2017)).

Demolition/construction conditions

(07) No development shall commence until a detailed Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority, and the plan shall include the following:

a. The construction programme and phasing;
b. Hours of operation, delivery and storage of materials;
c. Details of any highway works necessary to enable construction to take place;
d. Parking and loading arrangements;
e. Details of piling operations and mitigation measures to be employed (including the acoustic screen adjacent to the Holiday Inn);
f. Details of hoarding;
g. Traffic Management Plan to reduce congestion (including route signage and travel demand management);

h. Materials Management Plan (to include topsoil removal, storage and re-use);
i. Provision of a Dust Management Plan (including control of dust during demolition, construction, earthworks and the control of dust and dirt on the public highway);
j. Details of consultation and complaint management with local businesses and neighbours;
k. Site Waste Management Plan;
l. Mechanisms to deal with environmental impacts such as noise, air quality, light and odour.

The development shall be carried out in accordance with the Construction Environmental Management Plan as approved. (Reason: To enable the Local Planning Authority to exercise proper control over the development proposed, in the interests of securing a satisfactory standard of work and of highway safety and the control of environmental impacts. To accord with the objectives of Policies LLP1, LLP25, LLP31 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and to ensure the M1 Motorway continues to serve its purpose as part of a national system in accordance with section 10 of the Highways Act 1980).

(08) No impact piling shall commence until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to control noise and measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement. (Reason: To ensure adequate safeguards are taken during construction of the development, having regard to existing ground conditions, and to prevent pollution of the water environment and risk to other receptors. To accord with the objectives of Policies LLP1, LLP36 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Air quality conditions

(09) No development shall commence until a scheme of air quality mitigation measures has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme prior to the first occupation of any buildings. (Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(10) No development within Phase 3 or Phase 4 (as shown on drawing 089916_050_40 RevPL02) shall commence until a suitable Air Quality Assessment has been undertaken, submitted to and approved in writing by the Local Planning Authority to address the inclusion of any combined Heat and Power plant or similar installations. The assessment shall be undertaken in line with all current relevant guidance and standards. The report shall identify suitable measures to mitigate the impacts to any

sensitive receptors identified. The development shall be carried out in accordance with any approved plant or mitigation. (Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Unexploded ordnance condition

(11) No development shall commence until an Unexploded Ordnance (UXO) site safety and emergency procedures plan has been submitted to and approved in writing by the Local Planning Authority. (The Development shall only be carried out in accordance with the approved UXO site safety and emergency procedures plan). (Reason: To reduce risk from Unexploded Ordnance to an acceptable level, as the site lies within an area that has been identified as being at potential risk from buried explosive ordnance due to wartime bombing).

Contamination/remediation conditions

(12) No phase of development shall commence until a remediation strategy to deal with the risks associated with contamination of the site for that phase has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
   i. all previous uses;
   ii. potential contaminants associated with those uses;
   iii. a conceptual model of the site indicating sources, pathways and receptors considering both the current condition and proposed future usage of the site; and
   iv. potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors (current and future) that may be affected, including those off site. This must include a detailed hydrogeological risk assessment using site specific groundwater level and quality data to assess risks to controlled waters considering the current site conditions and the anticipated conditions post development. In addition, the hydrogeological risk assessment must assess the potential for leachate mobilisation / expulsion caused by disturbance and changes in loading in the historical Eaton Green landfill area that may occur as a result of the development.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the Local Planning Authority. The scheme shall be implemented as approved. (Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses. This condition is required to ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with and in order to protect human health. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF).

(13) Before each phase of development is brought into use a verification report demonstrating the completion of works set out in the approved remediation strategy for that phase, and the effectiveness of the remediation, shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. (Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses that may have resulted in soil and or groundwater contamination. Where such contamination is identified to present an unacceptable risk to groundwater within the context of the conceptual site model (CSM), controlled waters risk assessment, remediation strategy and verification plan, a verification report is required to demonstrate the remediation of the site has been successful and that residual contamination at the site no longer presents a risk to controlled waters. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF)

(14) The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority. (Reason: The Addendum to the Environmental Statement (GL Hearn Ltd, August 2018) submitted in support of this application indicates that groundwater beneath the proposed development site is already impacted with contaminants associated with the historical usage of the site. The groundwater monitoring and maintenance programme will provide data to demonstrate that no further deterioration of groundwater quality beneath the site has occurred as a result of the proposed development. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(15) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. (Reason: No

site investigation can completely characterise a site and contamination may exist or in areas where contamination was not expected and therefore not included in the original remediation proposals. To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF).

(16) No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details. (Reason: The previous use of part of the proposed development site as a landfill receiving mixed inert, industrial, commercial and domestic wastes presents a high risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS) leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(17) Piling and other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority with details to be submitted to and approved in writing by the Local Planning Authority (including details of a piling risk assessment to detail steps to prevent overlying contaminated materials from impacting the chalk aquifer). The development shall be carried out in accordance with the approved details. (Reason: Piling using penetrative methods can result in risks to groundwater from by introducing pollutants / turbidity, mobilising contamination, drilling through different aquifers and creating preferential pathways. Groundwater is particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and with paragraph 170 of the NPPF).

(18) A scheme for managing any redundant boreholes, shafts, tunnels and adits, including boreholes installed for the investigation of soils, groundwater or geotechnical purposes, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of how redundant boreholes, tunnels, shafts and adits are to be decommissioned and how any boreholes that need to be retained, post development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to of each phase of development. (Reason: To ensure that redundant boreholes, shafts, tunnels and adits are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and Position Statement A8 of the Environment Agency's Groundwater Protection: Principles and Practice. If these ground penetrations are not decommissioned correctly they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the

proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Drainage conditions

(19) Before each phase of the development commences, a detailed surface water drainage design for that phase shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. The design should include a maintenance and management schedule for the lifetime of the development.

The surface water scheme should be generally in accordance with the submitted flood risk assessment and drainage strategy with subsequent amendments and associated drawings as follows: New Century Park, Luton Flood Risk Assessment by Pell Frischmann, dated Dec 2017; London Luton Airport Century Park Access Road and New Century Park Drainage Strategy by Pell Frischmann, dated Dec 2017; Century Park Access Road Proposed Drainage Layout KQ30131H146 and KQ30131H147, Wigmore Valley Park Drainage Layout 083075 CA 0 GF DR CE 001 P02; New Century Park Outline Drainage Strategy Revised surface water layout KQ30131H182, Revision P4; Wigmore Valley Skate park Surface Drainage Plan WGMR-DLP01; Addendum to Century Park Access Road and New Century Park Drainage Strategy, August 2018; New Century Park, Luton Addendum to Flood Risk Assessment, RE30131/V006/P4A, July 2018. The surface water drainage scheme shall be implemented in accordance with the approved design before occupation of that phase. (Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the NPPF).

(20) Before each phase of the development is brought into use, a set of 'as built' drawings of the above drainage scheme together with a written statement by a suitably qualified person should be submitted to the Local Planning Authority, confirming that the scheme operates as designed. (Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the National Planning Policy Framework (NPPF)).

(21) No phase of the development shall be occupied until confirmation has been provided that either:- all wastewater network upgrades required to accommodate the additional flows from that phase of the development have been completed; or - a commercial buildings and infrastructure phasing plan has been agreed with the Local Planning Authority (in consultation with Thames Water) to allow additional buildings to be occupied. Where a commercial buildings and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed

commercial buildings and infrastructure phasing plan. (Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any network reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Noise conditions

(22) Noise emitted from any fixed plant on site shall be at least 10dB lower than the existing background noise level as measured at the nearest noise sensitive location outside the site and the measurement should be made in accordance with BS4142:1997. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(23) No development shall commence until details of the acoustic screen associated with the proposed New Century Park Access Road to the west of the Holiday Inn hotel (illustrated on drawing D-Q30131-H-0101 have been submitted to and approved in writing by the Local Planning Authority. Such details shall include acoustic reduction properties, height, materials and colour. The scheme shall be implemented in accordance with the approved plans and thereafter permanently retained and maintained. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Design and sustainability conditions

(24) Details of a Design Code for the light industrial quarter (Phase 2), the office quarter and the hybrid quarter (both Phase 3), as shown on drawing 089916_050_01 RevPL02, shall be submitted to and approved in writing by the Local Planning Authority prior to the submission of the details reserved for subsequent approval for each phase. The Code shall identify all details to maximise the quality and legibility of the spaces, to help reinforce local character and accessibility, the details should ensure that these areas would be high quality. The construction of the proposed development shall then be carried out in accordance with the details set out within the approved Design Code. (Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017)).

(25) No above ground works associated with the New Century Park access road shall take place until details of all structures (including embankments, retaining walls, bridges, fences and walls) have been submitted to and

approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details. (Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017)).

(26) No above ground works within a phase of the development shall take place until a detailed scheme of feasible on-site sustainability measures covering:

1. The sourcing of materials to be used in the construction of and fitting out of the buildings (involving reuse, recycling and other sustainable sourcing);
2. Certification that the hotel, industrial units and offices would achieve a BREEAM Very Good rating and that the Technical Services Building would achieve at least a BREEAM Good rating;
3. The use of passive ventilation and other passive measures;
4. Reducing carbon emissions from the total energy needs (heating, cooling and power) by 25% from the 2010 Part L Building Regulations Standards for the overall outline phases (including from the on-site generation of renewable energy);
5. Details of arrangements to allow future connection to a centralised energy centre either on the site or in the locality (district heating network); and
6. Rainwater harvesting

has been submitted for each phase and approved in writing by the Local Planning Authority. The scheme as approved for each phase shall be implemented prior to occupation of that phase unless otherwise approved in writing by the Local Planning Authority and retained and maintained thereafter.

7. Within 3 months of first use of the buildings a BREEAM Post Construction Certificate for the relevant buildings, issued by the BRE or equivalent licensing organisation, must be submitted to the Local Planning Authority to demonstrate that BREEAM targets in (b) above have been achieved. All the measures integrated shall be retained for as long as the development is in existence.

(Reason: To prevent an unsatisfactory form of permanent development. To accord with the objectives of Policies LLP1, LLP25 and LLP37 of the Luton Local Plan 2011-2031 (November 2017)).

(27) No above ground works within a phase of the development shall take place until a scheme has been submitted to and approved in writing by the Local Planning Authority, giving details of how the buildings, open spaces and car parking address 'Secured by Design' principles. Each phase of the development shall be carried out in full accordance with the approved details and maintained thereafter. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(28) No above ground works within a phase of the development shall take place until an external lighting strategy and details of CCTV for that phase of the development have been submitted to and approved in writing by the Local Planning Authority. Lighting and CCTV for each phase shall be completed in accordance with the approved strategy for each phase prior to occupation of that phase, and shall be maintained in accordance with the approved details permanently thereafter. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

(29) No above ground works within a phase of the development shall take place until details of the arrangements for storage and collection of refuse and recycling for the approved buildings and uses, have been submitted to and approved in writing by the Local Planning Authority. The development shall be completed in accordance with the approved details prior to occupation of each phase, and shall be maintained permanently thereafter. (Reason: To ensure adequate provision is made for storage and management of refuse and recycling, and to ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)).

Landscaping and tree conditions

(30) Before any building or engineering works within a phase are commenced on site the existing trees, shrubs and/or hedges to be retained shall be safeguarded against damage or injury by the erection of fencing or other suitable protection at a distance of not less than 2 metres from the tree trunk(s) or shrubs or hedging, and no plant, materials or other objects shall be stored or placed against any of the trees, shrubs or hedges. The protection measures referred to above shall be maintained during the whole period of site excavation and construction. (Reason: To safeguard the existing trees, shrubs and/or hedges on the site. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(31) The Wigmore Valley Park landscaping shown on the approved drawings (series WVP-CAP-DR-L-101 to WVP-CAP-DR-L-109) shall be undertaken within the first planting season following commencement of development and shall incorporate the tree, hedgerow, groundcover and grassland species and quantities set out in the submitted Planting Schedule and Specification (ref; WVP-CAP-DR-L-210).

If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation. (Reason: To

enable the Local Planning Authority to monitor the implementation of the approved landscaping scheme. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(32) The landscaping reserved matter for each phase (referred to in condition 02) shall include full details of all hard surfaces, grassed areas, tree and shrub plantings and the proposed times of planting. The landscaping scheme approved for a phase shall be carried out by a date not later than the end of the full planting season immediately following the completion of building operations within that phase. If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

(33) A landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for each phase of the areas covered by the outline permission for all hard and soft landscape areas shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of above ground works in that phase. The maintenance schedule shall be for a minimum period of ten years (for each phase) and include details of the arrangements for its implementation. The landscape management plan shall be carried out as approved. (Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017)).

Transport and parking conditions

(34) No above ground works within a phase of the development shall take place until details of cycle parking in accordance with the Local Plan cycle parking standards for that phase have been submitted to and approved in writing by the Local Planning Authority. The approved cycle parking shall be implemented prior to occupation of buildings within that phase and maintained in perpetuity afterwards. (Reason: To maximise cycling as a mode of travel to the site. To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP32 of the Luton Local Plan 2011-2031 (November 2017)).

(35) No occupation of any phase of the development shall commence until details of parking in accordance with the Local Plan parking standards for that phase has been submitted to and approved in writing by the Local Planning Authority. Parking shall be provided in accordance with the approved details prior to the first use of the approved phase, with these facilities to be permanently maintained thereafter. (Reason: To avoid the

creation of traffic congestion on the highway in the interests of safety and convenience of pedestrians and other road users. To accord with the objectives of Policies LLP1, LLP2 and LLP31 of the Luton Local Plan 2011-2031 (November 2017)).

(36) No phase of the development shall be brought into use until a Travel Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be broadly in line with the Framework Travel Plan prepared by Pell Frischmann (December 2017) and shall be in line with the prevailing policy and best practice and shall include as a minimum:

- The identification of targets for trip reduction and modal shift;
- The methods to be employed to meet these targets;
- The mechanisms for monitoring and review;
- The mechanisms for reporting;
- The penalties to be applied in the event that the targets are not met;
- The mechanisms for mitigation;
- Implementation of the Travel Plan to an agreed timetable and its operation thereafter; and
- Mechanisms to secure variations to the Travel Plan following monitoring and review.

The Travel Plan shall be implemented as approved before occupation of the development. (Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017)).

(37) No part of phase 3 or 4 (as shown on drawing 089916_050_40 RevPL02) shall be occupied until the New Century Park access road and the link to Eaton Green Road have been completed and are ready for use. The link road between the New Century Park access road and Eaton Green Road shall not be provided and available for use in advance of the completion and opening of the New Century Park access road. (Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017)).

(38) No buildings within the Office Quarter, the Hybrid/Industrial Quarter or the Hotel, identified on drawing 089916_050_01 RevPL02 (proposed illustrative masterplan), are to be occupied until such time as the effects of traffic generated by such development and any identified relevant mitigation measures have been submitted to and approved in writing by the Local Planning Authority (in consultation with the Highways Authority and Highways England). The mitigation measures shall be carried out in accordance with the approved scheme. (Reason: To ensure the M1 Motorway continues to serve its purpose as part of a national system of routes for through traffic, to satisfy the reasonable requirements of road safety on the M1 Motorway and connecting roads in accordance with section 10 of the Highways Act 1980).

Appendix 3: Addendum Report

At the end of the officer's presentation to the Development Control Committee on 27 March 2019, the following matters were reported verbally to members:

- **Sport England –** have formally written in saying that as an appropriate financial contribution has been agreed that would be used towards the delivery of identified playing field projects that Sport England is supportive of, the confirm that the proposals would address the concerns they first raised and can advise that Sport England does not wish to raise an objection to this application. This is strictly subject to the matters being addressed through a legal agreement.
- **LLAOL –** advised that following further discussions with the applicant their initial concerns have been taken into account that they withdrew their objection.
- **NHDC –** comment that "the impact of the proposal on highways infrastructure in terms of capacity within NHDC should be assessed and represented by HCC as Local Highways Authority.
  Given the context of the site, the Council have no further comments to raise other than that the application should be considered and determined in line with relevant Development Plan policies."
- **Further reps –** one further letter to date following the further press advertisement
- **ACV –** we have been informed that Kings Walden Parish Council and Offley Parish Council have nominated Wigmore Valley Park as an asset of community value. Since it is currently being used for recreational and sporting interests that contribute to the social wellbeing and social interests of the local community and could do so in the future, it is evident that the park meets these criteria and it is understood that the nomination has been approved and the nominating parties informed.
  It is open to the local planning authority to consider whether listing as an asset of community value is a material consideration in the determination of the application and in this instance its registration is a material consideration. However, since the planning application before the Committee provides a greater area of parkland and provides new and improved facilities within the park, it is considered that the designation does not materially affect the recommendation that is before the Committee.
- **Para 354 –** there is an error in paragraph 354 which refers to "Phase 3 (the Light Industry quarter) is occupied", however, this should read Phase 3 (the Office Quarter…"

- **Conditions:**
  - could we add in to the resolution to give delegated authority for the Development Control Manager to amend such conditions as necessary in order to ensure their effectiveness, delete and repetitive conditions and add any missing conditions. SO FOR INSTANCE.
  - **Condition 4** delete at the end of the condition the words “before the buildings are occupied”.
  - **Condition 19** add “The surface water scheme shall be implemented in accordance with the approved design before occupation of that phase”.
  - **Condition 21** should be converted into an informative (condition 16 covers infiltration)
- **S106 agreement –** the resolution does not include a monitoring fee associated with the measures associated with the provision of the enhanced Wigmore Valley Park and maintenance/management specification. The additional HoT should read “£6,000 administration and monitoring fee”

Appendix 4: Secretary of State's letter of 22 July 2019

Ministry of Housing, Communities & Local Government

Mr David Gurtler
Planning (Airport Related Developments)
Luton Council

Sent via e-mail to:
[redacted]

Please ask for: Tara Dickenson
Tel: 0303 44 48044
Email: [redacted]

Your ref: 17/02300/EIA

Our ref: PCU/CONS/B0230/3226938

Date: 22 July 2019

Dear Mr Gurtler

The Town and Country Planning (Consultation) (England) Direction 2009

Outline permission for a new business park comprising office space (Class B1), warehouse and industrial space (Class B2 and B8), mixed employment space (Class B1/B2/B8), a hotel (Class C1), cafe space (Class A3); energy centre (sui generis), internal access roads; car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection; and relocation of the airport car hire centre. 2) Full permission for the construction of a 2km Century Park Access Road incorporating a new junction on the A1081, alterations to the existing Airport Way roundabout, alterations to Frank Lester Way, a newly created access from Eaton Green Road, a new roundabout providing access into the business park, demolition of buildings, provision of replacement car parking (temporary and permanent), associated earthworks, landscaping, surface water drainage and utilities diversions; the creation of new public open space including footpaths, landscaping and ecological mitigation; extension and alterations to Wigmore pavilion building to provide cafe (Class A3) and additional community space; construction of a new skate park and children's play area; and construction of a replacement airport technical services building and associated parking at Land north and south of Airport Way, Luton, LU2 9JB. Planning Application No. 17/02300/EIA

I refer to your letter of 15 April 2019 referring to the Secretary of State for Housing, Communities and Local Government ("The Secretary of State") an application for planning permission for the above development.

Planning Casework Unit
Ministry of Housing, Communities and Local Government
5 St Philips Place
Colmore Row
Birmingham B3 2PW

Tel: 0303 44 48050
pcu@communities.gov.uk

The Secretary of State has carefully considered the case against call-in policy, as set out in the Written Ministerial Statement by Nick Boles on 26 October 2012. The policy makes it clear that the power to call in a case will only be used very selectively.

The Government is committed to give more power to councils and communities to make their own decisions on planning issues, and believes planning decisions should be made at the local level wherever possible.

In deciding whether to call in this application, the Secretary of State has considered his policy on calling in planning applications. This policy gives examples of the types of issues which may lead him to conclude, in his opinion that the application should be called in. The Secretary of State has decided not to call in this application. He is content that it should be determined by the local planning authority.

In considering whether to exercise the discretion to call in the application, the Secretary of State has not considered the matter of whether the application is EIA Development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The local planning authority responsible for determining these applications remains the relevant authority responsible for considering whether these Regulations apply to these proposed developments and, if so, for ensuring that the requirements of the Regulations are complied with.

Yours sincerely

[redacted]

Tara Dickenson
Planning Casework Manager

Appendix 5: Draft Decision Notice

BOROUGH OF LUTON

TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) ORDER 2010

PLANNING PERMISSION NOTICE

Name and Address of Agent (if any):
Ms Eleanor Lomas - GL Hearn
Vantage Point
2 Hardman Street
Manchester
M3 3HF

Name and Address of Applicant:
LLAL
Hart House Business Centre
Kimpton Road
Luton
LU2 0LA

Date of Application: 15th December 2017 **Application No:** 17/02300/EIA

PARTICULARS AND LOCATION OF DEVELOPMENT:

1) Outline permission for a new business park comprising office space (Class B1), warehouse and industrial space (Class B2 and B8), mixed employment space (Class B1/B2/B8), a hotel (Class C1), cafe space (Class A3); energy centre (sui generis), internal access roads; car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection; and relocation of the airport car hire centre.
2) Full permission for the construction of a 2km Century Park Access Road incorporating a new junction on the A1081, alterations to the existing Airport Way roundabout, alterations to Frank Lester Way, a newly created access from Eaton Green Road, a new roundabout providing access into the business park, demolition of buildings, provision of replacement car parking (temporary and permanent), associated earthworks, landscaping, surface water drainage and utilities diversions; the creation of new public open space including footpaths, landscaping and ecological mitigation; extension and alterations to Wigmore pavilion building to provide cafe (Class A3) and additional community space; construction of a new skate park and children's play area; and construction of a replacement airport technical services building and associated parking.

Airport Way - Century Park, Luton, Bedfordshire,

The proposal is in conformity with Policy(ies) LLP1, LLP2, LLP3, LLP6, LLP13, LLP14, LLP25, LLP27, LLP28, LLP29, LLP30, LLP31, LLP32, LLP34, LLP36, LLP37, LLP38, LLP39, of the Luton Local Plan. Therefore, in pursuance of their powers under the Town and Country Planning Act 1990, the Council of the

[redacted]

INTERIM DEVELOPMEN

See Notes for Applicants Attached.

BOROUGH OF LUTON

TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (GENERAL DEVELOPMENT PROCEDURE) ORDER 2015

Continuation (Forming part of Application No: 17/02300/EIA

Borough of Luton HEREBY GRANT CONSENT for the development described above in accordance with the details given in the application numbered above, subject to the following condition(s):-

General conditions

1 The development hereby permitted shall be begun not later than the expiration of three years beginning with the date of this permission.

1 *Reason: To limit the duration of the permission in accordance with the provisions of Sections 91-96 of the Town and Country Planning Act, 1990.*

2 Applications for approval of the access, appearance, landscaping, layout and scale (herein after called the "reserved matters") for the first phase of the outline development hereby permitted shall be made to the Local Planning Authority before the expiration of three years from the date of this permission. Thereafter, applications for approval of all reserved matters relating to subsequent phases of the development shall be made to the Local Planning Authority before the expiration of two years from the date of approval of the last of the reserved matters of the preceding phase.

2 *Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).*

3 Full details and particulars of the reserved matters referred to in condition 02 above shall be submitted to and approved in writing by the Local Planning Authority before any development of the outline element of the scheme is commenced (phases 2, 3 or 4).

3 *Reason: To ensure a satisfactory standard of development in accordance with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).*

4 The development hereby permitted shall not be carried out other than in complete accordance with the approved plans and documents listed in Appendix 2, or as shall have been otherwise approved in writing by the Local Planning Authority.

4 *Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP2, LLP6, LLP13, LLP14, LLP31, LLP32, LLP36, LLP37 and*

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LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the aims and objectives of the NPPF.

5 The development hereby permitted shall be limited to the following:

- 29,400sqm B1(a) office floorspace;
- 13,000sqm flexible office/industrial floorspace;
- 11,700sqm B2 general industrial and B8 storage;
- 2,950sqm Technical Services Building;
- 685sqm sui generis use comprising two buildings, one an energy centre and the other a recycling centre;
- 7,200sqm (145 bedroom) hotel;
- 225sqm ancillary retail;
- Between 3,200 and 3,500 car parking spaces within New Century Park, the extended long stay car park and the relocated car hire facility in the Central Terminal Area;
- New and enhanced park (including refurbished Pavilion Building, children's play areas, skate park, parkland, footpaths, ancillary park furniture, orchard, woodland and shrub planting, and habitats); and
- Associated access, highways, structures (including bridge, retaining walls and embankments), public realm, landscaping and ancillary works.

5 *Reason: To ensure the development is carried out in accordance with the planning permission and to ensure that any development that is carried out is that which has been assessed. To accord with the objectives of Policies LLP1, LLP25 and LLP31 of the Luton Local Plan 2011-2031 (November 2017).*

Archaeology condition

6 No development shall take place until a written scheme of heritage asset resource management (SHARM) has been submitted to and approved in writing by the Local Planning Authority. The SHARM shall include provision for preservation and management in situ (where possible); archaeological investigation and recording and an outline strategy for post excavation analysis and publication. The development hereby approved shall only be implemented in full accordance with the approved archaeological scheme.

6 *Reason: This condition is pre-commencement as a failure to secure appropriate archaeological investigation in advance of development would be*

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contrary to paragraph 141 of the National Planning Policy Framework (NPPF) that requires developers to record and advance of understanding of the significance of any heritage assets affected by development before they are lost (wholly or in part) and Policy LLP30 of the Luton Local Plan 2011-2031 (November 2017).

Demolition/construction conditions

7 No development shall commence until a detailed Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority, and the plan shall include the following:

a) The construction programme and phasing;
b) Hours of operation, delivery and storage of materials;
c) Details of any highway works necessary to enable construction to take place;
d) Parking and loading arrangements;
e) Details of piling operations and mitigation measures to be employed (including the acoustic screen adjacent to the Holiday Inn);
f) Details of hoarding;
g) Traffic Management Plan to reduce congestion (including route signage and travel demand management);
h) Materials Management Plan (to include topsoil removal, storage and re-use);
i) Provision of a Dust Management Plan (including control of dust during demolition, construction, earthworks and the control of dust and dirt on the public highway);
j) Details of consultation and complaint management with local businesses and neighbours;
k) Site Waste Management Plan;
l) Mechanisms to deal with environmental impacts such as noise, air quality, light and odour.

The development shall be carried out in accordance with the Construction Environmental Management Plan as approved.

7 *Reason: To enable the Local Planning Authority to exercise proper control over the development proposed, in the interests of securing a satisfactory standard of work and of highway safety and the control of environmental impacts. To accord with the objectives of Policies LLP1, LLP25, LLP31 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and to ensure the M1 Motorway continues to serve its purpose as part of a national system in accordance with section 10 of the Highways Act 1980.*

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8 No impact piling shall commence until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to control noise and measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

8 *Reason: To ensure adequate safeguards are taken during construction of the development, having regard to existing ground conditions, and to prevent pollution of the water environment and risk to other receptors. To accord with the objectives of Policies LLP1, LLP36 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

Air quality conditions

9 No development shall commence until a scheme of air quality mitigation measures has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme prior to the first occupation of any buildings.

9 *Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

10 No development within Phase 3 or Phase 4 (as shown on drawing 089916_050_40 RevPL02) shall commence until a suitable Air Quality Assessment has been undertaken, submitted to and approved in writing by the Local Planning Authority to address the inclusion of any combined Heat and Power plant or similar installations. The assessment shall be undertaken in line with all current relevant guidance and standards. The report shall identify suitable measures to mitigate the impacts to any sensitive receptors identified. The development shall be carried out in accordance with any approved plant or mitigation.

10 *Reason: To prevent pollution of the environment and protect local air quality. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

Unexploded ordnance condition

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11 No development shall commence until an Unexploded Ordnance (UXO) site safety and emergency procedures plan has been submitted to and approved in writing by the Local Planning Authority.

The Development shall only be carried out in accordance with the approved UXO site safety and emergency procedures plan.

11 *Reason: To reduce risk from Unexploded Ordnance to an acceptable level, as the site lies within an area that has been identified as being at potential risk from buried explosive ordnance due to wartime bombing.*

Contamination/remediation conditions

12 No phase of development shall commence until a remediation strategy to deal with the risks associated with contamination of the site for that phase has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
   i. all previous uses;
   ii. potential contaminants associated with those uses;
   iii. a conceptual model of the site indicating sources, pathways and receptors considering both the current condition and proposed future usage of the site; and
   iv. potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors (current and future) that may be affected, including those off site. This must include a detailed hydrogeological risk assessment using site specific groundwater level and quality data to assess risks to controlled waters considering the current site conditions and the anticipated conditions post development. In addition, the hydrogeological risk assessment must assess the potential for leachate mobilisation / expulsion caused by disturbance and changes in loading in the historical Eaton Green landfill area that may occur as a result of the development.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are

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complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the Local Planning Authority. The scheme shall be implemented as approved.

12 *Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses. This condition is required to ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with and in order to protect human health. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF.*

13 Before each phase of development is brought into use a verification report demonstrating the completion of works set out in the approved remediation strategy for that phase, and the effectiveness of the remediation, shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

13 *Reason: The proposed development overlies land that has been historically utilised for potentially contaminative land uses that may have resulted in soil and or groundwater contamination. Where such contamination is identified to present an unacceptable risk to groundwater within the context of the conceptual site model (CSM), controlled waters risk assessment, remediation strategy and verification plan, a verification report is required to demonstrate the remediation of the site has been successful and that residual contamination at the site no longer presents a risk to controlled waters. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF.*

14 The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority.

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14 *Reason: The Addendum to the Environmental Statement (GL Hearn Ltd, August 2018) submitted in support of this application indicates that groundwater beneath the proposed development site is already impacted with contaminants associated with the historical usage of the site. The groundwater monitoring and maintenance programme will provide data to demonstrate that no further deterioration of groundwater quality beneath the site has occurred as a result of the proposed development. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

15 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

15 *Reason: No site investigation can completely characterise a site and contamination may exist or in areas where contamination was not expected and therefore not included in the original remediation proposals. To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and paragraph 170 of the NPPF.*

16 No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

16 *Reason: The previous use of part of the proposed development site as a landfill receiving mixed inert, industrial, commercial and domestic wastes presents a high risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS) leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

17 Piling and other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority with details to be submitted to and approved in writing by the Local

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Planning Authority (including details of a piling risk assessment to detail steps to prevent overlying contaminated materials from impacting the chalk aquifer). The development shall be carried out in accordance with the approved details.

17 *Reason: Piling using penetrative methods can result in risks to groundwater from by introducing pollutants / turbidity, mobilising contamination, drilling through different aquifers and creating preferential pathways. Groundwater is particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and with paragraph 170 of the NPPF.*

18 A scheme for managing any redundant boreholes, shafts, tunnels and adits, including boreholes installed for the investigation of soils, groundwater or geotechnical purposes, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of how redundant boreholes, tunnels, shafts and adits are to be decommissioned and how any boreholes that need to be retained, post development, for monitoring purposes will be secured, protected and inspected. The scheme as approved shall be implemented prior to of each phase of development.

18 *Reason: To ensure that redundant boreholes, shafts, tunnels and adits are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework and Position Statement A8 of the Environment Agency's Groundwater Protection: Principles and Practice. If these ground penetrations are not decommissioned correctly they can provide preferential pathways for contaminant movement which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the proposed development site is located upon a Principal aquifer. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

Drainage conditions

19 Before each phase of the development commences, a detailed surface water drainage design for that phase shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. The design should include a maintenance and management schedule for the lifetime of the development.

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The surface water scheme should be generally in accordance with the submitted flood risk assessment and drainage strategy with subsequent amendments and associated drawings as follows: New Century Park, Luton Flood Risk Assessment by Pell Frischmann, dated Dec 2017; London Luton Airport Century Park Access Road and New Century Park Drainage Strategy by Pell Frischmann, dated Dec 2017; Century Park Access Road Proposed Drainage Layout KQ30131H146 and KQ30131H147, Wigmore Valley Park Drainage Layout 083075 CA 0 GF DR CE 001 P02; New Century Park Outline Drainage Strategy Revised surface water layout KQ30131H182, Revision P4; Wigmore Valley Skate park Surface Drainage Plan WGMR-DLP01; Addendum to Century Park Access Road and New Century Park Drainage Strategy, August 2018; New Century Park, Luton Addendum to Flood Risk Assessment, RE30131/V006/P4A, July 2018.
The surface water drainage scheme shall be implemented in accordance with the approved design before occupation of that phase.

19 *Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the NPPF.*

20 Before each phase of the development is brought into use, a set of 'as built' drawings of the above drainage scheme together with a written statement by a suitably qualified person should be submitted to the Local Planning Authority, confirming that the scheme operates as designed.

20 *Reason: To prevent an increased risk of flooding and surface water pollution; to improve and protect water quality, improve habitat and amenity and to accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017) and the National Planning Policy Framework (NPPF).*

21 No phase of the development shall be occupied until confirmation has been provided that either:- all wastewater network upgrades required to accommodate the additional flows from that phase of the development have been completed; or - a commercial buildings and infrastructure phasing plan has been agreed with the Local Planning Authority (in consultation with Thames Water) to allow additional buildings to be occupied. Where a commercial buildings and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed commercial buildings and infrastructure phasing plan.

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21 *Reason: The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any networky reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents. To accord with the objectives of Policies LLP1 and LLP38 of the Luton Local Plan 2011-2031 (November 2017)*

Noise conditions

22 Noise emitted from any fixed plant on site shall be at least 10dB lower than the existing background noise level as measured at the nearest noise sensitive location outside the site and the measurement should be made in accordance with BS4142:1997.

22 *Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

23 No development shall commence until details of the acoustic screen associated with the proposed New Century Park Access Road to the west of the Holiday Inn hotel (illustrated on drawing D-Q30131-H-0101 have been submitted to and approved in writing by the Local Planning Authority. Such details shall include acoustic reduction properties, height, materials and colour. The scheme shall be implemented in accordance with the approved plans and thereafter permanently retained and maintained.

23 *Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

Design and sustainability conditions

24 Details of a Design Code for the light industrial quarter (Phase 2), the office quarter and the hybrid quarter (both Phase 3), as shown on drawing 089916_050_01 RevPL02, shall be submitted to and approved in writing by the Local Planning Authority prior to the submission of the details reserved for subsequent approval for each phase. The Code shall identify all details to maximise the quality and legibility of the spaces, to help reinforce local character and accessibility, the details should ensure that these areas would

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be high quality. The construction of the proposed development shall then be carried out in accordance with the details set out within the approved Design Code.

24 *Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017).*

25 No above ground works associated with the New Century Park access road shall take place until details of all structures (including embankments, retaining walls, bridges, fences and walls) have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

25 *Reason: In order that the Local Planning Authority may be satisfied as to the details of the development relating to appearance in the interest of the visual amenity of the area and having regard to the site's sensitive location. To accord with the objectives of Policies LLP1, LLP25 and LLP30 of the Luton Local Plan 2011-2031 (November 2017).*

26 No above ground works within a phase of the development shall take place until a detailed scheme of feasible on-site sustainability measures covering:

(a) The sourcing of materials to be used in the construction of and fitting out of the buildings (involving reuse, recycling and other sustainable sourcing);
(b) Certification that the hotel, industrial units and offices would achieve a BREEAM Very Good rating and that the Technical Services Building would achieve at least a BREEAM Good rating;
(c) The use of passive ventilation and other passive measures;
(d) Reducing carbon emissions from the total energy needs (heating, cooling and power) by 25% from the 2010 Part L Building Regulations Standards for the overall outline phases (including from the on-site generation of renewable energy);
(e) Details of arrangements to allow future connection to a centralised energy centre either on the site or in the locality (district heating network); and
(f) Rainwater harvesting

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has been submitted for each phase and approved in writing by the Local Planning Authority. The scheme as approved for each phase shall be implemented prior to occupation of that phase unless otherwise approved in writing by the Local Planning Authority and retained and maintained thereafter.

(g) Within 3 months of first use of the buildings a BREEAM Post Construction Certificate for the relevant buildings, issued by the BRE or equivalent licensing organisation, must be submitted to the Local Planning Authority to demonstrate that BREEAM targets in (b) above have been achieved. All the measures integrated shall be retained for as long as the development is in existence.

26 *Reason: To prevent an unsatisfactory form of permanent development. To accord with the objectives of Policies LLP1, LLP25 and LLP37 of the Luton Local Plan 2011-2031 (November 2017).*

27 No above ground works within a phase of the development shall take place until a scheme has been submitted to and approved in writing by the Local Planning Authority, giving details of how the buildings, open spaces and car parking address 'Secured by Design' principles. Each phase of the development shall be carried out in full accordance with the approved details and maintained thereafter.

27 *Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).*

28 No above ground works within a phase of the development shall take place until an external lighting strategy and details of CCTV for that phase of the development have been submitted to and approved in writing by the Local Planning Authority. Lighting and CCTV for each phase shall be completed in accordance with the approved strategy for each phase prior to occupation of that phase, and shall be maintained in accordance with the approved details permanently thereafter.

28 *Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

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29 No above ground works within a phase of the development shall take place until details of the arrangements for storage and collection of refuse and recycling for the approved buildings and uses, have been submitted to and approved in writing by the Local Planning Authority. The development shall be completed in accordance with the approved details prior to occupation of each phase, and shall be maintained permanently thereafter.

29 *Reason: To ensure adequate provision is made for storage and management of refuse and recycling, and to ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP38 of the Luton Local Plan 2011-2031 (November 2017).*

Landscaping and tree conditions

30 Before any building or engineering works within a phase are commenced on site the existing trees, shrubs and/or hedges to be retained shall be safeguarded against damage or injury by the erection of fencing or other suitable protection at a distance of not less than 2 metres from the tree trunk(s) or shrubs or hedging, and no plant, materials or other objects shall be stored or placed against any of the trees, shrubs or hedges. The protection measures referred to above shall be maintained during the whole period of site excavation and construction.

30 *Reason: To safeguard the existing trees, shrubs and/or hedges on the site. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).*

31 The Wigmore Valley Park landscaping shown on the approved drawings (series WVP-CAP-DR-L-101 to WVP-CAP-DR-L-109) shall be undertaken within the first planting season following commencement of development and shall incorporate the tree, hedgerow, groundcover and grassland species and quantities set out in the submitted Planting Schedule and Specification (ref; WVP-CAP-DR-L-210).

If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.

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31 *Reason: To enable the Local Planning Authority to monitor the implementation of the approved landscaping scheme. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).*

32 The landscaping reserved matter for each phase (referred to in condition 02) shall include full details of all hard surfaces, grassed areas, tree and shrub plantings and the proposed times of planting. The landscaping scheme approved for a phase shall be carried out by a date not later than the end of the full planting season immediately following the completion of building operations within that phase. If within a period of five years from the initial date of planting of any tree or shrub, any such plant is removed, uprooted or destroyed or dies, or becomes in the opinion of the Local Planning Authority, seriously damaged, diseased or defective, another tree or shrub of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.

32 *Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).*

33 A landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for each phase of the areas covered by the outline permission for all hard and soft landscape areas shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of above ground works in that phase. The maintenance schedule shall be for a minimum period of ten years (for each phase) and include details of the arrangements for its implementation. The landscape management plan shall be carried out as approved.

33 *Reason: To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1 and LLP25 of the Luton Local Plan 2011-2031 (November 2017).*

Transport and parking conditions

34 No above ground works within a phase of the development shall take place until details of cycle parking in accordance with the Local Plan cycle parking standards for that phase have been submitted to and approved in writing by the Local Planning Authority. The approved cycle parking shall be

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implemented prior to occupation of buildings within that phase and maintained in perpetuity afterwards.

34 *Reason: To maximise cycling as a mode of travel to the site. To ensure a satisfactory standard of development and to safeguard the amenities of the surrounding area. To accord with the objectives of Policies LLP1, LLP25 and LLP32 of the Luton Local Plan 2011-2031 (November 2017).*

35 No occupation of any phase of the development shall commence until details of parking in accordance with the Local Plan parking standards for that phase has been submitted to and approved in writing by the Local Planning Authority. Parking shall be provided in accordance with the approved details prior to the first use of the approved phase, with these facilities to be permanently maintained thereafter.

35 *Reason: To avoid the creation of traffic congestion on the highway in the interests of safety and convenience of pedestrians and other road users. To accord with the objectives of Policies LLP1, LLP2 and LLP31 of the Luton Local Plan 2011-2031 (November 2017).*

36 No phase of the development shall be brought into use until a Travel Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be broadly in line with the Framework Travel Plan prepared by Pell Frischmann (December 2017) and shall be in line with the prevailing policy and best practice and shall include as a minimum:

- The identification of targets for trip reduction and modal shift;
- The methods to be employed to meet these targets;
- The mechanisms for monitoring and review;
- The mechanisms for reporting;
- The penalties to be applied in the event that the targets are not met;
- The mechanisms for mitigation;
- Implementation of the Tavel Plan to an agreed timetable and its operation thereafter; and
- Mechanisms to secure variations to the Travel Plan following monitoring and review.

The Travel Plan shall be implemented as approved before occupation of the development.

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36 *Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017).*

37 No part of phase 3 or 4 (as shown on drawing 089916_050_40 RevPL02) shall be occupied until the New Century Park access road and the link to Eaton Green Road have been completed and are ready for use. The link road between the New Century Park access road and Eaton Green Road shall not be provided and available for use in advance of the completion and opening of the New Century Park access road.

37 *Reason: To avoid the creation of traffic congestion on the highway in the interest of safety and convenience of pedestrians and other road users. To accord with the objective of Policies LLP31 and LLP32 of the Luton Local Plan 2011-2031 (November 2017).*

38 No buildings within the Office Quarter, the Hybrid/Industrial Quarter or the Hotel, identified on drawing 089916_050_01 RevPL02 (proposed illustrative masterplan), are to be occupied until such time as the effects of traffic generated by such development and any identified relevant mitigation measures have been submitted to and approved in writing by the Local Planning Authority (in consultation with the Highways Authority and Highways England). The mitigation measures shall be carried out in accordance with the approved scheme.

38 *Reason: To ensure the M1 Motorway continues to serve its purpose as part of a national system of routes for through traffic, to satisfy the reasonable requirements of road safety on the M1 Motorway and connecting roads in accordance with section 10 of the Highways Act 1980.*

INFORMATIVES :-

1 The proposed strategy incorporates sustainable urban drainage systems (SUDs) in the form of infiltrative drainage for parts of the site. Where there is a risk of hydrocarbons being present in surface water, run off appropriate pollution prevention techniques should be incorporated. The drainage strategy refers to by-pass separators which would be effective as long as they are maintained and do not allow cleaning detergents (e.g. from car washes) into them. This reduces the separators ability to remove the oil from the water. There should be no infiltrative drainage in the former landfill area due to the

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risk of mobilising contaminants within the landfill body. The siting of soakaways should also be mindful of the presence of clay with flints at the site as the low permeability of this strata is not suitable for infiltrative drainage.

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The plans/documents which are the subject of this decision can be viewed on the on-line planning system at www.eplan.luton.gov.uk by entering 17/02300/EIA into the application search. Please note that the numbers given here are used so that the Document number and number on the decision notice are compatible. They are not the plan numbers on the drawings themselves used by the Applicant/Agent. The documents are viewable on the "Documents" tab and comprise the following Luton Borough Council numbers:-

PLANS

Century Park Access Road plans:

Car Parking Strategy Properties Demolished And Lost KQ30131H120 Rev9
Car Parking Strategy Properties Demolished And Lost KQ30131H120A Rev9
Car Parking Strategy Properties Demolished And Lost KQ30131H121 Rev8
Car Parking Strategy Areas Affected KQ30131H121A Rev8
Parking Strategy Reprovision (1 of 2) KQ30131H122 Rev9
Parking Strategy Reprovison (2 of 2) KQ30131H123 Rev8
CPAR Scheme Layout KQ30131H141 Rev6
New Airport Way Layout KQ30131H142 Rev2
CPAR Highway General Arrangement Sheet 0 - 350M KQ30131H148 Rev3
CPAR Highway General Arrangement Sheet 350 - 700M KQ30131H149 Rev2
CPAR Highway General Arrangement Sheet 700 - 1050M KQ30131H150 Rev4
CPAR Highway General Arrangement Sheet 1050 - 1400M Rev3
CPAR Highway General Arrangement Sheet 1400 - 1750M KQ30131H152 Rev2
CPAR Highway General Arrangement Sheet 1750 - 1950M KQ30131H153 Rev2
CPAR highway general arrangement (new century park) sheet 1 of 5 KQ30131H153A Rev3
CPAR highway general arrangement (new century park) sheet 2 of 5 KQ30131H154 Rev2 (outline only)
CPAR highway general arrangement (new century park) sheet 3 of 5 KQ30131H155 Rev2
CPAR highway general arrangement (new century park) sheet 4 of 5 KQ30131H155A Rev2 (outline only)
CPAR highway general arrangement (new century park) sheet 5 of 5 KQ30131H156 Rev3
Typical Kerb Details KQ30131H157 Rev0
Tactile Paving Details KQ30131H159 Rev0
Carriageway & Footway Construction KQ30131H160 Rev0
Typical Cross Sections Main Carriageway Sheet 1 Of 6 KQ30131H164 Rev2
Typical Cross Sections Main Carriageway Sheet 2 Of 6 KQ30131H164A Rev0
Typical Cross Sections Main Carriageway Sheet 3 Of 6 KQ30131H164B Rev0
Typical Cross Sections Main Carriageway Sheet 4 Of 6 KQ30131H164C Rev0
Typical Cross Sections Main Carriageway Sheet 5 Of 6 KQ30131H164D Rev0

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Typical Cross Sections Main Carriageway Sheet 6 Of 6 KQ30131H164E Rev0
Frank Lester Way GA Plan KQ30131H166 Rev0
Airport Way Typical Cross Section KQ30131H167 Rev2
Eaton Green Road GA Plan KQ30131H168 Rev3
CPAR Construction Compound Locations And Site Access Points KQ30131H169 Rev3
Car Park Plots Standard details KQ30131H210 Rev0
Individual plot detail - Plot A KQ30131H211 Rev0
Individual plot detail - Plot B KQ30131H212 Rev0
Individual plot detail - Plot B -ext KQ30131H213 Rev0
Individual plot detail - Plot C KQ30131H214 Rev0
Individual plot detail - Plot D KQ30131H215 Rev0
Individual plot detail - Plot E KQ30131H216 Rev0
Individual plot detail - Plot F KQ30131H217 Rev0
Individual plot detail - Plot G KQ30131H218 Rev0
Individual plot detail - Plot H KQ30131H219 Rev0
Individual plot detail - Plot I KQ30131H220 Rev0
Individual plot detail - Plot J KQ30131H221 Rev0
Individual plot detail - Plot L KQ30131H223 Rev0
Individual plot detail - Plot M & N KQ30131H224 Rev0
Individual plot detail - Plot P KQ30131H226 Rev0
Temporary Parking - T1-T9 KQ30131H227 Rev0
Temporary Parking plot detail Plot H, J and P KQ30131H228 Rev0
Car Park Phasing - West Of Frank Lester Way - Existing KQ30131H229 Rev0
Car Park Phasing - West Of Frank Lester Way - Proposed KQ30131H230 Rev0
Car Park Phasing - East Of Frank Lester Way - Existing KQ30131H231 Rev0
Car Park Phasing - East Of Frank Lester Way - Proposed KQ30131H232 Rev0
Car Park Phasing - East Of Frank Lester Way - Temporary KQ30131H233 Rev0
Car Park Phasing - West Of Frank Lester Way - Temporary KQ30131H234 Rev0
Individual plot detail - Plot Q KQ30131H236 Rev0
Individual plot detail - Plot R KQ30131H237 Rev0
CPAR Bridge Structure General Layout D30131 H0101 Rev0
Retaining Structure 3 General Arrangement DQ30131 G019 Rev0
Retaining Structure 4 General Arrangement DQ30131 G020 Rev0
Retaining Structure 2 General Arrangement DQ30131s022 Rev0
Retaining Structure 1 General Arrangement DQ30131 G016 Rev0

Lighting plans:
Preliminary street lighting layout (1 of 11) DQ30131H01-1300-001 Rev8
Preliminary street lighting layout (2 of 11) DQ30131H01-1300-002 Rev8
Preliminary street lighting layout (3 of 11) DQ30131H01-1300-003 Rev8
Preliminary street lighting layout (4 of 11) DQ30131H01-1300-004 Rev8

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Preliminary street lighting layout (5 of 11) DQ30131H01-1300-005 Rev8
Preliminary street lighting layout (6 of 11) DQ30131H01-1300-006 Rev8
Preliminary street lighting layout (7 of 11) DQ30131H01-1300-007 Rev8
Preliminary street lighting layout (8 of 11) DQ30131H01-1300-008 Rev8
Preliminary street lighting layout 9 of 11) DQ30131H01-1300-009 Rev8
Preliminary street lighting layout (10 of 11) DQ30131H01-1300-010 Rev8
Preliminary street lighting layout (11 of 11) DQ30131H01-1300-011 Rev8

Drainage plans:
Typical Drainage Details (1 of 3) KQ30131H161 Rev0
Typical Drainage Details (2 of 3) KQ30131H162 Rev0
Typical Drainage Details (3 of 3) KQ30131H163 O Rev0
Proposed CPAR Drainage Layout (sheet 1 of 2) KQ30131H146 Rev4
Proposed CPAR Drainage Layout (sheet 2 of 2) KQ30131H147 Rev4
Play and Skate Park Drainage Layout 083075-CA-0-GF-DR-CE-001-RevP02

New Century Park plans:
Proposed Illustrative Masterplan 089916_050_01 RevPL02
Indicative Phasing Plan 089916_050_40 RevPL02
Proposed Building Types 089916_050_10 RevPL2
Proposed Building Heights 089916_050_20 RevPL2
Proposed Land Take 089916_050_30 Rev PL2
Building Use Parameters Plan 089916_050_60 RevPL2
Building Heights Parameters Plan 089916_050_70 RevPL2
Relocated Car Hire Centre Option 2 Rev0

Technical Service Building plans:
Proposed Site Layout 089916-050-102 Rev0
Proposed Ground Floor Plan 089916-050-103 Rev0
Proposed First Floor Plan 089916-050-104 Rev0
Proposed Roof Plan 089916-050-105 Rev0
Proposed Sections 089916-050-106 Rev0
Proposed Elevations 089916-050-107 Rev0

Wigmore Valley Park plans:
Existing Pavilion Plan 02910-FA-00-00-DR-A-10P02 Rev0
Proposed Pavilion Plan 02910-FA-00-00-DR-A-10P03 Rev0
Proposed Contour Plan ACAD Export-KOMPAN 083075-CA-0-00-DSP-CE-401-P00 Rev0
Wigmore-Valley-Park-Surfacing-Groundworks PLAY_PARK_Scheme_G.W IN-SITU Rev0



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Wigmore-Valley-Park-Finalised-Drawing-July18 PLAY_PARK_Scheme Isolated View Rev0
Wigmore-Valley-Park-Finalised-Drawing-July18-In-Situ PLAY_PARK_Scheme IN-SITU Rev0
Technical-Plan-Wigmore-Valley-Park PLAY_PARK_Scheme_T.D. Rev0
Mound Area - Sketches & Photos PLAY_PARK_Scheme M.A Rev0
Wigmore-Valley-Park-Toddler-Foundation-Plan-July18
PLAY_PARK_Scheme_T.F.P Rev0
Wigmore-Valley-Park-Junior-Foundation-Plan-July18
PLAY_PARK_Scheme_J.F.P. Rev0
Surface Drainage Plan WGMR-DLP01 RevA
Existing Site Conditions WGMR-ESC01 RevA
General Arrangement Plan WGMR-GAP01 RevA
Setting Out Plan WGMR-SOP01 RevA

Landscaping plans:
Detailed Landscaping Masterplan (1 of 9) WVP-CAP-DR-L-101 T5 Rev5
Detailed Landscaping Masterplan (2 of 9) WVP-CAP-DR-L-102 T3 Rev3
Detailed Landscaping Masterplan (3 of 9) WVP-CAP-DR-L-103 T4 Rev4
Detailed Landscaping Masterplan (4 of 9) WVP-CAP-DR-L-104 T3 Rev3
Detailed Landscaping Masterplan (5 of 9) WVP-CAP-DR-L-105 T3 Rev3
Detailed Landscaping Masterplan (6 of 9) WVP-CAP-DR-L-106 T3 Rev3
Detailed Landscaping Masterplan (7 of 9) WVP-CAP-DR-L-107 T3 Rev3
Detailed Landscaping Masterplan (8 of 9) WVP-CAP-DR-L-108 T3 Rev3
Detailed Landscaping Masterplan (9 of 9) WVP-CAP-DR-L-109 T3 Rev3
Landscape Mitigation Plan CS/083075_L_020 RevD
Landscape Masterplan (1 of 5) CS/083075-L-21 RevC
Landscape Masterplan (2 of 5) CS/083075-L-22 RevC
Landscape Masterplan (3 of 5) CS/083075-L-23 RevC
Landscape Masterplan (4 of 5) CS/083075-L-24 RevD
Landscape Masterplan (5 of 5) CS/083075-L-25 RevD
Soft Landscape Plan Key Plan WVP-CAP-DT-L-200 Rev0
Soft Landscape Plan 1 of 9 WVP-CAP-DT-L-201 Rev0
Soft Landscape Plan 2 of 9 WVP-CAP-DT-L-202 Rev0
Soft Landscape Plan 3 of 9 WVP-CAP-DT-L-203 Rev0
Soft Landscape Plan 4 of 9 WVP-CAP-DT-L-204 Rev0
Soft Landscape Plan 5 of 9 WVP-CAP-DT-L-205 Rev0
Soft Landscape Plan 6 of 9 WVP-CAP-DT-L-206 Rev0
Soft Landscape Plan 7 of 9 WVP-CAP-DT-L-207 Rev0
Soft Landscape Plan 8 of 9 WVP-CAP-DT-L-208 Rev0
Soft Landscape Plan 9 of 9 WVP-CAP-DT-L-209 Rev0
Planting Schedule & Specification Notes WVP-CAP-DR-L-210 Rev0

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DOCUMENTS

Arboricultural Survey (Perimeter Road) ref: RE3013V002B (dated May 2016);
Extended Arboricultural Survey (Enterprise Zone) ref: RE3013V003A (dated September 2016);
BREEAM (Hotel) Design Strategy and Pre-Assessment Report ref CS/089916-06 Rev01 (dated November 2017);
BREEAM (Industrial Units) Design Strategy and Pre-Assessment Report ref CS/089916-06 Rev01 (dated November 2017);
BREEAM (Offices) Design Strategy and Pre-Assessment Report ref CS/089916-06 Rev01 (dated November 2017);
BREEAM (Technical Services Building) Design Strategy- Pre-Assessment Report ref CS/089917-05CAP-Z1-XX-RP-ES-P2 (dated November 2017);
Consultation Statement (dated 13 December 2017)
Consultation Statement Addendum (received 15 August 2018)
Design and Access Statement ref: CS_089916 RevPL02 (dated July 2018)
Drainage Strategy (CPAR and NCP) RevP3 (dated December 2017)
Addendum to Drainage Strategy (CPAR and NCP) (dated August 2018)
Wigmore Valley Park Drainage Strategy ref: CS-08305 Rev R03 (dated 8 June 2018)
Flood Risk Assessment ref: RE30131/V006/P3 (dated December 2017)
Addendum to Flood Risk Assessment ref: RE30131/V006/P4A (dated July 2018)
Framework Travel Plan ref: Q30131/TP/R01 (dated December 2017)
Lighting Strategy ref: RQ30131H015-4 (dated June 2018)
Planning Statement (dated December 2017)
Planning Statement Addendum (dated August 2018)
Outline Site Waste Management Plan ref RQ30131/H050-3 (dated December 2017)
Car Parking Strategy ref: Rq30131H013-9 Rev 10 (dated July 2018)
Transport Assessment ref Q30131/TA/R02 (dated December 2017)
Supplementary Transport Assessment ref: Q30131/STA/R01B (dated June 2018)
Hard and Soft Landscape Material Palettes RevA (dated August 2018)
Landscape Mark-ups SK-002-180703 RevA (received 15 August 2018)
Landscape Management Plan ref: 083075-L-RP01 RevA (revised 18 July 2018)
Amenity Grass Maintenance Informal Soft Play Area ref TOHA/18/3101/TW (dated 31 January 2018)

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Updated Environmental Statement Volume 1: Non-Technical Summary (dated August 2018)
Updated Environmental Statement Volume 2: Technical Chapters (dated August 2018)
Environmental Statement (Volume 3): Technical Appendices (dated December 2017) with additional technical chapters provided on 14 August 2018 as follows:

- **INT1 - LBC Scoping Opinion**
- **INT2 - LBC Letter, Advice Note and Regulation 22)**
- **INT3 – Reg 22 Responses**
- **INT4 – Stakeholder Comments & Responses**
- **ECO14 - Barn Owls**
- **ECO15 - Great Crested Newts**
- **AQT5 - Energy Plant Specification**
- **AQT6 - Construction Mitigation**
- **ARC1 – Revised Geophysical Report**
- **ARC3 - Correspondence**
- **GCC7 - Construction Effects Input**

1.1 If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990 within 6 months of the date of this notice or for certain applications from 01.10.13, within the following timescales:-

a) within 28 days of the date of this notice for a decision on a planning application relating to the same or substantially the same land and development as is already the subject of an enforcement notice [see reference above]
b) within 28 days of the date of service of the enforcement notice, or within 6 months [12 weeks in the case of a householder appeal] of the date of this notice, whichever period expires earlier if an enforcement notice is served relating to the same or substantially the same land and development as in your application
c) within 12 weeks of the date of this notice for a decision to refuse planning permission for a householder application or for a minor commercial application
d) within 8 weeks of the date of receipt of this notice for a decision to refuse express consent for the display of an advertisement

If you want to appeal against your local planning authority's decision then you must do so.

Appeals must be made using a form which you can get from the Secretary of State at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN or online at www.planningportal.gov.uk/pcs.

The Secretary of State can allow a longer period for giving notice of an appeal but will not normally be prepared to use this power unless there are special circumstances

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which excuse the delay in giving notice of appeal.
The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

1.2 If permission to develop land is refused or granted subject to conditions, whether by the Local Planning Authority or by the Secretary of State for the Environment and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted he/she may serve on the Common Council, or on the Council of the District in which the land is situated as the case may be, a purchase notice requiring that Council to purchase his/her interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

1.3 In certain circumstances, a claim may be made against the Local Planning Authority for compensation, where permission is refused or granted subject to conditions by the Secretary of State on appeal or on a reference of the application to him/her. The circumstances in which such compensation is payable are set out in section 114 of the Town and Country Planning Act 1990.

2. Where this notice conveys the grant of planning permission, approval of reserved matters or discharge of condition(s):-

If the development involves the carrying out of works:-

(i) for the demolition of a building listed under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as a building of special architectural or historic interest, or for its extension or alteration, or

(ii) for the demolition of a building which is within a Conservation Area designated under Section 69 of the Act,

The work may not be carried out without Listed Building Consent under Part 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 or Conservation Area Consent under Part 11 of the Act. A separate application must be made for this purpose.

Exceptions:

(i) an excepted building within the meaning of Section 60 of the Act, or

(ii) a building exempt by direction of the Secretary of State.

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Any person who fails to comply with the above provisions is committing an offence and may be prosecuted.

3. **This permission or approval does not exempt you from complying with Building Regulations and General Statutory Provisions in force in the District and in particular does not override any public right of way which may exist.**

4. The LPA takes a positive and proactive approach to development proposals with the aim of delivering quality outcomes to the benefit of the applicant, the Council and the community at large by providing access to development plan policies, offering a pre-application advice service and where practicable and appropriate through engagement with applicants/agents during the application process in accordance with the requirements of paras.186 and 187 of the National Planning Policy Framework and the Town and Country Planning (Development Management Procedure) (England) Order 2010 Article 31 (as amended) and having regard to the policies of the development plan and other material considerations. In this instance the LPA has worked in a positive way by assessing the application in a prompt and reasonable manner to achieve an acceptable outcome subject to the imposition of appropriate conditions and for the reasons stated above and as set out in the Case Officers report.

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INTERIM DEVELOPMENT MANAGEMENT SERVICE MANAGER

Item No:
2.1

Development Control Committee

Minutes

24 February 2021 at 6.00 pm

Present:

Councillor Taylor (Chair); Councillors Agbley, Ali, Bridgen, Campbell, Donelon, Franks, A. Hussain, M. Hussain and Roche

10 Apology for Absence – (Ref 1)

An apology for absence from the meeting was received on behalf of Councillor Rivers.

11 Minutes - Ref (2.1)

That the minutes of the meeting of the Committee held on the 27 January 2021 be taken as read, approved as a correct record and signed by the Chair in due course.

12 2 Wodecroft – 2100006FULHH (Ref 7)

The Planning Officer reported on Application No. 21/00006/FULHH submitted by Luton Council's Building Technical Services for a resubmission of planning permission in relation to the erection of two storey side and rear extensions, front parking area and construction of vehicular crossover at No 2 Woodcroft, Luton.

An update to the report was circulated to Members in advance of the meeting.

The Planning Officer reported that the application had been notified to 9 adjoining and nearby residential occupiers. To date one representation had been received in objection to the application.

The Planning Officer further referred to a previous planning application Ref (20/00848/FULHH) for this site on 20 July 2020 for a scheme that was identical in principle, however, different in design to the current scheme.

In accordance with the right to speak procedure (RTS), the applicant and one objector addressed the Committee.

Following discussions and deliberation by Members, Councillor Franks moved that the application be deferred, seconded by Councillor Taylor.

Resolved: That Application No. 21/00006/FULHH be deferred for further consideration at a future meeting of the Committee as members of the Committee raised concerns about the lack of clarity on the proposed development which needed further discussions with the Applicant to ensure that the issues raised were appropriately addressed.

13 Airport Way, Century Park 1702300EIA - Ref 8

The Planning Consultant reported on application 17/02300/EIA – 1, Outline permission for a new business park comprising office space (Class B1), warehouse and industrial space (Class B2 and B8), mixed employment space (Class B1/B2/B8), a hotel (Class C1), cafe space (Class A3); energy centre (sui generis), internal access roads; car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection; and relocation of the airport car hire centre. 2) Full permission for the construction of a 2km Century Park Access Road incorporating a new junction on the A1081, alterations to the existing Airport Way roundabout, alterations to Frank Lester Way, a newly created access from Eaton Green Road, a new roundabout providing access into the business park, demolition of buildings, provision of replacement car parking (temporary and permanent), associated earthworks, landscaping, surface water drainage and utilities diversions; the creation of new public open space including footpaths, landscaping and ecological mitigation; extension and alterations to Wigmore pavilion building to provide cafe (Class A3) and additional community space; construction of a new skate park and children's play area; and construction of a replacement airport technical services building and associated parking at Airport Way – Century Park Luton.

An update to the report was circulated to Members in advance of the meeting.

He reported that this was an update of the previous report Application No. 17/02300/EIA, considered and approved by the Committee on 27 March 2019, subject to, inter alia, referral to the Secretary of State.

In accordance with the right to speak procedure, the Applicants and several Objectors had already exercised their right to speak at the Committee's meeting on 27 March 2019.

The Planning Consultant also explained the purpose of this report and the decision of the Secretary of State as contained in the Report Ref: 8.

Resolved: That having taken the additional matters contained in the report Ref: 8 into account: to grant Planning Permission Application No. 17/02300/EIA as the reasons for approval and resolution to grant as agreed on 27th March 2019 still stand; subject to the previously agreed conditions, the addition of one further condition in relation to ecological surveys [as indicated in the Update to the report] and the satisfactory completion of a Section 106 legal agreement on the terms previously agreed and as contained in the update report.

(Note: (i) Councillor M. Hussain declared a personal and prejudicial interest in respect of Agenda Item 7 Application No. 21/00006/FULHH (Resubmission) (2 Woodcroft Road, Luton) as a result of his friendship with the objector to the application. He added that he was also surprised to hear that Luton Council's Building Technical Services submitted the application. Consequently, he escalated the matter to the Council's Chief Executive for further investigation. Councillor Hussain neither participated nor took part in the discussions or the Committee's decision regarding this item);

(ii) Councillor David Taylor (Chair of the Development Control Committee) did not declare interest; however, in relation to Item 8 of the Agenda, Airport Way Century Park Planning Application, he explained that he had previously declared interest on 27 March 2019, when this application was initially considered. He stated that at that time his nephew was a Member of the Board of Directors of London Luton Airport Limited. Therefore, as this was no longer the case, and following legal advice, he remained in the room and continued his role as Chair of the Committee.

(iii) Councillor A. Hussain in relation to Item 8 of the Agenda, Airport Way Century Park Planning Application, stated that a petition regarding this application was considered by the Petitions and Representations Board for which he is a member but was not present at that meeting. He did not declare interest, remained in the virtual meeting room, and participated in the debate, discussions and decision thereof.

(iv) The meeting ended at 7.50pm))

Luton

Item No:
8

Committee:	**Development Control**			
Date of Meeting:	24 February 2021			
Subject:	17/02300/EIA - 1) Outline permission for a new business park comprising office space (Class B1), warehouse and industrial space (Class B2 and B8), mixed employment space (Class B1/B2/B8), a hotel (Class C1), cafe space (Class A3); energy centre (sui generis), internal access roads; car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection; and relocation of the airport car hire centre. 2) Full permission for the construction of a 2km Century Park Access Road incorporating a new junction on the A1081, alterations to the existing Airport Way roundabout, alterations to Frank Lester Way, a newly created access from Eaton Green Road, a new roundabout providing access into the business park, demolition of buildings, provision of replacement car parking (temporary and permanent), associated earthworks, landscaping, surface water drainage and utilities diversions; the creation of new public open space including footpaths, landscaping and ecological mitigation; extension and alterations to Wigmore pavilion building to provide cafe (Class A3) and additional community space; construction of a new skate park and children's play area; and construction of a replacement airport technical services building and associated parking.			
Address:	Airport Way - Century Park Luton Bedfordshire			
Report Author:	Head of Development Management			
Contact Officer:	David Gurtler			
Implications:	Legal	☑	Community Safety	☑
	Equalities	☐	Environment	☑
	Financial	☐	Consultations	☑
	Staffing	☐	Other	☑
Wards Affected:	Wigmore			

Purpose

1. The purpose of the report is twofold. To remind Members of the position that was reached in respect of the application when it was presented to the Development Control Committee (the Committee) on the 27th March 2019 and secondly to update the Committee to reflect the current position and to seek confirmation that the decision of 27th March 2019 can now be issued.

2. Attached to this Report as Appendix 1 is the full report that was presented to the Committed on 27th March 2019 prior to the decision to grant consent being made and a copy of the resolution that was passed is included within the minutes of the meeting as Appendix 2. Both the report and the resolution should be used to remind the Committee of the decision that was made and the basis for it. In addition at Appendix

3 there is an addendum report which was also presented to that March Committee (read out by the officer) which added further information and updated some matters which also needs to bread at this time.

3. On the basis of those two earlier reports the decision was made to grant consent subject to four specific matters. Those four matters having been addressed and as such following the updated in this Report in respect of any new matters which require consideration, the purpose of the Report is to seek confirmation that the consent can now be issued.

Recommendations

4. It is recommended to the Committee:

(i) That having taken the additional matters below into account: to grant planning permission as the reasons for approval and resolution to grant as agreed on 27th March 2019 still stand; subject to the previously agreed conditions and the satisfactory completion of a Section 106 legal agreement on the terms previously agreed.

Background

The Site

The application was reported to the Development Control Committee on 27 March 2019 and the application site was described in paragraphs 8-13 in that report (attached as Appendix 1). For ease of reference the master plan showing the area covered by the planning application and the overall proposal is shown in Figure 1 below.

Fig. 1: Site Location Plan



Site History

5. The relevant planning history associated with the site was described in paragraphs 14-23 of the previous committee report in Appendix 1.

The Proposal

6. The application proposal has not changed from that described in paragraphs 24-43 of the report in Appendix 1.

The 27 March 2019 Development Control Committee Meeting

7. At the Committee meeting on the 27 March 2019, following his presentation, the officer verbally provided an addendum to the main report, noting, inter alia, that:

- a nomination made by Kings Walden and Offley Parish Council's for Wigmore Valley Park to be recognised as an Asset of Community Value had been approved;
- various conditions needed slight amendments; and
- the Section 106 legal agreement needed to include a monitoring fee.

8. The addendum report is included as Appendix 3.

9. Following the presentation circa twenty objectors addressed the Committee, together with two ward Councillors and the applicants, before the application was discussed by members of the Committee.

10. The Committee resolved that the application be granted subject to: (1) referral to the Secretary of State; (2) the satisfactory completion of a Section 106 legal agreement; (3) the final date for any further comments for the departure consultation (10.04.19) and review thereof; and (4) the imposition of the proposed planning conditions (as amended).

11. On the 15th April 2019, following the expiry of the departure consultation period the application was referred to the Secretary of State. On the 22 July 2019 the Secretary of State confirmed that he had decided not to call in the planning application and that he was content that it should be determined by the local planning authority (see Appendix 4).

12. The Section 106 legal agreement has now been finalised and will be signed imminently. In relation to the third element of the resolution, no further representations were received during the remaining consultation period, though there was on-going correspondence with one of the members of the public who had spoken at the Committee. This is addressed further below but does not raise any issues that were not aired on the night of the Committee. Finally, the decision notice has been prepared and reflects the conditions, including amendments that were agreed by the Committee (see Appendix 5).

Policy Implications

13. The relevant policy and guidance at both national and local level was set out in paragraphs 44-78 of the previous report.

14. Since the Committee meeting two considerations have emerged which should be taken into account as part of the decision making process. The first of these is that although planning policy at the local level remains the same there has been a revision to the National Planning Policy Framework (NPPF) with an update published in June 2019. That update has not changed anything that is material to the decision to approve the development (the only change to the NPPF was the removal of paragraph 209(a) which recognised the benefits of on-shore oil and gas) and the approach as set out in the original report remains the same.

15. The second consideration relates to climate change following the declaration by the Council of a climate emergency (Executive 13 January 2020) and the publication of a climate change report prepared by the Anthesis Group. The matter of climate change is dealt with below.

Consultation Responses

16. Significant rounds of consultation were undertaken associated with this planning application, with paragraphs 79-125 summarising those responses (appendices to the report to the Development Control Committee included the representations received, whether individual letters, petitions or proforma responses). Additional responses that had been received subsequent to the report being completed were also reported to Members (including, as noted above, the fact that Wigmore Valley Park had been nominated [and approved] as an Asset of Community Value, recognising that this was a material consideration, but that since the planning application was providing a greater area of parkland with new and improved facilities, the designation did not materially affect the recommendation before the Committee).

17. At the Development Control Committee meeting in 2019 one of the members of the public providing an oral presentation contended that the application was a Nationally Significant Infrastructure Project and should therefore be determined by the Planning Inspectorate. The application did not fall into any of the categories defined in Section 14 of the Planning Act 2008 as nationally significant infrastructure projects.

18. Following the Committee meeting further correspondence was received from that member of the public in relation to this matter, alleging that since the development included a dual carriageway which connected to the strategic highway under the Secretary of State's control, the development would meet the criteria in the Planning Act 2008. Detailed responses were sent both by the planning officer and the planning solicitor, stating that since neither the Secretary of State nor the strategic highway authority would be the highway authority associated with the New Century Park Access Road, section 22 of the Planning Act 2008 was not engaged and the proposed development did not fall within Section 14 of the Planning Act 2008 and so was not a nationally significant infrastructure project.

Report of the Officer

Section 106 legal agreement

19. The legal agreement has taken a considerable period of time to complete for a variety of reasons, including the significant number of land titles within the application site and the need to ensure that the agreement satisfactorily bound the parties to secure the

delivery of the benefits that were identified in the heads of terms. As indicated above, the legal agreement has now been completed and awaits engrossment.

Climate Change

20. Since the Committee resolution there have been a number of developments in terms of climate change that are relevant to this application. The various changes are identified below and the effect of them is specified. The thrust of the emerging policy approach is clear in that it is seeking to elevate questions relating to climate change in the overall assessment. There is, however nothing in the guidance, policy or law which indicates that the overall thrust contained within the NPPF to bring forward sustainable development is to be reduced or prevented by such considerations. What the new climate change approach does is to seek to ensure that such considerations are taken fully into account in planning decisions. As explained below by reference back to the earlier report, such considerations have been taken into account in respect of the development proposed and will continue to be as part of the need to meet the various planning conditions imposed.

21. At a national level the following should be taken into account:

- In June 2019 the Climate Change Act (2050 Target Amendment) Order 2019 amended the 2008 Climate Change Act. The effect of this amendment was that by 2050 the minimum percentage by which the net UK carbon account should be reduced below the 1990 baseline was increased from 80% to 100%.

- The Government's National Infrastructure Strategy, published in November 2020, states that it includes ambitious commitments on energy, decarbonisation, and clean economic growth towards net zero in 2050.

- The Climate Change Committee published the Sixth Carbon Budget on 9 December 2020, providing ministers with advice on the volume of greenhouse gasses that the UK can emit during the period 2033-2037. This information is required under the Climate Change Act and builds on the net zero advice that the Committee provided in 2019. The report effectively recommends bringing the UK's previous target forward by 15 years (to 2035), to be achieved by a take up of low carbon solutions (i.e. electric cars, replacement of gas boilers, use of renewable electricity); expansion of low-carbon energy supplies; reducing demand for carbon intensive activities; and land and greenhouse gas removals (i.e. planting mixed woodlands and restoring and managing peatlands).

- Following the Government's consultation on a Future Homes Standard (October 2019-February 2020) which has the aim to move to net zero and seeks to deliver highly efficient buildings from 2025, the Government has commenced a consultation (which runs until April 2021) on the Future Buildings Standard, relating to non-domestic buildings. The direction of travel is clear and will be achieved through the Building Regulations.

22. At the local level the Council has declared a climate emergency and in January 2020 published the climate change report, prepared by the Anthesis Group, entitled 'Climate Action Plan Support'. This report and the draft climate change action plan outlined initial

areas that the Council could focus on in order to cut carbon emissions and set out the next steps to ensure that Luton is carbon neutral by 2040.

23. The report to the Development Control Committee in March 2019 did refer to, inter alia, policies LLP1, LLP25 and LLP37, which recognise the significance of climate change and the need to ensure that new development delivers upon its obligation to protect the environment for future generations.

24. The report also referenced the fact that the proposed development seeks to achieve sustainability that incorporates, and exceeds, BREEAM 'very good' ratings for all buildings (other than the Technical Services Building which was to exceed BREEAM 'good'). It is worth noting that in the Royal Town Planning Institute's (RTPI) guide for local planning authorities on planning for climate change entitled 'Rising to the Climate Crisis' (December 2018), the RTPI report points to "the value of using established assessment frameworks", including BREEAM for buildings, which endorses the beneficial use of such assessment processes referenced in the Committee report. It was therefore considered that the proposal would achieve sustainable building design and suitable energy efficiency, with conditions proposed to secure this (including condition 25: Design Codes and condition 27: Sustainability Measures).

25. It is recognised that there has been greater emphasis on tackling climate change since the application was considered by the Development Control Committee in March 2019. However, sustainability was taken into account at the time, and going forward the development is likely to become even more sustainable as the Building Regulations are tightened for new buildings (making the development even more energy efficient and sustainable), whilst new diesel and petrol vehicles will be phased out by 2030 (and hybrids by 2035) also contributing to improvements in carbon emissions.

Concluding Remarks

26. Overall, it is considered that development comprises a sustainable and high quality form of development and that the Council's declaration of a climate emergency and of being carbon neutral by 2040 does not alter the position in relation to granting planning permission for this development now that the Section 106 legal agreement has been finalised.

Appendix

- Appendix 1: Report considered by Development Control Committee on 27 March 2019 (including associated appendices)
- Appendix 2: Minutes of meeting of Development Control Committee on 27 March 2019 in relation to application 17/02300/EIA (including resolution)
- Appendix 3: Addendum Report (as reported by the officer at the Committee)
- Appendix 4: Secretary of State's letter of 22 July 2019
- Appendix 5: Draft decision notice

List of Background Papers – Local Government Act 1972, Section 100D

27. Luton Local Plan 2011-2031

28. Planning Obligations SPD (2007)

29. Luton Borough Council Climate Action Plan Support (January 2020)

30. National Planning Policy Framework (*NPPF, or the Framework*)

31. National Planning Practice Guidance (*NPPG*)

Determination of Planning Applications

32. The Council is required in all cases where the Development Plan is relevant, to determine planning applications in accordance with policies in the Development Plan, unless material considerations indicate otherwise. The report to the Development Control Committee on 27 March 2019 considered the proposed development against this requirement, with Members concluding that planning permission should be granted.

DEVELOPMENT CONTROL COMMITTEE 24th February 2020

UPDATE REPORT

ITEM NO.:8 **APPLICATION NO**.: 17/02300/EIA **PAGE NOS.:** 30-349

SITE: Airport Way - Century Park Luton Bedfordshire

PLANNING OFFICER PRESENTING: David Gurtler

Since drafting the report updating members on the progress of the S106 associated with the New Century Park development, we have received further representations.

Many of the points that were raised had been raised in response to the various consultations that took place before the application was reported to Committee in March 2019 and members will see the appendices to that Committee Report included all the representations received. The additional representations now being reported have been summarised below (with some points from different respondents combined).

i. The proposal is not in accordance with the local plan due to the access to Eaton Green Road

– this issue was raised in representations to the original consultation and addressed in the Committee Report in March 2019 and taken into account in the resolution to grant planning permission (including paragraphs 222-229).

ii. Destruction of Wigmore Valley Park and loss of County Wildlife Site

– this issue was raised in representations to the original consultation and addressed in the Committee Report in March 2019 and taken into account in the resolution to grant planning permission (including paragraphs 230-242).

iii. The need to take out loans in order to fund this speculative development will increase LLAL's debt

– the personal financial circumstances of an applicant and their motive for applying are not material planning considerations. This representation is not relevant to the resolution to grant planning permission.

iv. Amazed that Luton Borough Council has the money to fund this after being bailed out by the Government, and the Council funding this development will result in Council taxes going up

– this is not directly relevant to planning nor relevant to the resolution to grant planning permission.

v. Covid-19 and the move to working from home means less of a demand for office space and less of a demand for car parking

– whilst the pandemic has forced a shift in working practices, it is not known what the long term implications will be, and it does not negate the fact that the site is allocated in the Local Plan as a strategic site for business, industry and the service sector. The parking provision included replacement parking, was in line with the Council's parking standards and was addressed in the Committee Report in March 2019 and taken into account in the resolution to grant planning permission (including paragraphs 299-303)

vi. Covid 19 has shown that the need to travel for business is not essential and international decisions can be made via Zoom, etc

– this representation appears to be linking the development to international travel, but the planning application is not related to airport expansion proposals, whether the current application to increase the passenger cap at the airport promoted by the airport operator LLAOL (ref: 21/00031/VARCON) or the potential Development Consent Order (DCO) that may be brought forward by LLAL.

vii. Plenty of land is available within the existing airport boundary for office development

– the site is allocated in the Local Plan for business, industry and service sector uses and the principal of the development accords with that allocation and was addressed in the Committee Report in March 2019 and taken into account in the resolution to grant planning permission (including paragraphs 193f).

viii. Has the business case been independently verified

– the application proposed the provision of offices, warehouses and industrial uses within the strategic site, this was an identified need in the Local Plan, as such the principle of this form of development was considered acceptable. The scale of the jobs that were anticipated and the contribution to the economy used recognised forecasting techniques and was considered realistic and appropriate.

ix. No economic case for this vanity project

– the site was identified in the Local Plan as a strategic site for economic growth and opportunity and the economic benefits were addressed in the Committee Report in March 2019 and taken into account in the resolution to grant planning permission (including paragraphs 324-330).

x. The economic position has changed since the application was considered, the proposal will not create new jobs just replace jobs that have been lost

– clearly the pandemic has affected the economy considerably, but the potential for the creation of new jobs and the economic benefits that they will create is a material consideration and arguably all the more important now.

xi. The proposal will be to the detriment of people living within the flight path due to noise, air pollution and night flights

– the proposal is for a new business park, the access road to service the business park and an enhanced Wigmore Valley Park. The proposal is not connected to the current application to expand the capacity of the airport (ref: 21/00031/VARCON) and as was made clear in the report to Committee in 2019 is a planning application being considered under the 1990 Planning Act, an entirely different process to any aspirations by LLAL to expand the airport via a DCO, which would be considered under the Planning Act 2008 by the Secretary of State.

xii. Climate change reality means need to suppress flying ambitions and not allow airport expansion, as per the French Government decision to drop plans for a fourth terminal at Charles de Gaulle airport, and general comments on climate change

– as noted above the proposal is not related either to the current planning application to expand the passenger cap to 19mppa or the potential DCO and does not entail an increase in flights, but is rather for a business park. The issue on Climate Change and sustainability is commented upon in the body of the report.

xiii. Loss of trees as a consequence of the development

– this issue was raised in representations to the original consultation and addressed in the report to Committee in March 2019. The comments received from the Council's Parks Manager were reported with recommendations for additional planting plus a contribution for planting at other sites to be secured through the s106 agreement.

xiv. Loss of the area of local landscape value

– this issue was raised in representations to the original consultation and addressed in the report to Committee in March 2019 and taken into account in the resolution to grant planning permission, with additional open space being created together with further planting and landscaping (including paragraphs 243-253).

xv. Loss of access to open space and distance from residential areas

– this issue was raised in representations to the original consultation and addressed in the Committee Report in March 2019 and taken into account in the resolution to grant planning permission, with a larger area of parkland being created, with enhancements to existing facilities (including paragraphs 236-240).

xvi. Loss of sports pitches

– this issue was raised in representations to the original consultation and addressed in the report to Committee in March 2019 and taken into account in the resolution to grant planning permission, with support from Sport England and a significant contribution towards replacement facilities being secured through the s106 agreement (including paragraphs 230-235).

xvii. Issues associated with development over the former airport landfill site

– this issue was raised in representations to the original consultation and addressed in the report to Committee in March 2019 and taken into account in the resolution to grant planning permission (including paragraphs 245-260).

xviii. Pollution from noise and aviation fuel would be greater in the new park

– this issue was raised in representations to the original consultation and noise was addressed in the Environmental Statement and report to Committee in March 2019. The northern part of the park which is likely to be most heavily used will have new and enhanced facilities (children's play area, skatepark, pavilion, landscaping). The new areas of parkland nearer to the runway will expand the rural footpath network in the area.

xix. Reference to the Wigmore Area Planning Brief and the land being given to the people of Luton

– this issue was raised in representations to the original consultation and addressed in the report to Committee in March 2019 and taken into account in the resolution to grant planning permission (including paragraphs 22, 237, 252 and 348).

xx. Additional traffic in Wigmore Lane with issues on safety and pollution, if a new terminal is to be built the infrastructure needs to be in place first

– again there seems to be some confusion with the DCO with the original officer's presentation and report to Committee making it very clear that this was entirely separate from the DCO should it come forward. In relation to the impact of traffic in terms of safety, congestion and pollution, this was addressed in the original planning application which was accompanied by a Transport Assessment (the findings of which concluded that the new access road would enable traffic to bypass Eaton Green Road, which would reduce interaction with vulnerable road users. Transport issues and air quality/pollution were raised in representations to the original consultations and addressed in the report to Committee in March 2019 and taken into account in the resolution to grant planning permission (including paragraphs 288f and 312f).

xxi. Representations also included whether LLAL could be trusted, given the promotion of the DCO that would introduce a new terminal

– as noted in the original Committee report any DCO application would be dealt with under the 2008 Planning Act and if it came forward it would be entirely separate to this planning application.

xxii. There are notable omissions from the ecological reports that were undertaken and new surveys should be undertaken as there could be protected, notable or very rare species on site

– the original application was accompanied by an Environmental Statement which included 13 technical appendices covering surveys that were undertaken. The Council's ecologist reviewed the surveys and provided comments and recommendations and has confirmed that he is satisfied with the work that was undertaken and the statutory protection that is in place. Ecological implications of the development were addressed in the report to Committee in March 2019 and taken into account in the resolution to grant planning permission (including paragraphs 244-253). The Council's ecologist has recommended one further condition be added, namely:

> "Prior to the commencement of any development, including site preparation or clearance, protected species surveys shall be completed by an appropriately qualified ecologist and in the appropriate season. The information collected shall be used to update information on the species and to assess potential impacts of the development. The survey report together with a mitigation strategy as appropriate shall be submitted to and approved in writing by the Local Planning Authority prior to the implementation of the development and shall be thereafter implemented as agreed."

3. Members should be aware that the s106 agreement has now been signed by the principal parties with an interest in the land (namely LLAL, the bank and LLAOL), and is now with the Council for engrossment.

4. Any other matters will be reported verbally to Members on the night.