

Technical Consultation Responses

Highways and Transportation

Responses to these comments have been incorporated into the Traffic and Transport section of the main report.

Highways Agency	<p>Directs that conditions are to be added to any planning permission which may be granted.</p> <p>Further clarification has been sought regarding the geographical area of impacts and it has been confirmed that the HA have considered the M1 (Junctions 7-11) and the A1(M1).</p>
AECOM (Consultants for the Highways Agency and Herts County Council)	<p>The vehicle trip generation data on which the TA is based has a sound foundation and is robust. The Transport Assessment therefore constitutes a sound and robust evaluation of the surface access implications of the proposed development</p>
LBC Highways Engineering	<p>This has been incorporated into the report.</p>
Network Rail	<p>With reference to the protection of the railway, Network Rail has no objection in principle to the development, but below are some requirements which must be met.</p> <p>We have some concerns over station capacity and whether the current station facilities will be adequate for the projected increase of usage that the application predicts. As such consultation should be held with First Capital Connect who operates Luton Parkway Station to discuss this aspect of the proposals.</p> <p>Security of Mutual Boundary</p> <p>Security of the railway boundary will need to be maintained at all times. If the works require temporary or permanent alterations to the mutual boundary the applicant must contact Network Rail's Asset Protection Project Manager.</p> <p>Abnormal Loads</p> <p>From the information supplied, it is not clear if during the construction phase any abnormal loads will be using routes that include any Network Rail assets (e.g. bridges). We would have serious reservations if during the construction of the site, abnormal loads will use routes that include Network Rail assets. Network Rail would request that the applicant contact our Asset Protection Project Manager at the address below to confirm that any proposed route is viable and to agree a strategy to protect our asset(s) from any potential damage caused by abnormal loads. I would also like to advise that where any damage, injury or delay to the rail network is caused by an abnormal load (related to the application site), the applicant or developer will incur full liability.</p> <p>Access to Railway</p> <p>All roads, paths or ways providing access to any part of the railway undertaker's land shall be kept open at all times during and after the development.</p> <p>Network Rail is required to recover all reasonable costs associated with facilitating these works.</p> <p>I trust full cognisance will be taken in respect of these comments. If you have any further queries or require clarification of any aspects, please do not hesitate to contact myself I would also be grateful if you could inform me of the outcome of this application, forwarding a copy of the Decision Notice to me in due course.</p>
First Capital Connect	<p>Generally supportive although significant growth in passenger numbers will require enhancements to the link to the station from the terminal buildings and to the rail service.</p> <p>The main obstacle to increasing rail share of passengers at Luton is the fact that the station is not located within the airport terminal. Diverting the main line or even building a branch line may not be cost effective solutions (and would have operational considerations) so other measures need to be considered. These could be, but not limited to:</p>

	<ul style="list-style-type: none"> • Boarding area for the shuttle link at the airport terminal and rail station to be under cover, well signposted and customer friendly; • Shuttle link to be high frequency; • Whatever form the shuttle takes it has a quick, high priority route; and • On board information advises customers of onward travel arrangements. <p>The station at Luton Airport Parkway is relatively modern, but if footfall increases significantly then access from the island platform and platform 4 (Northbound fast line) will need to be enhanced. Platform 1 (the main Southbound platform should be directly accessed by the shuttle bus through the new East side entrance. Waiting and other station facilities will also need to be enhanced.</p> <p>We see no capacity constraints through most of the day in accommodating growth, apart from a couple of hours in the morning and evening on weekdays. The new Thameslink rolling stock will provide plenty of space outside commuting peak periods.</p> <p>In summary, First Capital Connect welcomes the development plans for the airport, but for public transport to play a role in accommodating the growth in passengers and staff the shuttle service to Luton Airport Parkway needs to be enhanced, the train service needs to be strengthened overnight and station facilities need to be scaled up.</p>
Arriva	No response
Centrebus	No response
National Express	No response
Hackney Carriage Association	No response
Luton Private Hire Association	No response
NCP Car Parks	No response
Bedfordshire Police	<p>The Design and Access Statement appears to make no mention of crime or community safety? This is a particular concern given local trends, evidenced by the 50+ incidents of theft of/from motor vehicle in the vicinity in the last 12 months.</p> <p>Most, if not all, LBC parking facilities hold the Safer Parking Park Mark award. This relates to both the design and on-going management, and has to be renewed at intervals of between 1 and 3 years. It is a national Association of Chief Police Officers (ACPO) scheme, administered by the British Parking Association (BPA). Could approval of this application please be conditional on the LIA parking facilities reaching, and maintaining, the same standard?</p> <p>Subject to this, I have no objections to the application,</p>

Local Authorities

Further consultation has been carried out with the local authorities following the receipt of the noise and capacity reports. In addition, there have been separate discussions between the various Highways contacts.

Responses to these representations have been included under the various headings of the main body of the report.

Central Bedfordshire Council	<p>Holding objection –</p> <p>There should be appropriate and convenient public transport access to the airport.</p> <ul style="list-style-type: none"> • Concerns re transport modelling • Programme of surface access infrastructure development • A means to limit passenger numbers • Aircraft noise and air pollution aspects need to be considered carefully • Assurance that aircraft noise measurements will be repeated. • Consider the proposal should be treated as a Nationally Significant Infrastructure Project • Impact on the potential for archaeology (see separate
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	<p>response from CBC Archaeology)</p> <ul style="list-style-type: none"> • Comments on design of multi-storey car park and landscaping
Herts County Council	Letter sent to Secretary of State. Considers that the proposal should be dealt with as a Nationally Significant Infrastructure Project.
North Herts District Council	No response received.
Chiltern District Council	<p>Concern about overflying aircraft (especially at night) Potential for amendments to flight paths Concern about noise impact on residents living outside the 57 dBA noise contour. Traffic impact</p> <p>To conclude, whilst it is understood that operators need to plan for the future we do not expect this to be to the detriment of our local communities and feel strongly that the Luton Airport proposal requires further work to address the environmental issues, in particular noise, that would occur in the event of the proposed expansion being agreed.</p>
Dacorum	<p>The Council wishes to stress that:</p> <ul style="list-style-type: none"> • the expansion needs to be taken forward in an environmentally sensitive and sustainable way; • all impacts must be properly accounted and mitigated for; and • the proposal must minimise disturbance to local communities. <p>Considers that the number of jobs created as a direct result of the airport expansion is optimistic.</p> <p>Consider the proposal would have a significant impact on the environment of Dacorum and upon the area's transport network.</p> <p>Hertfordshire and surround districts have commissioned AECOM to consider the noise impacts of the application and raised concerns about conclusions within the application. In particular comments have been made about</p> <ul style="list-style-type: none"> • the disturbance of noise by increased flights, rather than the noise of individual aircraft. • Whilst peak noise levels may reduce, average noise • If ground noise takes account of tonal/low frequency characteristics or wind conditions. <p>Addition noise concerns raised about the impact on the Chilterns AONB and arising from night flights.</p> <p>Concerns regarding traffic impact on the roads in Hertfordshire.</p> <p>Considers that the application should not be determined until the outcome of the reviews of airspace, national guidance and future aircraft mix is known.</p>
East Hertfordshire District Council	<p>1) The provision of adequate, appropriate and timely surface access and public transport infrastructure is crucial, along with ambitious public transport mode targets. Surface access to the airport from the east, via the A414 and A120, would involve journeys through East Herts and these two roads in particular are already subject to capacity issues;</p> <p>2) Any planning application and subsequent planning permission should make clear the limits, in terms of passenger throughput, aircraft movements and noise contours, within which the airport would operate.</p> <p>3) The anticipated type of passenger service (long haul, low cost etc) and type of passenger (UK/foreign tourist, business etc), along with the level of cargo and business aviation are all important considerations. These have an impact on type and timing of aircraft movements, noise impact and surface access requirements. These factors need to be related to the envisaged runway capacity, on an hourly, daily</p>

	<p>and annual basis;</p> <p>4) The level of night flights during the 8 hour night period and that within the shoulder periods (06.00-07.00 and 23.00-24.00) are critical issues for East Herts residents. With the proposed significant increase in the number of flights, the extend to which there may be increased 'bunching' of flights late evening, rolling into the shoulder period, which in turn could impinge on the night period, need to be given serious consideration. Should planning permission be granted, rigorous restrictions should be imposed to control this. East Herts Council considers that, consistent with its approach to night flights at Stansted Airport, night flights should be progressively phased out at Luton. Such restrictions should be imposed via planning conditions and landowner covenants.</p>
Buckinghamshire County Council	<p>Buckinghamshire County Council welcomes the opportunities presented by the growth and efficient operations proposed by London Luton Airport. These may benefit Buckinghamshire businesses and residents but the Council also has concerns that it wishes to raise.</p> <p>Concerns raised in respect of flight paths and noise.</p> <p>The TA does not address the impact on the road network in Buckinghamshire.</p> <p>The County Council recognises and supports London Luton Airport's attempts to develop the public transport 'offer' through improvements to the public transport hub adjacent to the terminal and expects such improvements to be accompanied by improved public transport links with Buckinghamshire, in particular connecting with the proposed East West Rail and Buckinghamshire transport hubs (Aylesbury, High Wycombe, Amersham and Chesham). Buckinghamshire County Council would suggest that this development represents an excellent opportunity to reduce the percentage of passengers arriving by private vehicle. London Luton Airport clearly brings economic opportunities to Buckinghamshire, including connectivity with Europe, employment and potential inbound tourism opportunities. According to figures within the TA a large number of people from Buckinghamshire use London Luton Airport. There is no information about how many Buckinghamshire businesses use London Luton Airport but it is reasonable to suggest that as the offer from London Luton Airport is developed (with access to an increased number of locations and therefore markets) this will be beneficial to businesses based in Buckinghamshire.</p> <p>Buckinghamshire County Council does not find grounds to recommend objecting to the planning application for the London Luton Airport proposals, acknowledging that the improvements may have some benefits for Buckinghamshire, particularly the economy. However, there are negative impacts for residents affected by overflying aircraft and noise and all that entails. As such Buckinghamshire County Council requests that all that can be done is done to reduce or mitigate those impacts on our residents.</p>
Aylesbury Vale District Council	<p>Comments are based on those issues that most affect the residents of Aylesbury Vale, particularly noise, surface transport and wider economic development issues.</p> <p>Noise –</p> <ul style="list-style-type: none"> • Welcome proposals to decrease noise violation limits for daytime and night time departures and increase minimum height to be attained on noise preferential routes. • Note that no further controls are offered on the arrivals that largely effect AVDC residents during easterly operations. • Recognise the increase in the number of flights can be partially mitigated by individual aircraft becoming quieter. • Suggest a noise contour condition. • Night noise; proposing a night noise total movement limit and use of quota count <p>Highways –</p>

	<ul style="list-style-type: none"> • AVDC not directly affected by road traffic accessing the airport • More direct public transport links would be advantageous and consider bus operators should look at the potential arising from the LDB, which could provide services of benefit to AVDC residents. • Potential improvements by linking bus/coach services with the proposed east-west rail link. <p>Economic benefits</p> <ul style="list-style-type: none"> • Recognise the economic benefits the airport brings to the region • Recognise that the majority of jobs would benefit residents of Luton and Central Beds, with MK and Dacorum gaining some benefit • Business investment is looking to the emerging markets of the BRIC countries opening new export markets. • Provides a key strategic transport hub which can only bring and attract increased inward investment. • Promote tourism for consumers providing opportunities for the Vale. <p>In conclusion we do not believe we have any grounds to sustain an objection to this application and do recognise that there are potential economic benefits that can arise from future expansion. We are concerned about the potential environmental degradation that could occur if relatively unconstrained development is allowed. We would therefore urge Luton Borough Council to include conditions within any permission granted that both allow the airport to grow but ensure that both the airport and airline operators make the most of emerging technology to minimise issues related to aircraft noise</p>
<p>Hertfordshire Infrastructure and Planning Partnership</p>	<p>Letter sent to Secretary of State. Considers that the proposal should be dealt with as a Nationally Significant Infrastructure Project.</p>
<p>Cllr Stay Central Bedfordshire Council</p>	<p>I accept that there are potentially some economic benefits to be derived from the proposed expansion of the airport. A number of employment opportunities appear to be derived from the expansion plans.</p> <p>My principle concern and that of my constituents will be around the environmental impact that such a significant expansion plan will inevitably bring. Therefore I wish to OBJECT to the planning application and add the following comments in support of this Objection</p> <ul style="list-style-type: none"> • Application lacks a real impact assessment# • Increase in flights will further deteriorate the quality of life in adjacent communities • Limit on flight numbers • Opportunity to review and improve the impact that aircraft noise has on the surround communities. <p>Further comments</p>

Environmental consultees

Many of the environmental consultees have proposed additional conditions which have been included within the recommendation. Many of these require additional survey work to be carried out, the submission of additional details prior to the commencement of the development or on-going monitoring.

Separate discussions have taken place with the Environment Agency regarding drainage and the Council's Environmental Protection team will be further involved in respect of air quality and contamination through the ongoing monitoring of operations.

Some of the respondent's submissions are addressed in responses from other consultees (in particular air quality issues). Responses to the individual submission are covered either within the report or within appendix 4 of this report, where they relate to overflying of sensitive areas.

<p>Environment Agency</p>	<p>Although we still have concerns regarding the current management of surface water discharge to groundwater and surface waters, we have been involved in detailed discussions with London Luton Airport Operations Limited on the preparation of a strategy for the management of surface water runoff from the site. Once completed this should help to fulfil some of these conditions.</p>
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<p>LBC Environmental Protection</p>	<p>Conditions proposed.</p> <p><u>Contaminated Land</u></p> <p>Historic Landfill Site The information provided as part of the application identifies a historic landfill on the eastern side of the airport. The location of this landfill is such that parts of this proposal are directly affected. I have read the report that covers this area (of the proposed taxiway foxtrot) and consider that further information is necessary in order to ensure that adequate mitigation is provided in respect of the contamination present.</p> <p>The information required should be sufficient to enable suitable plans to be drawn up in respect of protecting workers health during groundwork operations, and to ensure that no source receptor pathway exists once the development is complete</p> <p>The report mentions the reuse of material from the landfill area. The Environmental Health department would require detailed information of any material from this area that was to be reused on site. This should include chemical testing prior to relocation of materials and then a plan of the site showing where the material is to be used. We would want to ensure that only materials suitable for purpose are used on other areas of airport land.</p> <p>The Environment Agency should be contacted with regards to groundwater issues at this site. In particular, any piling that is undertaken should not compromise any barrier layer that currently exists protecting the underlying chalk aquifer from contamination in the landfill. Also, there is mention in the report of interceptors on site which would collect any liquid contamination split on the surface. It should be ensured that such interceptors are of sufficient size to be effective should such a spill occur as this will help to minimise future pollution.</p> <p>General Comments I understand that a desk based investigation has been undertaken for the remaining part of the site. I have not had site of this report. I would wish to see further information with regards to the general pollution levels on site. It is understood from the Environmental Statement that there is pollution across the site as a result of the fuels and chemicals used in the operation of an airport. Whilst I appreciate that the development is not likely to produce a source receptor pollutant linkage once it is completed, I would wish to see further information in order that the health of the workforce is ensured during development.</p> <p>Our records show that the application site or a site adjacent to it is being used or has been used for industrial purposes. Unless investigations have shown otherwise, the site or any part of it is considered to be potentially contaminated. Before the application can be considered, an appropriate Phase 1 report commonly referred to as a desktop study, will need to be submitted.</p> <p>If the Phase 1 report indicates contamination is or may be present, a Phase 2 intrusive soil investigation should be undertaken and submitted. This will assess the degree and nature of any contamination present and determine its potential for pollution of the water environment, and the risk to other receptors via a qualitative risk assessment. The method and extent of the investigation should be agreed with the local planning authority in consultation with the Environment Agency and the Council's Environmental Health Service beforehand. The investigation should be undertaken prior to the commencement of the development.</p> <p>Depending on the results of the studies required by the above, a Remediation Strategy may be required. This will set out a timetable of works and the proposed means of dealing with any contamination, including provisions for monitoring any specified actions and validating the outcomes. It should 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 may then proceed in strict</p>
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	<p>accordance with the approved Remediation Strategy.</p> <p>If during development contamination not previously identified is found to be present at the site, no further development shall be carried out. An investigation and risk assessment should be undertaken and where remediation is necessary a Remediation Strategy must be submitted and approved by the Local Planning Authority.</p> <p>Following completion of 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.</p> <p>Please advise the applicant to follow the guidance contained in the document, "Technical Guide for Planning Applicants and Developers", which is available on the council's website, www.luton.gov.uk/contaminatedland.</p> <p>** The reason for this condition is to protect human health, and not (as for the Environment Agency) to protect groundwater resources. Please can you amend the standard reason on the system to reflect this, many thanks</p> <p>I have the following comments regarding <u>Air Quality</u>:</p> <p>The applicant has provided an Air Quality Assessment, which I have read along with Chapter 6 of the Environmental Statement.</p> <p>This assessment covers Particulates, Nitrogen Dioxide, Odour and Carbon Dioxide (Climate Change). This memo covers my response in relation to Particulates and Nitrogen Dioxide. Whilst I do deal with odour complaints, I do not have specific knowledge in relation to odour prediction /modelling and am therefore not able to comment on this. I understand that Carbon Management is dealt with by a separate department and would recommend that they are contacted in relation to Carbon Dioxide emissions.</p> <p>There are many uncertainties associated with predicting the impact on air quality from such a development, due to the numbers of road vehicles associated with increased capacity, the numbers of aircraft using the site, the type of aircraft using the site, the pollution levels created by eat aircraft and also the improvements to both air and road fleets that will be made between now and the implementation date of the scheme. These uncertainties have been acknowledged in the report.</p> <p>Construction phase Particulates are likely to be of concern during the construction phase of the scheme as earthworks are undertaken. The effects of particulates on sensitive receptors are likely to be much reduced due to the distances between operations and receptor locations. The air quality report does however detail a number of measures that will be taken in order to further mitigate against dust problems. I agree with the proposals in respect of this, and would recommend that these proposals be implemented in full.</p> <p>Operational phase Whilst there are many uncertainties associated with this part of the report, the consultants have acknowledged these uncertainties and modelled for a range of scenarios to predict nitrogen dioxide and particulate levels once the development is completed and operational. The modelling takes into account a "worst case" scenario where no improvements are made to vehicle emissions, and also a modelled situation using predictions of future improvements to emissions factors as provided by DEFRA. Whilst in the past, improvements in air quality have not been seen as expected using predicted emissions factor improvements, this has been acknowledged by the author and a precautionary approach has been taken. The factors used in the report are revised ones produced by DEFRA taking recent air quality into consideration. With this in mind, I consider that the report provided is an accurate a prediction as we are able to make at this stage.</p>
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	<p>The report does not show that air quality is likely to be concern with this development, however should improvement in air quality due to reduced future emissions from vehicles not occur as currently expected by DEFRA, there may be an increase in nitrogen dioxide levels. I understand that further monitoring is proposed to quantify the changes in nitrogen dioxide levels as a result of this development and I would welcome this.</p>
Beds, Cambs and Northants Wildlife Trust	<p>All of The suggested operations are within Luton Airport's existing operational area, the majority of which has limited biodiversity potential. There are some areas of 'derelict' land, however, which have been identified in the Environmental Statement as of County significance for invertebrates. These require careful consideration to ensure that their interest is retained.</p> <p>The Environmental statement identifies the site as being the habitat of Bombardier Beetles and badgers. A condition requiring an additional habitat survey has been requested.</p>
Natural England	<p>Natural England does not consider that this application poses any likely or significant risk to those features of the natural environment¹ for which we would otherwise provide a more detailed consultation response and so does not wish to make specific comment on the details of this consultation.</p>
Chilterns Conservation Board	<ol style="list-style-type: none"> 1. The Board considers that the application is premature because the proposed form of development and the likely implications have not been incorporated into an adopted national aviation strategy (this has yet to be published). 2. If the aircraft type were to remain as at present, the number of aircraft movements would roughly double with a rough doubling in the numbers of passengers. We understand that the size of aircraft is generally increasing, and even so this would still mean that such an increase in passenger numbers would be likely to lead to a significant increase (about 60%) in the number of flights, with consequent detrimental impacts on the Chilterns AONB and its enjoyment. 3. Furthermore, larger aircraft are noisier so the detrimental impacts that are likely to arise are more than likely to be at least the same if not worse. A significant increase in the number of flights by larger aircraft would mean that there would be a significant increase in the frequency of flights leading to a significant decrease in the intervening quiet periods. As a result average noise levels are likely to rise. 4. The Board is not convinced that the expansion would be taken forward in an environmentally sensitive and sustainable way. The Board previously made comments on the EIA Scoping Report and requested that the statutory Chilterns AONB Management Plan should clearly be referred to alongside the Board's Position Statement on Development Affecting the Setting of the AONB. There is no EIA, neither of these documents appears to have been referred to in the Environmental Statement and no account is taken of the impacts of the operational phase on the Chilterns AONB and its setting – the impacts on the AONB are summarily dismissed because the changes to the buildings and new development would not be clearly visible from the AONB. 5. The Board is extremely concerned about the likely impacts of overflying aircraft, especially at night, on the tranquillity and enjoyment of the Chilterns AONB, and this should clearly have been fully assessed as part of the Scoping and EIA process prior to the planning application being made. In addition, the EIA should also have addressed landscape and visual effects arising from the use of the airport and the proposed extended taxiways especially because there will be a huge number of aircraft that, when they are not on the ground, would be clearly visible from many miles around. Even when on the ground aircraft are visible from many areas including the Chilterns AONB.

	<ol style="list-style-type: none"> 6. The likely effects on the Chilterns AONB should have been fully considered because the AONB is clearly a sensitive receptor. For potential noise impacts the Chilterns AONB should have been subject to specific detailed consideration outside the normal confines of L_{Aeq} assessments. In addition, the impacts of night noise should also have been fully considered and should have included assessments from within the AONB and its setting. This does not appear to have taken place. 7. The Board is also concerned about the likely noise impacts arising from the increase in the number of taxiing aircraft. 8. The Board is concerned about the likely impacts on traffic flows on roads within the AONB arising from the traffic associated with additional passengers. 9. The Board is concerned about the likely development pressures for new housing for example to cater for the projected large increase in the number of employees. 10. Despite the recent adoption of the Airport Noise Action Plan (2010 to 2015) the Board considers that there is no clear commitment from London Luton Airport Operations Limited (LLAOL) towards effective noise and environmental controls and the Board considers that restrictions should be put in place to significantly reduce the number and frequency of night time flights. 11. In connection with this issue the Board understands that Heathrow, Gatwick and Stansted all have strict night noise controls with Government setting limits on noise emissions and aircraft movement numbers. We understand that London City has a night and weekend curfew. The Board is aware that there are no such limits placed upon LLA and we therefore consider that stringent limits on the number of night flights should be introduced to protect the local environment and to provide people with certainty. In addition, we consider that these should reflect the limits imposed by Government at the other three major south east airports. 12. The current planning application should have been treated by the applicant as an opportunity to seek significant improvements and mitigation to the noise impacts on the environment which are created by the airport. This does not appear to have happened. The Board had hoped that the planning application would contain a comprehensive analysis of the future noise implications of the growth proposals and for it to be proactive in coming forward with positive proposals for improvements and mitigation. The proposals should have included the imposition of night flight limitations consistent with those at Heathrow, Gatwick and Stansted. The Board would expect such limitations to be imposed through a Government body, which would be independent of the airport owner or operator, in order to ensure that environmental concerns are not biased by, and/or offset, commercial gains. 13. The Board would be grateful if it could be involved in the discussions or consultation about any revisions to the existing Night Noise Policy. 14. The Board considers that any expansion plans must be developed in the light of existing operational constraints. These include the proximity of Heathrow airspace and the Bovingdon stack, as well as possible route changes affecting Luton Airport. In addition, the future mix of aircraft and type of flight (for example passenger, corporate or cargo) also need to be taken account of. 15. In addition, the Board understand that NATS has plans to substantially review the structure of the airspace in the south east of England. This may involve changes to the Bovingdon stack which, with other things, may result in changes to departure and arrival routes at Luton Airport. It is not clear to what extent the proposed growth has taken such factors into account. 16. The Board considers that LLAOL is failing in its statutory duty of regard to the purpose of the AONB (to conserve and enhance the natural beauty of the area of
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	outstanding natural beauty, in accordance with Section 85 of the Countryside and Rights of Way Act 2000).
English Heritage	<p>The National Planning Policy Framework is clear that significance can be harmed or lost through development in the setting of heritage assets, policy 132. Any harm requires clear and convincing justification and should be weighed against public benefits, policies 132 and 134. The Planning Practice guide also emphasises that significance can be harmed by environmental changes such as increased noise levels.</p> <p>The application does not provide sufficient information for the visual impact of the built development on Luton Hoo to be properly assessed. The photomontages show the scale of the development in views from Someries Castle would increase further eroding the setting of the monument. At both Luton Hoo and Someries Castle the supporting information concludes that an increase in aircraft movements will result in an increase in noise and the overall presence of the airport however more detailed information should be provided to enable this to be properly considered. The affect of this on the optimum viable use of both sites should also be considered.</p> <p>The development would result in harm to the significance of the Someries Castle and Luton Hoo. We recommend further information is provided to enable this to be properly considered and the harm to be weighed against the public benefits of the scheme.</p>
CPRE Hertfordshire	A copy of a letter to the Secretary of State was received advising that CPRE considered the application was a Nationally Significant Infrastructure Project.
Central Bedfordshire Council (Archaeology)	<p>There is very little evidence for archaeological remains from within the proposed development site. This is largely due the site being difficult to survey in the past. It is therefore considered it has considerable potential to contain remains from the prehistoric period onwards.</p> <p>It is considered that the development would have an impact on the setting of Someries Castle and Luton Hoo Park, through increased aircraft movements.</p> <p>The Environmental Statement does not present adequate baseline evidence on archaeology to support the conclusions and relies on a lack of historical records.</p> <p>A condition is proposed.</p>
The Woodland Trust	No response received.
The Ramblers	No objections
The British Horse Society	No response received.
Friends of the Earth	<p>Summary of response –</p> <p>Conflict of interest Proposal should be dealt with as a Nationally Significant Infrastructure Project Infringement of human rights for thousands of people to be deprived of peace and healthy air Noise and health Noise complaints Air Pollution Water Pollution DOHA Declaration on climate, health and wellbeing Health impacts Economy: Does not attempt to reach a sustainable balance for the town Efficiency of the airport Concern regarding claims of employment gains Transport access Climate impact/change Traffic impacts flawed as levels of car ownership incorrect Wildlife threatened on site</p>
RSPB	No response recieved
North Chilterns Trust	No response recieved
LBC Natural and Built Environment	The Phase 1 report openly acknowledges that having been carried out in March, it is unlikely to have comprehensively

	<p>covered the botanical interest of the site, especially those open mosaic habitats on previously developed land, which is a Section 41 habitat of principal importance for the purpose of conserving biodiversity Areas of grassland with some calcicolous species present and others (including orchids) are also likely to have been missed. I would urge that a further survey of those areas showing some grassland and ruderal interest should be undertaken nearer the time, and that these should be undertaken in the summer months and include NVC data and species lists that can be used to assess levels of indicator species known to be of significance in the County.</p> <p>I think these points were raised in the Wildlife Trust response, which I endorse and which I hope the recommendations thereof will be followed, and that mitigation through enhanced habitat management at Wigmore Park CWS following additional NVC habitat and invertebrate surveys of that site.</p> <p>I recognise that there is very limited interest for protected species on the site, although there is limited bat and badger activity. I do not regard mitigation in the form of a handful of bat boxes an adequate response to the potential loss of Nationally important Section 41 habitat and its interesting invertebrate communities.</p>
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Economic consultees

Many of these responses are self explanatory, but where required they are also addressed in the main report and in appendix 4.

SEMLEP	<p>The proposals contained in this planning application form an important part of the ambitious programme of growth in jobs for this area. We understand that by increasing passenger through put without more land take over 4,500 jobs would be provided in the area.</p> <p>The Board of SEMLEP gave their unanimous support for these proposals welcoming the growth in jobs and the emphasis on increasing the use of sustainable transport modes. This would minimise the impact on the strategic road network and enhance the opportunities for stronger links with the remainder of the SEMLEP area. The new guided busway would be important as a means of bringing employees to the airport as well as passengers.</p> <p>The proposed extension to London Luton Airport will, as well as providing additional jobs, will attract more businesses and visitors to the whole area.</p> <p>These proposals are therefore completely in line with SEMLEP's objectives, as set out in its Business Plan 'Getting down to business - Plan for growth April 2012-13.</p>
Chamber of Commerce	<p>Bedfordshire Chamber of Commerce supports wholeheartedly the planning application for London Luton Airport. We believe the development of the airport is vital to the health of the local and sub-regional economies creating much-needed jobs and opportunities for associated businesses and suppliers. Our members have shown overwhelming support for the plans and we believe that these views reflect those of the majority of population and that they should not be jeopardised by parochial interest that concentrates on only a fraction of the evidence. Getting behind the development of the airport is getting behind economic recovery not only for Bedfordshire but for the region and the UK. For this reason alone, the development must go ahead and we are happy to offer any support we can to ensure this happens.</p>
East Anglia Tourist Board	No response received
LBC Economic Development	No response received

Utilities

The technical consultees who have responded in this instance, are interested in drainage, contaminated land and pollution of the water course. Their concerns will either be addressed by the proposed conditions or through the surface water drainage strategy.

Anglian Water	No response received, but they have been involved in the surface water drainage strategy with the applicant.
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EDF Energy	No response received
National Grid Transco	No response received
Affinity Water	No response received
Thames Water Utilities	<p>Following a review of the Flood Risk Assessment and other documents submitted, Thames Water has concerns about the impact of the proposed development on the local sewerage network. We require the developer to submit more detailed drainage strategies, not only stating the existing and proposed peak discharge rates, but also the exact points of connection to the public foul and surface water network, and any alterations to existing trade flows. Developer funded impact studies are also necessary to assess how flow and discharge rate alterations will affect the networks, along with highlighting any potential upgrade requirements.</p> <p>For planning purposes, information about the proposed timescales and any phasing of this development is also requested.</p>
Veolia Water Partnership	No response received

Aviation Bodies

The responses here are addressed within the report and appendix 4.

National Air Traffic Services	<p>Work associated with the London Airspace Management Programme (LAMP) and RNAV 1 route developments is aimed at improving the efficiency and overall operation of the London TMA for the future and it is not specific to London Luton Airport nor its current planning application.</p> <p>NATS recognises that the LLAOL application is independent of LAMP and RNAV 1 developments and that the plan in isolation will not require any additional airspace or supporting airspace change.</p>
Airport Policy Division (Dept for Transport)	No response received
LLAOL Aerodrome Safeguarding	No safeguarding objection to the proposal.

Other Bodies

CABE/Design Council	No response received
Luton North Police Station	No response received
Chief Fire Officer	No response received
East of England Strategic Health Authority	No response received
Ambulance and Paramedic Service	No response received
Luton Health Primary Care Trust	<p>1. A principle and key recommendation of this HIA as part of the Planning Application is the development and implementation of an overall and suitably appropriate Health Management Plan. This should accompany the HIA detailing how the recommendations will be (enhanced) and mitigated. It will also support monitoring and evaluation and ensure appropriate follow up. This should also include longitudinal monitoring to develop the database for supporting the impact over time. Indicators/KPI's could include:</p> <ol style="list-style-type: none"> Actual and correct postcodes of staff living in Luton (not LU) recruited over time; Changes in morbidity/mortality rates due to air particles dangerous to human health; Changes in morbidity/mortality rates due to RTA's collision records. <p>2. In addition to this, we acknowledge it is difficult to quantify new/further illness and mortality resulting from the</p>

	<p>projected increases of traffic, air quality, noise and annoyance. However, this information, acquired through modelling (if applicable) is essential in order for us to ascertain what this could mean to Luton's population.</p> <p>General Comments: This Health Impact Assessment as part of the Planning Application of the proposed development at London Luton Airport, represents a good approach to highlight some of the potential health impacts that could arise from the development. However, more in-depth attention could be given to specific areas where health and wellbeing are more likely to affect Luton's population. Our ideas and suggested approach has been highlighted below.</p> <p>Indirectly linked to the proposed alterations are impacts related to the M1 and more specifically the junction10A expansion. The HIA should demonstrate how the increase in traffic flow due to increased travel will impact on the local area and highlight how this could be reflected more explicitly demonstrating association between M1 changes and the proposed development.</p> <p>HIA does not just concentrate on the potential negative impacts of the proposal but also the positives. Are there any positive impacts that could be further enhanced? If so, what are the recommendations?</p> <p>Included in the HIA could be a short paragraph on the impacts relating to risk management and emergency planning. What would be the potential impacts on health organisations, hospitals and blue light services such as the Ambulance Service?</p> <p>----- <i>Response: Comments have been addressed under the Health Impact section of the main report.</i></p>
National Planning Casework Unit	No comments submitted, but they have been kept informed of progress on the application
National Planning Infrastructure Unit	No response received

Local Bodies

LLACC	No response received
LADACAN	Extensive comments have been received following consultation with these groups. Their responses were also passed to the Capacity and Noise consultants for consideration as part of his assessment of the application.
LLATVCC	
LANAG	
HALE	The highways, noise and capacity sections of the main report seek to address the points raised in their submissions.
PAIN	No response received
SoS	No response received
PAVAN	No response received