NORTH HERTFORDSHIRE DISTRICT COUNCIL

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Sent by Email

Dear Mr Olver

Future LuToN - Statement of Community Consultation (SoCC) - Statutory Consultation - January 2022

Thank you for the opportunity to comment on the Statement of Community Consultation – Statutory Consultation 2022 (SoCC).

The Council notes that there will be a "digital first" approach to the consultation and that the Statement of Community Consultation has made provision for continuing the consultation in the event that COVID-19 restrictions are re-introduced during the consultation period. We also note that many of the community engagement methods for the forthcoming consultation are the same as the consultation methods outlined in the 2019 Statement of Community Consultation.

However, there are a couple of detailed comments that we would like to raise before the SoCC is finalised:

Section 1- Introduction

Consultation to Date - Section 1.3

At paragraph 1.1.3 an 8 week consultation period is proposed. Given the substantial amount of material and supporting documentation that will be available as part of the consultation, the scale of which may make it challenging to many parties wishing to engage in the process, it is suggested that serious consideration be given to extending the proposed consultation period to 10 or even 12 weeks.

Assuming that the summary of comments to the Statutory Consultation held in Autumn 2019 is completed, it is suggested and in the interests of assisting the public, that the feedback report is uploaded earlier rather than waiting to publish this as part of the launch of the second statutory consultation and suggest that paragraph 1.3.5 is amended accordingly.

Project Description – Section 1.4

At paragraph 1.4.3 the Council notes that there is no mention in the main elements of the project list about managing air quality and noise impacts, creating employment opportunities or seeking to

address wider surface access impacts beyond Luton Borough. Nor is there reference to working with neighbouring authorities at paragraph 1.4.5.

It is suggested that LLAL may wish to consider inclusion of these points in SoCC before it is published.

Changes to our proposals and updated supporting information - Section 1.5

At paragraph 1.5.3, the Council expresses its disappointment that there appears to be no mention of an updated surface access/transport report included in the list. As the Council would expect such work will have been undertaken in light of the comments received to the 2019 Autumn consultation and in seeking to address the requirements of the new PIER and the airport's Green Managed Growth Report.

Green Managed Growth – Section 1.6

The Council is of the view that more detail should be provided in the SoCC on the how GMG approach will be monitored and reported.

Section 3 - Statutory Consultation

Document Inspection Venues – Section 3.2

At paragraph 3.2.4, please note that currently, our Customer Service Centre is only open for essential appointments only and would not be fully open for members of the public to inspect the consultation documents on demand.

As a matter of detail, the SoCC will need to be updated to reflect the opening hours for the Council Offices before it is published.

The Council considers that additional document inspection venues should be added for North Hertfordshire at the libraries in Baldock, Knebworth and Letchworth Garden City as these venues were previously included as Document Inspection Venues in the 2019 SoCC and will be affected by the airport's expansion proposals.

Consideration should be given to reinstating the full list of document availability locations and if not, provide an explanation as to why changes have been made

Consultation events - Section 3.3

At paragraph 3.3.6, while the Council welcomes that, subject to Covid regulations, events will be held in Breachwood Green, Whitwell and Hitchin, the 2019 consultation programme included events in Letchworth and Royston. The Council is disappointed that there are no events planned for either Letchworth Garden City or Royston. Apart from reference to Covid regarding the risk of face-to-face meetings the draft SoCC provides no further reason or justification for the reduction in the number of exhibition points.

Consideration should be given to including additional events in these locations, most certainly within Letchworth Garden City and should be included on the Events Location Map at Appendix 1.

Section 5 - Engagement

Hard-to-reach Groups - Section 5.4

At Para 5.4.4 reference is made to making use of local authority contacts with the traveller communities in the local area to ensure that people without permanent addresses who reside in the

local area are informed about the consultation. The Council queries the reference to 'We will offer to support local authorities to deliver face-to-face engagement with these groups' and why the applicant is expecting local authorities to deliver face-to-face meetings on the proposal?

Clarity is sought on this point. The Council is willing to provide contacts but des not consider its role to deliver face to face engagement on behalf of the applicant.

Appendices

Map of development boundary

The first SoCC contained a map of the proposed development boundary as Appendix 1. It would be helpful for this SoCC to do likewise.

Yours faithfully

Councillor Sam Collins

Executive Member for Enterprise, the Arts and Transport.